



European Materials Handling Federation

FEM comments on the draft Ecodesign regulation on electronic displays

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FEM is the European federation representing manufacturers of materials handling, lifting and storage equipment.

Several types of FEM equipment will be impacted by the Ecodesign regulation on electronic displays as currently drafted. Indeed, electronic displays are integrated into various types of materials handling, lifting and storage equipment, notably industrial trucks, including electrical warehouse trucks, mobile elevating work platforms, and intralogistic systems equipment, including stacker cranes. Therefore, FEM would like to provide its views on the draft Ecodesign regulation on electronic displays in the context of the public consultation.

First, the Ecodesign Directive (Article 15.4(b)) requires that an assessment be carried out to consider impacts on the environment, consumers, manufacturers, innovation, costs and benefits. This impact assessment has not been done for a vast range of equipment affected by the current scope, including materials handling, lifting and storage equipment.

In addition, the Ecodesign Directive (Article 15.4(d)) requires an appropriate consultation with stakeholders during the preparation of a draft implementing measure. Product manufacturers integrating displays into other equipment, such as FEM members, have not been contacted and the present consultation is, in our view, insufficient.

Therefore all displays integrated, or intended to be integrated, into other products should be excluded. We suggest amending Article 1.5 of the draft regulation by a derogation for “all displays integrated into or intended to be integrated into other products, except TVs and computer monitors”.

We believe that displays “intended to be integrated into” should benefit from a similar exclusion as that which applies to integrated displays. This is necessary to ensure fair treatment of displays placed on the EU market prior to their integration. Otherwise, the regulation may result in market distortions, notably between equipment manufactured in the EU and imported equipment.

Our concerns on the need to exclude displays “intended to be integrated into” also arise in the current Article 1.4. The regulation should also exempt displays “intended to be integrated into” industrial machinery (Article 1.4(f)) and equipment whose main function is status display or control and function activation (Article 1.4(g)).

As far as resource efficiency requirements are concerned, the current draft regulation raises uncertainties on the share of obligations, notably for displays integrated into other products. It is unclear which requirements should be fulfilled by display manufacturers and equipment manufacturers.

Finally, allowing only the use of double-sided adhesive tape to seal some components, such as batteries and display panels, inside the electronic display is far too intrusive and prescriptive. Such a requirement could negatively impact the functionality of the product, notably in harsh environment, and industry’s competitiveness. This conflicts with the criteria for Ecodesign implementation measures, provided in Article 15.5 of the Ecodesign Directive, such as not imposing negative impact on industry’s competitiveness and proprietary technology on manufacturers.