



## PROMPT

Premature Obsolescence Multi-Stakeholder Product Testing Program

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# 1 **Executive Summary**

Throughout the project, ANEC has provided input to standardisation processes relevant to PROMPT. In this report we highlight comments and input shared by ANEC both on material efficiency-related standards that will apply across the board (horizontal) and product-specific standards in development. The project findings as well as the expertise of PROMPT partners were valuable insights to standardisation bodies, resulting in some comments taken up in standards as well as close collaboration with Chairs of relevant standardisation working groups.

## 2 Introduction

Longer lasting products are needed for both consumers and the planet, and common standards have an important role to play in the transition to more durable products. In fact, the absence of suitable standards has been one of the key barriers so far to the inclusion of material efficiency requirements, such as reliability and reparability in Ecodesign measures.

As part of the European Green Deal and its latest Circular Economy Action Plan<sup>i</sup>, The European Commission has announced quite a bold ambition to “make sustainable products the norm”, notably through a new version of Ecodesign framework, through the recent proposal for Ecodesign for Sustainable Products Regulation (ESPR)<sup>ii</sup>. It aims to broaden the scope of Ecodesign to include material efficiency requirements across the board – beyond the historic focus on energy efficiency – and apply to almost all products on the market. Such ambition has created a momentum to work further on standards in sustainable consumption and production, with strengthened product durability and reparability as key objectives. In fact, the European Commission's 2022 Standardisation Strategy<sup>iii</sup> specifically states that the introduction of sustainability requirements under Ecodesign and the ESPR will require the development of standards for the European market. Improving durability and reparability of products will require a comprehensive approach: improve design, but also information and consumer rights. In this direction, the EU is working on additional policy initiatives, notably the proposal for a Directive for Empowering Consumers for the Green Transition ([ECGT](#)), ‘Common rules promoting the repair of goods’, so-called “[Right to Repair](#)” initiative, and a Directive on [Green Claims](#).

PROMPT is a timely project to feed into this legislative and standardisation initiatives. The EU-funded multi-stakeholder project researched reasons why products fail or are discarded too soon, and developed testing criteria to assess how likely products are to last longer without failure (reliability), be easier to repair (reparability) and be used for longer when working well (to address behavioural obsolescence). The project focused on electrical and electronic products, notably on washing machines, televisions, smartphones and vacuum cleaners. Based on insights from PROMPT's findings and efforts to develop a durability test programme, we provided input to standardisation experts working on material efficiency and this document compiles key comments and insights shared, both horizontal and product-specific for PROMPT key products (washing machines, television, smartphones and vacuum cleaners.)



### 3 Summary of comments and input shared with relevant standardisation processes during the project

Based on insights from PROMPT's findings and efforts to develop a durability test programme, ANEC provided input to European standardisers working on material efficiency and this document compiles key comments and insights shared by the PROMPT consortium, both at horizontal and product-specific level.

#### 3.1 Horizontal

- ANEC actively participated, with a dedicated ANEC expert, in the standardisation activities of the **CEN CENELEC JTC 10**, and its sub-groups, such as the WG1 on “terminology”, the WG2 on “durability”, the WG3 on “ability to repair, reuse and upgrade energy-related products” the WG4 on “ability to remanufacture and method for determining the proportion of reused components in products” and the WG8 on “circular design”. Being an active member of the technical committee throughout the duration of the project enabled us to directly contribute the consumer perspective to the discussion and to disseminate results from the project. Next to the discussions in plenary or working group meetings, we also had the opportunity to send several comments directly to the draft standardisation deliverables during their development process, such as the EN45552:2020 (on durability), the EN45553:2020 (on remanufacturing) and the EN45560 (circular-ready design).

Comments and input submitted:

- **Comment to prEN45553 “General method for the assessment of the ability to remanufacture energy-related products”** (submitted in 2019)  
Through this comment, we stressed that it would benefit this standard to identify the products which are suitable for remanufacturing, especially in regards of used materials and firmware/software installed. Additionally, we commented that this standard – and later product specific standards- should have provisions for marking remanufactured products in an understandable way for consumers. (*ANEC-SUST-2019-G-037*)<sup>1</sup>
- **Comment and favourable opinion on FprEN45552 “General method for the assessment of the durability of energy-related products”** (submitted in 2019)  
In the comments to Fpr EN 45552, we gave a favourable opinion and highlighted the implications of software and of the hardware-software relationship for durability. We stressed that software should be mentioned more than just in the definition of parts, and that products should not be designed in a way that hardware parts are fully dependant on software. (*ANEC-SUST-2019-G-062*)
- **Comments to the draft prEN45560 “Circular ready design” developed by CEN CENELEC JTC 10 WG8** (submitted in 2022)  
We welcomed the work undertaken by the WG8 but raised some comments regarding the following points: we noted that the interpretation of circularity in the scope of the standard, may be narrower than the one of the Ecodesign regulation, and focuses strictly on product design elements. There are however key elements to ensuring products last longer and can be easier to repair, and closely linked to design, such as a long spare part availability period or banning software pairing, that risk being out of the scope. We also emphasised the importance of product appearance for consumers, which we believe should be / could benefit from being addressed separately from performance. (*ANEC-SUST-2022-G-095*)
- **Presentation on the eDIM method and on PROMPT findings on reparability, CEN CENELEC JTC 10 WG3 meeting on 13<sup>th</sup> December 2022**

<sup>1</sup> Each submitted comment receives a file numbering in the ANEC archive system, referring to the sector (here SUST for Sustainability) and the year of issue.



The partner TU Delft was invited and attended the meeting and presented some of the project findings, notably on the use of the eDIM method and on how the EN45554:2020 standard was applied when developing PROMPT testing programmes.

- Aside from the participation in the above-mentioned technical committees, ANEC experts and ANEC/BEUC PROMPT coordinator have regularly attended other relevant standardisation meetings on horizontal aspects, such as the **CEN/CLC SABE Circular Economy Topic Group (SABE CE-TG)**, **CENELEC TC 111X** on Environment, **CEN/ CENELEC Ecodesign Coordination Group**, or the **CENELEC TC WG 23** on Material efficiency of household and similar electrical appliances, and on product-specific developments. ANEC has submitted comments to various technical committees drawing attention to i) the importance of creating and using a consistent and standardised terminology for material efficiency; ii) the importance to systematically consider consumer relevant testing and anti-circumvention in standards supporting Ecodesign and Energy labelling, and iii) the topic of software durability.

Comments and input submitted:

- **Comment to the standardisation meeting on noise – aspect consumer relevant testing** (submitted in 2020)  
This comment addressed the necessity of testing noise levels, especially of smart appliances, and pointed out the necessity to provide meaningful noise level ratings on the labels that will reflect realistic consumer experience. (*ANEC-SUST-2020-G-029*)
- **Comments to Report “ICT Standardisation supporting Circular Economy” by the Study Group Circular Economy of the EU Multi-Stakeholder Platform for ICT Standardisation** (submitted in 2020)  
ANEC emphasised the importance to use a standardised terminology of material efficiency standards throughout policy actions, as well as when transferred to product specific standards. We noted for instance the use of terms such as ‘Better design’ and ‘More efficient asset use’, which should be matched to terms defined and used ‘Ecodesign’ or ‘Material Efficiency’ or ‘Circular design’.  
On the topic of software, we also accentuated that software reparability and upgradability need to be given proper consideration as it can substantially influence the longevity of products. (*ANEC-SUST-2020-G-082 and ANEC-SUST-2020-G-088*)
- **Comments to the SABE CE-TG draft Work Plan** (submitted in 2021)  
Here again, we commented that consistency is needed across terms and definitions on material efficiency with those previously agreed upon in technical committees such as CEN/CLC JTC 10. (*ANEC-SUST-2021-G-018*)
- **Comments to the ECO-CG TF2 “Guidelines for anti-circumvention in standards supporting Ecodesign and Energy labelling”** (submitted in 2020 and 2021)  
The scope of this document is “to provide guidance and support to standardisers on Ecodesign and Energy labelling for a systematic consideration of the issue of circumvention in the development of standards”. We supported the drafting of this guideline with editorial and technical comments. (*ANEC-SUST-2020-G-061, ANEC-SUST-2020-G-101 and ANEC-SUST-2021-G-064*)
- **Comments to prTR 50527 “material efficiency – Household and similar appliances – assessment of applicability of EN 4555X”** (submitted in 2021)  
We supported the drafting of this guideline with editorial and technical comments. (*ANEC-SUST-2021-G-006*)
- **BT vote on the CEN CENELEC JTC 10 proposal to ensure coordination of the product specific standardisation on material efficiency aspects with the general methods developed in JTC 10** (submitted in 2022)

Favourable opinion submitted. We repeated the importance of creating and using a consistent and standardised terminology for material efficiency, and subsequently the necessity to ensure coordination of the product specific standardisation on material efficiency aspects with the general / horizontal methods developed at horizontal level. (ANEC-SUST-2022-G-015)

## 3.2 Product-specific

PROMPT focused on developing a testing programme for 4 key consumer products: televisions, smartphones washing machines, smartphones and vacuum cleaners. Below we detail relevant input shared to standardisation experts working on these product categories.

### 3.2.1 **Electronic displays (TVs and computer displays)**

ANEC has been actively participating, with a dedicated ANEC expert, in the standardisation activities of the CENELEC TC 100X “Audio, video and multimedia systems and equipment and related sub-systems”, which focuses on electronic displays, including TVs. Next to that, the ANEC expert on electronic displays also participated in the standardisation request ad hoc group on electronic displays, which was tasked to finalise the standardisation request as regards energy labelling of electronic displays to support the application of Delegated Regulation (EU) 2019/2013 and as regards ecodesign of electronic displays to support the application of Regulation (EU) 2019/2021. Next to the discussions in the SRAHG meetings, we had the opportunity to send comments to the draft standardisation request.

- **Comments to the Standardisation Request on electronic displays** (submitted in 2020)  
In these comments to the SREQ, ANEC particularly welcomed the inclusion of material efficiency requirements and of software/firmware availability requirements. (ANEC-SUST-2020-G-060)

Aside from this activity in the SRAHG however, standardisation activities under the CENELEC TC 100X have only addressed energy efficiency (for instance with the development of an international IEC standard IEC 62087:2022 on determination of power consumption for television sets) and not material efficiency, where standards are still lacking.

### 3.2.2 **Smartphones**

As the European Commission started developing the first ever Ecodesign rules for smartphones through a draft Implementing Act, ANEC had several opportunities to submit comments relating to the material efficiency of smartphones to the **CENELEC TC 100X**. A standardisation request pertaining to ecodesign requirements for smartphones and tablets is expected but has not come through during the duration of the project.

- **Comments to CENELEC TC 100X draft position paper on technology neutrality in the draft Regulation on Ecodesign requirements for mobile phones, cordless phones and tablets** (submitted in 2021)  
In this contribution, we rejected the CENELEC TC 100X proposal to introduce ‘workarounds’ that would allow manufacturers to increase the reliability only, with no advances on the repairability of mobile phones, cordless phones and tablets. We encouraged instead an approach through Ecodesign where components (such as batteries for example) and whole products are increasingly more durable and where key components are easier to remove and replace. (ANEC-SUST-2021-G-040)
- **Comments to the CENELEC TC 100X position paper on Enhanced security of products and ecodesign requirements** (submitted in 2021)

In this comment, we particularly addressed the topic of operating systems updates, highlighting that these updates should be robust and supported long enough to avoid shortening the longevity of products. It is therefore crucial to clearly separate security and functionality operating system updates and to allow consumers to roll back operating system updates, especially in situations where an update has impacted the performance or functionality of a previously perfectly functional product. Consumers should have the right to expect to use their products securely into the future without necessarily improving the functionality of the product beyond the level provided when they first purchased their products. (ANEC-SUST-2021-G-077)

### **3.2.3 Washing machines (including washer driers)**

On the topic of washing machines, ANEC has been actively participating, with a dedicated ANEC expert, in the standardisation activities of the **CENELEC TC 59X WG01** “laundry appliances” and WG23 “material efficiency”. Being an active member of these technical committees throughout the duration of the project enabled us to directly contribute the consumer perspective to the discussion and to disseminate results from the project.

Next to the discussions in working group meetings, we also had the opportunity to send several comments directly to the draft standardisation deliverables during their development process, such as the prEN50371 “Durability - Measurement method for the assessment of the reliability of washing machines for household use”. To disseminate PROMPT findings to the **CENELEC TC 59X WG23**, ANEC organised a dedicated workshop in May 2022 to have a structured exchange between WG23 Chairs and PROMPT partners on their respective work on durability of washing machines. ANEC took this opportunity to highlight the importance for consumers of longer lasting products, and the need for suitable standards for the introduction of sustainability requirements in the field of product design. We also emphasised the importance of developing a meaningful methodology, as this standard deliverable will set a precedent for future product-specific standards. The workshop deepened the collaboration between PROMPT and European standardisers and led to further exchanges as the lead PROMPT expert on washing machine was invited and participated in official WG23 meetings on 22<sup>nd</sup> September 2022.

- **ANEC-PROMPT comments to prEN50731 "Durability - Measurement method for the assessment of the reliability of washing machines for household use"** (submitted in 2023)

ANEC coordinated the first PROMPT written input to the consolidated draft prEN50371. We insisted on the need to have clear definitions for durability and reliability to avoid confusion, and suggested to approach durability as the combination of reliability and repairability. We also recommended to provide clear instructions for washing machine inspection throughout the testing process and to clarify the test sequencing and testing parameters, to improve the accuracy of the test procedure while reducing the cost of testing. For example, defining average temperature and spin speed for the calibration test; reducing the number of different washing cycles or defining general characteristics of the load to broaden the range of load that can be used. (ANEC-PT-2023-ErP-007)

### **3.2.4 Vacuum Cleaners**

On the topic of washing machines, PROMPT has also been actively participating, with a dedicated PROMPT expert appointed by ANEC, in the standardisation activities of the **CENELEC TC 59X WG06** and its sub-groups on anti-circumvention and battery related items. Being an active member of these technical committees throughout the duration of the project enabled us to directly contribute the consumer perspective to the discussion and to disseminate results from the project. The contributions of the PROMPT expert were particularly important to the anti-circumvention group, which acts like a forum for consumer organisations and NGOs to collect information on circumvention activities. This group has been very proactive in identifying potential ways of circumvention and loopholes in the existing standards and providing possible solutions.

Next to the discussions in working group meetings, we also had the opportunity to send several comments directly to the draft standardisation deliverables during their development process, such as the the IEC 62885-4 ED1 on cordless dry vacuum cleaners and the EN 60312-1:2017 on dry vacuum cleaners.

- **FprEN IEC 62885-4 ED1 Surface cleaning appliances - Part 4: Cordless dry vacuum cleaners for household or similar use - Methods for measuring the performance** (submitted in 2020)

Here, we asked for clearer definitions of vacuum cleaners categories to avoid excluding any type of vacuum cleaners, and for clearer requirements regarding batteries. *(ANEC-SUST-2020-G-035)*

- **Formal Vote on EN 60312-1:2017 Vacuum cleaners for household use - Part 1: Dry vacuum cleaners - Methods for measuring the performance** (submitted in 2022)

In this comment, we expressed concerns that the recommended 500 hours for the motor operational lifetime testing could act as guidance for new EU legislation, thus preventing requirements for higher life-time values. We suggested adding an explanatory note on the rationale behind the 500 hours, stating that the test can be continued beyond 500 hours if so desired, which was accepted by the working group. *(ANEC-PT-2022-ErP-006)*