Computer & Communications Industry Association

Open Markets. Open Systems. Open Networks.

Ecodesign of digital services: CCIA Europe's approach

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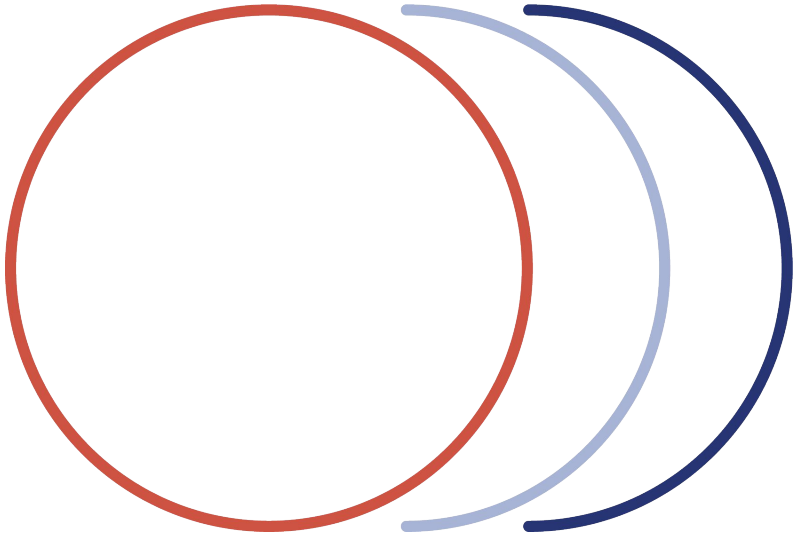
Presentation overview

1. Existing legislation is sufficient to achieve the EU's goals
2. CCIA Europe's contribution to ESPR implementation
3. Industry's commitments to ecodesign
4. Conclusions: need for regulatory simplification and avoid uncertainty



What we stand for

- Open **markets**, open **systems**, open **networks**

The Computer & Communications Industry Association (CCIA) is an international, not-for-profit association.

We represent a broad cross-section of computer, communications, and internet industry firms.

What we stand for

- Open **markets**, open **systems**, open **networks**

As an advocate for a thriving European digital economy, CCIA Europe has been actively contributing to EU policy making since 2009.

CCIA's Brussels-based team seeks to improve understanding of our industry and share the tech sector's collective experience, with a view to fostering balanced and well-informed policy making in Europe

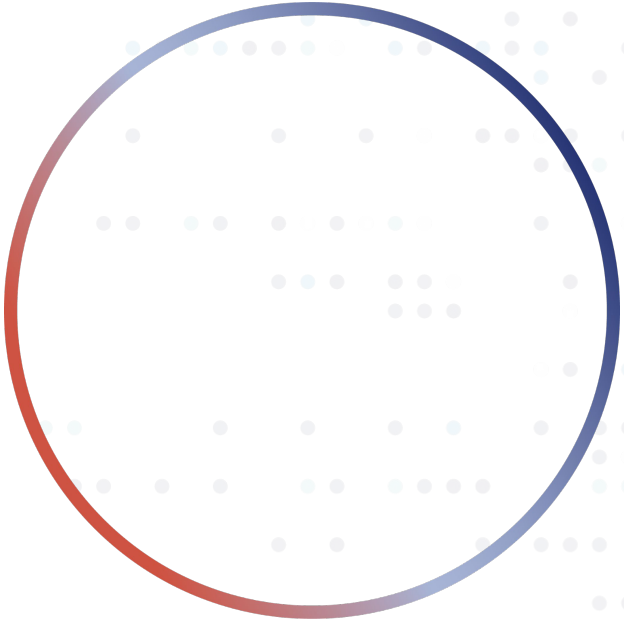
1. Existing legislation is sufficient to achieve the EU's goals

Simplification?

- The European Commission is explicitly prioritising **regulatory simplification**
- **CCIA Europe supports this endeavour**
- CCIA Europe advocates for **full enforcement of existing measures** before considering others
- Industry actors have already developed **self-regulatory initiatives** to support compliance while minimising complexity

Risk of overlaps

- A range of **legislative and non-legislative measures** are already in place
- Digital services include a vast range of services but all need a **device/physical product to be used**
- The development of new measures could potentially result in **overlap** and **duplication**



Ecodesign Directive

Includes rules for Electronic Displays, Smartphone and Tablets, Computers, External Power Supplies, Servers and Data Storage Products

Digital Product Passport

It will contain product information, likely including sustainability, market, consumer, and compliance, once finalised

Artificial Intelligence Act

Introduces the requirement to maintain technical documentation on the environmental footprint of AI and a possible code of practice on AI sustainability

Ecodesign Regulation

ICTs to be covered by horizontal requirements (repairability, recycled content and recyclability of EEE) coming in 2029

Right to Repair

Clarifies obligations to repair goods, incentivises repair of products and extends their warranty after repair

Energy Efficiency Directive

Introduces an obligation for the monitoring and reporting of energy performance of data centres, including establishing an EU-wide rating scheme for data centres

2. CCIA Europe's contribution to ESPR implementation

Ecodesign Forum: Need for long term stakeholders dialogue

- The European Commission set up the **Ecodesign Forum** to gather stakeholders input
- CCIA Europe was **nominated as member** in January 2025; 132 members (industries from different sectors, public authorities, etc.) are part of the Forum
- The **first meeting** was held on 19-20 February 2025
- Process of stakeholder participation just started

CCIA Europe is engaging with ESPR

- 3 feedback documents: on the first ESPR work plan; on the disclosure of information on unsold consumer goods; and a joint industry call for a transitional regime for the implementation of Article 24 of the ESPR.
- Implementation takes times to translate policy into actionable product requirements
- Pragmatic approach to classification; ensure clarity, consistency and alignment in reporting requirements for the disclosure of information on unsold consumer products.

Prioritise impact assessment and research

Cost-benefit analysis and thorough impact assessments ahead of the establishment of requirements

Unlock digital technologies

Ensure a practical Digital Product Passport that is comprehensive and industry-friendly

Factor in global trade

Consider the role of imported refurbished goods

Clarify timelines

Transparency on the studies for the translation of requirements to the ESPR

Ensure time for stakeholder input

Provide sufficient time for stakeholders to engage

Give time to the market

Wait for market adjustment before (re)considering the requirements

Tailor requirements to products

Establish clear hierarchy where product-specific requirements prevail over horizontal ones

Foster harmonisation

Fragmented national approaches may hinder harmonisation and increase costs for businesses

3. Industry's commitments to ecodesign

Amazon

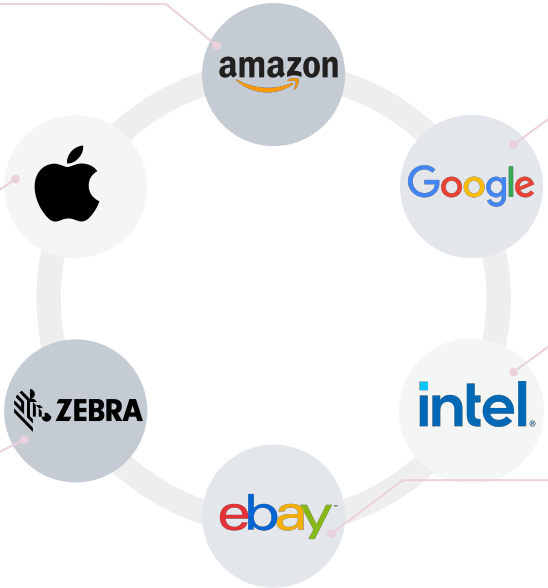
- Water positive by 2030
- AWS infrastructure is up to 4.1 times more efficient than on-premises
- It can reduce workloads' carbon footprint by up to 99%

Apple

- Products designed with more recycled content, with 100% renewable energy and with lower-carbon methods (e.g., Apple Watch Series 10, Mac enclosures, etc.)

Zebra Technologies

- By 2025, goal of 50% reduction in waste going to landfill from 2021 baseline
- 2020: launch of circular economy programme for mobile computers



Google

- 34% of the plastic used in products manufactured in 2023 was recycled
- By 2025: use recycled or renewable material in at least 50% of plastic used across consumer hardware products

Intel

- 2023: powered its operations with 99% renewable electricity
- More than 38.6bln litres of water saved

eBay

- 2023: 40% of GMV was pre-owned and refurbished.
- It avoided 1.6mln metric tons of carbon emissions and 69,000 metric tons of waste

Industry is moving!

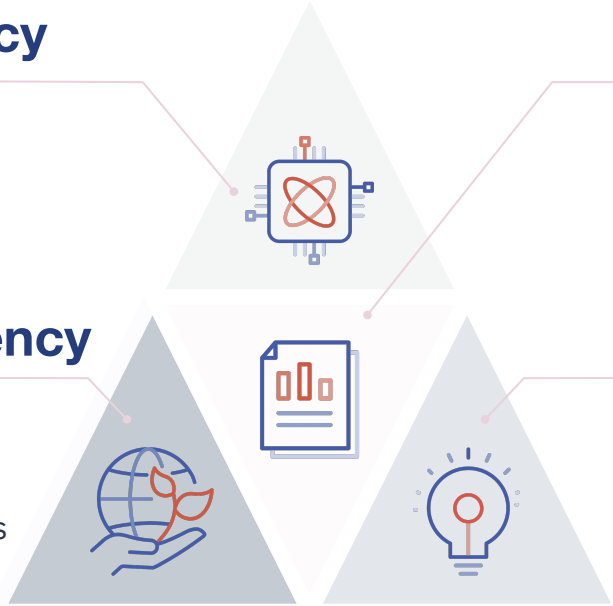
Focus on AI and data center commitments

Hardware efficiency

- Use of more energy-efficient TPUs (e.g., Amazon with AWS Trainium; Google with Trilium TPUs)

AI model training

- Cut training energy use by up to 100x to reduce emissions



Data centre efficiency

- Quadrupled computing power per unit of energy in 5 years
- Ongoing focus on maximising energy efficiency in operations
- Data centres using closed-loop, water-based cooling (eBay)

Clean energy goals

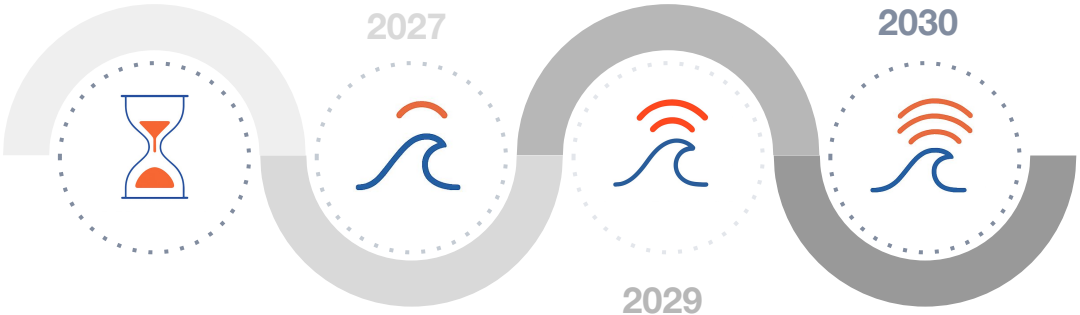
- Since 2010: 115+ PPAs, enabling 14+ GW of clean energy capacity
- 24/7 carbon-free energy at all data centres by 2030(Google)

4. Conclusions: need for regulatory simplification and avoid uncertainty

ESPR requirements for ICTs

Transitional clause
Computers, external power supplies, servers and data storage products

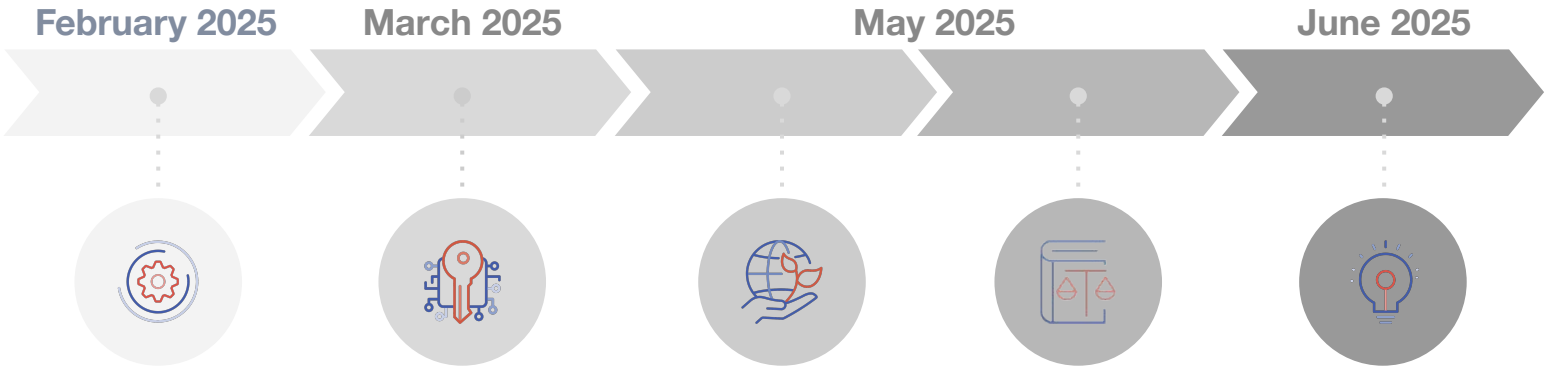
Second wave
Recycled content and recyclability of electrical and electronic equipment (EEE)



First wave
Repairability (horizontal requirement)
Ecodesign requirements for displays

Third wave
Smartphones and tablets

Timeline of data centres (EED)



Workshop 1

- Introduction of the study (timeline, expectations)
- Stakeholder dialogue

Workshop 2

- Overview of data completeness and UX
- Preliminary assessments

Workshop 3

- Overall energy efficiency and sustainability assessment
- Needs and ways to improve energy efficiency of data centres

EC report

By 15 May 2025, the Commission will assess data centre efficiency and report to lawmakers, possibly proposing further measures.

Workshop 4

- Topics TBA

Key takeaways

- **Risks of overlaps**: New rules on ecodesign of digital services could create overlap and conflicts
- **Focus on enforcement and simplification:** Efforts should be focused on the enforcement
and finalisation of current rules, while simplifying others to boost competitiveness
- **Industry is moving**: Companies are delivering on their sustainability efforts
- **Continuous industry feedback**: Align ecodesign rules with business needs

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