

# Independent Inspector Annual Compliance Report – Final

**Reporting Period 2018**

## Games Consoles Self- Regulatory Initiative

**SCOPE OF WORK:**  
**COMPLIANCE REPORT FOR THE SELF-REGULATORY  
INITIATIVE ON ENERGY AND RESOURCE EFFICIENCY  
OF GAMES CONSOLES**

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## CUSTOMER

Steering committee for the self-regulatory  
Initiative on energy efficiency of games  
consoles

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## 1 SUMMARY

### 1.1 Commitments and requirements

This Annual Compliance Report from the Independent Inspector for the Self-Regulatory Initiative (SRI) covers the reporting period January 2018 to December 2018.

The SRI covers games consoles placed on the EU market by three Signatories. For this reporting period only two of the three Signatories reported sales of games consoles which fall into the scope of the SRI. The games consoles reported on in this ACR still represent 100% of the games consoles, within the scope, accounting for around 47 million unit sales in 2018.

The SRI aims to further improve the energy efficiency of games consoles and reduce the environmental impact over their life cycle with energy savings through better design as well as non-energy characteristics.

The key requirements covered by the SRI are:

- Meeting maximum power consumption targets (power caps)
- Compliance with Auto-Power Down (APD) requirements
- Achieving specific Market Coverage
- Non-energy Commitments: resource efficiency and end-of-life design requirements
- Further Information: Including energy and non-energy related information in the user instructions

### 1.2 Signatories

There are three manufacturers that are Signatories to the games console SRI;

- Microsoft Corporation
- Nintendo Co., Ltd.
- Sony Interactive Entertainment Inc.

### 1.3 Data collection and processing

The Independent Inspector, following the requirements given in the SRI, reviewed information from the Signatories submitted using a Product Compliance Report for each games console.

For this reporting period a new Product Compliance Template was adopted. The new template aimed to avoid repetition of reporting in subsequent reporting periods and simplify the data submissions by directing the Independent Inspector to online information. The data and information signposted via the PCR covers predominantly the information that

must be provided to consumers. This includes the performance data that was required to be manually reported in the previous PCR template.

The Independent Inspector reported back to the Signatories individually after reviewing the Product Compliance Reports. There were few issues to report back to the Signatories; they mainly concerned web links not directly resulting in easily accessible data required to demonstrate compliance with the SRI requirements, and clarification regarding model numbering.

#### **1.4 Compliance**

In order to comply with the Self-Regulatory Initiative, Signatories must achieve the following:

- Ensure that Product Compliance Reports for all games consoles within the scope of the SRI are submitted to the Independent Inspector on time;
- Ensure that the Product Compliance Reports for all games consoles are complete;
- Ensure that no more than 10% of products, within the scope of the SRI, from an individual Signatory fail to comply with the requirements in the SRI.
- Demonstrate that the SRI covers more than 80% of the games consoles sold in the EU for the preceding reporting period (bi-annually).

Only the first three commitments listed above are covered in this report. The market data compliance regarding aggregate sales of consoles in Europe must be provided by the Signatories directly to the European Commission.

The three Signatories complied with the requirements given above.

All the Signatories met the requirements of the SRI in terms of declarations made for in-scope games consoles regarding maximum power consumption, auto-power down, market coverage, and declaring non-energy requirements in relation to resource efficiency and information to the consumer.

## 2 INTRODUCTION

The Self-Regulatory Initiative (SRI) establishes a voluntary agreement, under the terms of EU Directive 2009/125/EC on Energy Related Products, for improved energy and resource efficiency, and end-of-life treatment and recycling of games consoles, which use more than 20 watts in Active Game mode.

The SRI, which includes the scope, definitions and commitments, and other administration elements of the SRI, can be found on the dedicated games console SRI website; <http://www.efficientgaming.eu/>

The main categories of commitments and requirements detailed in the SRI<sup>1</sup> include:

- Meeting maximum Power Consumption targets (power caps) (3.2)
- Compliance with Auto-Power Down (APD) requirements (3.1)
- Specific Market Coverage: as a sector and individual manufacturer requirements
- Non-energy commitments: resource efficiency and end-of-life design requirements (3.3)
- Further Information: Including energy and non-energy related information in the user instructions (3.3 and Annex B)

This Annual Compliance Report (ACR), prepared by the Independent Inspector, covers the reporting period January 2018 to December 2018. It includes information on the compliance by the Signatories according to the Games Console Self-Regulatory Initiative (SRI) version 2.6.3.

This Annual Compliance Report has been compiled following the submission of Product Compliance Reports by the Signatories to the Independent Inspector. The reporting by the Signatories was undertaken using a standard Product Compliance Report template document which enables Signatories to report where product information can be found using online links, and demonstrate compliance with the commitments set out in the SRI. The Product Compliance Report template document is accessible from the Efficient Gaming website. The information submitted has been reviewed by the Independent Inspector against the requirements in the SRI.

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<sup>1</sup> Parentheses provide SRI paragraph references

### 3 LIST OF SIGNATORIES

For the reporting period January to December 2018, there were three manufacturers signed up to the Self-Regulatory Initiative for games consoles. These are the manufacturers that instigated and work together to produce and undertake revisions to the voluntary agreement for this product.

- Microsoft Corporation
- Nintendo Co., Ltd.
- Sony Interactive Entertainment Inc.

### 4 COMMITMENTS AND REQUIREMENTS

The following sections provide a summary of the commitments and requirements for Signatories of the games console Self-Regulatory Initiative (SRI). Further detail and full wording can be found in the published SRI (version 2.6.3) <sup>2</sup>

#### 4.1 Energy efficiency

The SRI specifies power caps applicable to Media Playback and Navigation modes. The power caps are based upon the adoption of best available technologies and determined following a review of a number of studies (referenced in Annex F of the SRI).

In order to achieve a progressive improvement in energy efficiency, power caps are specified in four tiers over a five year period. Further details can be found in Appendix B.

- The power caps for Navigation Mode are the same for High and Ultra-high definition consoles
  - 90 Watts from 2014 and 70 Watts from 2017
- For Media Playback and Streaming HD the power caps for High definition consoles are the same level as in Navigation mode
  - 90 Watts from 2014 and 70 Watts from 2017
- For Media Playback and Streaming HD, the Ultra-high definition consoles have power caps applicable two years later than for High definition consoles
  - 90 Watts from 2016
- Both High definition and Ultra-high definition consoles have additional power cap allowances when using a Natural User Interface.

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<sup>2</sup> The SRI can be downloaded from the dedicated website; <http://www.efficientgaming.eu/>

- Tighter power caps for Navigation and Playback Mode will be applicable for all types of console from 2019, but are not relevant for the reporting period covered by this annual report.

The SRI also specifies requirements for the duration of time before Auto-Power Down (APD) is triggered.

## **4.2 Market coverage**

The Signatories to the SRI, in aggregate, must account for more than 80% of the unit sales of Games Consoles in the EU for the relevant Reporting Period. Signatories are required to provide independent market data to prove this level of market coverage to the European Commission every two years.

Each Signatory must ensure that at least 90% of the games console units it places on the market and/or put into service meet the requirements of the SRI.

## **4.3 Non-energy commitments**

There are two main areas covered by non-energy commitments:

1. Resource efficiency and end-of-life design requirements
2. Information to be provided to consumers via the instructions

### **4.3.1 Resource efficiency and end-of-life**

- Support product life extension – by providing consumers (via onscreen, hardcopy or online instructions) explanations on;
  - how to keep the product in good working order,
  - instructions on deleting personal data and,
  - information on options to upgrade the console (if available),
  - information on end-of-life processing, refurbishment and out-of-warranty repair options
- Facilitate refurbishment or out-of-warranty repair services -
  - make technical documents available to authorised repair centres,
  - make spare parts available to authorised repair centres,
  - facilitate non-destructive disassembly for recycling, reuse, maintenance and refurbishment,
  - provide documentation to enable dismantling operations

- For end-of-life, efficient recycling is facilitated by the marking of plastic parts according to material composition (parts >25g).<sup>3</sup>

### 4.3.2 Information to Consumers

Signatories are required to provide information for consumers within console operating instructions either provided with the console itself, onscreen or hardcopy, or online.

The information includes;

- some energy consumption data for different modes and in standby,
- energy-saving advice including default modes or settings,
- adjusting automatic-power down settings,
- signposting consumers to end-of-life, refurbishment and out-of-warranty service information,
- information to support product life extension (as given in section 4.3.1 above)

## 5 DATA COLLECTION AND PROCESSING

### 5.1 Product Compliance Report Template

For this Annual Compliance Report, a new simplified Product Compliance Report (PCR) template was used for the Signatories to declare compliance with the requirements of the SRI. The template is published on the Efficient Gaming website and is also reproduced in Appendix A of this report.

To prevent PCR duplication for consecutive years the Signatories can now record whether a games console is:

- a new games console
- a revised model of an existing games console
- or an existing games console model

This allows the Signatory to refer to a previously submitted PCR rather than completing a new document each year for existing consoles. For a new console placed on the market a new fully completed Product Compliance Report must be submitted.

The template also no longer requires the Signatories to enter specific data such as power consumption values. The majority of the data required to demonstrate compliance and requirements is also the information that is to be provided to consumers. By providing links to online information the Signatories can cover all the SRI requirements at the same point. The PCR is therefore used to record to whereabouts of this information.

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<sup>3</sup> Additional requirements for plastics apply from 2020 – which are not covered in this report

## 5.2 Data processing

As the PCR template and the referencing of past reports is new for this reporting period, there have been some areas that have required clarification.

Despite the use of the simplified template, Signatories opted for slightly different completion approaches.

Microsoft had two existing models falling within the scope of the SRI. The completed PCR therefore simply listed these in the PCR summary box at the top of the form, with web links to the previous PCRs available on the Efficient Gaming website. There were no web links given for the subsections of the specific models in the PCR, as these are given in the old format PCR.

Sony had four models of games consoles listed in the PCR; two of the model number consoles appeared in last year's Annual Report. Two additional consoles were listed as existing models although they had different model numbers. The new model numbers did not signify a new console.

Under the definition in the SRI an "existing games console" is one that has been already placed on the market and reported in previous year(s). It includes revisions of an existing model, which affect style, colour or are an RF or memory storage size change, whereas these revisions do not increase the power consumption of the console compared to the original (initial) version of the console. Sony therefore referred to previous PCRs as a declaration that the two consoles with new model numbers are the same as previously reported consoles in terms of compliance with the SRI.

Nintendo did not submit a PCR. They informed the Independent Inspector that Nintendo had not marketed a games console that falls within the scope of the SRI for the reporting period of this report.

### 5.2.1 Online links

The Product Compliance Reports no longer contain actual performance data; the information to be declared as part of the requirements for the SRI and the information provision for consumers is accessed via online links provided by the Signatory in the PCR.

The Independent Inspector did not scrutinize the performance data provided via the online links because the requirements on the Independent Inspector for this annual reporting process is purely to check that all PCRs are submitted on time and are complete according to the SRI.

The Independent Inspector did check that the online links in the PCR did open up to documents and/or web pages where the information could be found.

### 5.2.2 Market Coverage

Previous Product Compliance Reports have included games console sales information, per month for each console covered by the SRI, and/or links to 3<sup>rd</sup> party sales figures. Using the new Product Compliance Report format the Signatory simply specified what percentage of products sold comply with the SRI. Sales data is only required if the Signatory states that less than 90% of products sold comply with the SRI requirements.

With regard to the SRI commitment to demonstrate that the SRI covers at least 80% of the games consoles sold in the EU, this is not covered by the annual review and reporting by the Independent Inspector using the Product Compliance Reporting process. The SRI states that Signatories will provide data from an independent 3<sup>rd</sup> party to the Commission to prove market coverage within three months following a change in Signatories and will reconfirm market coverage every two years during the operation of the SRI<sup>4</sup>.

## 6 SIGNATORY COMPLIANCE

In order to comply with the Self-Regulatory Initiative, Signatories must:

- Demonstrate that the SRI covers at least 80% of the games consoles sold in the EU for the preceding period;
- Ensure that Product Compliance reports for all games consoles within the scope of the SRI are submitted to the Independent Inspector on time;
- Ensure that the Product Compliance Reports for all games consoles are complete;
- Ensure that no more than 10% of products, within the scope of the SRI, from an individual Signatory fail to comply with the requirements in the SRI.

The requirements given in the SRI cover the following:

- Meeting maximum Power Consumption targets (power caps);
- Compliance with Auto-Power Down (APD) limits;
- Reporting and achieving specific Market Coverage;
- Non-energy commitments: resource efficiency and end-of-life design requirements
- Further Information: Including energy and non-energy related information in the user instructions.

Any audit of the requirements given above would only be carried out by the Independent Inspector as part of a verification investigation (see Annex C of the SRI).

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<sup>4</sup> Energy Efficiency of Games Consoles, Self-Regulatory Initiative for further improve the energy efficiency of Games consoles, Version 2.6.3, Section 4.2

## **6.1 Submission of product reports**

All initial Product Compliance Reports (PCR) were received by the Independent Inspector within the timeframe given in the SRI (by 28<sup>th</sup> February).

### **6.1.1 Product compliance report completeness**

Following a review by the Independent Inspector, each Signatory was contacted individually, within four weeks after they submitted the PCRs. Any data entry or information issues identified by the Independent Inspector were reported back to the individual Signatories concerned. There were only a couple of issues raised; one in relation to an online link for consumer information access, and another seeking clarification of model numbers and previously reported models. All issues were dealt with quickly and a Product Compliance Report provided along with notification any online updates.

### **6.1.2 Market coverage**

Only two Signatories sold games consoles that fall under the specification for the SRI, for this reporting period. In both cases the Signatories declared that they comply with the requirements of the SRI for 100% of products sold.

With regard to the SRI commitment to demonstrate that the SRI covers at least 80% of the games consoles sold in the EU, this is not covered by the annual review and reporting by the Independent Inspector using the Product Compliance Reporting process (see 5.2.2 above).

## **7 SRI REQUIREMENTS**

### **7.1 Power consumption requirements**

From observing the publicly available data reviewed via their websites, all the Signatories complied with the power consumption requirements given in the SRI, Tier 3.

Similarly, all Signatories were compliant for Auto-Power Down requirements according to online data observed by the Independent Inspector.

### **7.2 Market coverage requirements**

As specified in section 5.2.2 above, all Signatories with applicable games consoles declared compliance for 100% of products sold.

### **7.3 Non-energy commitments**

As a self-regulatory initiative with reporting of requirements being self-declared by the Signatories, the Independent Inspector reviewed the online links provided by Signatories in the PCRs for the presence of this information.

Actually verifying the validity of the self-declared values or data provision would form part of a verification audit process. Annex A-2 of the SRI specifies methods of verification of the non-energy and energy efficiency information requirements.

All the Signatories were compliant with this requirement.

### **7.4 Resource efficiency and recycling requirements**

All the Signatories provided links to the information specified in Annex B of the SRI, regarding product life extension and refurbishment or out-of-warranty repair services.

All the Signatories are therefore compliant with this requirement.

### **7.5 Further information: Instructions for use**

All the Signatories provided links to the information specified in Annex B of the SRI, regarding the provision of power consumption, energy efficiency related information and end-of-life related information in the instruction manuals.

All the Signatories are therefore compliant with this requirement.

## 8 OVERALL COMPLIANCE

For the reporting period January to December 2018, all the three Signatories comply with the commitments in the SRI. Only two of the Signatories sold products within the scope of the SRI for this reporting period. These two manufacturers complied with the commitment to provide declarations regarding:

- Power Consumption
- Auto-Power down
- Market Coverage
- Resource and recycling
- Further Information to be included in the instructions for use.

### 8.1 Signatories and games consoles

Table 1 below lists the manufacturers and the corresponding games consoles that are covered by the Self-Regulatory Initiative for the reporting period January to December 2018.

All games consoles that fall under the scope of the SRI are manufactured by the Signatories and constitute all the models available in the EU.

Nintendo is still a Signatory to the games console SRI, but did not sell a model that falls within the scope of the SRI for this reporting period.

Table 1. Signatories and compliant models covered by the SRI (reporting period 2018)

Manufacturer	Games Console name	Model number	Type
Microsoft	Xbox One S	1681	Ultra High Definition
Microsoft	Xbox One X	1787	Ultra High Definition
Sony	PlayStation 4	CUH2116	Ultra High Definition Media Capable
Sony	PlayStation 4	CUH 2216	Ultra High Definition Media Capable
Sony	PlayStation 4 Pro	CUH7116	Ultra High Definition Gaming Capable
Sony	PlayStation 4 Pro	CUH 7216	Ultra High Definition Gaming Capable

### 8.2 Compliance testing

No compliance testing or auditing was undertaken in the reporting period up to December 2018.

## 9 RECOMMENDATIONS

The recommendations given below are those in relation to the reporting process, data handling and product compliance review associated with the role of the Independent Inspector for the production of the Annual Compliance Report.

For this fourth Annual Compliance report the main change has been the use of a simplified Product Compliance Report for providing information to the Independent Inspector. This reporting method aimed to avoid repetition of reporting in subsequent reporting periods, and simplify the data submissions by directing the Independent Inspector to online information. This aim has essentially been achieved. The data and information signposted via the PCR covers the information that has to be provided to consumers, including the performance data that was previously required to be manually entered in the PCR template – thus reducing the duplication of information.

It is recommended that this method continues, however for consistency when reporting publically and publishing the Product Compliance Reports it would be appropriate if all Signatories adopt the same level of completion of the new PCR - either simply completing the top summary section and linking back to the previously published PCR from the last reporting period, or providing the online links for each model individually.

## **Appendix A - PRODUCT COMPLIANCE REPORTING TEMPLATE**

The template reproduced here was generated in Microsoft Word by the Signatories and allows all appropriate games consoles models to be reported on in one document, with a summary at the beginning.

This PCR is submitted for compliance with the Games Console Voluntary Agreement (SRI version 2.6.3).

For further information please see: <http://efficientgaming.eu/>

PCR version: 1.0

Date: [dd/mm/yyyy]

Product Compliance Report Summary

Signatory company	Choose an item.			
Reporting period	Jan – Dec [yyyy]			
Date submitted	[dd/mm/yyyy]			
Completed by	[name]			
Contact details	[VA administrator details]			
List of consoles within scope of SRI				
#	Model name	Model number	Console type	Status
A.	[model name]	[model number]	Choose an item.	Choose an item.
B.	[model name]	[model number]	Choose an item.	Choose an item.
The Signatory complies with the requirements of the SRI for:			100% of products sold	

#	Reference to previously submitted PCR for applicable models	Submitted on:
A.	[Link/reference for model A if applicable]	Click or tap to enter a date.
B.	[Link/reference for model B if applicable]	Click or tap to enter a date.

This PCR is submitted for compliance with the Games Console Voluntary Agreement (SRI version 2.6.3).

For further information please see: <http://efficientgaming.eu/>

PCR version: 1.0

Date: [dd/mm/yyyy]

Product Compliance Report (A)

A.	Model name	[model name]	Model number	[model number]	Console type	Choose an item.
Additional model information						

Section 1.

The following information and documents are submitted in support of this declaration by the references provided		References to documentation / hyperlink
1.1	Information on the energy-saving potential of power management. (Section 3.1)	
1.2	Information on default low power mode when the Games Console is powered-down. (Section 3.1)	
1.3	Information on the default auto power-down time settings. (Section 3.1)	
1.4	Information on how to change time settings for auto power-down. (Section 3.1)	
1.5	References to further information on other available low power modes. (Section 3.1)	
1.6	Record of console power consumption in active modes. (Section 3.2)	
1.7	Record of console power consumption in standby mode and additional user-enabled low power modes. (Section 3.2)	
1.8	Information on availability of end-of-life processing, refurbishment, out-of-warranty services. (Section 3.3)	
1.9	Information on product life extension: explanation on how to keep the consoles in good working condition. (Section 3.3)	
1.10	Information on product life extension: how to delete personal data. (Section 3.3)	
1.11	Information on product life extension: options available (if any) to consumers to upgrade the performance of their consoles. (Section 3.3)	

Section 2.

This PCR is submitted for compliance with the Games Console Voluntary Agreement (SRI version 2.6.3).

For further information please see: <http://efficientgaming.eu/>

PCR version: 1.0

Date: [dd/mm/yyyy]

#	Reasons for non-compliance	Supporting documentation / reference / hyperlink

This PCR is submitted for compliance with the Games Console Voluntary Agreement (SRI version 2.6.3).

For further information please see: <http://efficientgaming.eu/>

PCR version: 1.0

Date: [dd/mm/yyyy]

Product Compliance Report (B)

B.	Model name	[model name]	Model number	[model number]	Console type	Choose an item.
Additional model information						

Section 1.

The following information and documents are submitted in support of this declaration by the references provided		References to documentation / hyperlink
1.1	Information on the energy-saving potential of power management. (Section 3.1)	
1.2	Information on default low power mode when the Games Console is powered-down. (Section 3.1)	
1.3	Information on the default auto power-down time settings. (Section 3.1)	
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1.10	Information on product life extension: how to delete personal data. (Section 3.3)	
1.11	Information on product life extension: options available (if any) to consumers to upgrade the performance of their consoles. (Section 3.3)	

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For further information please see: <http://efficientgaming.eu/>

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Date: [dd/mm/yyyy]

## Notes for Independent Inspector

#	Notes	Regarding



Total Quality. Assured.

INDEPENDENT INSPECTOR ANNUAL COMPLIANCE REPORT—DRAFT

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## **Appendix B - SELF REGULATORY INITIATIVE KEY POWER CONSUMPTION REQUIREMENTS**

The following tables detail the power cap and Auto-Power Down (APD) requirements for the SRI. Further detail can be found in the SRI.

**Power consumption caps**

Mode	Tier	Effective from	High Definition Consoles (W)	Ultra High Definition Consoles (W)	
Navigation Mode	Tier 1	01-Jan-14	90 <sup>1</sup>	90 <sup>2</sup>	
	Tier 2	01-Jan-16	90 <sup>1</sup>	90 <sup>2</sup>	
	<b>Tier 3</b>	<b>01-Jan-17</b>	<b>70<sup>1</sup></b>	<b>70<sup>2</sup></b>	
	Tier 4	01-Jan-19	50 <sup>1</sup>	Media Capable 50 <sup>2</sup>	Gaming Capable 70 <sup>2</sup>
Media Playback DVD Media Playback Blu-ray Disc Streaming HD	Tier 1	01-Jan-14	90 <sup>1</sup>	-	-
	Tier 2	01-Jan-16	90 <sup>1</sup>	90 <sup>1</sup>	
	<b>Tier 3</b>	<b>01-Jan-17</b>	<b>70<sup>1</sup></b>	<b>90<sup>1</sup></b>	
	Tier 4	01-Jan-19	60 <sup>1</sup>	Media Capable 60 <sup>2</sup>	Gaming Capable 70 <sup>1</sup> 110 <sup>3</sup>
Additional Power Cap using a Natural User Interface	Tier 1	01-Jan-14	+20	-	
	Tier 2	01-Jan-16	+20	+20	
	<b>Tier 3</b>	<b>01-Jan-17</b>	<b>+15</b>	<b>+20</b>	
	Tier 4	01-Jan-19	+15	+15	

<sup>1</sup> Measured at HD video resolutions

<sup>2</sup> Measured at HD and 4K (UHD) video resolutions

<sup>3</sup> Measured at 4K (UHD) video resolutions

**Auto-Power Down**

Title	Requirement
Navigation Mode APD	APD to trigger within 60 minutes to the power limits for Standby
Active Gaming APD	APD to trigger within 60 minutes to the power limits for Standby
Disc-Based Media Playback APD	APD to trigger within 4 hours to the power limits for Standby
Media Streaming Playback APD	APD to trigger within 4 hours to the power limits for Standby