

# Independent Inspector Annual Compliance Report - Final

**Reporting Period 2019**

## Games Consoles Self- Regulatory Initiative

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

**REPORT NUMBER:**  
V1.1

**ISSUE DATE:**  
21st May 2020

**PAGES:**  
28



## CUSTOMER

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

## REPORT ISSUED BY

Intertek Testing & Certification Ltd  
Davy Avenue  
Knowhill  
Milton Keynes  
MK5 8NL

Tel: +44 (0)1908 857777

Compiled by:	Jane Lee & Stephen Fernandes	Reviewed by:	Caroline Blenkhorn
Title:	Project Manager & Technical Development Manager	Title:	Laboratory Manager
Signature:		Signature	
Date	21st May 2020	Date:	21st May 2020

This report is for the exclusive use of Intertek's Client and is provided pursuant to the agreement between Intertek and its Client. Intertek's responsibility and liability are limited to the terms and conditions of the agreement. Intertek assumes no liability to any party, other than to the Client in accordance with the agreement, for any loss, expense or damage occasioned by the use of this report. Only the Client is authorized to permit copying or distribution of this report and then only in its entirety. Any use of the Intertek name or one of its marks for the sale or advertisement of the tested material, product or service must first be approved in writing by Intertek. The observations and test results in this report are relevant only to the sample tested. This report by itself does not imply that the material, product, or service is or has ever been under an Intertek certification programme.

Intertek Testing & Certification Ltd, Registered office: Academy Place, 1-9 Brook Street, Brentwood, Essex, CM14 5NQ, United Kingdom  
Registered No: 3272281 (England), VAT No: GB 672-7639-96-011

1	SUMMARY	5
1.1	Commitments and Requirements	5
1.2	Signatories	5
1.3	Data Collection and Processing	5
1.4	Annual Reporting Compliance	6
1.5	Compliance Verification Investigation	6
1.6	Overall Compliance	6
2	INTRODUCTION	7
3	LIST OF SIGNATORIES	8
4	COMMITMENTS AND REQUIREMENTS	8
4.1	Commitments Reviewed by the Independent Inspector	8
4.2	Energy and Resource Efficiency Requirements	8
4.2.1	Energy Efficiency	9
4.2.2	Market Coverage	10
4.2.3	Non-energy Commitments	10
5	DATA DECLARATIONS AND PROCESSING	11
5.1	Product Compliance Report Template	11
5.2	Data Processing	11
5.3	Online Links	12
5.4	Market Coverage	12
6	SIGNATORY COMPLIANCE	13
6.1	Submission of Product Compliance Reports	13
6.2	Product Compliance Report Completeness	13
6.3	Market Coverage	13
7	SRI REQUIREMENTS COMPLIANCE INVESTIGATION	14
7.1	Compliance Investigation Trigger	14
7.2	Model Selection and Verification	15
7.3	Energy Related Performance Test Results	16
7.4	Non-energy and Energy Efficiency Information Requirements	16
7.5	Non-compliance Actions	17
7.5.1	APD Non-compliance for Microsoft Xbox	17
7.5.2	Link to Non-energy Related Product Information for Sony	17
8	OVERALL COMPLIANCE	18

8.1	Signatories and Games Consoles	18
9	RECOMMENDATIONS	19
9.1	Product Compliance Report Template	19
9.2	Compliance Investigation Review	19
Appendix A - PRODUCT COMPLIANCE REPORTING TEMPLATE		20
Appendix B - SELF REGULATORY INITIATIVE KEY POWER CONSUMPTION REQUIREMENTS		27

## 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 2019 through December 2019.

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 within the scope of the SRI. This still accounts for 100% of the in-scope games consoles sold in the EU in 2019.

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:

- Ensure that maximum power consumption targets (power caps) are not exceeded
- 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 reviewed the Product Compliance Report for each games console submitted by the Signatories.

The Product Compliance Template used, simplifies the data submissions method which indicates compliance by listing links to online information. The data and information signposted via the PCR predominantly covers the information that must be provided to consumers.

The Independent Inspector reported back to the Signatories individually after reviewing the Product Compliance Reports. For Sony clarification was required regarding the referencing

of a PCR previously used for the existing consoles. For Microsoft, confirmation was sought regarding the number of consoles sold in 2019 that were not compliant. Both Xbox consoles were found to not meet the minimum Auto Power Down requirements during a compliance verification investigation test in the autumn of 2019. Further details and information on the corrective action can be found in section 7.5.1.

Nintendo informed the Independent Inspector that no in-scope consoles were sold.

## **1.4 Annual Reporting Compliance**

In order to comply with the SRI, Signatories must achieve the following:

1. Ensure that Product Compliance Reports for all games consoles within the scope of the SRI are submitted to the Independent Inspector on time;
2. Ensure that the Product Compliance Reports for all games consoles are complete;
3. 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.
4. 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 reported appropriately on the first two items given above. Microsoft did not achieve the required sales as specified in the third item – see section 1.5.

## **1.5 Compliance Verification Investigation**

During this reporting period the Independent Inspector undertook product testing and documentation review to verify compliance against the requirements of the SRI.

Two consoles from each of Microsoft and Sony were reviewed. Microsoft was found to have non-compliance issues with APD for some of the usage modes. Remedial action has been undertaken via software updates to rectify the non-compliance in relation to APD (further information can be found in section 7.5.1).

## **1.6 Overall Compliance**

All the Signatories met the requirements of the SRI for in-scope games consoles for maximum power consumption, auto-power down, and declaring non-energy requirements in relation to resource efficiency and information to the consumer. Although non-compliant in terms of market coverage for the reporting period, Microsoft has communicated corrective action prior to this Annual Compliance Report which means that it is considered to be compliant with the SRI.

## 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:

- No exceeding 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
- Non-energy commitments: resource efficiency and end-of-life design (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 2019 to December 2019. It includes information on the compliance by the Signatories according to the Games Console Self-Regulatory Initiative (SRI) 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 (PCR) template document which enables Signatories to report where product information can be found using online links, and demonstrate compliance with the requirements set out in the SRI. The Product Compliance Report template document is accessible from the Efficientgaming website. The submission of the PCR has been reviewed by the Independent Inspector against the reporting obligations in the SRI.

---

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

### 3 LIST OF SIGNATORIES

For the reporting period January to December 2019, there were three manufacturers signed up to the Self-Regulatory Initiative for games consoles. These are the manufacturers that instigated and worked 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 Commitments Reviewed by the Independent Inspector

The SRI specifies four commitments to be met by the Signatories:

1. Ensure that Product Compliance Reports for all games consoles within the scope of the SRI are submitted to the Independent Inspector on time;
2. Ensure that the Product Compliance Reports for all games consoles are complete;
3. 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.
4. 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 two commitments listed above are checked by the Independent Inspector prior to the compilation of this annual report. The Independent Inspector verifies that a statement has been provided regarding the third commitment.

The market data compliance regarding aggregate sales of consoles in Europe (point 4) must be provided by the Signatories directly to the European Commission.

#### 4.2 Energy and Resource Efficiency Requirements

The following requirements are those specified in the SRI in relations to the consoles energy usage and resource efficiency, and also requirements of providing such information to consumers. These requirements are only checked by the Independent Inspector when a compliance investigation is undertaken (see section 7 of this report).

---

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

### 4.2.1 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. The power caps applicable for the 2019 reporting period are given below.

The power caps for Navigation Mode are:

- High Definition consoles 50W
  
- Ultra-high definition consoles, Media Capable 50W
- Ultra-high definition consoles, Gaming Capable 70W

HD consoles are measured with HD video resolutions

UHD consoles are (measured with HD and 4K(UHD) video resolutions

For Media Playback the power caps are:

- High definition consoles 60W
  
- Ultra-high definition consoles, Media Capable 60W
- Ultra-high definition consoles, Gaming Capable - measured with HD video resolutions 70W
- Ultra-high definition consoles, Gaming Capable - measured with 4K video resolutions 110W

Both High definition and Ultra-high definition consoles have additional power cap allowances when using a Natural User Interface.

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

- For operational modes other than Media Playback - 1 hour or less from the time of the last user input.
  
- In Media Playback mode - within 4 hours of starting any audio or video media playback or within 1 hour or less of user inactivity

Further details can be found in Appendix B of this report.

## 4.2.2 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.

## 4.2.3 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

### 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>

### 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.

---

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

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 above)

## 5 DATA DECLARATIONS AND PROCESSING

### 5.1 Product Compliance Report Template

For this Annual Compliance Report the simplified Product Compliance Report (PCR) template, introduced for the reporting period 2018, was again 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 majority of the data required to demonstrate compliance with the requirements is also the information that is to be published to consumers. By providing links to online information the Signatories can cover all the SRI requirements at the same time. The PCR is therefore used to record the location of this information.

### 5.2 Data Processing

As there were no new models of game consoles introduced during the 2019 reporting period, both manufacturers with in-scope consoles referenced previous PCRs for the existing models.

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 Efficientgaming website.

Sony had two models of games consoles listed in the PCR which were the same as the consoles in the previous reporting period (2018). Sony therefore referred to previous PCRs in the Summary section of the PCR with links to the Efficientgaming website. For each of the consoles the Sections A and B of the PCR were completed with links for consumer information which covers the requirements of 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.

### 5.3 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 requirement 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 feel that it was appropriate to check that the online links in the PCR led to documents and/or web pages where the information could be found.

In a covering letter Sony commented that the name of the link in the user manual had been updated to 'ecodesign' rather than 'energy efficiency' on the recommendation of the Independent Inspector following the compliance verification investigation. Sony also commented that the original 'energy efficiency' link remains active and returns to the same webpage displaying the Ecodesign information.

### 5.4 Market Coverage

Using the Product Compliance Report format the Signatory 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 3rd 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>.

---

<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 SIGNATORY COMPLIANCE

The SRI specifies four commitments to be met by the Signatories:

1. Ensure that Product Compliance Reports for all games consoles within the scope of the SRI are submitted to the Independent Inspector on time;
2. Ensure that the Product Compliance Reports for all games consoles are complete;
3. 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.
4. 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 checked by the Independent Inspector prior to the compilation of this annual report.

The market data compliance regarding aggregate sales of consoles in Europe (point 4) must be provided by the Signatories directly to the European Commission.

### 6.1 Submission of Product Compliance Reports

All initial Product Compliance Reports (PCR) were received by the Independent Inspector within the timeframe given in the SRI (by the end of February).

### 6.2 Product Compliance Report Completeness

Following a review by the Independent Inspector, each Signatory was contacted individually. Any data entry or information issues identified by the Independent Inspector were reported back to the individual Signatories concerned via an Individual Compliance Report letter.

For this reporting period a couple of issues were raised:

- one in relation to an online link for consumer information access,
- and another seeking clarification regarding the number of compliance games consoles sold following a compliance issue that was identified through verification testing in the reporting period 2019.

All issues were dealt with and an updated Product Compliance Report provided as necessary.

### 6.3 Market Coverage

Microsoft failed to meet the obligation that more than 90% of consoles sold were compliant with the requirements. This was due to the non-compliance highlighted by the compliance verification investigation in relation to Auto Power Down for three out of nine modes across both Xbox variants (see section 7).

The SRI states<sup>5</sup> that a Signatory has twelve months following a relevant investigation report to correct a non-compliance, and would be considered compliant if it had taken necessary action before the finalisation of this Annual Compliance Report. In December 2019 Microsoft did inform the Independent Inspector of the measures undertaken following the verification investigation, and again via the PCR prior to the writing of this annual report.

Sony declared that it complied with the requirements of the SRI for 100% of products sold.

## 7 SRI REQUIREMENTS COMPLIANCE INVESTIGATION

The Self-Regulatory Initiative states that the Signatories only have to submit a completed PCR with links to where the data and information set out in the SRI requirements are found. For the annual compliance review the Independent Inspector has to confirm that the completed PCR is submitted for the preceding reporting period. There is no remit for the Independent Inspector to review the online links provided in the PCR to check that they actually go to a working webpage with, what would appear to be, appropriate data or information, or to check the energy performance claims against the SRI requirements.

The actual investigation of the links provided in the PCR, and verification of the self-declared values or data provision forms part of a compliance verification investigation. Annex A-1 and A-2 of the SRI specifies methods of verification for both energy consumption and the non-energy and energy efficiency information requirements.

### 7.1 Compliance Investigation Trigger

In accordance with Annex C of the SRI, the Independent Inspector performed an investigation in order to verify Signatory compliance to the Requirements of the SRI.

The investigation was undertaken because the last substantial revision of the SRI<sup>6</sup> included a requirement that a product compliance investigation may be conducted on any new games console model or a revised model after it is first placed on the market. No product compliance investigation had taken place for any consoles in the past by the Independent Inspector, so, although no new models had been launched, an investigation was deemed appropriate by the Signatories. For this reporting period a product investigation was undertaken in October 2019.

---

<sup>5</sup> Section 5.4

<sup>6</sup> The revision in 2017 aligned the Games Console SRI with the European Commission Guideline for Voluntary Agreements. The compliance investigation for newly launched or revised consoles was included.

## 7.2 Model Selection and Verification

As no product compliance investigation had been carried out in the past, it would have been within the remit to consider all the games consoles reported on in 2018. However, the Independent Inspector felt it appropriate to test 2 models from each of the Signatories with games consoles falling within the scope.

The following models were therefore selected.

Microsoft: the two variants of the Xbox -

- Xbox One S
- Xbox One X

Sony: the most recent variants of existing models -

- PlayStation 4 (series 22)
- PlayStation 4 Pro (series 72)

All these models have been reported on in previous years, but as no previous compliance investigation had been carried out, existing models were selected.

The samples for performance testing were purchased and tested by the Consumer Electronics division of Intertek Performance Electrical & Network Assurance test facility in Milton Keynes, UK.

The Energy Related Performance was carried out in accordance with Annex A-1 of the Games Console SRI (version 2.3.6), covering the following aspects:

Energy consumption:

- Navigation mode
- Active gaming
- Media playback DVD
- Media playback Blu-ray Disc (HD/UHD)
- Media streaming

Auto-Power Down:

- Navigation mode
- Active gaming
- Disc-based Media playback
- Media streaming playback

## 7.3 Energy Related Performance Test Results

Testing took place in October 2019. The results of the energy related performance tests were sent to the individual Signatories for review in mid-November.

For Sony both the consoles - PlayStation 4 and PlayStation 4 Pro - complied with the energy related performance requirements (energy consumption and APD times).

For Microsoft both consoles - Xbox One S and Xbox One X - complied with energy consumption requirements. For the Auto Power Down (APD) tests, both consoles met the limit values for 6 of the 9 modes tested:

- APD for DVD playback exceeded the limit value (240 minutes) by 1%,
- APD for navigation mode and active gaming exceeded the limit value (60 minutes) by more than 10%.

## 7.4 Non-energy and Energy Efficiency Information Requirements

The Non-energy and Energy Efficiency Information requirements review was carried out in accordance with Annex A-2 of the Games Console SRI (version 2.3.6), covering the following aspects:

- Information to support product life extension
- Provision on refurbishment or out-of-warranty repair service
- Provision of spare parts to authorised repair/refurbishment centres
- Confirmation of non-destructive disassembly of key components
- Provision of documents to enable access of components for dismantling operations
- Information to confirm the marking of plastic parts by composition
- Information demonstrating the provision of energy efficiency information to consumers

In order to investigate compliance with the requirements the Signatories were required to submit documents or links to information to the Independent Inspector.

- Evidence for the provision of information to consumers was via websites links to instructions
- For assessing components, copies of documents used by processors were provided
- For other aspects such as repair services, parts and plastic marking, signed letters from repair and/or recycling agents were provided

Both Sony and Microsoft provided appropriate information to verify the non-energy requirements.

The Independent Inspector made one observation regarding the link to information for consumers regarding product extension from Sony. This link is provided in the User Manual under a heading of 'energy efficiency'. As the information to consumers contains other non-energy related product information it was felt that this heading was not fully inclusive for the requirements, and not obvious for consumers seeking product extension information.

## **7.5 Non-compliance Actions**

### **7.5.1 APD Non-compliance for Microsoft Xbox**

For both the Microsoft Xbox games consoles the APD for DVD playback, navigation mode and active gaming exceeded the SRI limit values. Microsoft was informed of this by the Independent Inspector in a draft report. There was no challenge of this result by Microsoft, and they communicated immediately the steps that were being undertaken to correct this aspect.

Microsoft suggested that the failure to meet the APD requirements was due to a different interpretation by the software team of when the APD should start. The Independent Inspector was informed, in December 2019, that this interpretation had been reviewed and that initial revisions had been made to the APD timing software update which was under test. The testing of the updated software was due to be completed early 2020 and Microsoft informed the Independent Inspector that the update would be sent to all Xbox consoles in February 2020.

Microsoft also requested, in February 2020, retests of the Xbox One console that was tested during the compliance review in the autumn of 2019, in order to demonstrate the software updates and improvement in APD times. The retests were just for the APD functions for the modes that previously exceeded the limit values. The APD for two of the three functions retested were found to slightly exceed the limit but were compliant within tolerance allowed by the SRI. Microsoft has stated that it will further improve the APD times with an appropriate margin to ensure that the APD are closer to the SRI requirement and that this will be achieved within 12 months of the original verification testing.

### **7.5.2 Link to Non-energy Related Product Information for Sony**

In submitting the PCRs for the reporting period 2019, Sony confirmed that it had reviewed the link given in the instruction book for the PlayStation and revised it to refer to 'ecodesign' rather than 'energy efficiency'.

## 8 OVERALL COMPLIANCE

For the reporting period January to December 2019, all the three Signatories comply with the commitments in the SRI, in terms of the submission of Product Compliance Reports and declaring market coverage. Only Microsoft and Sony sold products within the scope of the SRI for this reporting period. Nintendo did not sell any consoles that fall into the scope of the SRI.

Following a compliance verification investigation undertaken during this reporting period, and subsequent product improvements, the two Signatories with consoles in scope of the SRI, complied with the requirements of the SRI:

- 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 2019.

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 2019)

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

## 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.

### 9.1 Product Compliance Report Template

The use of the simplified PCR template, which requires Signatories to provide only on-line links as declaration that they comply with the requirements, again provides an efficient reporting method. However, the Independent Inspector is still concerned about the level of consistency that this provides, particularly in referencing previous PCR. The reference to a PCR from a previous reporting period for an existing or updated console may mean that non-working web addresses may be cited due to updates between reporting periods.

The SRI obligation only requires the Signatory to provide a completed PCR, but for the annual reporting process there is no requirement for a basic 'functionality check' by the Independent Inspector to check that the content of the PCR is valid i.e. that the links work, and this is felt to be a deficiency of the SRI annual reporting process.

### 9.2 Compliance Investigation Review

This has been the first occasion that compliance investigation tests and information reviews have been carried out for the Games Console SRI. As was the case with the first Annual Compliance Report, the process was tested and minor discrepancies in the system identified.

On the basis of the experiences gained on this occasion the Independent Inspector would recommend that the inclusion of a 10% allowance as stated in Annex 1 is reviewed to ensure that such an inclusion is less ambiguous. Clarity is needed on what measurements this 10% applies to and why it is deemed necessary. As a self-declared initiative the Signatories should know and take account of any sample variation and this should be accounted for in value declarations, such that a sample variation tolerance is not necessary.

## **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)	
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]

## Notes for Independent Inspector

#	Notes	Regarding



Total Quality. Assured.

INDEPENDENT INSPECTOR ANNUAL COMPLIANCE REPORT—FINAL

Report No: V1.1

Issue date: 21st May 2020

## **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 version 2.6.3. 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