

GAMES CONSOLES VOLUNTARY AGREEMENT (GCVA) SECOND UK STEERING COMMITTEE MEETING

Tuesday, 23 November 2021, 16h30-17h30
Conference call

PARTICIPANTS

BEIS

1. Adrian Barker
2. Margaret Sutherland
3. Hannah Wall

Energy Saving Trust

4. Stew Horne

Microsoft

5. Kim Braun
6. Ted Eckert
7. Adriana Mattei, Zetacast, consultant to Microsoft

Nintendo

8. Julie Cheung-Rückert
9. Eiichiro Morisaki
10. Emil Schweiger

Sony

11. Josh Aslan
12. Ceri Fenwick
13. Martin Green
14. Anne Hühnerfuß, Interel Group, consultant to Sony
15. Kieren Mayers

VA Administrator (Cambre Associates)

16. Ferial Saouli

AGENDA

1. Welcome and introductions
2. Approval of minutes of previous Steering Committee meeting
3. Review of actions of previous Steering Committee meeting
4. Update from Signatories
 - Industry response to stakeholder comments on draft UK SRI (received after 1st UK SC meeting)
 - Appointment of Administrator and Independent Inspector
5. Update from the UK Government
6. Recognition of UK SRI v 1.0
7. Timeline
8. AOB and date of next Steering Committee meeting
9. End of meeting

MEETING MINUTES

The meeting was held online via web conference, due to meeting/travel restrictions related to Covid-19.

1. Welcome and introductions

Ted Eckert (Microsoft) opened the meeting and welcomed all participants. Ferial Saouli (Cambre Associates, VA Administrator) then reviewed the agenda.

2. 1st UK Steering Committee meeting (7 September 2021) approval of minutes and review of actions

Ferial Saouli (Cambre Associates, VA Administrator) said the minutes were circulated, approved, and uploaded on the Games Consoles [website](#)¹. She also noted that all the actions agreed at the 1st UK Steering Committee meeting had been completed.

3. Update from Signatories

Ted Eckert (Microsoft) said Signatories would start with an update on the industry response to stakeholder comments on the draft UK VA (received after the 1st UK SC meeting), followed by an update on the appointment of the Administrator and Independent Inspector.

Industry response to stakeholder comments on draft UK VA (received after 1st UK SC meeting)

Ted Eckert (Microsoft) mentioned Signatories received comments from Energy Saving Trust (EST) on 1 October 2021. The Signatories' stakeholder response document was completed on 27 October 2021 and shared with BEIS for distribution. The topics raised by EST included

¹ <https://www.efficientgaming.info/uk/documents.html>

compliance, showing the VA is fit for purpose, scope, spare parts, right to repair, recycling, terminology, power consumption of media modes.

The industry responses provided clarifications to address concerns raised by EST.

- 1) Would welcome evidence that the VA is working and is fit for purpose (i.e. emerging technologies), and welcome greater clarity on how compliance is monitored and controlled: Ted Eckert (Microsoft) mentioned Signatories believe the VA is working and is fit for purpose. The VA is flexible enough to adapt to the emergence of new technologies. It is reviewed every two years at a minimum (or more frequently when new consoles are launched) in a process that is open to all stakeholders. This allows for much faster updates compared to typical regulations. Compliance is verified through annual Product Compliance Reports submitted to the Independent Inspector and there is the possibility for further testing if needed. Additionally, Signatories estimate that there are considerable energy savings with the VA: 25 TWh energy avoided to date since 2015. These estimates have been verified by the European Commission's independent consultant report. The VA continues to work effectively: it is the first time industry has managed to launch new generation consoles (at the end 2020) with no increase in power caps, even for consoles that have considerably increased processing power and resolution.
- 2) Consider including controllers within the scope: Emil Schweiger (Nintendo) stated that controllers can be purchased by consumers via multiple sales channels. Consequently including remote controllers as spare parts, similar to how it is implemented for TVs (where the remote controls are not available in general retail), does not make sense for games consoles. Including accessories in the scope of the VA to meet the VA's resource efficiency requirements would not be in alignment with requirements applicable to other product groups.
- 3) Requirement for provision of replacement parts for two years is not long enough: Emil Schweiger (Nintendo) mentioned that there is a current VA commitment to provide spare parts for two years after the last product has been placed on the market. Stakeholders might consider this period to be shorter compared to other product groups; however, compared to other AV-IT consumer electronic products subject to ecodesign requirements, the shelf life of each console generation is considerably longer (5-6 years on average). This means that on the whole, Signatories must provide spare parts for 5-6 years plus the already committed two years (therefore making spare parts available for 7-8 years). Additionally, console manufacturers provide out-of-warranty services for much longer. **Signatories take note of the stakeholder comments. The length of time spare parts are made available will be re-evaluated during the next review cycle starting in 2022.**
- 4) There is no requirement for the manufacturer to ensure repair services are actually available for consumers, only that they provide parts and information to those providing this service: Josh Aslan (Sony) explained that both in-warranty and out-of-warranty console repair services are made available to consumers, not just provision of spare parts and information to repairers. The UK VA already requires that a "refurbishment or out-of-

warranty repair service for each game console shall be made available...” (Section 3.2.1 Resource Efficiency Requirements to Promote Repair and Recyclability). This commitment goes beyond any ecodesign requirements for any other product categories. He showed some screenshots of the repair services available on the Signatories’ websites (see slide 12 of the Signatories’ presentation).

- 5) Whilst there are requirements for the console to be recyclable, there is no specific requirement (beyond WEEE) for the manufacturer to facilitate this (e.g. offering trade in/exchange when new consoles are released): Ted Eckert (Microsoft) noted that the Signatories’ products are in scope of the WEEE Directive. The take-back of individual products from consumers has high environmental impacts in terms of transport, however Signatories are looking into this. As noted by Josh Aslan (Sony), manufacturers have out-of-warranty repair and refurbishment services within the UK VA and, in addition, consoles have a fairly long life-cycle compared to other products.
- 6) Encourage or require manufacturers to work with the game industry to ensure new games are available on previous version consoles for a set period of time after the release of a new console version: Emil Schweiger (Nintendo) explained that this is not in scope of the UK VA due to technical limitations. Most consoles tend to be conceptually different from generation to generation, and console generations tend to be improved in performance as well, so what might work for the new consoles will probably not work on the older models. On backwards compatibility and the request that games that were released on previous consoles should be playable on new consoles, he noted that this is something that has been offered now and then in different versions of the consoles. Additionally, he mentioned that some games that have been released on previous generations and that now are playable on new generations actually allow consumers to save energy because of the much more efficient structure of the newer consoles, as has been noted in several of the newer games from the various Signatories.
- 7) Request for clarity on energy allowance while console or controllers are charging (requirement to ‘cut off’ once fully charged) and on the definition of handheld devices: Emil Schweiger (Nintendo) clarified that each console that Signatories put on the market has energy efficient controller charging methods. However, each console is configured differently, making it difficult for the industry to agree on a harmonized requirement. On the topic of the console unit battery charging, the low power consumption itself is the main feature of the Nintendo Switch, which allows it to function as a hybrid device, enabling the consumer to use it as a battery-powered, hand-held device. He noted that, generally charging the battery of a main unit or an accessory is a process which is designed to shut off after the battery is full. Therefore, adding any kind of “charging cut-off” requirement within the VA would limit options to implement an existing feature that is currently considered industry best practice.
- 8) Recommend a review into the comparative energy consumption in media streaming mode of games consoles vs smart TVs and other streaming devices to understand if there needs to be a specific energy consumption requirement for this mode: Josh Aslan (Sony) explained that manufacturers already report power consumption of media modes to consumers as a UK VA requirement. In general, consoles are efficient devices when

compared to like devices such as PCs (in particular gaming PCs), as such they tend to use much less power for media streaming (when compared to those like devices for example). But when compared to dedicated streaming devices, games consoles will generally have slightly higher power consumption, but that is because games consoles have hardware specifications required to meet the processing performance needed for gameplay. In general, if you do compare games consoles to like devices such as PCs or gaming PCs, consoles are generally more efficient for media streaming and gameplay. Power consumption in media mode has been substantially reduced through the lifetime of the VA and for some consoles that's up to 50% reduction in power consumption for media streaming. This has been made possible by the use of many different efficient technologies, such as using dedicated media streaming chips on the main processor. This means that games consoles effectively scale their power consumption to meet the different processing demands of different methods. Nevertheless, **for the upcoming VA review in 2022 Signatories will look at the technical feasibility of making further reductions/ improvements in power caps for media modes.**

Update on proposed appointment of Administrator and Independent Inspector

Ted Eckert (Microsoft) mentioned that Signatories confirm the selection of [Cambre Associates](https://www.cambre-associates.com)² as Administrator for the UK VA. Signatories also confirm that contractual negotiations have started with [Intertek](https://www.intertek.com)³ for their appointment as Independent Inspector of the UK VA.

Questions/comments from stakeholders

Stew Horne (Energy Saving Trust) thanked Signatories for their update and asked to what extent the Signatories' reporting covers the controllers that come as a default with consoles themselves (if they are covered or out of scope).

Emil Schweiger (Nintendo) replied that at this stage the scope of the VA includes only the main unit itself. In the case of the Nintendo Switch console this would be the actual Switch main unit without the Joy-Con controller, and the same applies for the PlayStation and Xbox consoles.

Stew Horne (Energy Saving Trust) added that since controllers that come as a package with the console are the default item that will be used with the console, it would be useful to have some clarification on where the lines are drawn.

Kieren Mayers (Sony) replied that consoles are bundled with all sorts of combinations of accessories and the controllers also vary between consoles (i.e. set-up, power, configuration, etc.). It is important to look at each specific provision and what is the scope of application, for example when looking at the power that the console consumes, it is in relation to how it is supposed to be set-up and configured in the instruction manual, but a lot of these devices that come with the console are different categories and different classes of products, so it is really case by case as to how far the requirements can be extended and also as a parallel to the way that other products are also handled and defined. The definition came from the European

² <https://www.cambre-associates.com>

³ <https://www.intertek.com>

Commission to start with, and is constantly reviewed as to what is appropriate, what is applicable and what is uniform. In terms of the energy efficiency requirements, aspects of the controllers (i.e. using the controllers during play) is included. Alluding to the material efficiency requirements, it depends on what it is and how it is included, but generally for the hard material efficiency requirements they are not included in the scope.

Emil Schweiger (Nintendo) added that within different generations, especially for Nintendo products, manufacturers offer different types of controllers (either bundled or sold separately) and the consumers also have the option to buy third party products, so it is hard to regulate the whole field of controllers within the VA itself at this stage.

Kieren Mayers (Sony) added that drawing the parallel to computer accessories is a good example, and when looking at the scope of Lot 3 and how that applies, that is going to be the direction for the future, but it is just the standard approach of what you can define as a product and therefore what can be standardised.

Stew Horne (Energy Saving Trust) said he understood the arguments made by Signatories, but added that consoles bought at a store come bundled with the controllers which are the manufacturers' defaults, so why shouldn't those be equally important in terms of a drive/vision for manufacturers to be able to make those energy and materially efficient products.

Kieren Mayers (Sony) replied controllers are de facto in scope of what manufacturers need to test under the energy efficiency provisions and there is no specific exclusion for controllers written in the SRI. It is more to do with how you define the product and how you set it up and test it per case. Signatories have different types of controllers, but that does not mean they are not doing things that are showing leadership for those types of controllers (i.e. use of recycled plastics), but controllers are sold as separate products and there are many hundreds of suppliers of accessories (both for computers and PCs) that are not regulated, so an expansion of the VA scope to cover all those other categories of products is rather complex (i.e. having blanket requirements for accessories across different product categories).

Emil Schweiger (Nintendo) added that by definition itself controllers are usually battery-powered, so looking at controllers from the energy efficiency aspect, they are initially intended to be low-power consuming and to last long (because consumers will use them for an extended period of time), so manufacturers strive to make sure both resource and energy efficiency aspects are already considered at the design phase of the controllers.

Kieren Mayers (Sony) said that as we see the emergence of horizontal material efficiency requirements for products, there will be horizontal requirements coming forward in the next 3-4 years that will cover all categories of products, so it will make things easier in terms of harmonised requirements. This is something Signatories will keep in mind when looking at what sort of measures are applicable to these sorts of products.

Ted Eckert (Microsoft) mentioned there is continuing innovation going on for controllers, for example earlier this year Microsoft introduced the first Xbox controllers that use post-consumer

recycled materials. Manufacturers are continually working on this area and material efficiency is moving forward, even if controllers are not in scope.

Stew Horne (Energy Saving Trust) thanked Signatories for the clarifications and said there was clearly a lot of good work going on. On the issue of review of comparative energy consumption in media streaming mode, he asked whether Signatories could benchmark against other industries (rather than looking at the absolute targets per se) and recommended benchmarking against other types of media devices and not only PCs (i.e. mobile phones or tablets), in order to have two parameters by which to monitor progress made on consoles (additional transparency).

Kieren Mayers (Sony) explained the reason for comparing consoles to PCs is that they have similar functionalities which allow for comparison, whereas mobile phones and tablets do not have similar specs to consoles, and a high performance gaming is not possible on those devices. He added that Signatories do communicate on their media power consumption (on their websites) and the comparisons to PCs look at the level of power that is required by these devices in different functions.

Ted Eckert (Microsoft) added that power consumption for media has been reduced continually since the introduction of each generation of consoles and it is an area where there is continuous improvement: the PS5 consumes less power in media playback than the PS4 did, and the Xbox Series S has considerably lower power in media playback than any previous generation of Xbox. As noted, there is a baseline for Signatories, but information is always made available to the user.

4. Update from the UK Government

Hannah Wall (BEIS) gave the following updates:

- The [Energy-Related Products Policy Framework](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1034456/energy-related-products-policy-framework.pdf)⁴ (the equivalent of the Commission's Working Plan) was published on 4 November 2021 and sets out policy proposals for the next few years. The Framework explains how the Government plans to look at policy levers and various incentives to improve the efficiency of products. Some of the elements covered are: filling evidence gaps, barriers and enablers for the purchase of more efficient products, financial incentives, minimum energy performance standards, horizontal proposals and circular economy principles, resource efficiency, working with Market Surveillance Authorities to improve how energy labels are displayed, etc. **The Framework includes a small section on Voluntary Agreements (Chapter 4.4 and 6.5) which sets out how the UK Government hopes to use more VAs moving forward.**
- The UK Government also published in November 2021 a [UK Energy-Related Products Policy Study](https://etl.beis.gov.uk/erp-policy-study)⁵ which identified products which might be suitable for VAs in the future. The

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1034456/energy-related-products-policy-framework.pdf

⁵ <https://etl.beis.gov.uk/erp-policy-study>

study will be used towards looking at expanding the scope of VAs and using the same current principles (added value, participation, etc.)

Recognition of UK SRI v 1.0

Hannah Wall (BEIS) thanked Signatories for their hard work and confirmed the UK Government's recognition of the agreement, with the understanding of the final VA amendments re. legislative edits (shared on 22 November 2021) being incorporated after the 2nd UK SC meeting. The Signatories agreed to confirm their review of the edits by 8 December 2021 and BEIS will then send an email to the VA Administrator to officially confirm the recognition of the VA, so Signatories can move forward with the Signature of Annex D of the VA (Membership Form).

BEIS looks forward to working together on the VA review period in 2022 and looking at further ambition going forward.

5. Timeline

Ted Eckert (Microsoft) gave an overview of the 2021-2022 timeline for the UK and EU VAs which run in parallel:

- December 2021: Final SC minutes to be provided 30 days after the meeting.
- January 2022: Start of review cycle for the next version of the UK and EU VAs.
- 28 February 2022: Signatories submit Product Compliance Reports (PCR) to the Independent Inspector.
- 31 March 2022: Independent Inspector issues non-compliance notifications (if any).
- 15 April 2022: Draft Annual Compliance Report (ACR) sent to Signatories for review.
- 1 May 2022: Deadline to provide comments on the draft ACR.
- 22 May 2022: Final ACR shared with the Steering Committee.
- 31 May 2022: ACR posted on the Efficient Gaming website.
- June 2022 (tbc): next Steering Committee meeting.

Questions/comments from stakeholders

Hannah Wall (BEIS) asked about the review cycle and if there was a specific period to provide comments on specific areas of the VA (i.e. ambition).

Ted Eckert (Microsoft) explained the normal review process is a two-year cycle where stakeholder comments are accepted at each Steering Committee meeting throughout that cycle. There will typically be 2-3 iterations of stakeholder comments and industry responses before a final draft of the next version of the VA is available.

Kieren Mayers (Sony) added that Signatories would consider the UK's Product Policy Framework when looking at the ambition and expectations around the VA. He mentioned that Signatories always revisit stakeholder comments made in previous meetings and have historically adopted half to two-thirds of those recommendations in the past.

Emil Schweiger (Nintendo) mentioned the two-year review cycle operates on the idea that after a version of the VA is approved, Signatories take additional stakeholder comments and try to build them into the next version of the VA. Based on the timeline, by June 2022 Signatories hope to have an early indication on what they will be changing/updating in the VA and will then take the further stakeholder feedback into consideration.

Josh Aslan (Sony) added that Signatories produce a draft Review Report which explains the proposed VA changes and provides information such as the feasibility study for different requirement options, as well as a summary of industry commitments and achievements (i.e. energy savings, material efficiency requirements, etc.). Stakeholders give feedback on that report and the comments are then addressed by the Signatories to produce a final version of the Report, which is usually discussed at the last Steering Committee meeting.

6. AOB and date of next Steering Committee meeting

There was no AOB put forward. Ferial (Cambre Associates, VA Administrator) said the 3rd UK SC meeting will be held around June 2022 and the exact date will be confirmed in due course.

7. End of meeting

Ted Eckert (Microsoft) thanked all participants for their comments and closed the meeting at 17h30.

Actions

- VA Administrator to prepare and share the minutes of the current meeting.
- Signatories to provide comments re. legislative edits to VA by 8 December.
- BEIS to send email to confirm official recognition of the VA (after 8 December).
- Hannah Wall to confirm who the Membership Form (Annex D) should be addressed/sent to.
- Signatories to suggest next Steering Committee date.
- Signatories to discuss internally the points raised by stakeholders for the next review cycle:
 - Re-evaluate the length of time to provide spare parts.
 - Look at the technical feasibility of making further reductions/ improvements in power caps for media modes.