

Submission on energy labelling requirements for computers

Submitted to the European Commission

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National Adult Literacy Agency

Áisíneacht Náisiúnta Litearthachta do Aosaigh

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Introduction

We are the National Adult Literacy Agency (NALA), a registered charity with 1,700 members.

We believe literacy is a human right.

We are committed to making sure people with unmet literacy, numeracy and digital literacy needs can fully take part in society, and have access to quality learning opportunities that meet their needs.

NALA welcomes the opportunity to contribute to the development of the European Commission's energy labelling requirements for computers.

Literacy, numeracy and digital literacy

Literacy, numeracy and digital literacy skills involve listening, speaking, reading, writing, using numbers and everyday technology to communicate, to build relationships, to understand information and to make informed choices – for example, choosing what computer product to buy.

Literacy, numeracy and digital skills enable people to reach their full potential, to be active and critical participants in society and to help address poverty and social exclusion. These life skills allow us to participate in, and make sense of, the world. Climate and environment is a key domain (see figure to the right).



In this submission, the word “literacy” may refer to all these skills (for ease of reading).

Literacy skills can vary depending on context. For example, identifying the most energy-efficient computer product involves technical and environmental terminology, as well as numeracy.

Literacy is not about individual intelligence. Unmet literacy needs arise because of educational and wider structural inequalities.

Literacy needs in Europe

Statistics for adults aged 25 to 64 in Europe (CEDEFOP, 2020) show that:

- Just over 1 in 4 (25.5%) have low basic digital skills
- Just over 1 in 5 (20.2%) have low numeracy levels
- Almost 1 in 5 (18%) have low literacy skills.

Energy labels must be clear enough for everyone to understand. Plain language and clear design are essential.

Plain language commitments by the European Union

The European Commission has demonstrated its commitment to plain language by running the Clear Writing for Europe campaign.

Plain language is also a part of existing European regulations, for example, the General Data Protection Regulation (EU 2016) and the Regulation on Clinical Trials (EU 2014).

The European Accessibility Directive (EU 2019) will also require businesses to communicate in inclusive and plain language in practice.

Comments on energy labelling requirements for computers

We would like to make the following comments on the proposed energy labelling requirements for computers.

- The requirements should explicitly refer to literacy, numeracy and digital literacy needs in Europe and should require producers to label their products in a way that can be understood by adults with all levels of literacy, numeracy and digital literacy skills.
- The specific labelling requirements should be co-designed and user-tested with a diverse range of consumers, including people with literacy, numeracy and digital literacy needs. Visuals will be an important part of energy labelling but visuals can be interpreted subjectively, so user-testing is essential.
- There should be guidance for producers and consumers about the new requirements, and all the guidance should be written in plain language. The following documents should inform this guidance:
 - The International Organisation for Standardisation has established **Governing principles and guidelines** for developing plain language documents (ISO, 2023).
 - The **Communications Toolkit for Services to the Public** produced by Ireland's Department of Public Expenditure and Reform, and National Disability Authority (2023), is a good practical guide to plain language and other aspects of universal design in communications.
 - Do not rely on readability checkers; they are not reliable enough and focus has moved to real usability (Schriver, 2017). There is no substitute for user-testing.

Conclusion

We strongly recommend that the European Commission takes literacy, numeracy and digital literacy needs into account when developing energy labelling requirements for computers. This is a good opportunity to include all EU residents in climate action.

In practical terms, we suggest using plain language guides, co-design and user-testing. We are confident that our suggestions will be taken on board as the Commission has already shown its commitment to plain language communication.

Contact

We are happy to discuss our comments and recommendations further.

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References

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About NALA

The National Adult Literacy Agency (NALA) is a charity and membership based organisation. We support adults with literacy, numeracy and digital literacy needs to access learning opportunities that meet their needs and to take part fully in society. NALA does this by raising awareness of the importance of literacy, doing research and sharing good practice. We also provide support through our online learning courses, tutoring service and by lobbying for further investment to improve adult literacy, numeracy and digital literacy skills.

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