



HPE PROLIANT, APOLLO, SYNERGY, AND CLOUDLINE SERVERS AND EUROPEAN UNION ERP LOT 9 REGULATION

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PREFACE

The European Union (EU) Commission Regulation 2019/424, also known as the EU ErP Lot 9 regulation (Lot 9) for servers and data storage products will take effect on March 1, 2020. This regulation specifies new system-level requirements that must be met for these products to be placed on the European Union¹ market after this date.

HPE has developed this document to provide customers and channel partners with key understandings to procure or recommend HPE ProLiant, Apollo, and Synergy Gen10 and Gen10 Plus as well as certain HPE Cloudline Gen10 server configurations that meet ErP Lot 9 requirements. HPE ProLiant Apollo, and Synergy Gen10 and Gen10 Plus as well as certain HPE Cloudline Gen10 servers supporting four or fewer processor sockets (4P or less) are in scope.

INTRODUCTION

Products that are manufactured and imported into a European Union (EU) country or trade region need to meet certain standards that guarantee consumer safety, environmental, and other criteria. This typically means that a certain product must undergo testing to certify that it meets or exceeds the standards before it can be placed into the EU market.

Lot 9 sets certain energy and other environmental standards for in-scope products that are placed on the EU market. Lot 9 establishes a new set of product standards for servers and data storage products. For servers Lot 9 establishes a list of requirements for power usage and efficiency that must be met. If products do not meet Lot 9 requirement, products are considered non-compliant after March 1, 2020. Compliance with Lot 9 is a necessary part of ensuring conformity with all relevant EU-wide requirements prior to affixing the CE mark, which is a product marking that indicates conformity and is required for applicable products to be placed on the market in the EU.

Lot 9 is one of many vertical product regulations under the ErP (Energy related Products) umbrella framework of the EU. Lot 9 covers servers and online data storage products. More specifically, it covers servers with up to four processors sockets, and excludes some specific server types, such as server appliances,² small-scale servers,³ fully fault-tolerant servers.⁴ For storage products, it covers online storage category 2 to 5, and excludes small and large data storage products.⁵

EU ERP LOT 9 (COMMISSION REGULATION [EU] 2019/424): AN OVERVIEW

Lot 9 is associated with the EU circular economy initiative and will have an impact on energy and disclosure requirements for servers and storage products. The intent of the Lot 9 initiative is to reduce the environmental footprint of server and storage products by reducing energy usage and allowing server and storage systems to be more effectively reused and recycled. Energy requirements include power supply efficiency, idle power limits, and active power efficiency. The product requirements introduced by Lot 9 will apply to all in-scope products from March 1, 2020.

EU countries include Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, and United Kingdom.⁶ The non-EU countries from the European Economic Area are Norway, Lichtenstein, and Iceland.

A summary of the significant requirements is listed below.

Requirement	Impact	Deadline
Power supply efficiency	In-scope servers and online storage	March 1, 2020 for initial requirements/January 1, 2023 for increased requirements
Idle power limit	1 and 2 socket in-scope servers	March 1, 2020
Operating performance	1 and 2 socket in-scope servers	March 1, 2020
Power disclosure	In-scope servers and online storage	March 1, 2020
Firmware and security	In-scope servers and online storage	March 1, 2021
Material efficiency	In-scope servers and online storage	March 1, 2020
Secure data deletion	In-scope servers and online storage	March 1, 2020

¹ All references in this white paper to the “EU market” or “Community market” include also the European Economic Area (EEA), European Free Trade Association (EFTA) States: Iceland, Liechtenstein, and Norway.

² As defined in Article 2.1(4) of Lot 9.

³ Classified as small-scale servers in terms of Regulation (EU) No 617/2013.

⁴ Large servers and network servers (as defined in Article 2.1[6] and [9] of Lot 9 respectively) as well as servers > 4P sockets are also excluded.

⁵ Small data storage product < 4 HDD/SSD; large data storage product > 400 HDD/SSD and with the following required attributes: no single point of failure, non-disruptive serviceability, and integrated storage controller.

⁶ United Kingdom: EU rules, including Lot 9, will continue to apply until December 31, 2020.

Note: The link to the overall document for all Lot 9 Articles is: eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0424&from=EN



This document focuses on HPE ProLiant, Apollo and Synergy Gen10 and Gen10 Plus as well as HPE Cloudline Gen10 servers capable of 4P or less.

The following sections outline the regulatory requirements.

Power supply efficiency

To meet the March 1, 2020 efficiency requirement, all multi-output supplies must be “Gold” rated or better. All single output supplies must be rated “Platinum” or better. From January 1, 2023, all supplies will require Platinum for multi-output, and Titanium ratings for single output supplies. Most HPE server products already meet the 2020 power supply requirement. Power supply efficiency requirements affect all in-scope products, whether energy limits apply or not.

Active power efficiency and Idle power requirements

All server energy tests require the industry standard Server Efficiency Rating Tool (SERT) test.

Once a system has been measured for active state efficiency, a configuration-dependent calculation must be performed to determine the permissible idle power. Additional idle allowances are given for high-performing processors, input/output (I/O) devices, memory, drives, etc. The power requirements will be measured on high- and low-end configurations in each product family. Based on testing that has been performed on HPE ProLiant, Apollo and Synergy Gen10 and Gen10 Plus as well as HPE Cloudline Gen10 servers to date, one processor (1P) systems with low-end Intel® Xeon® Bronze processors and configurations bearing 8 GB memory DIMMs are at the greatest risk of not meeting the power requirements.

Firmware and security update requirements

The requirements related to firmware and security updates only apply from March 1, 2021. More specifically, from March 1, 2021 the date the first product of a certain model is placed on the market (start date), as well as the date the last product of a certain model is placed on the market (end date), are critical dates pertaining to these requirements of Lot 9.

From March 1, 2021, the latest available version of the firmware shall be made available from two years after the start date for at least eight years after the end date, free of charge or at a fair, transparent, and non-discriminatory cost. The latest available security update to the firmware shall be made available from the start date until at least eight years after the end date, free of charge.

Material efficiency requirements

The weight range of critical minerals present in servers and data storage products must be declared. The materials are currently limited to Cobalt and Neodymium, which are typically found in batteries and rare earth magnets in hard disk drives, respectively. All HPE’s EU ErP Lot 9 declarations will be referencing a single source for material efficiency requirements data.

Secure data deletion requirements

Functionality for secure data deletion shall be made available for the deletion of data contained in all data storage devices of the product. As of this publication, HPE has validated that the current SSD and HDD offerings meet NIST SP 800-88, a standard that meets this requirement.

HPE server configuration and component offering

In order to comply with the requirements set forth under Lot 9, HPE is providing server platform configuration and component guidance. If a server or component is non-compliant on March 1, 2020 HPE will remove it from the HPE product offering. As of this publication certain server processors, server memory, and power supplies will no longer be compatible and thus removed from the HPE product offering.

While Lot 9 is applicable only for the EU/EEA member states, HPE is anticipating that other governments and customers outside the EU will establish Lot 9 or similar requirements. Further, cross-country border commerce is a reality and HPE will be implementing compliance across the HPE Europe, Middle East, and Asia region.

HPE lists server products in scope of Lot 9 on [hpe.com](https://www.hpe.com), accompanied with the compliance information required by Lot 9. This information can be found [here](#).

Certain HPE Cloudline Gen10 platforms are not currently evaluated for EU ErP Lot 9 compliance at the time of publication, and therefore are not on offer in covered regions. This includes:

- HPE Cloudline CL3100 Gen10
- HPE Cloudline CL4100 Gen10
- HPE Cloudline CL4150 Gen10
- HPE Cloudline CL5800 Gen10



HPE continues to evaluate all HPE ProLiant, Apollo and Synergy Gen10 and Gen10 Plus as well as certain HPE Cloudline Gen10 servers for compliance. HPE will have EU ErP Lot 9 declarations in place for March 1, 2020 implementation. HPE is fully prepared to offer configuration guidance to HPE customers to support EU ErP Lot 9 compliance.

SUMMARY

The European Union (EU) Commission Regulation 2019/424 (also known as EU ErP Lot 9) is a new product regulation that deals with servers and data storage products, going into effect on March 1, 2020. In-scope products that are not compliant with Lot 9 requirements cannot be manufactured and imported into the European Union from March 1, 2020.

HPE has performed countless server configuration tests toward Lot 9 regulations and will continue to do so. So far, we have found the vast majority of the HPE ProLiant, Apollo, Synergy, and Cloudline Gen10/Gen10 Plus server configurations to be compliant and we are prepared to offer configuration guidance to our customers once Lot 9 is in force.

This document provides key insights into the delivery of HPE ProLiant, Apollo and Synergy and Cloudline Gen10 and Gen10 Plus servers that are in a good position to meet requirements under Lot 9 starting March 1, 2020.

For additional information, please visit: hpe.com/us/en/about/environment/msds-specs-more.html

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a50000858ENW, February 2020