



Position of ECOS, EEB, Friends of the Earth Europe, WWF EPO, CAN Europe and INFORSE Europe on the review of the Ecodesign regulation on external power supplies

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In the context of pushing forward draft measures already at an advanced stage and dedicating resources on the reviews with the most significant energy savings potential, the Commission has proposed, among other options, going ahead with a light revision process on external power supplies (EPS). Undoubtedly, this is a product group with less energy savings potential compared to other lots that will be revised in the near future; however there are opportunities in this review, which should be fully grasped, particularly regarding resource efficiency and waste avoidance.

Timely and thorough preparation needed

Environmental NGOs welcome the timely review of EPS but would like to note that more time should be given in the future for the elaboration of similar background studies, allowing for more comprehensive analysis and further detailed description concerning the potential impacts of the proposed actions (such as the calculation of the least life cycle cost).

To this effect, **we call for the launch of a preparatory study to tackle as a priority the compatibility of chargers, including an in depth assessment of the embedded energy related to this aspect, as well as the potential requirements for Active Efficiency at a 10% load.** This study should be made available at the very latest by the next review, 3 years after entry into force of the revised EPS regulation.

Ecodesign requirements on energy performance

The EPS review study suggested the introduction of a Tier 3 for ecodesign requirements concerning the energy performance of EPS. **We strongly support the introduction of a Tier 3**, since it would send a long term signal to the market and be

in line with the approach taken by the Commission for other product groups currently in the pipeline.

Concerning the 10% load active efficiency requirement, proposed to be tackled at the next review due to lack of data, we understand that a measurement method is available so testing at this level is actually feasible, as clarified in the consultation forum meeting; aware that an extensive data gathering would be needed to actually establish energy efficiency requirements for this, **at least an information requirement on the 10% loading active efficiency should be established for Tier 1**. This will provide the basis for setting ecodesign requirements at the review stage.

Similarly, regarding the proposed extension of the scope to include low voltage wireless chargers at the next review, setting information requirements at Tier 1 would facilitate further this work and provide the needed basis for the establishment of legally binding measures.

Other environmental aspects: an opportunity not to be missed

The working document suggests that the compatibility of chargers will be further explored at the review in 3 years' time. It is clear that **standardising and reducing the quantity of EPS and chargers in use would have a positive impact on material efficiency, reducing EPS electronic waste potentially by up to 500 000 tons¹**, as well as extending lifetime, enhancing reliability and decreasing weight by up to 30%; these findings are also in line with the initial Commission's Impact Assessment. Moreover, this would potentially have **a significant impact on embedded energy, corresponding to a non negligible fraction of the energy that can be saved during the use stage**. Additionally, this should contribute to cost savings for consumers, reducing the need to buy a new EPS each time a small ICT device is acquired.

Environmental NGOs find disappointing that this issue has not been tackled in the ongoing review, and call for swift action (in addition to the launch of a preparatory study set out in the introduction of this document). Specifically, we call for:

a) the timely development of harmonised standards (ENs) and ecodesign requirements on the compatibility of chargers for a broad range of ICT devices (e.g. data-enabled mobile telephones, tablets, laptops, e-book readers etc.), within the limits of safety and technical constraints. This work could build on the existing standard EN/IEC 62684: interoperability of common external power supply with data-enabled mobile telephones and be extended to ICT devices. Consequently, **Annex A of M495 should be swiftly updated, in order to accelerate the development of such a standard within the foreseen 2 years' timeframe, to be ready before the review date by 2017**.

¹ITU & GESI, (2012), An energy-aware survey on ICT device power supplies

With regard to setting legal requirements on the compatibility of charges, we understand that – at the time of drafting the EPS regulation- the Commission’s legal service raised an objection on the basis that such a requirement would apply -not only to the EPS- but also to the products connected to this. The opinion should be revisited and communicated to stakeholders, and the compatibility of chargers should not be further postponed, particularly as USB (or USB 2) ports seem a common feature for more and more small handheld ICT devices. Sufficient time should be allowed to identify and put into force constructive alternatives tackling this point raised by the legal service. Environmental NGOs would welcome any opportunity to provide further input on this topic.

One potential way to address the above objection, could be during the review of the standby regulation (1275/2008) due by 2014, by standardising the receptacle of a broad range of ICT products, to which the EPS connect to, within technical and safety constraints. Should harmonisation of the interface between EPS and some ICT products not be possible, **these ICT products should be made compatible with an adapter that would be provided together with the product, allowing connectivity to universal EPS.** Solutions adjusting to various charge levels, would further support interoperability of EPS between such products and should consequently be further explored.

On the basis of the aforementioned preparatory and standardisation work, clear requirements on the compatibility of chargers should be set at the latest by the next review, with an entry into force swiftly after that (e.g. 4 years after entry into force of the revised regulation). In particular, a specific article should be introduced in the review clause, similar to that on wine storage appliances in 643/2009 along the following lines:

- **The Commission shall mandate European standardisation bodies to prepare harmonised standards on the compatibility of chargers for ICT products 2 months after entry into force of this regulation.**
- **The Commission shall assess the need to introduce specific ecodesign requirements for the compatibility of chargers 3 years after the entry into force of this Regulation.**

b) the separate placement on the market of multi device EPS from the actual products they connect to. Promoting this would reduce overall costs for the consumer, who would have the option of buying products with or without the EPS as well as lead to innovation and differentiation in different ‘EPS’. Furthermore, this would potentially lead to an extended life cycle of EPS that would no longer be discarded with each individual appliance. The eventual additional packaging that could be generated from this separate selling would represent an environmental impact far from offsetting the potential material savings linked to universal and efficient EPS, noticeably if the associated packaging is designed smartly and easy to recycle.

Finally, we also call for the introduction of information requirements concerning recycling, as well as the weight of recoverable metals, which could provide useful

information to the recycling industry and create the basis for possible legally binding requirements set at the next review.

END.

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