External Power Supplies:
Recommendations on the final Ecodesign proposal

December 2018

Ahead of the Member States' vote, we would like to support the Ecodesign regulation proposed by the European Commission. We regret the single-tier approach taken by the Commission despite the massive delays experienced by this file, as well as the low ambition, notably in terms of resource efficiency. We have a number of recommendations on how to further improve the text.

Tighten the scope

The regulation does not cover the following types of external power supplies:

- ***external power supplies placed on the market by 30 June 2025 as a service part or spare part*** *for an identical external power supply placed on the market by 1 April 2021 at the latest, under the condition that the service part or spare part, or its packaging, clearly indicates the primary load product(s) the spare part or service part is intended to be used with.*

  We fear that the current wording could create a significant loophole. A large number of EPS sold separately from a product that can be linked to a primary load product placed on the market prior to April 2021 would become exempt from the new requirements. We do not consider that EPS as a service part or spare parts should be exempted by default, as most of the time there are no fundamental incompatibility to use EPS respecting the latest Ecodesign requirements as replacement to older EPS.

  We therefore recommend the deletion of this exemption from the scope. If it is decided to retain the exemption, it is important that it is specified that strong, technical justification must be provided in the relevant documentation to demonstrate that these EPS are not able to meet the new Ecodesign requirements.

- **Wireless chargers**: we believe it is essential to consider this rapidly emerging category and potentially significant new source for energy waste. Inefficient design can have a resource efficiency impact in terms of adverse thermal effects (overheating) that can cause device malfunction or damage. Cheap inefficient wireless chargers on the EU market could reduce mobile phone lifetimes, as well as having poor lifetimes themselves.

  We therefore call on the Commission to issue a standardisation request as soon as possible to define testing approaches for these products, and to immediately add them to the scope, starting as of April 2024.

Finally, we support scope widening to multi-voltage EPS, as proposed. While sales of these are low, it is possible they could become more significant in the future. Further, adding another output of a different voltage to a standard EPS would move it into this category and, consequently, the EPS in

question would not need to comply with the regulation. It is therefore important that they are included.

Allow for a 10% load active efficiency requirement at next revision

We regret that a 10%-load active efficiency requirement is not included in the proposal and think that an information requirement is the essential minimum allowing to address this in the next revision. It is very little additional effort and cost to test at 10% and the availability of comprehensive data will allow legislators to determine the right level of ambition for the next revision.

Promote EPS interoperability and repair

We also regret that this regulation has not been better integrated into the Circular Economy strategy of the European Union. The European institutions should play an active role in promoting the interoperability of supplies and EPS/chargers. It is clear that standardising and reducing the quantity of EPS and chargers in use would have a positive impact on material efficiency. Moreover, this would have a significant impact on embedded energy, corresponding to a non-negligible fraction of the energy that can be saved during the use stage and should contribute to cost savings for consumers, reducing the need to buy a new EPS each time a small ICT device is acquired. EPS should be considered as a device per se rather than an accessory to which little attention is paid when automatically associated with the purchase of the main targeted product.

In our opinion, European decision-makers should push for interoperability of supplies and USB-C. USB-C connectors use a new protocol (USB 3.1) that allows for the sending of both power and data, and can adapt to the power levels and charge times of different devices, essentially allowing for interoperability of EPS, which could increase lifetime and eliminate the need for EPS to be supplied with products.

We therefore recommend adding the following provisions:

> *From 1 April 2020, EPS intended to operate at or below 20V/5A [with removable cables] shall use industry standard connectors that allow variable power delivery such that devices are able to negotiate for greater current and/or higher or lower voltages.*
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> *From 1 April 2020, EPS intended to operate at or below 20V/5A shall be shipped separately to the product they are intended to be used with.*

Finally, as a minimum, we believe that this regulation should include a requirement for the EPS to be **repairable with widely available tools**. One of the most frequent failures of EPS being cable failure, cables should be replaceable without the need to discard the whole EPS.

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