Position on the updated Draft Commission Regulation on External Power Supplies
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Following the update of the Commission's Working Document on External Power Supplies, we have put forward our views below.

Scope

The inclusion of "indirect" EPS is welcome and important: this distinction only makes sense in the US context given battery charger regulations in effect in California and under development by DOE. Implementing an exception in the EU would have meant creating a large loophole and loss of energy savings.

We take note of the reasons given for not including **wireless chargers** in the current scope (lack of standard test method and early stage for this technology). However it is important to consider this rapidly emerging category and potentially significant new source for energy waste, if possible in the Ecodesign Working Plan 2015-17, as it is already part of the related study to establish the next Ecodesign Working Plan 2015-17. If this is not feasible, it should be tackled at the next EPS revision in 2019, at the latest.

High power EPSs should be covered: Despite the small amount of energy savings at stake, this would be a missed opportunity. US DOE already covers these power supplies, and has performed a detailed analysis of the technical feasibility and cost of efficiency requirements. Aligning EU requirements with DOE would be simple and avoid leaving savings on the table unnecessarily. We encourage the Commission to reconsider this proposal.

Ecodesign requirements

We would first like to express **our strong support for levels and dates** proposed in the updated working document**:** US DOE for Tier 1 and CEC Tier2 for Tier 2 are fairly ambitious, as evidenced by the low pass rates (Table 3 of the technical report). We especially support Tier 2 requirements as they will provide significant additional savings at little extra costs.

We encourage the Commission services **to reconsider the 10% load active efficiency.**

- The lack of a 10%-load active efficiency requirement is a big gap in the current proposal: while the loss of savings accounts for only approximately 10% of total savings (although this estimate seems very low), we disagree with the justification provided. The report notes that there is significant test data available, and international harmonisation should not be an excuse to prevent legitimate evolution and innovation in global efficiency standards. 10% load efficiency matters for many end uses as explained in the report, and technology to achieve reasonable efficiency levels at 10% load is readily available at little or no cost.
- However, if no further action is possible at this stage, the proposed information requirement could be considered a compromise, paving the way for inclusion of an efficiency requirement at the next revision.

Future opportunity: revise the 4-point average active efficiency metric. One area to consider and start work on to prepare for future revisions is the enhancement of the 4-point average active efficiency metric. This metric was defined over a decade ago by US DOE to meet a U.S. statutory requirement of using a single metric for DOE appliance efficiency standards. It has served its purpose well for transforming the market from very inefficient EPSs to reasonably efficient ones. But this instrument is blunt and not optimal to continue to optimise energy efficiency. For example, the average of 4 load points dilutes the impact of any single load point, which can allow an EPS to comply despite relatively poor efficiency at one load point. This load point may be critical for particular end uses, resulting in relatively poor product efficiency. The 4-point metric also does not cover the 5-20% load range which is critical for some end uses. We encourage the commission to consider a different metric setting minimum efficiency requirements at each of 10%, 25%, 50%, 75% and 100%, without averaging them out into a single metric.

Material efficiency

We find disappointing that no action has been taken on material efficiency aspects, in particular on the possibility of introducing a common charger, with valuable time being lost. We reiterate our call[1] for **work to start without further delay on the compatibility of chargers** in order for the evidence base to be in place in time for the next review. New technologies such as USB 3.1 and Type-C standards should be investigated among others, which could provide replacement solutions for chargers used not only for mobiles phones, but for a plethora of other commonly used household products.

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 tons[2], 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.

Therefore, as Germany and Belgium, we call for **active EU support to the development of interoperability standards** for EPS battery charging systems in mobile equipment and EPS for household and office equipment. The aim should be: a reduction of the number of EPS in use by shared use for mobile devices, easy replacement in case of failure, and reuse when buying a new product.

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[1] Please refer to our earlier comments which can be found here.
[2] ITU & GESI, (2012), An energy-aware survey on ICT device power supplies