POSITION PAPER

ON THE DRAFT ACT FOR THE EXTERNAL POWER SUPPLY ECODESIGN REGULATION (2019/1782)

9 December 2024

Following the circulation of the draft act on 18th November 2024, in which the Commission presented the draft legislative proposal for the Ecodesign regulation on External Power Supplies (EPS), Coolproducts members, ECOS, DeutscheUmwelthilfe and the EEB would like to provide the Commission with the following comments:

Aspects strongly supported:

- Refinements to definitions related to wireless chargers and requirements on their standby mode power consumption.
- More ambitious no load power consumption, low load efficiency and active efficiency requirements, and clarifications on how these apply to different types of EPS.
- Inclusion of common charger / interoperability requirements, clarity on detachable cables and inclusion of wording to justify exemptions.
- The inclusion of the common charger logo on the nameplate, packaging and in the instruction manual plus port markings showing max output power and maximum supported power markings on cables.

Key issues to address:

- **SCOPE/DEFINITIONS:**
  - Reduce duration of exemption for EPS as spare parts
  - Include industrial EPS of applicable power / voltage in scope
  - Clarify the definition of user-selectable EPS.
- **ENFORCEMENT:**
  - Reduction of transition times to 2 years.
- **INTEROPERABILITY / COMMON CHARGER AMBITION:**
  - Tighten exemption and corresponding information and measurement requirements.
- **REVIEW CLAUSE:**
  - Include un-addressed aspects as specific requirements to be assessed again at the next review.

The following sections describe the key issues observed in the draft act. These issues need to be tackled to result in effective regulation.

SCOPE/DEFINITIONS

BATTERY CHARGERS

We note that there is no longer an intention to address battery chargers in the scope of the revision. As a result, the title of the regulation should be edited to exclude these.

Action:

Change title to:

COMMISSION REGULATION (EU) …/…of XXX laying down ecodesign requirements for external power supplies, wireless chargers, wireless charging pads, ~~battery chargers for portable batteries of general use~~ and USB Type-C cables, pursuant to Directive 2009/125/EC of the European Parliament and of the Council and repealing Commission Regulation (EC) No 2019/1782

EPS AS SPARE PARTS

The current wording in clause 28 related to EPS as spare parts is not sufficiently clear, and risks conflicting requirements being put in place due to the insufficient referencing to spare part EPS. Further, the time duration of this extension is excessive, considering that the published regulation only anticipated this provision being in place until April 2025.

Action: The clause should be reworded as follows:

> *Regulation (EU) No 2019/1782 should be repealed with effect from [date of entry into application of this Regulation – OP – Regulation (EU) No 2019/1782 should be repealed with effect from [date of entry into application of this Regulation – OP – Please insert reference], with the exception of Annexes I, II and III* ***to that Regulation that should remain in application <u>for spare part EPS</u> for <u>two</u> years after the date of application of this Regulation. This allows temporarily the placing on the market of spare part EPS which enable the powered device to continue to be used.*** *The spare part EPS should in this case comply with the ecodesign requirements applicable at the time of placing on the market of the original EPS.*

And Article 9 on Transitional provisions edited to be consistent with these changes:

> *Annexes I, II and III to Regulation (EU) 2019/1782 shall continue to apply to spare part EPS until [**<u>2</u>** years after entry into application of this Regulation – OP – Please insert reference] instead of the requirements set out in points 1, 2, 3, 4 and 6 of Annex I to this Regulation, provided that…:*

INDUSTRIAL EXEMPTION / RESTRICTION OF DEFINITION TO ONLY HOUSEHOLD AND OFFICE PRODUCTS

The previous draft of the regulation consulted upon inclusion in scope of EPS for industrial equipment of applicable power / voltage. This revision includes many edits to ensure that very specialist industrial EPS are not covered by the requirements, yet at the same time reinstates the definition in the published regulation of an EPS that it "is used with household and office products", resulting in EPS used in industrial products falling out of scope. Due to the power/voltage ranges of EPS within scope and other stipulations e.g. on interoperability, there is no issue for specialist industrial EPS and they should remain in scope to optimise savings.

Action: Remove the line from the definition "it is used with household and office products".

USER-SELECTABLE EPS DEFINITION

A user-selectable EPS is defined as 'a single voltage EPS that allows users to select more than one output voltage'. Such a contradictory definition is counterintuitive and insufficiently differentiated from adaptive EPS so runs the risk of opening a large loophole and reducing the effectiveness of the regulation.

The definition appears to be trying to capture the US DOE concept of a "switch-selectable EPS" that allows users to manually select among multiple output voltages, typically through a physical switch or dial.

Action:

Reword the definition of user-selectable EPS : '**a single output EPS that allows users to manually select from multiple predetermined output voltages using a physical interface, such as a switch or dial**."

ENFORCEMENT

REDUCE TIME FOR ENTRY INTO FORCE TO 2 YEARS

The current draft specifies in Article 10 that the requirements will apply from **three years** after entry into force of the regulation. This is an excessive amount of time to allow for transition that will result in missed savings, especially considering that the previous draft specified requirements applying after **two years**, and advancements in energy efficiency of EPS including e.g. gallium semiconductors, improved transformers, etc that make the proposed levels easily reachable.

Action:

Amend requirements for application into force of the requirements to two years.

INTEROPERABILITY

USB INTEROPERABILITY EXEMPTIONS

The exemption on interoperable EPS has been notably widened, significantly reducing the reflection of the ambitions of the common charger initiative. Some exemptions are unnecessary (100W instead of 240W exemption, exemption for cordless phone base stations) and the requirements for proof to support the application of the exemption are insufficient.

Further, we support the more robust definition of the peak-power demand exemption (peak power of more than 130% of nameplate output power for more than 15ms), whilst noting that verifying compliance with the 15ms duration and 130% threshold will require technical testing.

Action:

To ensure application of the exemptions only where technically necessary, 1. tighten the wording of the exemption and 2. expand on the requirements for information justification of the application of the exemption, 3. amend measurement requirements related to the exemptions as necessary:

1. In Annex I.3.c, change text to:

*"An AC-DC EPS is not required to be an interoperable EPS if it **has specific operational constraints, such as unique voltage or current requirements, or form factor limitations that are incompatible with standardized USB interfaces and** satisfies at least one of the following conditions:"*

And correct the exemptions in relation to the following issues:

Issue	Action
Exemption expanded from nameplate output power greater than **240 W in previous draft to greater than 100 W.** Substantially reduces common charger initiative ambitions, exempting	Reinstate at 240W level.

many laptop EPS. Unnecessary as non home/office products are now not in scope and USB Type-C and USB Power Delivery (USB PD) standards currently support up to 240 W.	
The exemption for EPS intended to be used only with **base stations for cordless phones** with an analogue line connection is not necessary. Whilst cordless phone systems with analogue connections (DECT phone systems.) might use legacy power interfaces that are incompatible with USB standards, new systems can easily be designed to be compliant with USB-PD standards, and the stipulations on spare part EPS would cover legacy designs.	Remove exemption.

2. In Annex II.6.d, change text to:

"for EPS exempt from the interoperability requirements pursuant to points 3(c)(v) to

(1) reference to the relevant point of point 3(c);

(2) supporting documentation, also concerning the intended powered product, ***explaining why a non-compliant power connector is required and*** *demonstrating that the conditions for the exemption are met;*

3. In Annex II, Measurements and calculations:

Include a clause in relation to the measurement of the 15ms duration and 130% threshold for the peak power exemption.

DURABILITY REQUIREMENTS

LOAD CYCLING AND COMPONENT-LEVEL REQUIREMENTS

The only durability requirements are now very basic requirements on surge resistance. Previously proposed requirements have now been removed that addressed expected lifetime (10 years continual operation at maximum output power) and minimum Mean Time Between Failures (MTBF) of 300 000 hours.

We understand that these requirements may have been challenging to implement, but consider that rather than deleting them altogether and failing to address durability, some alternatives could be adopted to address stress testing, load cycling and component-level requirements.

Action:

Include requirements to address stress testing, load cycling and/or component level durability as listed in the table below:

Durability aspect	**Measure**
Stress testing / load cycling	e.g. The EPS must withstand a minimum of X0,000 load cycles [at specified loading levels], or an equivalent accelerated test simulating X years of operation, including temperature cycling, humidity, and vibration, in line with the following standards: IEC 60068-2-1: Cold testing. IEC 60068-2-2: Dry heat testing. IEC 60068-2-14: Temperature cycling. without degradation in performance as follows: • Output Voltage Stability : Deviation within ±X% of nominal. • Ripple and Noise: must not increase by more than X%.

	• Efficiency: Efficiency must not decrease by more than X%. • Thermal Stability: Operating temperature must not increase by more than X°C.
Component-Level Requirements	e.g. Capacitors and power transistors must meet endurance requirements for at least X,000 operating hours at XX°C, as per IEC 60384-14 for capacitors and IEC 60747 for transistors.

REVIEW CLAUSE

NEED TO ADDRESS WIRELESS CHARGING AND EPS UNBUNDLING

We note that some of our previous requests to improve the draft act have not been taken on board and we consider it, therefore, essential that these are listed as topics to address at the next review.

Action:

Include a list of topics to address at the next review in Article 7:

The review shall assess in particular: options to tighten efficiency requirements, options for including within the scope battery chargers, and wireless charger efficiency and interoperability, default EPS unbundling, wireless charger charging orientation, and a reassessment of the appropriateness of separate low voltage EPS efficiency requirements.

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