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APPLiA view on the draft ecodesign regulation for external power supplies

1. Horizontal 10% Loading Efficiency (information) requirement

APPLiA does not support a horizontal 10% efficiency information requirement for external power supplies (EPS). While for some products there might be an use case for 10% load operation, for the majority of the EPS there is no use case at 10% or at best only during a limited timeframe. In the review study the relevance of 10% load for certain ICT equipment was raised, however the study also acknowledges the lack of relevance for EPS accompanying battery operated devices[1].

Typically, EPS for battery charged devices will shut off at 15%-20% load levels, never reaching the 10% load in practice. According to USA DoE data[2] over 80% of the EPS marketed are used for battery charged devices.

Although the draft regulation proposes only an information requirement with the purpose to allow for a more detailed analyses in the next review; the collection of information for EPS used in battery charged applications is redundant because setting efficiency requirements at 10% load, for these appliances would not be justified. Even setting an information requirement would already require (re)testing of EPS and add additional costs and administrative burden.

Instead of a horizontal requirement impacting all EPS, APPLiA proposes to either set a threshold at the EPS output power level exempting those EPS that are typically used for battery charged devices, or direct the 10% load (information) more specifically to the relevant product groups. The latter might be done via a product specific vertical regulation.

2. Spare parts

APPLiA supports provisions that exempts certain EPS made available by a manufacturer as a service or spare part. Nevertheless, this exemption applies only to "external power supplies placed on the market no later than 30 June 2025 as a service part or spare part for an identical external power supply which was placed on the market not later than one year after this Regulation has come into force".

We believe that the 'repair as produced' principle shall be respected without limitation. To avoid creating wastes and make product last longer, the date proposed is not sufficient. Spare parts should be totally exempted from this regulation or at least we invite the Commission to align with some other regulations that refer to 2029 (draft ecodesign motor regulations).

[1] EU Commission review study on regulation EC No 278/2009 external power supplies 2012
"Mobile EPS are unlikely to benefit from 10% efficiency improvements as they either charge the battery at full load or are unplugged or in no load condition"

[2] USA Department of Energy; >80% of the EPS sold are used for battery operated products. Data from 2009. With the introduction of smart phones and tablets after 2009 it is very likely that the percentage is even higher nowadays:

3. Multiple output EPS

In the current draft proposal, the Comm includes multiple output EPS. Because of this change in scope, it is important to ensure that provisions are consistent and adapt for this product category. Some other stakeholders have already stated it and we would like to echo such request.

4. Standardisation request

We would also like that the Commission issues urgently standardisation request, since this is required to create a harmonised standard and only compliance with harmonised standards will offer manufacturers a presumption of conformity to the provisions of the regulation.

5. Timing

We would also ask the Commission to allow a period of 18 months between publication of the regulation and the and deadline for the application of the requirements. It would allow manufacturers to have sufficient time to implement necessary changes.