



Raising standards for consumers



The Consumer Voice in Europe

Consumer interests in the review of the Ecodesign measures for External Power Supplies (Lot 7)

Review of EC Regulation 278/2009

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Summary

ANEC/BEUC considered the existing regulation (278/2009) on external power supplies an ambitious measure at the time when it was developed and put in place. Particularly Tier 2 requirements which are effective since 2011 resulted in removing a great proportion of the inefficient and bulky linear-power supplies from the market. We believe that the success of the initial measure should not generate complacency but be developed further as a review should lead to a common charger for portable devices as well as the optimization of some functional aspects. We are of the opinion that an encompassing review process with an extension of the scope is preferable to some marginal improvements which will not achieve large scale benefits for consumers.

More specifically, in this paper we focus on the following key consumer interests:

- ✓ Benefits of a common charger;
- ✓ Lowering the no load power value;
- ✓ Measurement of 10% load.

Consumer relevant issues:

The current Ecodesign regulation on External Power Supplies (278/2009) and particularly Tier 2 requirements, which are in force since 2011, resulted to a great proportion of the inefficient and bulky linear-power supplies being pushed out of the market. ANEC/BEUC believe that the success of regulation (278/2009) should not generate complacency but rather be used as a basis to exploit the opportunity that this scheduled review provides towards the promotion of a common charger for portable devices as well as the optimization of some functional aspects. We are of the opinion that the European Commission services should conduct a review that goes beyond the sole aspect of electricity consumption and look closer into the benefits that universal chargers can provide for consumers as well as for the environment.

With regard to the ongoing review ANEC/BEUC strongly support the inclusion of the following points:

A. The potential of a common charger needs to be fully assessed

Standardisation of interfaces and power supplies has been a priority for consumer organizations for many years. The excess of chargers which derives from the incompatibility of chargers with different models of appliances – both within brands and among brands - represents unnecessary costs to the consumer in their purchase, and to the environment in the extraction of the raw materials for their construction and in their disposal. The *Memorandum of Understanding regarding Harmonisation of a Charging Capability for Mobile Phones (2009)* between manufacturers and the European Commission for the development of universal power-supplies, by focusing only on mobile phones, was a weak step forward. In 2008, ANEC asked for a mandate to achieve a standardised universal power supply and provided the European Commission with an outline of the technical requirements for the mandate, as well as proposals on the quality aspects. All this activity, led to the publication of the Standard EN 62684:2010 – *Interoperability specifications of common external power supply (EPS) for use with data-enabled mobile telephones*, which is specifically tailored to smartphones. Although the standard is an important step towards universal power supplies, ordinary mobile phones are not covered by the standard and a number of smartphones are not yet equipped with a universal interface. A more demanding standard would have been possible and could have covered requirements for a common external supply for other devices if the manufacturers had the ambition or been compelled by the Commission to put the technical solutions in place. Today, after the expiry of the industry MoU, it is unclear whether it was successful, not only in terms of adherence by its signatories but the actual compliance of their chargers with EN 62684.¹ It has to be taken into account that according to the study *Estimating potential additional energy savings from upcoming revisions to existing regulations under the ecodesign and energy labelling directives*² carried out by CLASP, “The EPS market is projected to grow in the coming years, adopting new power architectures, smaller form factors, more efficient designs and improved power management technology. The applications that will contribute to this growth include communications, computers, consumer electronics, and many other products. The consumer market is offering new applications that were not considered in the 2007 preparatory study, such as tablet computers, smart phones, and gaming devices, that require higher wattage EPS than simple

¹ [ANEC Position Paper on the European Commission Proposal for a Directive on the making available on the market of radio equipment \(RED\)](#)

² <http://www.clasponline.org/~media/Files/SLDocuments/2013/Estimating%20Potential%20Additional%20Energy%20Savings.pdf>

mobile phones. The communications segment is projected to maintain the largest unit market and will be dominated by the mobile phone industry, which uses inexpensive, commoditised low-wattage power supplies".

We regret to see that the preparatory study on the review of External Power Supplies fails to provide an analysis of the impact and benefits of the aforementioned initiatives addressing, instead the issue in a single paragraph.

ANEC/BEUC call for a full preparatory study during this review which will evaluate the impact of these initiatives on the diffusion of the common charger and provide a thorough analysis of the benefits that mandatory requirements for a common charger for portable devices such as mobile phones, tablets, e-books etc. Only a thorough technical analysis of the improvement options provides the basis for a sound policy measure.

B. The no-load power value should be lowered

According to the preparatory study, a no load power consumption of modern charger is now often below 100mW (0.1 W) and sometimes as low as 10 – 30mW. This must be taken into account as often a charger remains plugged although the device is not charging any more resulting to electricity use which delivers no actual service to the user. Also, modern chargers in particular those for smartphones and tablets often are designed with a cable plugged into the main body of the charger (see picture):



Source: www.amazon.it

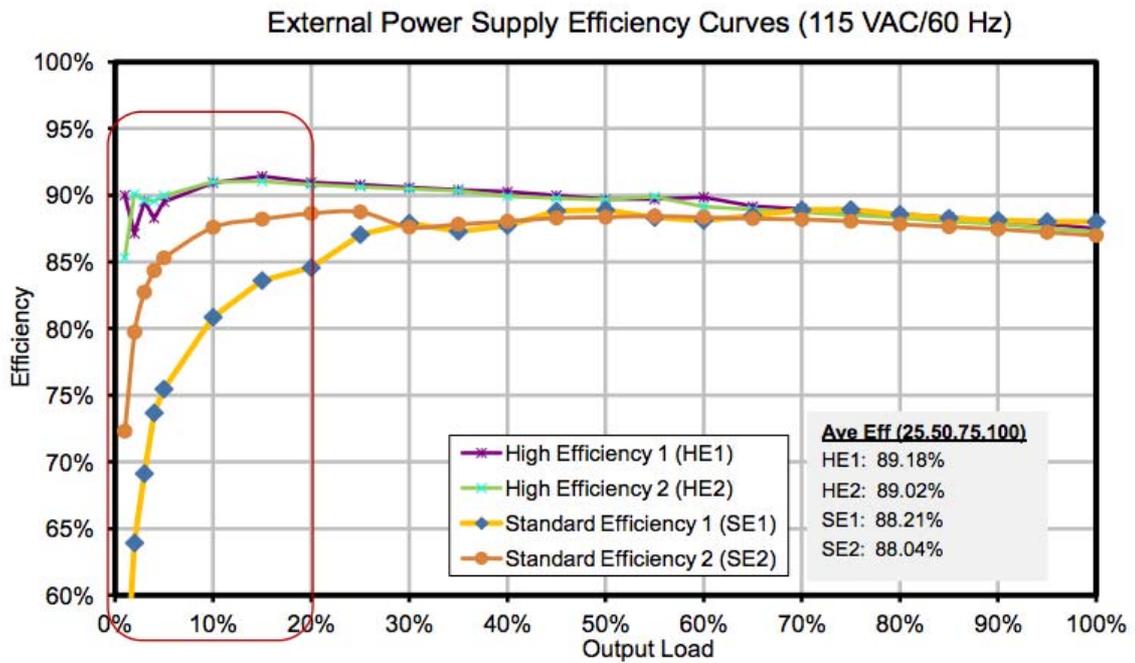
With these chargers, consumers are tempted to leave the charger connected to the electricity grid at all the time, simply because it is convenient and there is no cable that looks “messy”. Thus, lowering the no-load power level could further offset this negative effect linked to current consumer behavior.

ANEC/BEUC recommend lowering the current value from 0.3 W to 0.1 W.

C. Measurement of 10% load

The preparatory study suggests changing the measurement procedure in a way that takes a 10% load condition into account. Besides, the updated Code of Conduct on Energy Efficiency of External Power Supplies suggests in its Annex that efficiency at 10% should be reported. Power supplies are typically very inefficient in the low power range (see graphic below). Using a measurement point at 10% would make the benchmarks more stringent. ANEC/BEUC consider this is a very important aspect given that many future products i.e. computers, tablets etc. will be left in standby most of the time where the power supply is always in this low power range.

ANEC/BEUC consider crucial to introduce an efficiency measurement requirement at 10% load.



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END.

³ NRDC presentation under ENERGY STAR computer v6.0 specification discussions
http://energystar.gov/products/specs/sites/products/files/V6_D2_NRDC-Stakeholder_Presentation.pdf