

APPLiA's position on External Power Supplies before the Regulatory Committee meeting

APPLiA's observations of the Main Act

Article 1: Subject matter and scope

APPLiA was surprised to see that the former Article 1(2)(f) of the Main text on the exclusion of battery packs from the scope has been deleted from the draft EPS regulation. In our opinion, the paragraph provided the needed clarity to the scope of the ecodesign regulation on EPS as well as consistency with the provisions of the Battery Regulation.

(f) battery chargers for battery packs, as defined in Article 3(1), point (2), of Regulation (EU) 2023/1542;

APPLiA believes the specification on the exclusion of battery packs from the EPS Regulation is necessary in order to ensure that devices, which are not subject to general use such as chargers for battery-operated vacuum cleaners fall outside the scope of the regulation. Without this paragraph, the exclusion of such highly specialised battery chargers is not clear. Since our understanding is that the regulation aims at "universal" battery chargers for portable batteries of general use, we believe the reference to Article 3(10) of Regulation 2023/1542 is a necessary addition to the draft text.

Although Article 1(1) mentions 'battery chargers of general use' and the definition of an EPS in Article 2(2) specifies that an EPS is not a battery charger, we still recommend that Article 1(2)(f) is reinstated in the draft text so that confusion about the scope of the regulation is avoided.

APPLiA's observations of the Annexes

Annex 1, points 2(a) and (b): Power output performance requirements

To clarify the criteria, the phrase "*at any of the applicable load conditions*" needs to be modified to "**under the load conditions specified in Table 5**".

Annex 1, point 5(b)(1): information requirements

Based on the photo of an adapter on sale in the EU below, the space to display the 'Common Charger' logo on the nameplate/enclosure is insufficient. Therefore, APPLiA would request that products with limited display space would be excluded from the requirement to display the 'Common Charger' logo. In addition, the minimum height of the logo should be unified as 5mm and thus changed from 7mm to 5mm.



Annex 1, point 5(d): information requirements

As the ratio of the logo also determines the size of the font, APPLiA would like to request information on the ratio that does not require a font size of 2.56 mm or more.

Annex 1, point 5(e): information requirements

Instead of the output power, the information requirement should be for output current. According to the USB PD standard, input is required as current value and based on this, the alignment is necessary. In addition, we believe that the information could be sufficiently verified, even if it is marked only on one side of the plug's overmold. The double marking is unnecessary and it would be burdensome for manufacturers, with very little or no extra benefit to the consumer. Therefore, marking should be required only on one plug.

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