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ECOS Feedback to Inception Impact Assessment for Common Chargers for mobile telephones and other compatible devices

Following the expiration of the MoU of 2014 and the continuation of market fragmentation for mobile phone chargers, ECOS calls for the adoption of binding regulatory measures.

ECOS believes that such voluntary agreements (VAs) have proven to be ineffective in fostering market change and a single competitive market. Examples include VAs within the Ecodesign Directive for products such as printers and game consoles, characterised by limited scope, low ambition and lack of effective monitoring and reporting.

Similarly, in the case of mobile phone chargers, a fragmented market translates into significant detrimental market effects, including an increase of e-waste and use of plastic, consumer frustration, and competition barriers in charger manufacturing.

The introduction of the USB 3.1 standard and USB Type C connectors facilitates standardisation by enabling quality adaptive charging. Adaptive EPS are able to provide different output voltages using the same output port, so one power supply can serve a wide range of products requiring charging at a range of different standardised voltages (there is communication between the device and the charger to determine the voltage required).

Therefore, binding regulatory provisions should be set, obliging producers to implement common charging solutions. We propose the specification of requirements on common EPS be formulated as follows:

- Regulatory requirement via an amendment to the Radio Equipment Directive or the Ecodesign Regulation on External Power Supplies containing the following:
 - Application of requirements to the following products (with mobile, wifi or bluetooth connections) and rated power 100W or less: smartphones, tablets and e-readers, GPS/PND, Personal care products (toothbrushes etc), small network equipment, set-top boxes, small notebook computers, portable speakers, digital cameras/camcorders, portable games consoles, radio controlled toys, sports/activity monitors

Implementation could begin with smartphones, with clearly defined timings for other products. Many of these devices already use a USB 2.0 Micro B connector. Clear definitions will be necessary to ensure no loopholes are created for non-compliant products.

- Separation of cable and charger plug, and specification of connector standards:
 - The cable/connector to the product shall be separable from the plug charger to the mains and:
 - **the connection between the cable/connector and mains plug charger** will be either standard USB Type A/B or, USB Type C and compliant with the USB 3.1 standard, where the charger plug will be clearly marked to show which USB 3.1 voltage profiles it is able to supply (ensuring reuse with other appliances).
 - **the connection between the cable/connector and the product** shall be either USB Type C or USB 2.0 Micro B.
 - Alternatively, the product can be equipped with wireless charging functionality, where the compatible wireless charger is shipped separately from the product, can be used for multiple products, and meets minimum requirements for energy efficiency and no load power in line with the requirements for AC-DC power supplies of Regulation 278/2009.
 - EPS plug chargers and cables shall be shipped and sold separately from the product they are intended to be used with.
- Quality and durability standards should also be specified within the regulation to prevent premature cable wear-out (e.g. durability of interfaces between cable and end connectors is a common point of failure) and ensure safety and durability of charger plugs. The casing of the plug charger shall comprise one single type of recyclable plastic.
- *Transitional methods should be defined for the marking of plug chargers with USB-3.1 profiles, based off an EC preparatory study or similar.*
- *A Standardisation Request addressed to the European Standardisation Bodies should be launched to adequately adapt existing or develop European Standards that would support the regulatory requirements in aspects such as marking and durability.*

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