

Texte zu EU-Regelungen zur umweltgerechten Produktgestaltung und zur Energieverbrauchskennzeichnung in der Beleuchtung – Zusammenstellung ^[1] des Umweltbundesamtes (UBA), Deutschland



Entwurf der EU-Kommission vom Januar 2023
Stellungnahme von ANEC/BEUC ^[2]
vom März 2023

Hinweis: Bitte beachten Sie, daß der angehängte Text nur in Englisch verfaßt ist.

EN: Information on EU Lighting Regulations – Ecodesign and Energy Labelling – Compilation ^[1] of the Federal Environment Agency (UBA), Germany

The EU Commission's draft of January 2023
Comments by ANEC/BEUC ^[2] as of March 2023

FR: Informations sur réglementations de l'UE concernant l'éclairage – l'écoconception et l'étiquetage énergétique – Compilation ^[1] de l'Agence Fédérale de l'Environnement (UBA), Allemagne

Le projet de la Commission Européenne du janvier 2023
Commentaires de ANEC/BEUC ^[2] du mars 2023

Indication : Veuillez noter que le présent texte n'est disponible qu'en anglais.

^[1] <https://bscw.bund.de/pub/bscw.cgi/193290000/index.html>

^[2] ANEC = Association de normalisation européenne pour les consommateurs ; <http://www.anec.eu/>
 BEUC = Bureau Européen des Unions de Consommateurs; <http://www.beuc.eu/>

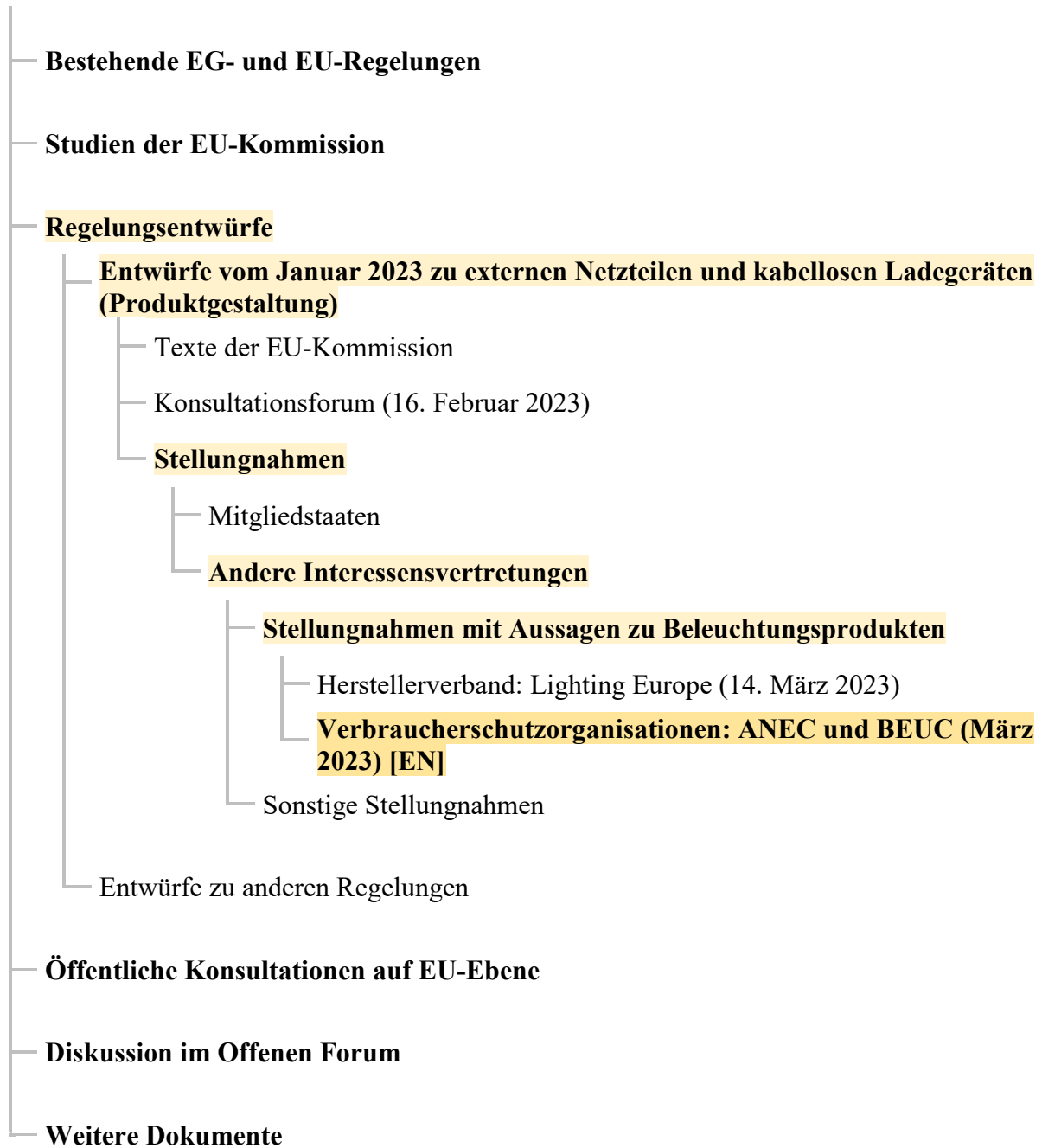
DE: ↓

EN: → page III

FR : → page IV

Texte im Offenen Forum

(**abc** = vorliegender Text)



Abkürzungen: ● EG = Europäische Gemeinschaft ● EU = Europäische Union

Documents in the Open Forum

(**abc** = text at hand)

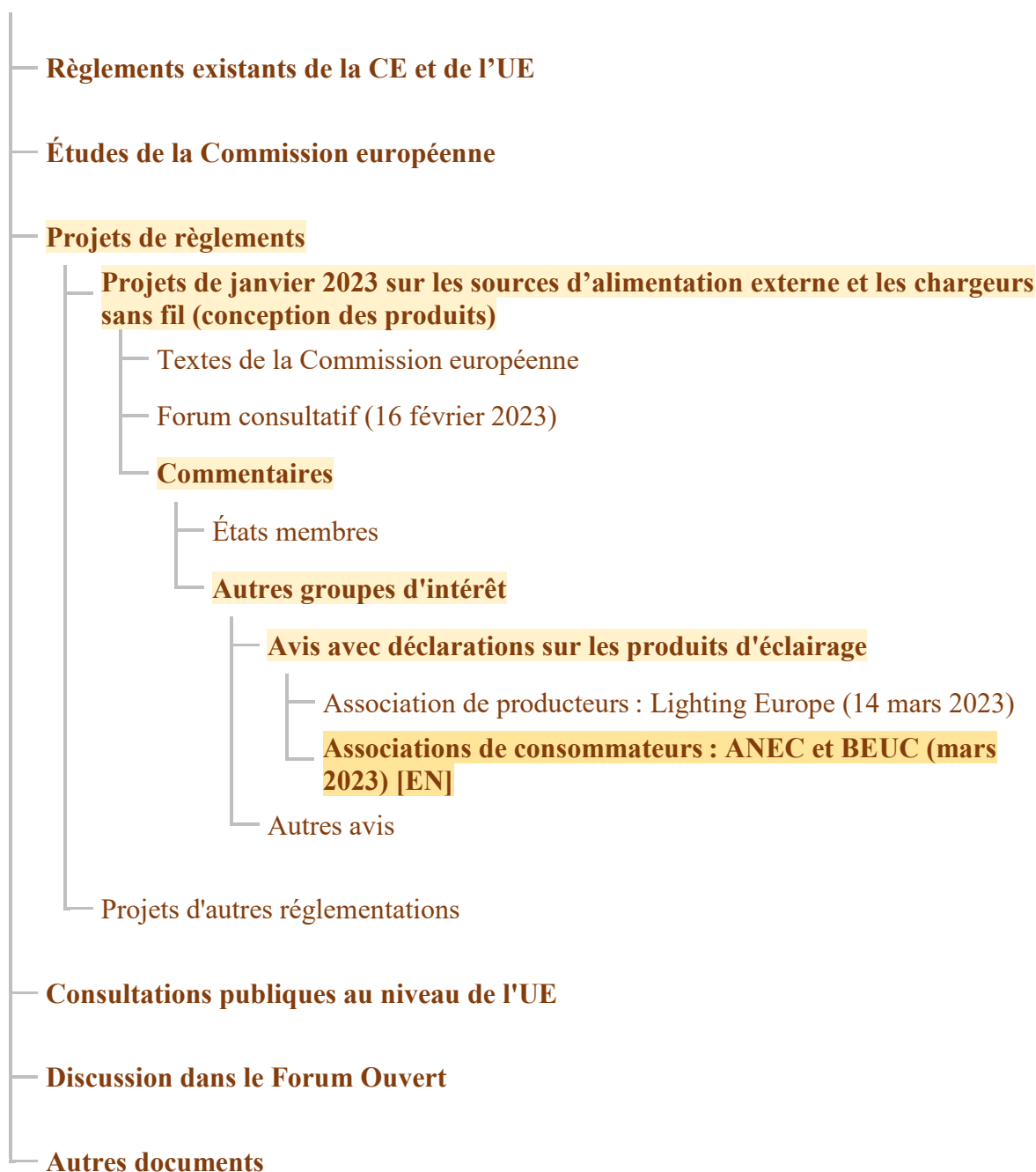


Abbreviations: ● EC = European Communities ● EU = European Union

FR

Documents dans le forum ouvert

(**abc** = présent document)



Abréviations : ● CE = Communauté européenne ● UE = Union européenne

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.



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ANEC-BEUC comments following the Ecodesign the online Consultation Forum 16 February 2023 on External Power Supplies

1. Background

The objective of the Consultation Forum on 16 February 2023 was a general introduction of the Commission's proposals for Ecodesign and Energy labelling requirements of EPS to give orientation to stakeholders. The proposals were based on a parallel Evaluation and Impact Assessment done by the study team. These ANEC/BEUC comments refer to the two presentations (Evaluation / Impact Assessment) and the accompanying Explanatory Memorandum for the Ecodesign Consultation Forum. For the documents on the draft legal requirements (main act, annex), the Commission admitted during the Consultation Forum some copy paste failures in the documents and it was not clear enough which sections are the right ones, thus the comments referring to these documents might not be correct in light of these failures. EC envisaged another Consultation Forum for later this year where revised documents will be presented.

2. Feedback to the presentation

2.1 Product scope / definitions

The current product scope of the EPS Regulation, Annex I¹ includes the following equipment:

1. Household appliances: Appliances for cooking and other processing of food, preparing beverages, opening or sealing containers or packages, cleaning, and maintenance of clothes; Appliances for hair cutting, hair drying, hair treatment, tooth brushing, shaving, massage and other body care appliances; Electric knives; Scales;

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R1782&from=EN>

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Rue d'Arlon 80, B-1040 Brussels • +32 (0)2 743 24 70 • www.twitter.com/anectweet • anec@anec.eu •
EC register for interest representatives: identification number 507800799-30

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Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • www.twitter.com/beuc • consumers@beuc.eu • www.beuc.eu
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Clocks, watches and equipment for the purpose of measuring, indicating or registering time.

2. Information technology equipment, including copying and printing equipment, and set-top boxes, intended primarily for use in the domestic environment.

3. Consumer equipment: Radio sets, Video cameras, Video recorders, Hi-fi recorders, Audio amplifiers, Home theatre systems, Televisions, Musical instruments, Other equipment for the purpose of recording or reproducing sound or images, including signals or other technologies for the distribution of sound and image other than by telecommunications.

4. Electrical and electronic toys, leisure and sports equipment: Electric trains or car racing sets, Game consoles, including hand-held game consoles, Sports equipment with electric or electronic components; Other toys, leisure and sports equipment.

According to the Explanatory Memorandum, section 3.1., point 1.), the scope of the current EPS regulation (EU) 2019/1782 shall be extended as follows:

- Additional equipment added:
 - Vacuum cleaners; Power-over-Ethernet injectors; Drones; Power tools and gardening tools; Electric bicycles with a maximum continuous rated power of 250 Watts; Table-top LED lighting equipment and lighting equipment with rechargeable batteries for use in household environments; Battery charging equipment (Battery Chargers; Charging Stations; Docking Stations for autonomous appliances; Wireless charging pads; Battery powered charging devices ('powerbanks')).
 - Wireless chargers up to 60 W included
 - Lighting converters
- Specification of the current 2. category "ICT", listing following equipment as being in scope:

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- Base stations for cordless phones; Routers and other home network equipment; Smartwatches, fitness trackers and other wearable devices with rechargeable batteries; Smart home assistants with voice recognition; Webcams and security cameras; Weather stations; Air quality monitors and sensors; Mass storage devices, multiple card readers, active USB hubs; Copying and printing equipment; Monitors; Set-top boxes; Power over Ethernet injectors; Computers; Docking stations; Other information technology equipment.
- Products referred to in Annex Ia of Directive (EU) 2022/... of the European Parliament and of the Council amending Directive 2014/53/EU on the harmonisation of the laws of the Member states relating to the making available on the market of radio equipment; this includes²
 - handheld mobile phones; tablets; digital cameras; headphones; headsets; handheld videogame consoles; portable speakers; e-readers; keyboards; mice; portable navigation systems; earbuds; laptops.

Feedback:

In general, we appreciate the extension and specification of the scope of the EPS Regulation. We welcome that the scope explicitly includes also EPS for applications/devices already covered by the scope of the RED-Directive 2022, as this in principle allows setting further Ecodesign requirements not included in the requirements of the RED-Directive.

We see the following points and ask the EC for further clarification:

The overall categorisation of Annex I as “**household and office equipment**” and reference to this term in Article 2 “definitions” might not match anymore with the scope extension to further devices probably not falling into household equipment or office equipment (power tools, bikes, lighting equipment etc.);

² <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022L2380&from=EN>

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Recommendation 1: we ask the EC to clearly define if the **term “household and office equipment”** is rather related to the kind of appliances (household appliances, ICT and consumer electronics etc.), or if the term is meant to specify the usage environment (delimitation of household use from commercial and professional use); otherwise, we recommend to change it into “equipment” (which seems to be the case in the Draft legal Annex document).

The comprehensive list of exemplary equipment falling into the scope of the Regulation helps to get an overview. However, we see following difficulties with this list: The list gives the impression of completeness which could lead to devices that do not match the listing 1:1 possibly not being considered in scope.

As seen with the current proposed scope extension, such a list cannot be exhaustive as new devices might come on the market not yet included in one of the categories or equipment listed in Annex 1.

Recommendation 2: We propose that each of the **categories** should include a bullet point “others” (currently only included in the categories “4.) Electrical and electronic toys, leisure and sports equipment” and the ICT-specifications according to the equipment covered by the RED Directive (“Other information technology equipment”) to make clear that the list is not exhaustive. This proposal is not included in the Explanatory Memorandum, but in the Draft legal Annex; the latter way is supported.

The devices listed are described in more general terms. Feedback of stakeholders at the Ecodesign Consultation Forum meeting suggested that this might cause uncertainties if products will fall under the scope or not; this can lead to nuisances especially if the devices interface with other (Ecodesign) regulations (e.g., “table-top LED lighting equipment and lighting equipment with rechargeable batteries for use in household environments”).

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Recommendation 3: For equipment already covered by other (Ecodesign) regulation, we suggest that the **terms** should be as concise as possible and linked to existing definitions to avoid uncertainties or loopholes of equipment being in scope or not. Otherwise it should become clear that these terms are just for general illustration.

Recommendation 3b: In the draft legal act, **lighting converters** were deleted from the scope; in Annex 1, however, they were not included; this seems to be a typo and they should be added.

Alignment to existing legislation is also necessary for the proposed definition of a “containing product”, see Explanatory Memorandum, section 3.1., point 2. Further, “containing products” are not yet listed as such in the extended scope – the proposed scope extension currently just lists the table-top lighting equipment (which in the definitions is one example of a containing product).

Recommendation 4: Specify if “**containing products**” shall be included in the scope (i.e., also further equipment like the wall-sockets with USB receptables), or only specific examples like the table-top LED lighting equipment; be aware of other definitions of “containing products”, e.g., as given in COMMISSION REGULATION (EU) 2019/2020 on lighting sources³

For some of the devices listed, stakeholders at the Ecodesign Consultation Forum meeting were concerned that the application of EPS might not be feasible, e.g., outdoor appliances also operated in wet conditions like lawn mowers; or electric bicycles, where an USB-C type EPS might be too small.

³ ‘containing product’ means a product containing one or more light sources, or separate control gears, or both. Examples of containing products are luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s). If a containing product cannot be taken apart for verification of the light source and separate control gear, the entire containing product is to be considered a light source; see <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R2020&from=EN>

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Recommendation 5: We ask the Commission to clarify the general circumstances or obstacles under **which equipment may be included in or excluded** from the scope (size of the appliance \Leftrightarrow USB-C interface, wet/dry conditions) and ideally include these conditions into the overall definition of an 'external power supply' so that it will become applicable independent of the specific equipment.

The devices listed are described in more general terms. Feedback of stakeholders at the Ecodesign Consultation Forum meeting suggested that this might cause uncertainties if products will fall under the scope or not; this can lead to nuisances especially if the devices interface with other (Ecodesign) regulations (e.g., "table-top LED lighting equipment and lighting equipment with rechargeable batteries for use in household environments").

Scope extension currently just lists the table-top lighting equipment (which in the definitions is one example of a containing product).

Wireless chargers "up to 60 W" shall be included in the scope. According to the Explanatory Memorandum, section 1.2, "the Qi standard currently covers power transmission up to 15 W, but work is in progress to extend the standard to the 30 – 60 W range, with tablets and laptops as explicit target application." On the other hand, the Preparatory Study for the Ecodesign and Energy Labelling Working Plan 2022-2024, Task 3, chapter 20, Table 251⁴, for example, shows for notebook computers a power range of 30 to 65 W.

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https://drive.google.com/file/d/1xw96WDdOJEmE7-YL4vHOLxj_Ag6xTL/view

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Recommendation 6: To avoid a situation that manufacturers will use a loophole and design EPS with 61 W just to be out of scope, we recommend that there should be no strict limitation of the power of wireless chargers, or to align the limitation to the output power of the appliances for which the EPS should be included in the scope. This recommendation also concerns the proposed definition (see Explanatory Memorandum, section 3.1., point 2) of a “wireless charging pad”, point (d) “it has a nameplate output power not exceeding 60 watts”. Otherwise, a review of the technological progress of wireless charging should be included in the Review Clause of the Regulation.

2.2 Ecodesign requirements for energy efficiency

2.2.1 Energy efficiency of wireless charging pads

In the Explanatory Memorandum, section 3.1 point 1, footnote 43 it says: “Given the aforementioned fact, that the energy efficiency of the entire wireless charging process is a system aspect beyond the scope of the regulation, being determined by the interplay of the charging pad, its power supply, and the device to be charged, the only requirement, which applies to wireless chargers is the design requirement to have the wireless charging pad powered by an external power supply and not to contain the 230 V AC circuitry.” At the same time, the document states in section 1.2 under “wireless charging”: “the energy efficiency of wireless charging is typically lower than that of wired charging”. The presentation “Impact Assessment”, slides 22-24, show that the market of wireless charging is expecting a huge increase in market size, energy efficiency differences and increased energy consumption and environmental impacts.

Feedback: In general, we appreciate the new requirement to have the wireless charging pads powered by an external power supply as this will reduce the overall environmental impacts which would have increased otherwise with the current situation of proprietary and non-interoperable different standards of wireless chargers.

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Recommendation 7: Against the above background, however, we see the urgent need to address the energy efficiency of wireless charging as this might be an overall loophole if the market will tremendously shift in more and more product categories towards wireless charging whose efficiency is not regulated at all. The Impact Assessment study should assess these impacts of “no EU action” on the overall increase of energy consumption. At least a minimum energy efficiency should be guaranteed. Further, consumers should be informed that the energy efficiency of wireless charging is lower than wired charging, if available for the equipment.

2.2.2 Energy efficiency of no load

The Evaluation Presentation, slides 14 and 16, show the current status of no-load power consumption according to information published by manufacturers. The graphs show that there is a large bandwidth below the current Ecodesign threshold, and on slide 14 it says that “Most EPS above 50 W show to be able to use quite less than the 210 mW limit. There is opportunity for stricter limits, like the DoE recently proposed 75mW @ <50 W and 150 mW from 50 W onwards.” However, in the proposal of the draft legal Annex, the energy efficiency requirements for no-load condition power consumption remain unchanged.

Recommendation 8: We are in favour of stricter limit values for no-load condition as proposed by US DOE. We assume that a revised EPS Regulation would be in place and unchanged for a longer period. Especially if also the future EPS will be kept in use for a longer period, such efficiency opportunities should be exploited as far as possible to avoid lock-in effects on EPS with lower efficiencies at no load.

2.2.3 Average active efficiency / efficiency at low load

Evaluation Presentation, slide 15, shows the current status of Average Active Efficiency (low voltage) according to information published by manufacturers. The graph shows that there is a large bandwidth above the current efficiency threshold”. Also, slide 53 of Impact Assessment document says that there is “potential for stricter average efficiency requirements and potential benefit from alignment of minimum requirements, as US DoE considers to raise minimum thresholds”. However, in the proposal of the draft legal Annex, the Average Active Efficiency requirements remain unchanged.

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Recommendation 9: We are in favour of higher Average Active Efficiency values. We assume that a revised EPS Regulation would be in place and unchanged for a longer period. Especially if also the future EPS will be kept in use for a longer period, such efficiency opportunities should be exploited as far as possible to avoid lock-in effects on EPS with lower efficiencies.

The same graph on slide 15 also shows the efficiency at low load (10% load). The Explanatory Memorandum, section 1.2, "Energy use external power supplies" says that "as a tendency, the efficiency at 10% load is in average 10%-points lower than the active average efficiency." It is proposed to set the limit values 10% lower than for the Average Active Efficiency.

Recommendation 10: We are in favour of **stricter values than -10% for the efficiency at low load**. The graphic in slide 15 of the Evaluation document suggests that all EPS would be within this limit value, i.e. there would be no efficiency gains at all; a slightly stricter efficiency, for example -5%, would cut off the least efficient EPS at low load; also Slide 51 of the Impact Assessment document says that "10%-points lower than average active efficiency would be a very moderate option with room for a more ambitious threshold". This could be especially important as the Explanatory Memorandum says "In a scenario with better compatibility of EPS across a broad range of products this 10% load efficiency will become much more important than today." This scenario is supported by slide 24 of the Evaluation document which states that many end-devices require often just a fraction of their maximum ratings, ICT equipment are operating at a very low percentage of their capabilities and Universal EPS may often power equipment below its maximum rating. Therefore, losses at these low loads are especially relevant and should be minimised as much as possible. Further, we assume that a revised EPS Regulation would be in place and unchanged for a longer period. Especially if also the future EPS will be kept in use for a longer period, such efficiency opportunities should be exploited as far as possible to avoid lock-in effects on EPS with lower efficiencies.

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3. Design requirements

According to the draft legal Annex II, point 2 “design requirements”, b), as standard interfaces still a USB Type-A receptacle shall be possible.

Recommendation 11: Neither from the Evaluation and Impact Assessment documents, nor from the Explanatory Memorandum it becomes clear why USB Type-A shall be still possible. To facilitate highest interoperability and reduce the need for consumers to still have different EPS we recommend focusing on USB Type-C only.

4. Information requirements

Background: Today, each device is equipped with an EPS and ideally the consumer knows which device may be powered with which EPS. If in future the EPS shall be interoperable to many devices but using the right EPS for the right equipment depends on the maximum power / voltage, then this information is highly relevant to the consumer to avoid in case of wrong use damage of the appliances / to the consumer.

- Slide 42 of the Impact Assessment document:
- **Recommendation 12:**
 - **Maximum power and maximum voltage** should be highlighted and clearly visible to the consumer as these values, if disregarded, may cause safety risks to the equipment and to the user. Negative example: On current Apple's EPS for smartphones, these values are provided in light grey letters on a white EPS in extremely small letters, i.e. not visible for consumers without a magnifying lens... Slide 43 of the Impact Assessment document proposes a pictogram to be used for marking on the EPS and the photo on the right side shows how this could appear on an EPS; again, the pictogram is rather small on the bottom of the EPS (which is usually placed into the socket). We recommend putting it on the upper side of the EPS and in a recognisable size for consumers.
 - On the other hand, the **efficiency rate in %**, proposed to be included new on the nameplate for consumer information, might be consumer relevant at the point of sale

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(and should be given there) when consumers decide purchasing a more efficient EPS (however, all EPS on the market have to fulfil the highest energy efficiency rating level, and most consumers will not know this value at all or understand the difference if some EPS have rather few percentage points higher efficiency). After purchase, the information is not relevant any more to be given on the EPS itself.

- Additional information that should be given to the consumer:

- At the Consultation Forum, there was a discussion about potential safety risks if EPS are used in wet / humid conditions like bathrooms or kitchens. An example was presented of a toothbrush that included a water-tap symbol to show if this device is operating safe in such conditions. If there would be different designs of EPS that can be used safely in humid conditions and others not, also such symbols (non-water-proof sign even more important) should be put clearly visible to consumers on the EPS itself.
- We understand from Slide 50 of Impact Assessment presentation, that it seems that a Type C cable might be sufficient also for a USB-PD EPS. If this is not the case and there is a need for a further different PD-cable:
 - There should be consumer information if a specific EPS has to be operated with a specific cable. If, for example, operating a USB-PD EPS requires a PD-suitable cable, this should be clearly marked (ideally on the EPS) if otherwise the EPS would not work well or get damaged. As cables of EPS will have to be detachable in future, there could otherwise be the risk that consumers are not aware of this and take the wrong cables.

5. Additional aspects

Policy option g) "Mandatory unbundling option"

Mandatory unbundling is not proposed under the EPS regulation as the regulation does not cover the end-device. Instead, voluntary unbundling of market players is expected to arise.

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Recommendation 13: To exploit highest savings potentials, a solution for including a **mandatory unbundling option** under the EPS Regulation should be searched for. There is only little potential to include this in end-device regulations as only fewest of the equipment listed in Annex 1 of the scope is regulated via product specific Ecodesign regulation, and even if so, even partly excluded (e.g., battery operated devices).

If the EPS Regulation would rather be seen and implemented as a horizontal Regulation (similar as for standby), and under the framework of the future ESPR, the potential of setting binding requirements on unbundled provision of EPS for the end-devices should be included.

ENDs

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