

EPTA-EGMF Position Paper on the European Commission's draft Delegated Regulation laying down ecodesign requirements for external power supplies reviewing Commission Regulation (EU) 2019/1782

The European Power Tool Association (EPTA) represents 25 European manufacturers of electrical power tools with a strong production base in central Europe. Members represent approximately 70.000 employees in Europe (170.000 worldwide) and around 90% of corded and cordless power tool sales in Europe (by value), the latter of which use lithium-ion rechargeable batteries.

The European Garden Machinery Federation (EGMF) represents large and small manufacturers of garden, landscaping, forestry, and lawn maintenance equipment. Registered in Europe since 1977, through its 35 member bodies – 7 national associations and 30 companies – EGMF represents about 20,6 million cordless and corded units placed on the European market every year, accounting for around 80% of garden machinery, and EGMF members employ over 120,000 people in the EU.

The two associations hereby submit their comments, laid out on the following pages, to the European Commission's DG ENER as feedback on the draft Delegated Regulation, circulated on 18 November 2024, for a revision of Commission Regulation (EU) 2019/1782 laying down ecodesign requirements wireless charging pads, battery chargers for portable batteries of general use and USB Type-C cables.

The joint commenters appreciate the constructive dialogue fostered throughout this process, as well as the renewed opportunity to provide input on the proposed Regulation. We commend the Commission for considering some of our previous comments and for its efforts to reduce cumulative regulatory costs by aligning North American and EU frameworks. We take this opportunity to offer additional feedback, aimed at further refining the draft and ensuring it minimises undue burdens for manufacturers and consumers, wherever feasible, and remain at full disposal to discuss our comments in detail in case further clarification is needed.

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No.	Section	Comment	Proposed Change
1.	Article 1 Paragraph 1	<p>The draft Delegated Regulation as proposed could be understood as to prohibit putting into service external power supplies (EPS) which were placed on the market before the date of application. Such an interpretation could cause the scrapping of products already produced and held in stock.</p> <p>The authors of the Regulation (EU) 2023/1542 “Batteries Regulation” addressed this issue and changed their definition of ‘putting into service’ accordingly. We propose to follow their lead and reduce the potential for misunderstanding.</p>	<p>1. <i>This Regulation lays down ecodesign requirements for the placing on the market or putting into service of external power supplies (‘EPS’), battery chargers for portable batteries of general use, wireless chargers, wireless charging pads and USB Type-C cables, <u>that have been placed on the market after the date of application of this Regulation.</u></i></p>
2.	Article 2 Definition (1) Item a)	<p>According to the United States of America’s Code of Federal Regulations (CFR) Title 10, Part 430, an external power supply is defined as a ‘<i>circuit that is used to convert household electric current into DC current or lower voltage AC current [...]</i>’.</p> <p>The European Commission’s proposal, however, characterises EPS as ‘<i>designed to convert alternating current (AC) power input from the mains power source input into one or more lower voltage direct current (DC) or AC power outputs.</i></p> <p>Equipment provided with mains voltage socket outlets is generally not required to be marked with a rated output voltage. Consequently, such equipment can likely not benefit from exception f) and could be considered to be an EPS. To avoid undue requirements for equipment having socket outlets, it is proposed to harmonise item a) to Definition 1) with the above-mentioned American legislation.</p>	<p>a) <i>it is designed to convert alternating current (AC) power input from the mains power source input into one or more lower voltage direct current (DC) or <u>lower voltage</u> AC power outputs;</i></p>

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3.	Article 2 Definition (1) proposed new item h)	<p>The mains can supply up to 3,8 kW for single phase or 11 kW for multiple phase devices. No evidence has been provided by the European Commission or the United States Department of Energy, which would prove that the proposed limits for standby power consumption are technically feasible and economically justified for such EPS.</p> <p>Section 2 c) of Article 15 of the Directive 2009/125/EC “Ecodesign Directive” requires a cost to benefit analysis of implementing measures. It is proposed to limit definition of “external power supplies” to products having an output power not exceeding what has been analysed.</p>	h) <i>its nameplate output power does not exceed 250 W.</i>
4.	Article 2 Definition (2)	<p>According to the proposed Definition (2), battery chargers only qualify as such when they are primarily used to charge the batteries or battery packs of household appliances.</p> <p>Conversely, a battery charger that is primarily used to charge the batteries or battery packs of garden machines or power tools and occasionally used to charge the batteries or battery packs of household appliances, would not meet the definition as proposed.</p> <p>We assume that this is unintended and propose to revise Definition (2).</p>	(2) <i>‘Battery charger’ means a device that is primarily used to charge the batteries or battery packs of household or office products, and that contains dedicated circuitry to regulate the charging current and voltage;</i>

