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**Position of ECOS, EEB, INFORSE-Europe,
Greenpeace and WWF**

**on the EC Working Document
on possible ecodesign requirements for external power supplies**

In the context of Directive 2005/32/EC establishing a framework for the setting of ecodesign requirements for energy using products.

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**Position of ECOS, EEB,
INFORSE-Europe, Greenpeace and WWF**

**on the EC Working Document
on possible ecodesign requirements for external power supplies**

ECOS, EEB, INFORSE-Europe, Greenpeace and WWF (hereafter “Environmental NGOs”) **welcome and support the introduction of mandatory ecodesign requirements on external power supplies.**

Several environmental concerns are raised by external power supplies (EPS) and battery chargers (BC): the energy waste in no-load mode, the inefficient multiplication of these devices due to poor standardisation of interfaces, the lack of care in their ecodesign since they usually are automatically provided with the primary load and therefore are not in the focus of consumers.

The number of cheap EPS and BC is rapidly expanding, whereas more eco-efficient solutions could be possible, for instance through a reduced number of more standardised battery chargers and power supplies per household, which would be used for several appliances, work at higher efficiency, include a hard off-switch function and be possibly partly fuelled by photovoltaics.

Environmental NGOs would like the European Commission to consider the following comments to the Working Document:

1. Considering battery chargers and avoiding loopholes

Environmental NGOs are concerned that battery chargers have been excluded from the scope, only based on least LCC arguments. The issue of standardised interfaces also applies to BCs and could be a major driver to increase reusability and thus reduce the overall environmental impact; this would not mean so much extra cost for manufacturers and should therefore be considered. Microprocessor-controlled battery chargers are another clear breakthrough that can bring substantial ecodesign improvements.

For these reasons Environmental NGOs strongly suggest **keeping BC on the Ecodesign agenda**. If a standardised measurement method is needed, then it should be made available as soon as possible.

Another concern raised by the exclusion of BCs in this Working Document is the risk of **introducing loopholes** in the legislation. Some products are both BC and EPS (e.g. device for laptop, for electrical shavers, etc.) It should at least be made clear that these BC/EPS fall under the scope of these ecodesign requirements.

2. Standardisation and reuse

Reducing the environmental impact of EPS and BC not only requires provisions on energy performance but also a reduction of the number of these devices through better standardisation of interfaces and a more efficient way of considering their use. On this the Working Document is insufficient and fails to provide a way for improvement.

Environmental NGOs call on the Commission to start **a mandatory process enabling a quick and effective standardisation of interfaces**. A mandate to standardisation bodies would require another 3 to 4 years, with industry probably trying to delay or water-down the process. Existing marketing strategies from manufacturers are clearly not going in the right direction, so a more stringent mechanism is needed. For instance a **horizontal IM** could be proposed within the

framework of the Ecodesign policy stating that for each current/voltage type of power supply a unique interface shall be possible for EuPs working under this current type and voltage; only EPS using this interface could be sold on the EU market. Environmental NGOs also require **EPS and BC to be sold separately from the primary loads**. This is a pre-requisite to allow consumers choice, reusability and reduction of waste, and to accelerate innovation and competition for better products. Consumers would for example be able to buy photovoltaic-powered BC and BC/EPS that can dramatically reduce the need for grid electricity.

3. End-of-life

Although EPS fall under the WEEE directive, they are still likely to be thrown away, rather than recycled because of their small size and the lack of consumer information on their content.

Public campaigns on the collection and disposal of EuPs should **make it clearer that EPS and BC are concerned** and should be brought to a collection point.

Environmental NGOs also encourage the European Institutions to consider an **ecodesign requirement on the lifespan of these devices**. Coupled with the above standardisation of interfaces it could prevent eco-unfriendly multiplication of EPS and BC in households.

4. Consumer information

Most consumers are not aware of the energy losses in no-load mode and the need to avoid throwing EPS and BC in the usual bin.

Environmental NGOs suggest introducing **a mandatory sticker on the product** to raise user awareness, with indications such as: *“Save energy: unplug me when I’m not in use”* and *“Do not throw me away. Bring me to an appropriate collection point”*

5. Comments on the requirements on electricity consumption

The benchmark of BATs provided in the beginning of the Working Document suggests that **more ambitious requirements could be envisaged, especially for the 2nd tier**.

The level of ambition of these requirements should not be overly driven by concerns for consistency with US legislation, since the EU aims at remaining a world leader in global warming policies. It should not be overly limited by least LCC calculations, since the EPS is just an intermediate device and only represents a small share in the overall price of the desired product and function.

Environmental NGOs understand the rationale to have separate requirements for halogen lighting convectors. However it is our view that these requirements should be dynamic as well and **have at least 2 tiers considered**. The first tier could be set 6 months after the IM comes into force and the next one 2 years after, with the no load limit set at 0.3 W and the active efficiency set at 0.94

END.