

CECAPI comments
on the working document supporting the revision of
COMMISSION REGULATION (EU) 2019/1782 of 1 October 2019
laying down Ecodesign requirements for external power supplies.

CECAPI, the European Committee of Electrical Installation Equipment Manufacturers, have analysed the draft Ecodesign requirements for external power supplies (Ares(2022)7800515 - 11/11/2022) and its draft Annexes.

CECAPI supports the EU energy savings objectives for 2050 and the transition towards a more circular economy.

This CECAPI document contains comments to be considered by the WG in charge of drafting the Ecodesign requirements for external power supplies.

CECAPI comment 1 regarding POE:

Active power over Ethernet injector:

There is no reason to limit the exclusion to active power over Ethernet injectors. In principle they are all active to respect the standardized process.

CECAPI Proposal:

Delete the word “active”, it’s creating unnecessary confusion.

Exclude all types of POE Injectors.

For clarification, add a Power over Ethernet injector definition.

CECAPI comment 2 regarding external power supplies that are part of the fixed home and building power distribution system:

Some specific power supplies used in fixed home and building power distribution systems e.g. in consumer distribution boards, to power products such as door entry systems or alarm systems etc. must be added in the list of excluded products.

These power supplies are directly connected to the 230 V main supply of the fixed installation using insulated conductors running into conduits. They deliver DC current at a reduced voltage through dedicated circuits of the fixed electrical system using insulated conductors running into conduits. Their connections are not readily accessible and are made through terminals requiring a tool and are not intended to be connected or disconnected in normal use. The circuits can be very long, up to 10 to 50 meters and can power multiple devices located in several rooms of a building. This is not compatible with the USB technology, USB connectors are not suitable for this purpose.

CECAPI proposal:

Add the following exclusion (i)

(i) External power supplies that are part of the fixed home and building power distribution system

Add the following definition (28) in article 2:

(28) 'External power supplies that are part of the fixed home and building power distribution system' means an external power supply directly connected to the circuits of the fixed electrical installation using, on the DC output, cables or insulated conductors running into conduits. The connections are made through terminals that are not intended to be connected or disconnected in normal use.

CECAPI comment 3 regarding USB Type-C technology:

USB Type-C is a well-established technology for IT products, it is designed for indoor environments like living rooms, but USB Type-C is not intended for harsh environments e.g. outdoor use, cellars, garages, gardens.

Using USB Type-C in this environment can cause critical situations as:

- pollutions on the contacts increase the contact resistance which could lead to an overheating of USB Type-C connector
- if a USB Type-C plug partly disconnects from its socket in a household switchboard with 230V equipments, which could create an electric shock, because it can touch live parts of equipments (furthermore it should not be encouraged that ordinary person could frequently operate in front of the switchboard, that must stay occasional), or can cause user in-satisfactions due to lack of reliability.

CECAPI proposal:

Delete applications for harsh environment e.g. outdoor use, cellars, garages, gardens, from the scope of this regulation.

CECAPI comment 4 regarding “no load condition”:

No-load condition means the condition in which the input of an external power supply is connected to the mains power source, but the output is not connected to any primary load.

CECAPI proposal:

According to the definition, no-load requirements shall be verified without any connected load.

CECAPI comment 5 regarding markings:

In CECAPi opinion, the markings required by the Ecodesign regulation are overloaded with information, as a result, it becomes unreadable and difficult to understand.

CECAPI Proposal:

Revise the marking requirements to keep only the customer relevant data.

CECAPI comment 6 regarding Annex II, Item 1:

According to definition 27 in the draft for “containing product”, an external power supply can be a function of a full product, e.g. a cord extension set with a USB power supply, or it can integrate some secondary functionalities, e.g. a LED pilot light.

CECAPI proposal:

Add a paragraph at the end of Annex II item 1. as follows:

For containing products, the energy efficiency requirements are measured and calculated only for the power supply part of the products. Other functions are disconnected or short circuited.
