

## JBCE feedback on the amending of the Common Charger for Electronic Devices on the Radio Equipment Directive

18 November 2021

### Introduction

Japan Business Council in Europe (JBCE) appreciates the opportunity to provide comments on the amending Directive 2014/53/EU on the harmonization of the laws of the Member States relating to the making available on the market of radio equipment of the Common Charger for Electronic Devices.

### Scope of the proposal

JBCE notes that the ‘common charger’ proposal would apply to hand-held mobile phones, tablets, digital cameras, headphones, headsets, handheld videogame consoles and portable speakers.

While the scope is clear for some of these categories, questions can be raised on others.

Regarding **digital cameras** (CN code for 8525 80 30 according to the Official Journal 2016/C 214/09), the impact assessment identified two main types of digital photo cameras: cameras with built-in lenses (e.g. action cameras and compact cameras) and cameras with interchangeable lenses (e.g. reflex and mirrorless cameras). Also, it pointed out that cameras with built-in lenses are normally smaller and are charged via USB connectors, while larger cameras generally have removable batteries that are charged with external battery chargers. While cameras with a removable battery often contain a USB connector, this interface is typically only used for transferring pictures to a personal computer or for triggering remote accessories. As the digital camera cannot be used during charging via USB cable, consumers prefer to charge the removable battery in the external battery charger. This way, the camera can be used while a spare battery is being charged. The Commission impact assessment did not identify this relevant use case, which is different from the typical charging characteristics of small and portable radio equipment with an embedded battery.

In addition, many other kinds of products with different charging characteristics (e.g. video camera recorders, CN codes 8525 80 91 and 8525 80 99) could be considered a “digital camera” and a more precise definition is needed.

- Recommendation: add a definition for digital photo cameras with an embedded battery

With respect to **headphones and headsets**, it is not clear whether earbuds are still excluded. As earbuds have very specific needs and charging requirements, those were excluded from scope after assessment by the Commission services. A precise definition for headphones and headsets is necessary, or a specific exemption for earbuds need to be added.

- Recommendation: add a definition for headphones and headsets

The impact assessment showed that all **portable speakers** already used USB connectors and that there is no fragmentation. This assessment focused on the small wireless speakers only and did not consider the other category of speakers that are large in size and weight, but still portable. As these portable speakers have higher power needs (e.g. AC IN connector) they are not comparable with the intended category of small and portable devices. From safety perspective,

some portable speakers are equipped with DC IN connectors that are commonly used by other electrical equipment as well (e.g. printers, etc.). Therefore, it is proposed to add a definition for portable speakers and limiting it to hand-held devices.

- Recommendation: add a definition for low-power hand-held portable speakers

JBCE suggests that such definitions are added in a guidance document prepared by the Commission services, after consultation with the Expert Group of Radio Equipment.

## Unbundling

Under the requirement of Article 3a, end-users should be able to acquire the radio equipment without **any charging device**. JBCE is of the opinion that the use of “any” will lead to unwanted impact which could significantly reduce the consumer convenience. As an example, digital photo cameras are often offered with the battery and a battery charger. In case consumers don’t have these accessories anymore, they will no longer be able to use the camera, even if it is equipped with the USB Type-C receptable. Also, the Commission proposal allows the use of other charging ports in addition to USB Type-C. Charging devices compatible with the other charging ports should still be allowed to be bundled, as well as charging docks that enable the use by people with disabilities.

Additionally, the ‘Questions and Answers’ page<sup>1</sup> from the European Commission confirms JBCE’s understanding that cables have other uses than charging as well, e.g. data transfer, and can therefore still be supplied in the box.

- Recommendation: limit the unbundling to the USB Type-C External Power Supply only

## Fast charging

As mentioned in the recital (12) of the proposed initiative, the USB Type-C receptable is able to handle both fast charging and traditional charging. In case the unbundling requirement will be implemented, there is no 100% guarantee that there will be a matching class between the charger bought by the consumer and by the equipment itself. JBCE would like to draw the attention to the fact that devices that do not support a fast-charging function are not able to meet the fast-charging expectations from the consumers, even if the charger itself supports that function. Also, for some products with a longer lifecycle the fast charging is not implemented to preserve the battery life.

## Provision of information

Keeping the “green and digital revolution” in mind, JBCE believes that new legislation should be adapted to these principles. In this respect, it is questionable whether providing text information in all EU languages on the packaging or a label, offers sufficient benefit to the consumers in comparison to the ecological impact. Manufacturers aim to reduce their environmental footprint by reducing the amount of paper and downsizing their packaging. JBCE members believe that consumers do a well-informed purchase of their products and can find the necessary information

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<sup>1</sup> [https://ec.europa.eu/commission/presscorner/detail/en/QANDA\\_21\\_4614](https://ec.europa.eu/commission/presscorner/detail/en/QANDA_21_4614)

through the online manual or specifications pages of the products. Providing such key characteristic in the format of a pictogram or through electronic way, would be preferred.

- Recommendation: limit the information obligations to a pictogram or electronic labeling

## Transition time

The 'common charger' initiative has been focused on mobile phones throughout the last decade and other products have been gradually implementing the USB Type-C receptable and USB Power Delivery protocols as well. The vast majority of mobile phone brands already moved to the USB Type-C receptable.

While mobile phones are replaced by the consumers quite often, this is not the case for most of the additional categories in scope. This means that manufacturers make the same line-up of products available during many years. As an example, a same model of a digital photo camera can be on the market for more than 5 years, while a new mobile phone model is on the market for only a few years. It will take time for current product line-ups of the other affected categories to gradually sell out and be replaced with new models that fully meet the new connector requirements. To allow a smooth transition, sufficient time needs to be foreseen. JBCE members believe that 3 to 5 years is a reasonable timeframe in order to modify the line-ups and at the same time avoid the creation of unnecessary electronic waste in the short term.

- Recommendation: allow a transition of 3-5 years for other products than smartphones

## About JBCE

Founded in 1999, the Japan Business Council in Europe (JBCE) is a leading European organization representing the interests of about 90 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, textiles and glass products.

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