



Summary of the Copenhagen Economics study

A COMMON SENSE APPROACH TO THE 'COMMON CHARGER' PROPOSED EU REGULATION

CLIENT: APPLE, FEBRUARY 2022

Full study [available here](#)

On 23 September 2021, the European Commission (the Commission) published a proposal for 'common charger' regulation, a number of requirements related to the charging of small electronic devices, designed to improve consumer convenience and benefit the environment. The proposed regulation includes four policy initiatives that would apply across a wide range of small electronic devices.

In our exploration of the expected impacts of the proposal, we have found that **at least two adjustments to the proposed regulation** would benefit consumers, manufacturers, and the environment, without compromising the objectives of the regulation.

Having gathered the evidence in the Commission's impact assessment and wider market evidence, we find the likely impact of the September 2021 proposal as follows:

SEVERAL BENEFITS UNLOCKED

Three out of the four policy initiatives – unbundling of the sale of the charging brick (external power supply – EPS) from the sale of devices, standardisation of charging protocols, and improved information to consumers – will deliver positive impacts to consumers and to the environment without causing any large negative effects.

OPPORTUNITIES TO AVOID MAJOR UNINTENDED CONSEQUENCES

We find that it would be more effective to focus on achieving interoperability at the EPS end of the charger rather than specifying a common device end port (the fourth policy initiative, which has led to

the whole package of regulation being referred to as the 'common charger' initiative).

This alternative approach would be less intrusive to manufacturers because there would be fewer constraints associated with integrating any common port to the EPS, and more impactful to the environment, because an EPS produces far more e-waste than a cable. Furthermore, a common device-end port would, according to the available evidence, deliver very few benefits to consumers and no benefits at all to the environment. Specifying that all devices must use the same device-end port would also undermine manufacturers' incentives and ability to develop and introduce new and better wired charging technologies, an obstacle that would ultimately harm consumers.

ADJUSTMENT #1

First, we recommend that, if policymakers want to mandate a common device-end port, they consider **an alternative approach that mandates the principle of standardisation** (e.g. allowing a standardisation body such as the USB-IF or a European standardisation body to choose the applicable standard to which manufacturers must conform) rather than specifying a certain version of a certain port in law (such as the already outdated version of the USB-C standard referenced in the current draft of the regulation). We find that this alternative and more future-proof approach to **regulation would benefit consumers by at least 10 billion EUR**, by avoiding delays to the introduction of both game-changing (e.g. a 'USB-D' standard) and incremental improvements (updates to the USB-C and USB PD standards, of which there have already been several).

ADJUSTMENT #2

Second, we recommend that, if policymakers want to mandate a common device-end port, they consider that for any given *en force* date, **so-called 'grandfathering' should be allowed**, i.e. the continued sale of existing models, even those without USB-C. Some consumers prefer to buy older models and it would be very costly and practically challenging for manufacturers to redesign/'retrofit' existing models with a different device-end port. We find that **allowing 'grandfathering'** and consequently ensuring that consumers are not forced to buy newer, more expensive devices, **would benefit consumers by 1 billion EUR**. Alternatively, policymakers could extend the transition period for all devices, which would achieve similar benefits and allow existing models to phase out naturally.

For further information, please read the [full study](#). We remain available for and appreciate any questions or comments.

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