

**EXPLANATORY MEMORANDUM FOR EUROPEAN UNION LEGISLATION/DOCUMENTS  
WITHIN THE SCOPE OF THE UK/EU WITHDRAWAL AGREEMENT AND THE WINDSOR  
FRAMEWORK**

C(2025)6759 FINAL + ANNEX

C(2025)7938 CORRIGENDUM

Commission Regulation (EU) 2025/2052 of 13 October 2025 laying down ecodesign requirements for external power supplies, wireless chargers, wireless charging pads, battery chargers for portable batteries of general use and USB Type-C cables, pursuant to Directive 2009/125/EC of the European Parliament and of the Council and repealing Commission Regulation (EU) 2019/1782 (“Regulation 2025/2052”)

*(C(2025) 6759 final, as corrected by C(2025) 7938 Corrigendum)*

Submitted by The Department for Energy Security and Net Zero, 2026

**SUBJECT MATTER**

1. On 13 October 2025, the EU adopted Regulation 2025/2052.
2. It will mostly apply from 14 December 2028, except for article 9 which accounts for transitional provisions and came into force 14 December 2025.
3. It updates several ecodesign requirements relating to energy efficiency at different loads, including standby, and facilitates the use of the same chargers across different products (interoperability). It supports the EU’s “Common Charging” initiative for harmonisation, aligning with Directive (EU) 2022/2380 and Regulation (EU) 2023/1717.
4. In order to facilitate its dual market access to both the UK Internal Market and EU Single Market, Northern Ireland continues to apply EU rules on ecodesign and energy labelling, as per the terms of the Windsor Framework. The updates set out in Regulation 2025/2052 accordingly also cover Northern Ireland, as well as the EU.
5. Regulation 2025/2052 also includes an early implementation clause: products complying with the new regulation before it takes effect will still be considered compliant with the existing regulation (EU) 2019/1782.
6. Regulation 2025/2052 covers the following products:
  - External power supplies (EPS),
  - Battery chargers for portable batteries of general use,

- Wireless chargers,
- Wireless charging pads
- Universal Serial Bus (USB) Type-C cables.

7. It does not cover:

- Uninterruptible power supplies (UPS),
- EPS for medical devices
- EPS for means of transport (e.g. bikes)
- Docking stations for autonomous appliances, and several other products.

8. It makes requirements that will contribute to achieving the EU's circular economy objectives, and to make EPS used with one or more separate consumer products as interoperable as is feasible.
9. Regulation 2025/2052 sets a direct and explicit requirement for EPS powering to use USB-Type C as its 'de facto' receptacle. This is in line with Directive 2014/53/EU of the European Parliament and of the Council.
10. EPS must display maximum power supported at output ports and carry the 'Common Charger' logo to provide the relevant interoperability specifications.
11. Minimum thresholds for the active mode efficiency of EPS have been raised.
12. EPS must provide nameplate output voltage, current, and power.

## SCRUTINY HISTORY

13. Commission Regulation (EU) 2019/1782 laying down ecodesign requirements for external power supplies pursuant to Directive 2009/125/EC of the European Parliament and of the Council was retained and then assimilated into GB law following EU exit as was repealing Commission Regulation (EC) No 278/2009. The assimilated version of this regulation can be found [here](#).

14. Previous relevant documents submitted for scrutiny include:

- C(2024)1732: Ecodesign requirements for local space heaters and separate related controls and repealing regulation (EU) 2015/1188: EM published October 2024.
- C(2023)7671 and C(2023) 4741: Ecodesign and Energy Labelling requirements for household tumble dryers: [EM](#) published 9 February 2024.

- C(2023)3538: Ecodesign for smartphones, mobile phones other than smartphones, cordless phones and slate tablets, and Energy Labelling for smartphones and tablets. [EM](#) published 14 December 2023.
- C(2023)2448: Ecodesign requirements for off mode, standby mode, and networked standby energy consumption of electrical and electrical household and office equipment: [EM](#) published 22 May 2023.
- COM(2022)144: Proposal for a Regulation of the European Parliament and Council establishing a framework for setting ecodesign requirements for sustainable products and repealing Directive 2009/125/EC: [EM](#) submitted 18 July 2022.

## MINISTERIAL RESPONSIBILITY

15. The Secretary of State for Energy Security and Net Zero has overall responsibility for existing ecodesign and energy labelling regulations.

## INTEREST OF THE DEVOLVED GOVERNMENTS

16. Ecodesign and Energy Labelling are not devolved matters under the devolution settlements in Scotland, Wales and Northern Ireland. We have shared this EM with the Devolved Governments.
17. Directive 2009/125/EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for the setting of ecodesign requirements for energy-related products is listed in Annex 2 to the Windsor Framework.

## LEGAL AND PROCEDURAL ISSUES

18. Directive 2009/125/EC (the “Directive”) empowers the European Commission to adopt implementing measures with ecodesign requirements for energy-related products.
19. Regulation 2025/2052 is an implementing measure made under article 15 of the Directive and is dated 13 October 2025.

## POLICY AND LEGAL IMPLICATIONS

20. The Government is committed to increasing the environmental performance of energy-related products through greater energy efficiency and resource efficiency.
21. Regulation 2025/2052 applies in Northern Ireland (NI) in accordance with the Windsor Framework. Products meeting these EU rules on the NI market will have

unfettered access to the GB market by virtue of the United Kingdom Internal Markets Act 2020.

22. Upon initial assessment, we do not anticipate this Regulation will present disruptions to the UK Internal Market and GB-NI-EU supply chains. Most External Power Supplies are manufactured outside of the UK and EU, with the EU and UK often treated as one market by importers.
23. Whilst the regulation is compatible with assimilated Regulation (2019/1782) (which continues to apply in GB), adhering to it will require adaptations related to administering product information in order to be compatible with new requirements when selling in both markets;
  - Regulation 2019/1782 requires the output current in the nameplate, while Regulation 2025/2052 does not.
  - Updated website and instruction manual requirements in Regulation 2025/2052 (despite covering the same parameters as the previous regulation.)
24. As the new Commission Regulation sets a lengthy three-year transition period (until 14 December 2028), and following engagement with industry stakeholders, we consider that this should provide ample opportunity for manufacturers to adjust to the new requirements. As such, we do not expect this Regulation to have negative impact on the movement of goods from GB into NI.
25. During this transition period, the UK Government intends to continue to engage with UK businesses on the potential effects on the UK internal market and to consider the benefits of applying similar measures in Great Britain, noting that the Government shares similar objectives to increase the environmental performance of these types of energy-related products.

## CONSULTATION

26. DESNZ officials have shared this regulation with Northern Ireland Executive (NIE) officials, and we will continue to engage NIE on arising impacts.
27. DESNZ have also started engaging industry to gather initial views around potential impacts of this regulation on manufacturers, retailers and consumers in GB and NI.
28. DESNZ officials met with key stakeholders as part of a roundtable convened by Tech UK. The group expressed general preference for alignment, noting issues around product information requirements (paragraph 24).
29. The transitional period of 3 years is Regulation 2025/2052 was deemed acceptable, with suggestions that either the same or later date of applicability could be used in GB, if plans and timelines are communicated in advance.

## **FINANCIAL IMPLICATIONS**

30. We do not anticipate a significant increase in costs for manufacturers and suppliers in NI; Any costs incurred will be extremely small due to the additional requirements limited to needing to print additional information.

A handwritten signature in black ink, appearing to read "Martin Mccluskey". The signature is fluid and cursive, with a large, stylized 'M' at the beginning.

Martin Mccluskey  
Minister for Energy Consumers  
Department for Energy Security and Net Zero