Dear Madam / Sir

Thank you very much for giving me the opportunity to share Apple's views on the European Commission's proposal to revise the EU Radio Equipment Directive, i.e. to introduce one common charger for a wide range of electronic devices across the internal market.

We at Apple share the Commission's general commitment to protect the consumer interest and to reduce environmental impact. We are, however, concerned that the proposal in its current form will not achieve these objectives.

Instead, it risks to discourage technological innovations in charging standards, incl. those related to safety and energy efficiency.
It furthermore risks to reduce consumer choice and in fact to create e-waste, rather than reduce it, by triggering the disposal of existing and functioning cables and accessories.

The proposal appears disproportionate to any perceived problem. The Commission's own studies in fact reveal
- no fragmentation of the market
- a strong consumer preference for technological innovation
- widespread interoperability amongst devices and external power supplies

Furthermore, the proposal does not incorporate the assumption of a phasing-out of older models, that the preparatory studies were based on. This leads to a significantly distorted conclusion as regards both the business, consumer and environmental impact.

Therefore I would like to work with you to avoid these negative consequences and to find a solution that allows for
- continued innovation and technological development, for the benefit of consumers and the environment
- the natural phase-out of previously designed models while new models with USB-C are introduced
- a digital provision of customer information

Below you can find Apple's formal response to the European Commission, as well as studies conducted by Copenhagen Economics, IPSOS, Fraunhofer et al..

I would be happy to engage in a dialogue with you, if you have any questions about the above or wish to discuss in more detail.
Of course, I am also available should you have any other questions or points of interest about Apple.

Thank you again and kind regards,
Maija

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Apple Submission to the European Commission:
https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/2020-Standard-chargers-for-mobile-phones/F2752582_en

Copenhagen Economics Study commissioned by Apple: https://www.copenhageneconomics.com/publications/publication/eu-consumers-evidence-shows-innovation-and-environmental-impacts-with-possible-common-charger-regulation

RPA 2019 study commissioned by DigitalEurope: https://www.digitaleurope.org/wp/wp-content/uploads/2019/12/RPA-Study-Common-Charger-2.0-final.pdf

IPSOS Study commissioned by the European Commission: https://op.europa.eu/en/web/eu-law-and-publications/publication-detail/-/publication/c6fadfea-4641-11ea-b81b-01aa75ed71a1

IPSOS Study (2) on unbundling commissioned by the European Commission: https://ec.europa.eu/docsroom/documents/46651

FRAUNHOFER Study on wireless charging commissioned by the European Commission: https://ec.europa.eu/docsroom/documents/46652

Official Proposal and Impact assessment:
https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2018-6427186_en