Dear [Name],

Thank you for your question.

Please note that the enforcement of the Radio Equipment Directive is under the remit of the Member States of the European Union. To our best understanding, this topic has not been discussed. The Commission cannot advice on the implementation of the RED for specific products. For the items in question, the authorities should take into consideration, without prejudice of other elements, the recital 14 of Directive (EU) 2022/2380 and the relevant parts of the Blue Guide.

Best regards,

[Name]

---

I am contacting you to seek the European Commission’s guidance on the interpretation and application of specific provisions in the Radio Equipment Directive, more specifically for earbuds. The Commission’s guidance would be invaluable in terms of ensuring Sony Europe’s thorough compliance with the provisions in question.

Directive (EU) 2014/53 details in Article 20(1) the rules and conditions for affixing the CE marking to radio equipment. In our understanding, union harmonization legislation applies to finished products that are placed on the market.

In the case of earbuds, they are placed on the market together with their charging case in the same packaging. The single function unit contains 3 main parts: 1 left earbud, 1 right earbud and the charging case. Each of the parts is marked with the same model number allowing traceability with the EU DoC. Additionally, the Directive (EU) 2022/2380 amending the Radio Equipment Directive 2014/53/EU, also considers the specific case of the combination of earbuds and their charging case as the radio equipment concerned in recital 14:
“As regards earbuds, the radio equipment concerned is considered together with its dedicated charging case or box, given that earbuds are rarely or never dissociated from their charging case or box due to their specific size and shape.”

Therefore, we believe it is not necessary to indicate CE marking on each individual part and it is sufficient to indicate it on 1 of the parts (e.g. the charging case), in addition to the packaging. Could you confirm to us whether this interpretation and implementation is in line with the spirit and intentions of the Radio Equipment Directive?

Many thanks in advance for your guidance. My colleagues and I remain at your disposal should you require further information or clarifications from our side.

With kind regards,

[Signature]

Product Safety
SQE - Environment & Product Compliance

Sony Belgium, bijkantoor van Sony Europe B.V.
Da Vincielaan 7 D1 - 1930 Zaventem - Belgium
Registration No. 0707.687.056
VAT No. BE0707687056

E-mail: [sony.com]

Sony Europe B.V.
Registered Office: The Heights, Brooklands, Weybridge, Surrey, KT13 0XW, UK
Incorporated in the Netherlands No. 71682147