Harelbeke, 11th of January 2023

Dear Mr. ⬇️, dear ⬇️,

Concerning: Request of information on the new common charger’s requirements and protective headsets

We are glad to see the EU commitment to product sustainability and to cut electronic waste. The new Directive (EU)2022/2380 amending Directive 2014/53/EU and introducing the common charger principle for electronic devices is a revolutionary step in that direction.

As representative of the Personal Protective Equipment (PPE) sector, the European Safety Federation is seeking clarification on the scope of the Directive. As you know, PPE protect users in workplaces and beyond. PPE users are often workers in e.g. manufacturing industry, construction sites or healthcare sector exposed every day to different kind of hazards, from respiratory diseases to hearing loss due to occupational noises.

For this reason, the PPE industry is also involved in the production of hearing protectors, mandatory to wear in workplaces where the noises exceed the permissible exposure limit. Protective communication earmuffs (headset/headphone) provide hearing protection while also enabling clear communication in noisy environments, and thus are an important safety component in several workplaces. Those products of course comply with the requirements of the PPE Regulation (EU)2016/425, essential for the safety of the workers.

As they also are communication headsets/headphones, we wish to get clarifications on two points:

- Should protective communication headsets/headphones (in the scope of the PPE regulation (EU)2016/425) be considered part of the scope of the Directive (EU)2022/2380, and thus obligatory need to use the common charger?

- Some of these protective headsets/headphones are designed to be used in ATEX environments. Our manufacturers report possible safety issues with how the USB-C connection can comply with the requirements under the ATEX directive 2014/34/EU. Would the ATEX requirements exempt them?
We feel a clarification would allow uniform implementation of the Directive (EU)2022/2380 across EU member states and avoid fragmentation of the market and its requirements. ESF will certainly inform its members accordingly.

We remain at your disposal for any further information on personal protective equipment and our protective headsets technology to have the chance to meet to give our insights on these issues impacting the safety of workers in Europe.

Secretary General
European Safety Federation