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**To:** Robin Donoghue  
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**From:** Michał Zakrzewski  
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**Subject:** APPLiA Comments on ECC Recommendation (25)01

Dear Mr. Donoghue,

APPLiA is a Brussels-based trade association that provides a single, consensual voice for the home appliance industry in Europe, promoting industry's mission to advance Europeans' lifestyles. It has 25 Direct Members and a network of 28 National Associations across 25 countries. More info can be found on <https://www.applia-europe.eu/>

At the end of last year, we had the opportunity to submit our comments on the draft ECC Recommendation (25)01, titled "Emission Limit Requirements for Wireless Power Transmission (WPT)," during the public consultation phase.

Unfortunately, none of our comments have been incorporated into the final document. Moreover, the recently published version of ECC Recommendation (25)01, published in February 2025, presents additional challenges for our industry, which we feel compelled to bring to your attention:

### 1. Removal of the low-power equipment restriction

**2. Lowering the starting frequency to 100 Hz:** Despite our previous request to increase the starting frequency from 8 kHz to 9 kHz—based on the availability of calibrated measuring instruments, test sites, and methods—the final recommendation instead lowered the starting frequency threshold to 100 Hz (!).

**3. Introduction of the peak detector:** The added recommendation to use the peak detector is problematic due to its poor repeatability. Minor disturbances during measurement, such as the simple switching of a contact, can immediately result in a failed compliance outcome.

### Implications for European Industry

If ECC Recommendation (25)01 is transitioned into a harmonized European standard without addressing these issues, there could be severe repercussions for the industry:





**Impact on Induction Cooking Appliances:** It may no longer be possible to market induction cooking appliances in Europe. Induction cooking is the most energy-efficient electrical cooking method available, saving approximately 1.3 MJ of primary energy over its lifetime compared to radiant heaters. This energy-saving technology, widely adopted with 100 million units currently in European households, contributes significantly to CO2 reduction.

**Hindrance to Innovation:** Emerging technologies, such as “cordless kitchen appliances,” could be effectively prohibited. A de facto ban on high-power WPT products would stifle innovation, diminish the global competitiveness of European industries, and jeopardize qualified jobs in the region.

We understand that Recommendation (25)01 will be reconsidered at the next meeting of **ECC > WG FM > SRD/MG** scheduled for 1st–4th September 2025 in Copenhagen. Given the significant impact on our industry, we kindly urge you to consider the following proposals during these discussions:

**APPLiA’s Proposals:**

**1. Clarify the Non-Applicability to Induction Cooking**

Induction cooking technology does not fall under the definition of WPT and should therefore be explicitly excluded from Recommendation (25)01. Over 30 years of coexistence with all radio services on the European market has demonstrated its safety and compatibility.

**2. Allow for Higher Magnetic Field Limits for High-Power WPT**

Should CISPR limits not be endorsed, we propose regulating high-power WPT emissions using the well-established limits specified in ERC Recommendation 70-03 (for wanted emissions) and ERC Recommendation 74-01 (for unwanted emissions).

**3. Start Magnetic Field Evaluation at 9 kHz**

Beginning evaluations at 9 kHz ensures alignment with existing measuring instruments, test sites, and methods.

**4. Recommend the Use of a Quasi-Peak Detector Instead of a Peak Detector**

The quasi-peak detector offers greater repeatability and a higher degree of accuracy in assessments.

We trust that ECC will carefully consider these recommendations to ensure that the European market continues to foster energy-efficient, innovative, and globally competitive technological solutions.

Thank you for your attention and ongoing commitment to open dialogue. Please do not hesitate to contact us for further clarification or discussion on any of the points raised.

Kind regards,

Michał Zakrzewski