



European Union Lot 9 regulatory update 2024

HPE helps you meet PSU requirements efficiently

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Preface

European Union (EU) Commission Regulation 2019/424¹ (also known as Lot 9) took effect on March 1, 2020. It establishes ecodesign requirements that servers and online data storage products must meet to be placed on the European Union market² and put into service.

In this document, Hewlett Packard Enterprise helps customers and channel partners procure or recommend server and data storage product configurations that meet Lot 9 ecodesign requirements, particularly regarding power supply unit (PSU) requirements.

Introduction

Products in the EU market must meet certain standards that guarantee consumer safety, health, and environmental protection requirements. The product must undergo conformity assessment to certify that it meets or exceeds the relevant standards, among other requirements, including an EU declaration of conformity and affixing a CE mark.

The EU Ecodesign Framework Directive³ is the overarching framework that determines ecodesign requirements that manufacturers must comply with. They must ensure that energy-related products with significant sales and trade volumes, high environmental impact, and potential to improve their environmental impact are placed in the EU market.

Lot 9 is one of many implementing measures under this framework that applies to specific energy-related products (for example, servers and data storage products).

Lot 9: An overview

Lot 9 establishes ecodesign requirements for certain servers and data storage products to be placed on the EU market and put into service. It includes servers with up to four processor sockets and online storage products in categories 2 to 5.⁴ It also sets out several express exclusions to the ecodesign requirements, including certain server types⁵ (such as server appliances,⁶ small-scale servers,⁷ and fully fault-tolerant servers) and small and large data storage products.⁸

It aims to limit the environmental impact of servers and data storage products with a set of rules on energy efficiency. These rules include:

- PSU efficiency
- Power factor requirements
- Material efficiency requirements for servers and online data storage products
- Idle-state power and active-state efficiency for servers with one or two processor sockets

These requirements intend to harmonize energy consumption, improve resource efficiency, and upgrade the environmental performance of these products.

Products that fail to meet the relevant ecodesign requirements are considered non-compliant. Lot 9 compliance is necessary to ensure conformity with all relevant EU-wide product requirements before affixing a CE mark.

¹ Commission Regulation (EU) 2019/424 of 15 March 2019 laying down ecodesign requirements for servers and data storage products pursuant to Directive 2009/125/EC of the European Parliament and of the Council and amending Commission Regulation (EU) No 617/2013.

² All references in this white paper to the “EU market” or “community market” includes the European Economic Area (EEA) and European Free Trade Association (EFTA) States: Iceland, Liechtenstein, Norway, and also Türkiye (EMEA country).

³ 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.

⁴ snia.org/emerald/taxonomyoverview

⁵ Large servers and network servers (as defined in Article 2.1(6) and (9) of Lot 9 respectively) and servers > 4P sockets are excluded from Lot 9.

⁶ As defined in Article 2.1(4), Lot 9.

⁷ Classified as small-scale servers in terms of Regulation (EU) No 617/2013.

⁸ As defined in Article 2.1(14) and (15), Lot 9.

The Lot 9 ecodesign requirements have applied to all in-scope products since March 1, 2020. Notably, the higher energy-efficiency requirements deadline for PSUs was extended by one year to January 1, 2024.

Table 1. A summary of significant requirements

Requirement	Impact	Deadline
Power supply efficiency	In-scope servers and online storage	March 1, 2020, for initial requirements / January 1, 2024, for increased requirements ⁹
Idle power limit	1 and 2 socket in-scope servers	March 1, 2020
Operating performance	1 and 2 socket in-scope servers	March 1, 2020
Power disclosure	In-scope servers and online storage	March 1, 2020
Firmware and security updates	In-scope servers and online storage	March 1, 2021
Material efficiency	In-scope servers and online storage	March 1, 2020
Secure data deletion	In-scope servers and online storage	March 1, 2020

Note

The link to the consolidated version of Lot 9 is available here: eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02019R0424-20210501

Lot 9 applies in the EU, the EEA, Switzerland, and the United Kingdom. EU countries include Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden. The non-EU countries from the EEA are Norway, Lichtenstein, Iceland, and also Turkiye (EMEA country).

The following sections outline certain relevant regulatory requirements.

Power supply efficiency

Power supply efficiency requirements affect all in-scope products, whether energy limits apply or not.

From March 1, 2020, the efficiency requirement for all:

- Multi-output power supplies are “Gold” rated or better
- Single-output power supplies are “Platinum” rated or better

From January 1, 2024, the efficiency requirement for all:

- Multi-output power supplies are “Platinum” rated or better
- Single-output power supplies are “Titanium” rated or better

To enable HPE to ensure it places in-scope products with compliant PSUs in the market, HPE has determined an internal cut-off date from when Gold-rated multi-output power supplies and Platinum-rated single-output power supplies can be ordered: November 6, 2023. Unless falling under the Appliance exemption, products with Lot 9 non-compliant PSUs must not be placed in the market and/or put into service with a CE mark affixed.

⁹ See Commission Notice on ecodesign requirements application for PSUs’ efficiency in servers and data storage products and ecodesign requirements on the power source efficiency of welding equipment (Text with EEA relevance) 2022/C 469/03, which extends the deadline until January 1, 2024.

Active power efficiency and Idle power requirements

All server energy tests require the industry-standard Server Efficiency Rating Tool (SERT) test.

Once a system has been measured for active state efficiency, a configuration-dependent calculation must be performed to determine the permissible idle power. Additional idle allowances are given for high performing processors, input/output (I/O) devices, memory, drives, and more. The power requirements will be measured on high- and low-end configurations in each product family. Based on testing performed on HPE ProLiant, HPE Apollo, HPE Synergy Gen10 and Gen10 Plus, and HPE Cloudline Gen10 Servers to date, one processor (1P) systems with low-end Intel® Xeon® Bronze processors and configurations bearing 8 GB memory DIMMs may not meet the power requirements.

Firmware and security update requirements

From March 1, 2021, the latest available:

- Version of the firmware must be made available from two years after the first product of a certain model is placed in the market (start date) for at least eight years after the last product of a certain model is placed in the market (end date), free of charge or at a fair, transparent, and non-discriminatory cost
- Security updates to the firmware must be made available from the start date until at least eight years after the end date, free of charge

Material efficiency requirements

The weight range of critical minerals present in servers and data storage products must be declared. The materials are currently limited to Cobalt in the batteries and Neodymium in the HDDs. HPE's Lot 9 declarations will reference a single source for material efficiency requirements data.

Secure data deletion requirements

Functionality for secure data deletion must be made available for the deletion of data contained in all data storage devices of the product. At the time of this publication, HPE has validated that the current SSD and HDD offerings meet NIST SP 800-88, a standard that meets the secure data deletion requirement.

HPE server configuration and component offering

To enable Lot 9 compliance, HPE provides server platform configuration and component guidance. If a server or component is non-compliant with the Lot 9 requirements, HPE will remove it from its product offering. At the time of this publication, certain server processors, server memory, and power supplies will no longer be compatible and will be removed from the HPE product offering.

From November 6, 2023, HPE will no longer offer Gold-rated multi-output power supplies and Platinum-rated single-output power supplies to ensure compliance with the January 1, 2024, deadline.

While Lot 9 is applicable to EU/EEA member states, HPE anticipates that other governments and customers outside the EU may also require compliance with Lot 9 requirements. Further, cross-country border commerce is a reality so that HPE can facilitate compliance across the HPE Europe, Middle East, and Africa region. It is also applicable in Turkiye (EMEA country).

HPE has performed countless Lot 9 server configuration tests and will continue to do so.

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