

Texte zu den geplanten neuen EU-Regelungen zur umweltgerechten Produktgestaltung und zur Energieverbrauchskennzeichnung in der Beleuchtung – Zusammenstellung * des Umweltbundesamtes (UBA), Deutschland



Entwürfe der EU-Kommission vom 3. Juli 2018
Offener Brief an die EU-Kommission
von Herrn Henk Stolk, Niederlande, 8. August 2018

*Hinweis: Dies ist die englischsprachige Version; die deutschsprachige kann heruntergeladen werden unter ** und die niederländische unter ***.*

EN: Information on the coming EU Lighting Regulations – Ecodesign and Energy Labelling – Compilation * of the Federal Environment Agency (UBA), Germany

The EU Commission's drafts of 3 July 2018

Open letter to the EU Commission
from Mr. Henk Stolk, Netherlands, 8 August 2018

*Please notice: This is a text in English. A version in German language can be downloaded at ** and a version in Dutch at ***.*

FR: Informations sur les futures réglementations de l'UE concernant l'éclairage – l'écoconception et l'étiquetage énergétique – Compilation * de l'Agence Fédérale de l'Environnement (UBA), Allemagne

Les projets de la Commission Européenne du 3 juillet 2018

Lettre ouverte à la Commission Européenne
de M. Henk Stolk, Pays-Bas, 8 août 2018

*Indication : C'est un texte en anglais. Une version allemande peut être téléchargé sous ** et une version néerlandaise sous ***.*

* <http://www.eup-network.de/de/eup-netzwerk-deutschland/offenes-forum-eu-regelungen-beleuchtung/dokumente/texte/>

** http://www.eup-network.de/fileadmin/user_upload/Lichtquellen_Offener_Brief_Henk_Stolk_2018_08_08_DE.pdf

*** http://www.eup-network.de/fileadmin/user_upload/Lichtquellen_Offener_Brief_Henk_Stolk_2018_08_08_NL.pdf

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

Open letter 2: European Commission DG Energy

8 August 2018

To the European Commission Directorate-General for Energy Dominique Ristori, Mechthild Wörsdörfer and Paul Hodson, this is an open letter written for revising the definition of light:

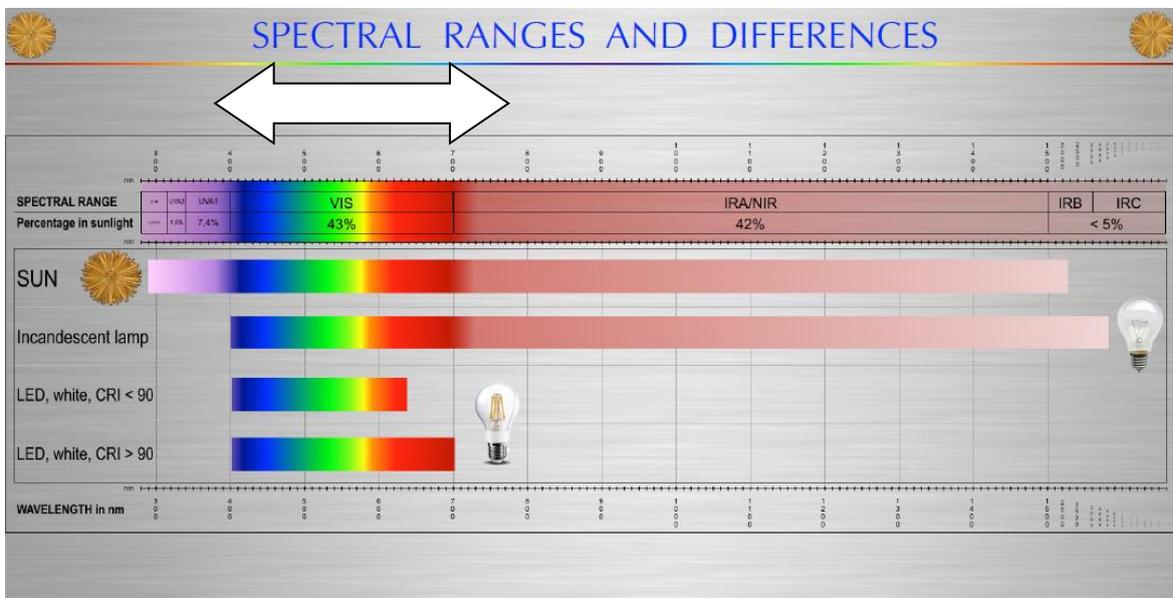
Creating a new definition of light?

This second open letter¹ to you focuses on your statutory intention in the draft text of 3 July 2018 to further stimulate the energy efficiency of lightfeatures. This process was prepared as of 2009 and had to pave the way for important more efficient LED lighting. Hidden between the many text proposals for legislative articles and regulations, an observant reader will find the following definition:

Article 2 Definitions 5.

'Light' means electromagnetic radiation with a wavelength between 380 nm and 780 nm;²

This new definition gives a physical description of light by means of a limitation of wavelengths. The white arrow below shows this. This excludes more than half of the natural sunlight spectrum.



This mainly concerns the infrared component of light and part of the ultraviolet range. The infrared part is mainly known for its effect on skin and heat, although it also, in the right dose, contributes to the recovery of balance of visual receptors in the eye. The danger of a definition that is only a half truth lies in the fact that working with it elicits a sense of truth in people that *hinders* them from *acknowledging* the *full truth*. Thus the present untruth, through the lack of the other half of the truth, is misleading.

What could the consequences be of a limitation of the definition of light? Answering this question means examining all its consequences in the future. No one can pretend that he can foresee these consequences, but without at least imagining them, a change of definition may seem like an innocent political manoeuvre. Examining where these consequences are heading, may already provide a lot of clarity.

Light has an all visualising, revealing effect. Limiting the definition of light seems to be an attempt to hide something. What is hidden in the planned definition is the heat component of light. Who can imagine light without its heat component? Hasn't there been a connection between light and heat since time immemorial? The candle is one of the oldest sources of light and everyone must learn how to avoid being burnt by it. The candle has a major heat component in its light whose value is recognised right up to the present day which is used in many places in restaurants, at home, in churches and on other occasions where an atmosphere is required. Will this ambience be prohibited in the future? Being one of the most unprofitable sources of light energy, the candle is still not banned in Europe, but the warmer artificial light of the lightbulb and the halogen light is already excluded from homes and other places where a warm atmosphere is desired.

If the consequences of limiting the definition is to be found in the area of influencing the sensitivity of humans for heat, then there will be massive consequences that can barely be estimated, as the heat of light has many effects on people which have not been included in the research of a new definition of light. A whole range of biochemical, life-impacting reactions through the skin with unknown consequences for health and human well-being pose a huge challenge for the future of light.

An age-old definition³ states: *"The body comes out of the womb from the dark, but the soul comes into the body from the light in the darkness."* and further on *"The body's sight is the eye, but that of the soul is the mind. Just like a body that has no eyes cannot see, a soul without a mind is blind."*

No one who prepared the legal text dealing with cold LED light seems to realise the effect of this limited definition. In a meeting in Frankfurt at the international trade fair for lighting on 20 March 2018, led and organised by Lighting Europe with EU officials from Brussels who prepared the legal text, the room was met with an eloquent silence from 150-200 light experts in reaction to the question:

"Is there anyone in Europe or the world who knows what it means to remove the infrared part from the definition of light?"

No one was capable of answering the question. One of the best informed drafters no longer had the definition in the text clearly in his mind, but concluded a week later that this definition was indeed included. A published protocol of a consultation forum⁴ for invitees on 7 December 2017 mentions that with the limitation in the definition of light, the scope of the legal text would be limited. This is of course nonsense as this *excludes* the manufacture and import of sources of infrared light that *fall outside the scope of the definition*.

There is a kind of naive innocence in these legal drafters with their aim merely to flesh out the Paris energy agreements. And yet, they can be reproached for many things. A completely unnecessary definition is in danger of becoming law and is included with a half-truth, which may result in the heat component in light missing with unforeseeable consequences in the future.

- 1 Press release Open letter 15 January 2018 The outphasing of the halogen lamp in 2018 a pitfall
- 2 The EU Commission's drafts of 3 July 2018 -Draft of the EU Commission for a regulation with requirements on the design of light sources and control gear – Main text –
- 3 The definitions of Hermes Trismegistus for Asclepius VII.3 – R. v.d. Broek - Hermes Trismegistus
- 4 The EU Commission's drafts of 13 November 2017 Consultation Forum on 7 December 2017 — Protocol

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Publications

<https://www.ovnl.nl/component/tags/tag/henk-stolk>

Filosofie voor Duisternis I,II,III en IV

How illuminated is the light?

Who has knowledge about laws for light?

Recognizing the source of the lamp

Open letter 15 Jan 2018 The outphasing of the halogen lamp in 2018 a pitfall

Open letter 2 August 2018 Creating a new definition of light?

Positions

Chairman of the Expert Group on Light Pollution

NL

Member of arbitration Code of Conduct Lighting Calculations

NL

Member of the study group on Humane Technology

NL

Teacher sports field lighting HVK

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Director Oostendorp Beheer b.v.

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