

Texte zu EU-Regelungen zur umweltgerechten Produktgestaltung und zur Energieverbrauchskennzeichnung in der Beleuchtung – Zusammenstellung ^[1] des Umweltbundesamtes (UBA), Deutschland



Diskussion über künftige Änderungsverordnungen (Produktgestaltung und information)

Diskussionstext der EU-Kommission vom 20. Mai 2020:
Stellungnahme des Herstellerverbandes APPLiA ^[2]
vom 27. Mai 2020

Hinweis: Bitte beachten Sie, daß der angehängte Text nur in Englisch verfaßt ist.

EN: Information on EU Lighting Regulations – Ecodesign and Energy Labelling – Compilation ^[1] of the Federal Environment Agency (UBA), Germany

Discussion of future amending regulations
(Product Design and Product Information)

**The EU Commission's discussion text as of 20 May 2020:
Comments by the Industry Association APPLiA ^[2] as of 27 May 2020**

FR: Informations sur réglementations de l'UE concernant l'éclairage – l'écoconception et l'étiquetage énergétique – Compilation ^[1] de l'Agence Fédérale de l'Environnement (UBA), Allemagne

Discussion sur les futurs règlements modificatifs
(Conception des produits et informations relatives aux produits)

**Texte de discussion de la Commission européenne du 20 mai 2020 :
Commentaires de l'association de producteurs APPLiA ^[2] de 27 mai 2020**

Indication : Veuillez noter que le présent texte n'est disponible qu'en anglais.

^[1] <https://www.eup-network.de/de/eup-netzwerk-deutschland/offenes-forum-eu-regelungen-beleuchtung/dokumente/texte/>

^[2] <https://www.applia-europe.eu/>

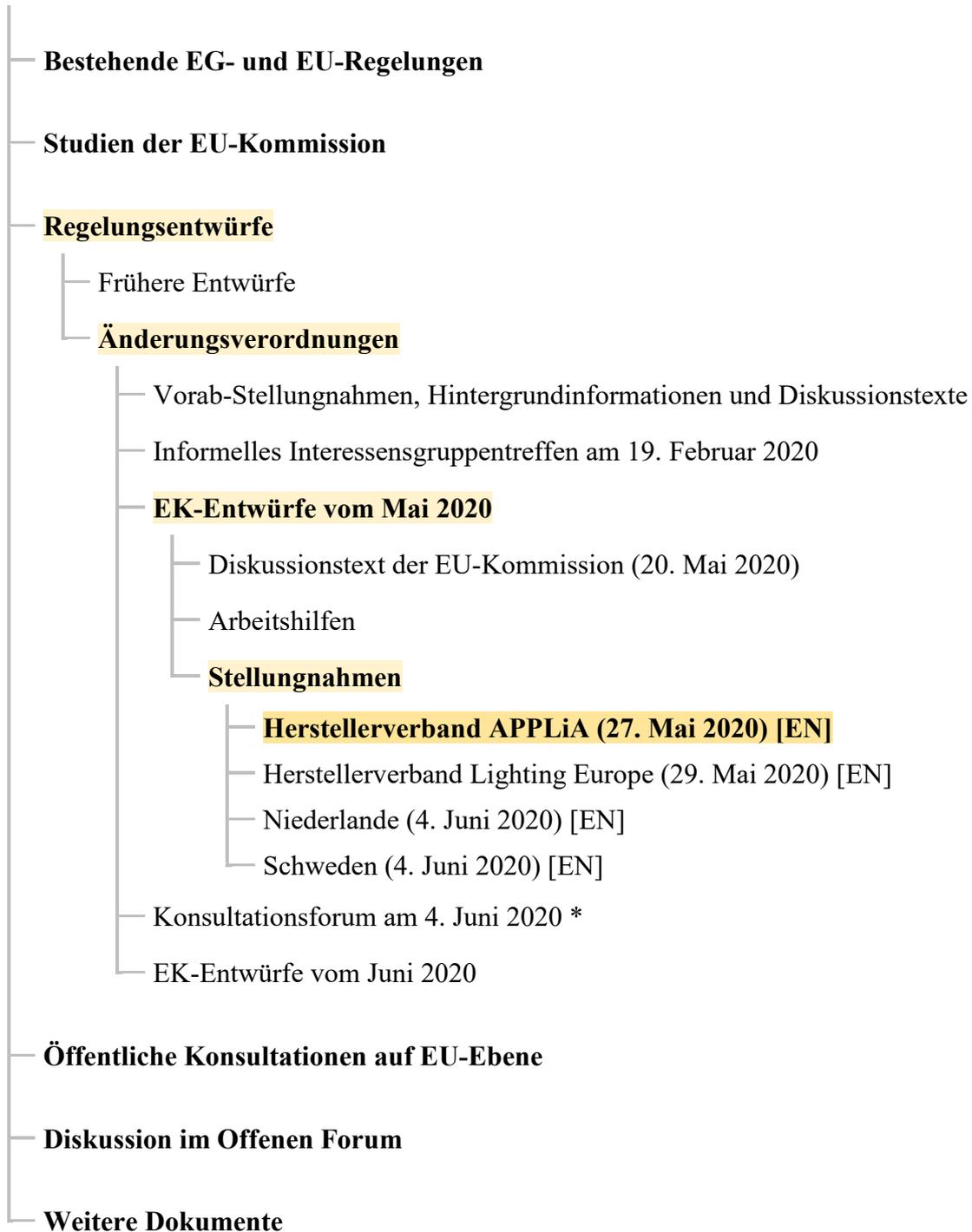
DE: ↓

EN: → page III

FR : → page IV

Texte im Offenen Forum

(abc = vorliegender Text)

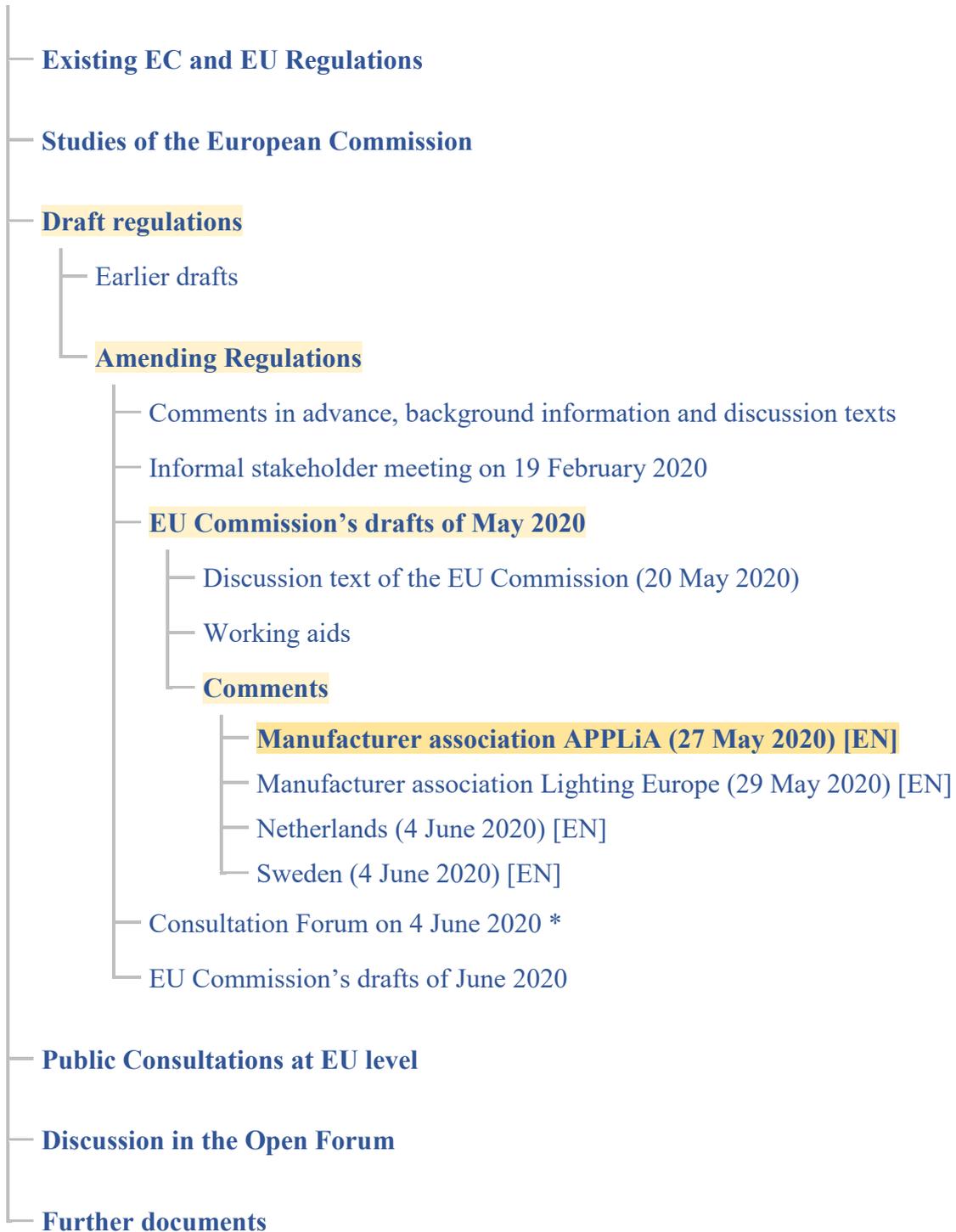


* Stand 15. Juni 2020: Dieser Text steht noch nicht zur Verfügung.

Abkürzungen: ● EG = Europäische Gemeinschaft ● EK = EU-Kommission ● EU = Europäische Union

Documents in the Open Forum

(abc = text at hand)

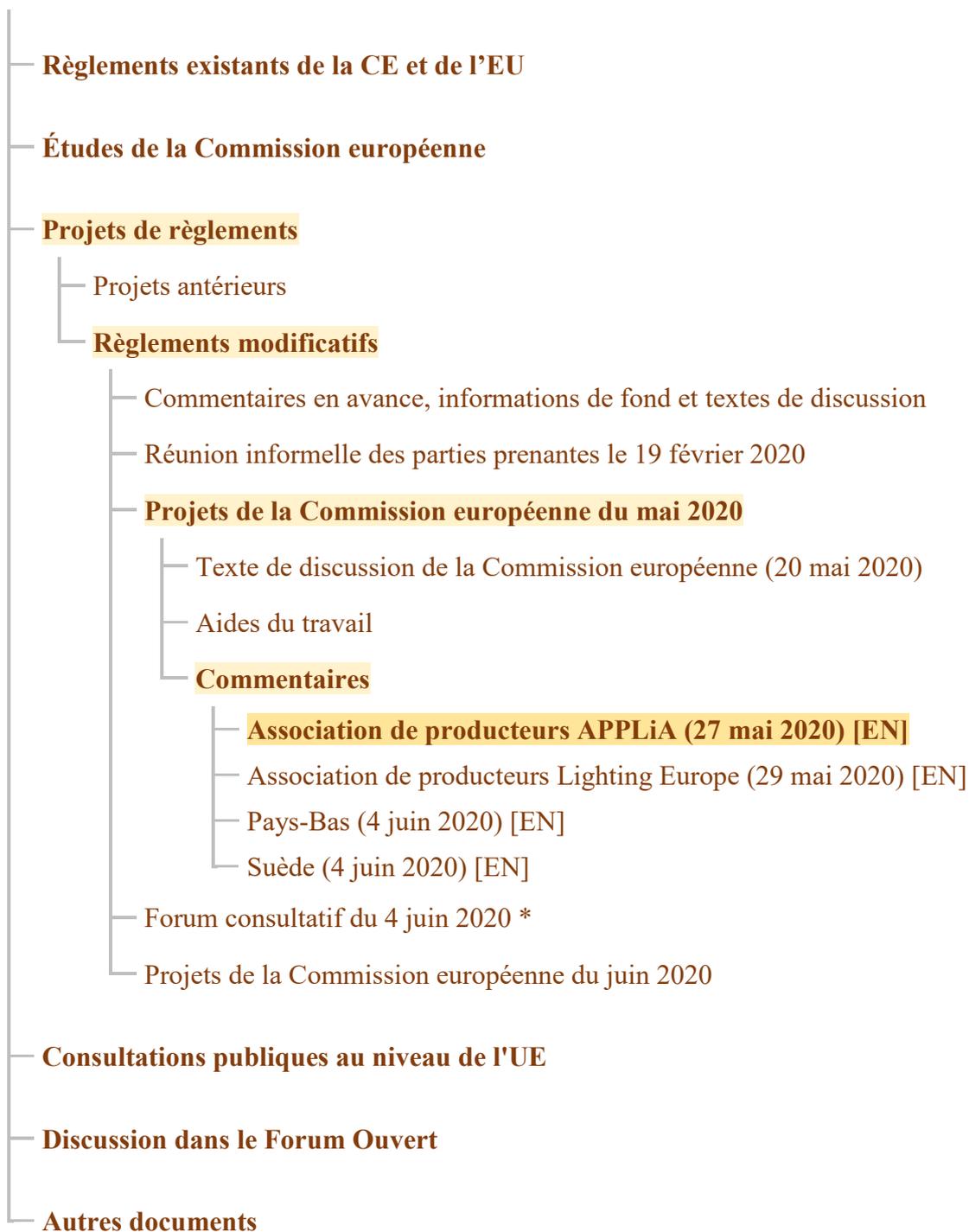


* Status as of 15 June 2020: This text is not yet available.

Abbreviations: ● EC = European Communities ● EU = European Union

Documents dans le forum ouvert

(abc = présent document)



* État au 15 juin 2020 : Ce texte n'est pas encore disponible.

Abréviations : ● CE = Communauté européenne ● UE = Union européenne

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR ENERGY

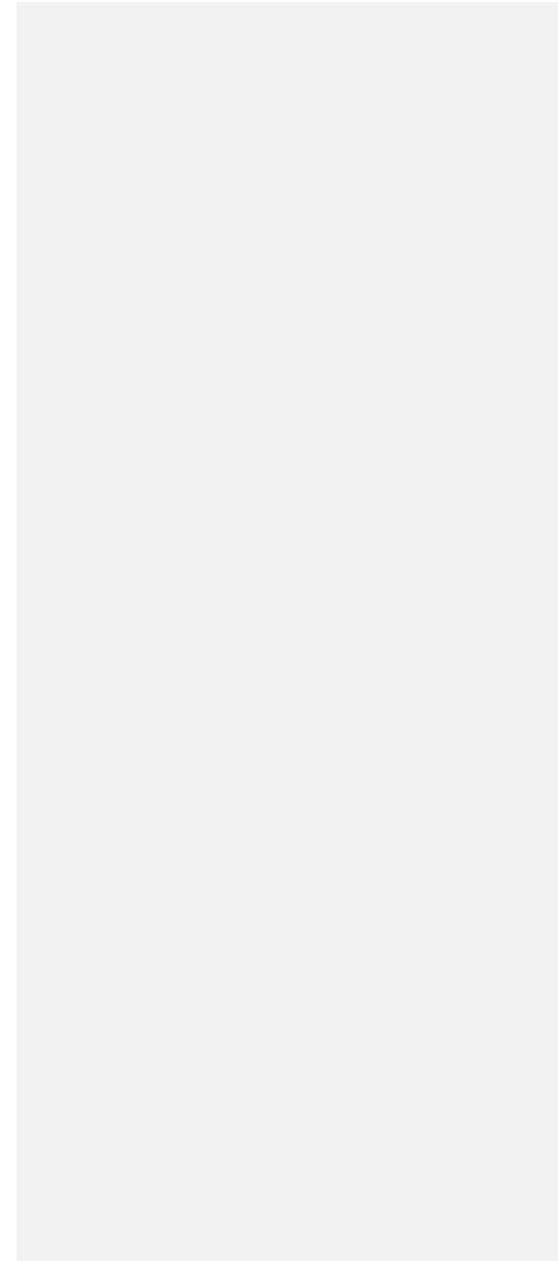
Directorate C - Renewables, Research and Innovation, Energy Efficiency
C.4 - Energy Efficiency: Buildings and Products

Brussels
ENER.C.4/

DISCUSSION PAPER

Subject: Possible amendments to Commission Delegated Regulations with regard to energy labelling and Commission Regulations with regard to ecodesign

1. SPECIFIC AMENDMENTS RELATED TO ENERGY LABELLING



1.1. Commission Delegated Regulation (EU) 2019/2015 supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of light sources and repealing Commission Delegated Regulation (EU) No 874/2012

Provision	Current text	Amended text	Rationale
New recital		The relevant product parameters should be measured or calculated using reliable, accurate and reproducible methods. Those methods should take into account recognised state-of-the-art measurement methods including, where available, harmonised standards adopted by the European standardisation bodies, as listed in Annex I to Regulation (EU) No 1025/2012 of the European Parliament and of the Council.	Some product parameters are not measured but calculated. This text is standard.
Article 2, point (3)	<p>‘containing product’ means a product containing one or more light sources, or separate control gears, or both.</p> <p>Examples of containing products are luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s). If a containing product cannot be taken apart for verification of the light source and separate</p>	<p>Article 2, point (3) is replaced by the following:</p> <p>‘containing product’ means a containing product for light sources or a containing product for separate control gears or both.</p> <p>‘containing product for light sources’ means a product containing one or more light sources, from which all contained light sources can be removed for verification.</p> <p>‘containing product for separate control gears’ means a product containing one or more separate control gears, from which all</p>	<p>Stakeholders flagged that the current definition of ‘containing products’ might create legal uncertainty when correlated with other definitions (e.g. of light sources). The updated definition also aims to clarify that some products, e.g. fridges or dishwashers should not be seen as light sources.</p> <p><u>We welcome the attempt to modify the definition of containing product which now clarifies from legal point of view that an appliance can never be considered as a light source for verification purposes.</u></p>

	control gear, the entire containing product is to be considered a light source;	<p>contained separate control gears can be removed for verification.</p> <p>Examples of ‘containing products for light sources’ are luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s). If a containing product cannot be taken apart for verification of the light source and separate control gear, the entire containing product is to be considered a light source</p>	<p><u>Nevertheless, we still see a possible conflict with Article 4 – we don’t understand the meaning and the added value of the sentence highlighted in yellow when considering it together with Art. 4.</u></p> <p><u>The above comment is valid also for the definition of ‘containing product for separate control gear’ and for the examples.</u></p> <p><u>We believe that the definitions are clearer and easier to understand if the highlighted text is removed.</u></p>
Annex III, point 1	<p>The label shall be:</p> <ul style="list-style-type: none"> - for the standard-sized label at least 36 mm wide and 75 mm high; - for the small-sized label (width less than 36 mm) at least 20 mm wide and 54 mm high. 	<p>The label shall be:</p> <ul style="list-style-type: none"> - for the standard-sized label at least 36 mm wide and 7572 mm high; - for the small-sized label (width less than 36 mm) at least 20 mm wide and 54 mm high. 	<p>To correct an error in the regulation. The current text mentions a label height of 75 mm, but it should be 72 mm, in accordance with the drawings.</p>
Annex IV, point 1(a)	<p>in radiological and nuclear medicine installations, as defined in Article 3 of Council Directive 2009/71/Euratom ⁽¹⁾;</p> <p>(Footnote 1) Council Directive 2009/71/Euratom of 25 June 2009 establishing a Community framework for the nuclear safety</p>	<p>in radiological and nuclear medicine installations that are subject to radiation safety standards as set out in Council Directive 2009/712013/59/EURATOM ⁽¹⁾;</p> <p>(¹) Council Directive 2013/59/Euratom of 5 December 2013 laying down basic safety standards for protection against the dangers</p>	<p>To correct an erroneous reference (to a wrong EURATOM Directive)</p>

	of nuclear installations (OJ L 172, 2.7.2009, p. 18).	arising from exposure to ionising radiation (OJ L 13, 17.1.2014, p. 1).	
<u>Annex IV point 2</u>	<u>N / A – to add</u>	<p>2. In addition this Regulation shall not apply to:</p> <p><u>BESPOKE light sources that are components or subassemblies or spare part of products and which are not placed on the market and/or put into service as individual product or equipment for end-users or the environmental performance of which cannot be assessed independently, with the exemption of Annex VI.</u></p> <p><u>BESPOKE light source means...</u></p>	<p><u>Most light sources used in home appliances are efficient LEDs and fulfil the ecodesign requirements already today. In addition, these are mostly BESPOKE light sources which means that they have a very limited risk to be used in other applications by consumers when sold separately as spare parts. Therefore, we propose that BESPOKE light sources that fulfil the ecodesign requirements are exempted from the Energy Labelling Regulation.</u></p> <p><u>Manufacturer will need to still comply with Annex VI (Technical Documentation) for the requirement on energy efficiency from the Ecodesign Regulation.</u></p> <p><u>With our proposal lamps that fall under the exemption of Annex III 3.(q)(r) – high temperature application – as well as off-the-shelf lamps, would still fall under the scope of the Energy label regulation whenever these are non-BESPOKE lamps.</u></p> <p><u>This will also ensure that consumers will have access to spare parts in the long term enabling the reparability principle.</u></p>

Kommentiert [GZ1]: Please note that APPLiA is working on a proposal for the definitions of respectively “*BESPOKE light source*” and “*BESPOKE spare part*”.

Annex V, point 1, Table 3	<table border="1"> <tr> <td data-bbox="248 357 360 564">Energy consumption in on-mode (kWh/1000 h)</td> <td data-bbox="360 357 389 564">x</td> <td data-bbox="389 357 501 564">Energy efficiency class</td> <td data-bbox="501 357 656 564">[A/B/C/D/E/F/G] ^(b)</td> </tr> </table>	Energy consumption in on-mode (kWh/1000 h)	x	Energy efficiency class	[A/B/C/D/E/F/G] ^(b)	<table border="1"> <tr> <td data-bbox="710 357 831 647">Energy consumption in on-mode (kWh/1000 h), rounded up to the nearest integer</td> <td data-bbox="831 357 860 647">x</td> <td data-bbox="860 357 972 647">Energy efficiency class</td> <td data-bbox="972 357 1126 647">[A/B/C/D/E/F/G] ^(b)</td> </tr> </table>	Energy consumption in on-mode (kWh/1000 h), rounded up to the nearest integer	x	Energy efficiency class	[A/B/C/D/E/F/G] ^(b)	To clarify the rule for rounding the figure on energy consumption.		
Energy consumption in on-mode (kWh/1000 h)	x	Energy efficiency class	[A/B/C/D/E/F/G] ^(b)										
Energy consumption in on-mode (kWh/1000 h), rounded up to the nearest integer	x	Energy efficiency class	[A/B/C/D/E/F/G] ^(b)										
Annex V, point 1, Table 3	<table border="1"> <tr> <td data-bbox="248 687 360 1201">Useful luminous flux (Φ_{use}), indicating if it refers to the flux in a sphere (360°), in a wide cone (120°) or in a narrow cone (90°)</td> <td data-bbox="360 687 389 1201">x</td> <td data-bbox="389 687 501 1201">in [sphere/wide cone/narrow cone]</td> <td data-bbox="501 687 613 1201">Correlated colour temperature, rounded to the nearest 100 K, or the range of correlated colour temperatures, rounded to the nearest 100 K, that can be set</td> <td data-bbox="613 687 687 1201">[x/x...x]</td> </tr> </table>	Useful luminous flux (Φ_{use}), indicating if it refers to the flux in a sphere (360°), in a wide cone (120°) or in a narrow cone (90°)	x	in [sphere/wide cone/narrow cone]	Correlated colour temperature, rounded to the nearest 100 K, or the range of correlated colour temperatures, rounded to the nearest 100 K, that can be set	[x/x...x]	<table border="1"> <tr> <td data-bbox="710 687 831 1201">Useful luminous flux (Φ_{use}), indicating if it refers to the flux in a sphere (360°), in a wide cone (120°) or in a narrow cone (90°)</td> <td data-bbox="831 687 860 1201">x</td> <td data-bbox="860 687 972 1201">in [sphere/wide cone/narrow cone]</td> <td data-bbox="972 687 1084 1201">Correlated colour temperature, rounded to the nearest 100 K, or the range of correlated colour temperatures, rounded to the nearest 100 K, that can be set</td> <td data-bbox="1084 687 1158 1201">[x/x...x or x...x (or x...)]</td> </tr> </table>	Useful luminous flux (Φ_{use}), indicating if it refers to the flux in a sphere (360°), in a wide cone (120°) or in a narrow cone (90°)	x	in [sphere/wide cone/narrow cone]	Correlated colour temperature, rounded to the nearest 100 K, or the range of correlated colour temperatures, rounded to the nearest 100 K, that can be set	[x/x...x or x...x (or x...)]	To further clarify the available options for declaring the figure(s) for Correlated colour temperature. The current options include a single value and a (continuous) range of values. The suppliers flagged that a number of discrete steps should also be allowed (e.g. 2700 K or 3500 K).
Useful luminous flux (Φ_{use}), indicating if it refers to the flux in a sphere (360°), in a wide cone (120°) or in a narrow cone (90°)	x	in [sphere/wide cone/narrow cone]	Correlated colour temperature, rounded to the nearest 100 K, or the range of correlated colour temperatures, rounded to the nearest 100 K, that can be set	[x/x...x]									
Useful luminous flux (Φ_{use}), indicating if it refers to the flux in a sphere (360°), in a wide cone (120°) or in a narrow cone (90°)	x	in [sphere/wide cone/narrow cone]	Correlated colour temperature, rounded to the nearest 100 K, or the range of correlated colour temperatures, rounded to the nearest 100 K, that can be set	[x/x...x or x...x (or x...)]									

Annex V, point 1, Table 3	[new row]	<table border="1"> <tr> <td data-bbox="712 355 936 432">Lifetime (L₇₀B₅₀) expressed in hours</td> <td data-bbox="936 355 1070 432">x</td> <td data-bbox="1070 355 1142 432"></td> <td data-bbox="1142 355 1158 432"></td> </tr> </table>	Lifetime (L₇₀B₅₀) expressed in hours	x			To add a technical parameter that is missing from the product information sheet
Lifetime (L₇₀B₅₀) expressed in hours	x						
Annex V, point 1, Table 7	<table border="1"> <tr> <td data-bbox="250 499 418 632">Rated light source luminous flux Φ (lm)</td> <td data-bbox="418 499 680 632">Claimed equivalent incandescent light source power (W)</td> </tr> </table>	Rated light source luminous flux Φ (lm)	Claimed equivalent incandescent light source power (W)	<table border="1"> <tr> <td data-bbox="712 499 920 603">Rated–Light source luminous flux Φ (lm)</td> <td data-bbox="920 499 1142 603">Claimed equivalent incandescent light source power (W)</td> </tr> </table>	Rated –Light source luminous flux Φ (lm)	Claimed equivalent incandescent light source power (W)	To amend the text in the table header for making it clearer. The current text contains the word 'rated', which is neither defined, nor necessary and was therefore removed.
Rated light source luminous flux Φ (lm)	Claimed equivalent incandescent light source power (W)						
Rated –Light source luminous flux Φ (lm)	Claimed equivalent incandescent light source power (W)						
Annex VI, point 1(e)	[new text]	<p>(4a) peak luminous intensity in cd for directional light sources (DLS);</p> <p>(7a) R9 colour rendering index value for LED and OLED light sources;</p> <p>(7b) survival factor for LED and OLED light sources;</p> <p>(7c) lumen maintenance factor for LED and OLED light sources;</p> <p>(7d) lifetime L₇₀B₅₀ for LED and OLED light sources;</p>	To add to the technical documentation some technical parameters that are missing, but are necessary for verifying the information in the product information sheet.				
Annex VI, point 1(e)(5)	correlated colour temperature (CCT) in K for FL and HID light sources;	correlated colour temperature (CCT) in K for FL and HID light sources	To further clarify this technical parameter required in the technical documentation. The				

			CCT applies to all technologies, not only to FL and HID.
Annex IX	[New text]	Where a model has been designed to be able to detect it is being tested (e.g. by recognising the test conditions or test cycle), and to react specifically by automatically altering its performance during the test with the objective of reaching a more favourable level for any of the parameters specified in this Regulation or included in the technical documentation or included in any of the documentation provided, the model and all equivalent models shall be considered not compliant.	Consistency across regulations
Annex IX, point 1 2 nd sentence	The Member State authorities shall verify 10 units of the light source model for point 2(c) of this Annex. The verification tolerances are laid down in Table 6 of this Annex.	In Annex IX, point 1, second paragraph is replaced by the following: ‘The Member State authorities shall verify 10 units of the light source model for point 2(c) of this Annex. The verification tolerances are laid down in Table 9 of this Annex.’	To correct a mistake. The current text wrongly refers to Table 6 instead of Table 9.

Annex IX, Table 9	Flicker [P _{st} LM] and stroboscopic effect [SVM]	10	The determined value shall not exceed the declared value by more than 10 %.	Flicker [P _{st} LM] and stroboscopic effect [SVM]	10	The determined value shall not exceed the declared value by more than 0,1.	To compensate for some low tolerances calculated in relation to small numbers (less than one unit).
Annex IX, Table 9	Lumen maintenance factor (for FL and HID)	10	The determined value shall not be less than 90 % of the declared value.	Lumen maintenance factor (for FL and HID)	10	The determined value shall not be less than 90 % of the declared value.	To remove unnecessary rows from the table of verification tolerances. Lumen maintenance factor and survival factor for FL and HID are not defined or required values, therefore no tolerances are needed.
	Survival factor (for FL and HID)	10	The determined value shall not be less than the declared value.	Survival factor (for FL and HID)	10	The determined value shall not be less than the declared value.	
Annex IX, Table 9	Luminous peak intensity [cd]	10	The determined value shall not deviate from the declared value by more than 25 %.	Peak luminous intensity [cd]	10	The determined value shall not deviate from the declared value by more than 25 %.	To use the correct terminology 'peak luminous intensity' and maintain coherence with other parts of the text. The text currently in the table reads 'luminous peak intensity'.

2. SPECIFIC AMENDMENT RELATED TO ECODSIGN

2.1. Commission Regulation (EU) 2019/2020 of 1 October 2019 laying down ecodesign requirements for light sources and separate control gears pursuant to Directive 2009/125/EC of the European Parliament and of the Council and repealing Commission Regulations (EC) No 244/2009, (EC) No 245/2009 and (EU) No 1194/2012

Provision	Current text	Amended text	Rationale
Article 2, point (4)	<p>‘containing product’ means a product containing one or more light sources, or separate control gears, or both. Examples of containing products are luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s). If a containing product cannot be taken apart for verification of the light source and separate control gear, the entire containing product is to be considered a light source;</p>	<p>‘containing product’ means a containing product for light sources or a containing product for separate control gears or both.</p> <p>‘containing product for light sources’ means a product containing one or more light sources, from which all contained light sources can be removed for verification, such as . luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s).</p> <p>‘containing product for separate control gears’ means a product containing one or more separate control gears, from which all contained separate control gears can be removed for verification.</p> <p>Examples of ‘containing products for light sources’ are luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves,</p>	<p>The current definition of ‘containing products’ might create legal uncertainty when correlated with other definitions (e.g. of light sources). The updated definition also aims to clarify that some products, e.g. fridges or dishwashers should not be seen as light sources.</p> <p><u>We welcome the attempt to modify the definition of containing product which now clarifies from legal point of view that an appliance can never be considered as light source for verification purpose.</u></p> <p><u>Nevertheless, we still see a possible conflict with Article 4 – we don’t understand the meaning and the added value of the sentence highlighted in yellow when considering it together with Art. 4.</u></p> <p><u>The above comment is valid also for the definition of ‘containing product for separate control gear’ and for the examples.</u></p>

		mirrors, display cabinets) containing light source(s).	<u>We believe that the definitions are clearer and easier to understand if the highlighted text is removed.</u>
Article 7	<p>The manufacturer, importer or authorised representative shall not place on the market products designed to be able to detect they are being tested (e.g. by recognising the test conditions or test cycle), and to react specifically by automatically altering their performance during the test with the aim of reaching a more favourable level for any of the parameters declared by the manufacturer, importer or authorised representative in the technical documentation or included in any of the documentation provided.</p> <p>The energy consumption of the product and any of the other declared parameters shall not deteriorate after a software or firmware update when measured with the same test standard originally used for the declaration of conformity, except with explicit consent of the end-user prior to the update.</p>	<p>The manufacturer, importer or authorised representative shall not place on the market products designed to be able to detect they are being tested (e.g. by recognising the test conditions or test cycle), and to react specifically by automatically altering their performance during the test with the aim of reaching a more favourable level for any of the parameters declared by the manufacturer, importer or authorised representative in the technical documentation or included in any of the documentation provided.</p> <p>The energy consumption of the product and any of the other declared parameters shall not deteriorate after a software or firmware update when measured with the same test standard originally used for the declaration of conformity, except with explicit consent of the end-user prior to the update. No performance change shall occur as result of rejecting the update.</p> <p>A software update shall never have the effect of changing the product's performance in a way that makes it non-compliant with the ecodesign requirements applicable for the declaration of conformity.</p>	Alignment with other regulations

Annex II, point 2, Table 4	Stroboscopic effect for LED and OLED MLS	SVM ≤ 0,4 at full-load (except for HID with Φuse > 4 klm and for light sources intended for use in outdoor applications, industrial applications or other applications where lighting standards allow a CRI < 80)	Stroboscopic effect for LED and OLED MLS	SVM ≤ 0,9 at full-load (except for light sources intended for use in outdoor applications, industrial applications or other applications where lighting standards allow a CRI < 80) From 1 September 2023: SVM ≤ 0,4 at full-load (except for light sources intended for use in outdoor applications, industrial applications or other applications where lighting standards allow a CRI < 80)	Proposal to amend the limit value for stroboscopic effect, which industry considers technically impossible to achieve for several types of light sources. The proposal builds on the text in the regulation adopted, as well as on the further evidence made available through the testing carried out by the MS and suppliers of light sources.
Annex II, point 3(d)(1)	The information specified in point 3(c)(2) of this Annex shall also be contained in the technical documentation file drawn up for the purposes of conformity assessment pursuant to Article 8 of Directive 2009/125/EC.		The information specified in point 3(c)(1) of this Annex shall also be contained in the technical documentation file drawn up for the purposes of conformity assessment pursuant to Article 8 of Directive 2009/125/EC.		To correct an erroneous reference (to a wrong point in art. 3)
Annex III	N / A – to add		Annex II 3.(a) and (b)1 of Ecodesign Regulation (EU)2019/2020 shall not apply to BESPOKE light sources used in appliances and sold as spare parts.		We do not see any additional value of having the information requirements for BESPOKE light sources used in appliances and sold as spare parts. The BESPOKE light sources and their spare parts cannot be used for any other applications except the appliance. Therefore, this additional requirement will not bring any added value to

			<u>consumers neither from an energy saving point of view nor from an informative one.</u>
Annex III, point 1(c)	in radiological and nuclear medicine installations, as defined in Article 3 of Council Directive 2009/71/EURATOM ⁽³⁾ (Footnote 3) Council Directive 2009/71/Euratom of 25 June 2009 establishing a Community framework for the nuclear safety of nuclear installations (OJ L 172, 2.7.2009, p. 18).	in radiological and nuclear medicine installations that are subject to radiation safety standards as set out in Council Directive 2013/59/EURATOM ⁽³⁾ ; ⁽³⁾ Council Directive 2013/59/Euratom of 5 December 2013 laying down basic safety standards for protection against the dangers arising from exposure to ionising radiation (OJ L 13, 17.1.2014, p. 1).	To correct an erroneous reference (to a wrong EURATOM Directive)
Annex III, point 2, new letter	N/A	<u>(^(b)) separate control gears specifically used in products covered by the Standby Regulation 1275/2008 and its amendments.</u> <u>(^(f)) separate control gears specifically used in products covered by specific ecodesign requirements ⁽¹⁶⁾. refrigerating appliances as defined in Commission Regulation (EU) 2019/2019^(16a), dishwashers as defined in Commission Regulation (EU) 2019/2022^(16b), washing machines and washer dryers as defined in Commission Regulation (EU) 2019/2023^(16c), refrigerating appliances with a direct sales function as defined in Commission Regulation (EU) 2019/2024^(16d), domestic ovens, hobs and range hoods as defined in Commission Regulation (EU) No 66/2014^(16e).</u> <u>^(16a) Examples:</u> Commission Regulation (EU) 2019/2022 of 1 October 2019 laying down	To insert an exemption for separate control gears that are components of household appliances, as proposed by Applia. These control gears are in a special situation because: (i) their energy efficiency is part of the overall energy efficiency of products that are already regulated; and (ii) the control gears are physically a part of bigger integrated control boards that regulate other functions of the white goods. Thus, it is hard to separate and measure/test the components that control the light sources.

		<p>ecodesign requirements for household dishwashers pursuant to Directive 2009/125/EC of the European Parliament and of the Council amending Commission Regulation (EC) No 1275/2008 and repealing Commission Regulation (EU) No 1016/2010 (OJ L 315, 5.12.2019, p. 267; and Commission Regulation (EU) No 66/2014 of 14 January 2014 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for domestic ovens, hobs and range hoods (OJ L 29, 31.1.2014, p. 33).</p> <p>Commission Regulation (EU) 2019/2019 of 1 October 2019 laying down ecodesign requirements for refrigerating appliances pursuant to Directive 2009/125/EC of the European Parliament and of the Council and repealing Commission Regulation (EC) No 643/2009 (OJ L 315, 5.12.2019, p. 187).</p> <p>^(16e) Commission Regulation (EU) 2019/2023 of 1 October 2019 laying down ecodesign requirements for household washing machines and household washer-dryers pursuant to Directive 2009/125/EC of the European Parliament and of the Council, amending Commission Regulation (EC) No 1275/2008 and repealing Commission Regulation (EU) No 1015/2010 (OJ L 315, 5.12.2019, p. 285).</p> <p>^(16d) Commission Regulation (EU) 2019/2024 of 1 October 2019 laying down ecodesign</p>	<p><u>APPLiA strongly welcomes the introduction of this exemption. Nevertheless, to be in line with the rationale provided by the Commission, we recommend to also add a reference to the Standby regulation (see our proposal in the text).</u></p> <p><u>Moreover, non-specific wording in the legislation would ensure that when new future ecodesign product specific legislation is created, the Commission would not need to amend this article in the lighting regulation every time.</u></p>
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		requirements for refrigerating appliances with a direct sales function pursuant to Directive 2009/125/EC of the European Parliament and of the Council (OJ L 315, 5.12.2019, p. 313).	
Annex III, point 3(s)	halogen light sources with blade contact-, metal lug-, cable-, litz wire- or non-standard customised electrical interface, specifically designed and marketed for industrial or professional electro-heating equipment (e.g. stretch blow-moulding process in PET-Industry, 3D-printing, gluing, inks, paint and coating hardening);	In Annex III, point 3(s) is replaced by the following: Incandescent light sources with blade contact-, metal lug-, cable-, litz wire- or non-standard customised electrical interface, encasing made from quartz-glass tubes, specifically designed and marketed for industrial or professional electro-heating equipment (e.g. stretch blow-moulding process in PET-Industry, 3D-printing, photovoltaic and electronic manufacturing processes, drying or hardening of adhesives, inks, paints or coatings);	To clarify a definition and make it more specific, as proposed by industry stakeholders.
Annex III, point 3(w)	white light sources which (1) are designed and marketed specifically for scene-lighting use in film-studios, TV-studios and locations, and photographic-studios and locations, or for stage-lighting use in theatres, during concerts or other entertainment events; and which:	light sources that (1) are designed and marketed specifically for scene-lighting use in film-studios, TV-studios and locations, and photographic-studios and locations, or for stage-lighting use in theatres, during concerts or other entertainment events; and that	To clarify an exemption for certain light sources used in theatre and entertainment applications. The clarification was requested by the industry.

	<p>(2) provide two or more of the following specifications:</p> <p>(a) LED with high CRI > 90;</p> <p>(b) GES/E40, K39d socket with changeable Colour Temperature down to 1 800 K (undimmed), used with low voltage power supply;</p> <p>(c) LED rated at 180W and greater and arranged to direct output to an area smaller than the light emitting surface;</p> <p>(d) DWE lamp type which is a tungsten lamp defined by its wattage (650 W) voltage (120 V) and terminal type (pressure screw terminal);</p> <p>(e) white bi-colour LED sources;</p> <p>(f) fluorescent tubes: Min BI Pin T5 and Bi Pin T12 with CRI ≥ 85 and CCT 2 900, 3 000, 3 200, 5 600 or 6 500 K.</p>	<p>(2) meet at least one of the following specifications:</p> <p>(a) LED with power ≥ 180 W and CRI > 90;</p> <p>(b) GES/E40, K39d socket with changeable Colour Temperature down to 1 800 K (undimmed), used with low voltage power supply;</p> <p>(c) LED with power ≥ 180 W and arranged to direct output to an area smaller than the light emitting surface;</p> <p>(d) Incandescent light source that is DWE type and has 650 W power, 120 V voltage and pressure screw terminal;</p> <p>(e) LED with power ≥ 180 W that allows the user to set different correlated colour temperatures for the emitted light;</p> <p>(f) LFL T5 with G5 cap and LFL T12 with G13 cap, with CRI ≥ 85 and CCT 2 900, 3 000, 3 200, 5 600 or 6 500 K.</p>	
Annex III, new point 3(x)	N/A	incandescent DLS fulfilling all of the following conditions: E27 cap, clear envelope, power ≥ 100 W and ≤ 400 W, CCT ≤ 2 500 K, specifically designed and marketed for infrared heating.	<p>To introduce an exemption for clear lamps used primarily for infrared heating.</p> <p>The industry considers that not having such an exemption will seriously impact several sectors (e.g. restaurants, poultry farming) that use incandescent lamps also as heat sources. Valid</p>

								alternatives for dual purpose lamps (lighting + heating) are not available.
Annex IV, Table 6		Flicker [P_{st} LM] and stroboscopic effect [SVM]	10	The determined value shall not exceed the declared value by more than 10 %.		Flicker [P_{st} LM] and stroboscopic effect [SVM]	10	The determined value shall not exceed the declared value by more than 0,1.
								To compensate for some low tolerances calculated in relation to small numbers (less than one unit).