

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 13. November 2017  
**Stellungnahme des Bundesverbandes der Deutschen Industrie  
 (BDI) vom 19. Januar 2018**

*Hinweis: Dies ist die englischsprachige Version; die deutschsprachige kann heruntergeladen werden 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 13 November 2017  
**Comments by the Federation of German Industries (BDI)  
 as of 19 January 2018**

*Please notice: This is a text in English. A version in German language can be downloaded 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 13 novembre 2017  
**Commentaires de l'Association fédérale de l'industrie allemande (BDI)  
 du 19 janvier 2018**

*Indication: C'est un texte en anglais. Une version allemande peut être téléchargé 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\\_Stellungnahme\\_BDI\\_2018\\_01\\_19\\_DE.pdf](http://www.eup-network.de/fileadmin/user_upload/Lichtquellen_Stellungnahme_BDI_2018_01_19_DE.pdf)

Es folgt ein unveränderter Originaltext.

**EN:** The following is an unmodified original text.

**FR:** Ce qui suit est un texte original.

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## **Position**

**BDI on the European Commission's  
13 November 2017 draft for a regime  
placing requirements on the  
ecologically responsible design of  
light sources**

**Federation of German Industries e.V.**

## Starting point

The Commission's 13 November 2017 draft for a regime placing requirements on the ecologically responsible design of light sources provides that new ecodesign requirements should apply to light sources from as soon as 1 September 2020, and hence only solutions which meet the minimum requirements for electricity efficiency could be placed on the market. According to estimates, the minimum requirements laid down in annex III cannot be met by a number of lighting systems and that, where possible, only LED light sources can meet them in the medium term.

## Evaluation

The use of LED technology is welcome from the angle of ecological efficiency because it achieves a high level of energy efficiency under laboratory conditions. Accordingly, industrial production has already converted to LED light sources in many areas. However, the service life values of LED products indicated by suppliers are based on calculations and not on measurements taken under everyday practical conditions. As a result, among other aspects, the shift to LED lighting technology is subject to limitations which need to be taken into account in further implementation of the stricter rules planned by the European Commission for ecologically responsible design of light sources.

- 1.) **LED technology is not yet fully mature:** Operating conditions in industrial installations, such as high temperatures or a chemical atmosphere (ammoniac, for example), can restrict the possibilities for use of light sources. Yet high temperatures are also often reached where heat from processes accumulates beneath the ceiling of the production hall.
- 2.) **LED light sources for rail applications not ready for market:** The market readiness of LED light sources is not a given for rail applications. This is the case in particular for the area of T8 lamps.
- 3.) **High replacement rate:** The use of LEDs can be made more difficult or even impossible in certain areas due to an above-average replacement rate. This is not sustainable.
- 4.) **Standardised solutions are not yet available:** The conversion to LED lamps would usually involve changing the entire module, since no standardised solutions are currently available on the market and the technology deployed is generally obsolete for an upcoming change. This increases costs and reduces the economic benefit. For instance, conversion of the existing system to LED technology would generate costs of around 815 million Euro for current rail applications.

- 5.) **CE conformity is not ensured:** When individual units are replaced, it is possible that the manufacturer's CE conformity may cease to be valid for the entire module.
  
- 6.) **Problems with evaluation of colour samples:** In the textile industry, there may be a problem with evaluating colour samples of dyed textiles. For this purpose, the suppliers in question provide complete sampling cabins, including lighting. There could be a problem for the manufacturers of such cabins if LED is the only lighting technology available.
  
- 7.) **Rules necessary for special solutions:** Many industrial production processes, for example in the chemical industry, place high requirements on material resistance in areas such as temperature, pH value or corrosion which have to be combined with explosion protection requirements. The extent to which the new ecodesign requirements have an impact on the installations in an area with explosion risk and in other safety-relevant areas must therefore be verified in detail. For example, the deployment of LEDs is not possible in explosion protection areas with the temperature classes T5 and T6. Under the new conditions, it might no longer be possible to use the established special solutions, which are sometimes niche products and available on the market only in comparatively small quantities. Hence, implementation of the new ecodesign requirements for special solutions requires **derogation rules or longer implementation periods**. This also applies with regard to the numerous energy-efficient T8 lamps which were installed just a few years ago for rail applications prior to the emergence of LEDs. In some cases, they have an economic service life until 2035.

### **Conclusion:**

Bearing in mind the arguments set out in points 1.) to 7.) above, the European Commission should make provision for an appropriate transition period of at least 15 years for implementation of the stricter requirements on the ecologically responsible design of light sources. The start date of 1 September 2020 envisaged by the European Commission for the stricter requirements on light sources is not feasible and makes no sense in either economic or ecological terms in many areas of industrial production.

## About BDI

The Federation of German Industries (BDI) communicates German industries' interests to the political authorities concerned. She offers strong support for companies in global competition. The BDI has access to a wide-spread network both within Germany and Europe, to all the important markets and to international organizations. The BDI accompanies the capturing of international markets politically. Also, she offers information and politico-economic guidance on all issues relevant to industries. The BDI is the leading organization of German industries and related service providers. She represents 36 inter-trade organizations and more than 100.000 companies with their approximately 8 million employees. Membership is optional. 15 federal representations are advocating industries' interests on a regional level.

## Imprint

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