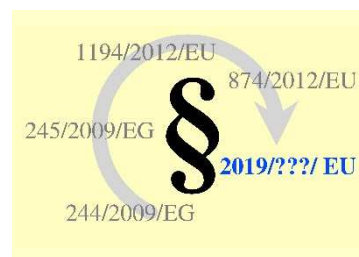


Texte zu den geplanten neuen EU-Regelungen zur umweltgerechten Produktgestaltung und zur Energieverbrauchskennzeichnung in der Beleuchtung – Zusammenstellung * des Umweltbundesamtes (UBA), Deutschland



Entwürfe der EU-Kommission vom 3. Juli 2018
Stellungnahme des BUND **
vom September 2018

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

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

Comments by BUND ** (Friends of the Earth, Germany)
as of September 2018

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

Commentaires de BUND ** (Les Amis de la Terre, Allemagne)
de septembre 2018

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

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

** BUND = Bund für Umwelt und Naturschutz e.V.; <https://www.bund.net/>

Texte im Offenen Forum

Bestehende Regelungen

Vorstudie vom Oktober 2015

Regelungsentwürfe

- EK-Vorentwürfe vom November 2015 für das Konsultationsforum
- VHK-Entwürfe vom Sommer 2016 (nicht im Offenen Forum verfügbar)
- VHK-Entwürfe vom Sommer 2017 (nicht im Offenen Forum verfügbar)
- EK-Entwürfe vom November 2017 für das Konsultationsforum

EK-Entwürfe vom Juli 2018 für die dienststellenübergreifende Konsultation

- EK-Texte
- Arbeitshilfen/Hintergrundtexte
- **Stellungnahmen**
 - Mitgliedstaaten
 - **Sonstige**
 - **BUND (September 2018)**
 - Sonstige
- Diskussionstexte
- EK-Entwürfe vom Oktober 2018 für die WHO-Notifizierung
- EK-Entwürfe für den Regelungsausschuß

Öffentliche Konsultationen auf EU-Ebene

Diskussion im Offenen Forum

Weitere Dokumente

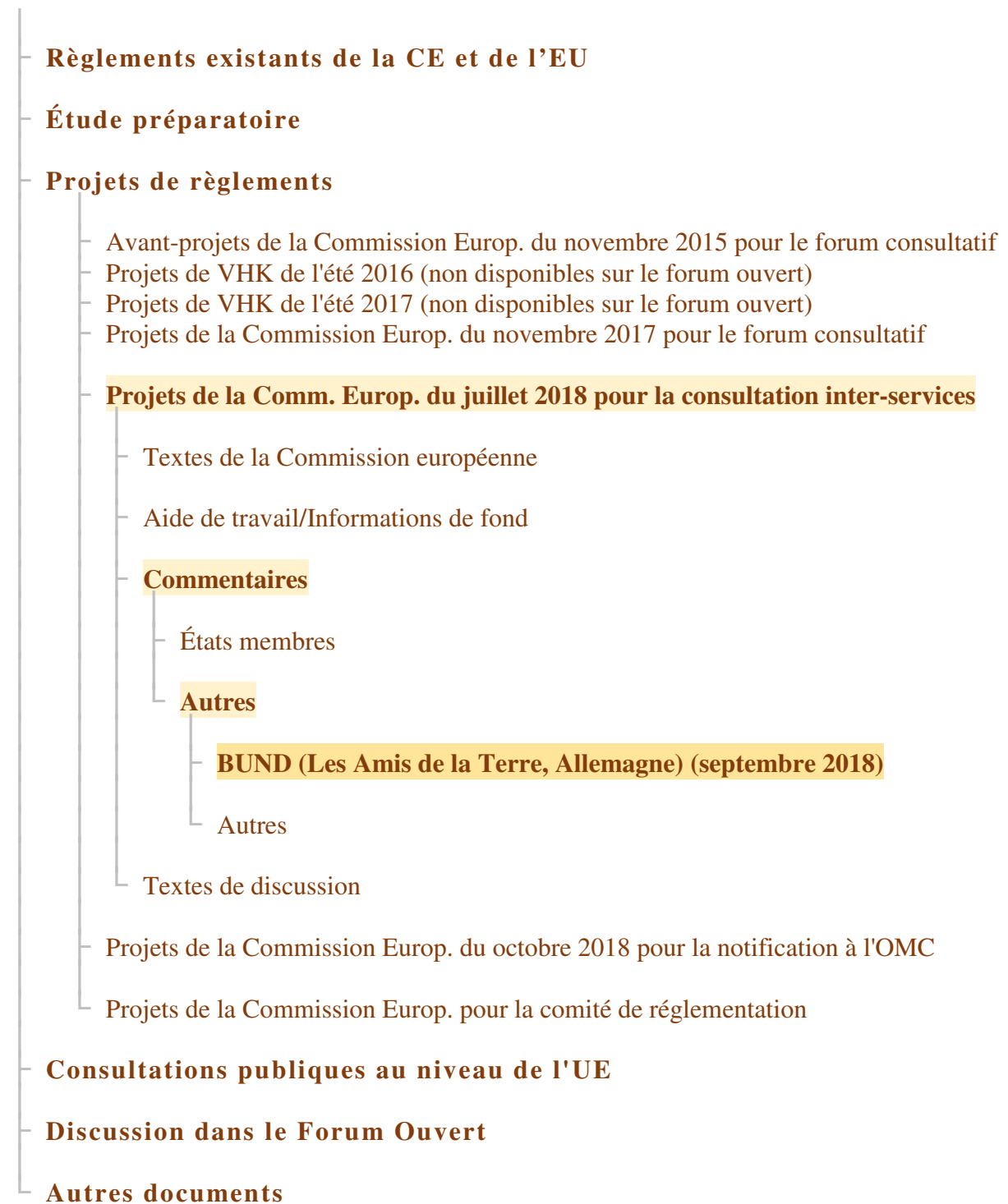
Abkürzungen: • BUND = Bund Umwelt und Naturschutz e. V. • EK = EU-Kommission
• KF = Konsultationsforum • VHK = Van Holsteijn en Kemna, <https://www.vhk.nl/>
• WHO = Welthandelsorganisation

Documents in the Open Forum



Abbreviations: • BUND = Bund Umwelt und Naturschutz e. V. • VHK = Van Holsteijn en Kemna, <https://www.vhk.nl/> • WTO = World Trade Organisation

Documents dans le forum ouvert



Abréviations : • BUND = Bund Umwelt und Naturschutz e. V. • OMC = Organisation mondiale du commerce • VHK = Van Holsteijn en Kemna, <https://www.vhk.nl/>

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

September 2018

As part of the Coolproducts campaign work, BUND has the following recommendations on the final Commission's proposal for Ecodesign and Energy Labelling Regulations for Light Sources:

Ahead of the Member states vote expected by the end of the year, we would like to support the draft Ecodesign and Energy Labelling regulations¹ proposed by the European Commission, and **particularly the phase out of T8 lamps, the precise information that will be made accessible in the product database, and the revised verification tolerance levels.** We also have the following recommendations on how to further improve the proposals.

Accelerate implementation

We do not support delaying the entry into force of the Regulations by a year or even more. We particularly oppose the nine-month transition period offered for relabelling products in shops until June 2022. It is way too long and inconsistent with Energy labelling Regulation 2017/1369 that states that new labels should be displayed in shops by the end of 2019.

Tighten the chromaticity boundaries

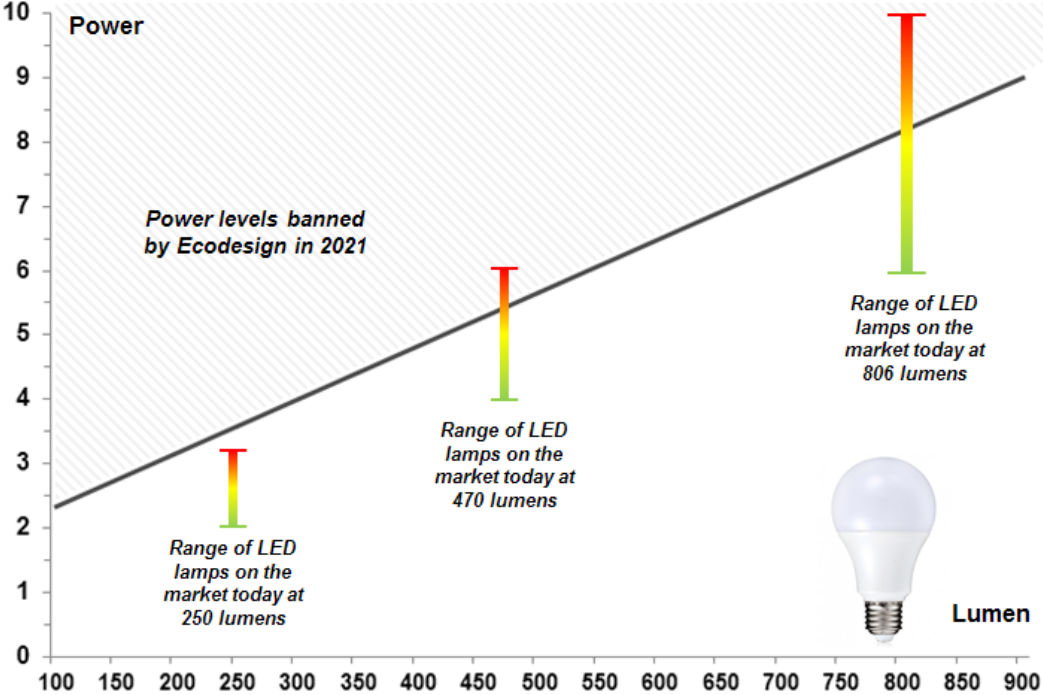
We urge the Regulatory Committee to ensure that the light chromaticity boundaries defining the scope are not creating the risk of a loophole (i.e. products placed on the market just outside the boundaries, that would still look like white light but would escape all requirements).

Set the L factor at 1.0 instead of 1.5

We warn again about the too high 'end-loss factor' L for LEDs in the formula for efficacy requirements. There will be hardly any impact on household products in the low and medium lumen ranges, where efficiency can be substantially improved. This is illustrated in

¹ Version of 3rd July 2018 circulated to the Ecodesign Consultation Forum on 13 July 2018

the graph below for standard (non-directional) LED bulbs. We recommend setting the L factor at 1.0 instead of 1.5.



Introduce a mid-term check in the new accelerated endurance testing proposal

We welcome the new accelerated endurance testing proposal, which combines resistance and lumen maintenance. However, a 5-month test is long for proper market surveillance and timely sanctions. In order to ensure products of the worst quality can be more quickly identified and taken care of, we suggest introducing a mid-term check during the test:

“After half of the test completion (that is 600 switching cycles), a check is made on the lamp batch. If one or more light sources have already failed, or if the lumen maintenance factor of the batch has already reached $X_{LMF,MIN}\%$ or less, the test is discontinued and the model is considered non-compliant.”

Raise ambition on product dismantlability

Provision on products dismantlability have been substantially weakened: while dismantlability of lighting products was foreseen in the initial proposal, it is now only foreseen for market surveillance purposes and only dismantling is required. This is a big step backwards and we call on the reintroduction of the initial proposal which was supported by several Member States in December 2017.

Should this option be considered unfeasible, it is essential in our opinion that to allow independent repairers to repair products by:

- Requiring non-destructive dismantlability by independent repairers
 1. *Manufacturers and importers of containing products shall ensure that light sources and separate control gears can be removed without being permanently damaged for repair purposes by independent repairers and without permanent damage to the containing product. For containing products, instructions should be available on request on how light sources and separate control gears can be removed for repair without these being permanently damaged and without permanent damage to the containing product.*
 2. *Manufacturers and importers of containing products shall ensure that light sources and separate control gears can be disassembled from containing products. Instructions shall be available on request.*
 3. *Manufacturers and importers of containing products shall provide information about the replaceability or non-replaceability of light sources and control gears by end-users or qualified persons without permanent damage to the containing product. Such information shall be available on free-access websites. For products sold directly to end-users, this information shall be on the packaging, at least in the form of a pictogram.*
- Making extremely clear to consumers that the light source cannot be dismantled by reinforcing Ecodesign Article 4.3:

Manufacturers and importers of containing products shall provide information about the non-replaceability of light sources and control gears by end-users without permanent damage to the containing product. Such information shall be available on any visual advertisement for a specific model, including on the Internet. For products sold directly to end-users, this information shall be on the packaging, at least in the form of a pictogram with explanatory text.

Other points

- Introduce functional requirements on control gears. Limiting these to lighting sources is insufficient in our opinion.
- Remove the exemption for lamps operating below -30°C.
- Remove the exemption of kitchen hoods. While we understand their lighting efficiency is already covered in a vertical regulation, these should not be exempted from removability and dismantability requirements of lighting parts.

- Reinstate the provision restricting green claims to top class models². Terms such as 'energy saver', 'eco-lamp', etc. should not be allowed for models that will be of the lowest performance.
- Include an article about obligations of web hosting platforms, as in the draft Energy Labelling regulations for dishwashers and washing machines (article 5).
- Refine Recital 17 and make it an Article, as with other drafts in discussion:

“Product parameters should be measured and calculated using reliable, accurate, reproducible and representative of real-life conditions and users’ behaviour methods which take into account recognised state-of-the-art measurement and calculation methods, including, where available, harmonised standards adopted by the European standardisation organisations following a request by the Commission, in accordance with the procedures laid down in Regulation (EU) No 1025/2012 of the European Parliament and of the Council.”

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² See for example regulation 244/2009: “The term ‘energy saving lamp’ or any similar product related promotional statement about lamp efficacy may only be used if the lamp complies with the efficacy requirements applicable to non-clear lamps in Stage 1 according to Tables 1, 2 and 3.”