

Texte zu den geplanten neuen EU-Regelungen zur umweltgerechten Produktgestaltung und zur Energieverbrauchs-kennzeichnung in der Beleuchtung – Zusammenstellung <sup>[1]</sup> des Umweltbundesamtes (UBA), Deutschland



Entwürfe der EU-Kommission vom 8. Oktober 2018

**Stellungnahme der Organisation CLASP <sup>[2]</sup>  
vom November 2018  
– Produktgestaltung –**

*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 <sup>[1]</sup> of the Federal Environment Agency (UBA), Germany

The EU Commission's drafts of 8 October 2018

**Comments by CLASP <sup>[2]</sup> as of November 2018  
– Product design –**

**FR:** Informations sur les futures réglementations de l'UE concernant l'éclairage – l'écoconception et l'étiquetage énergétique – Compilation <sup>[1]</sup> de l'Agence Fédérale de l'Environnement (UBA), Allemagne

Les projets de la Commission Européenne du 8 octobre 2018

**Commentaires de l'organisation CLASP <sup>[2]</sup>  
du novembre 2018  
– Conception des produits –**

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

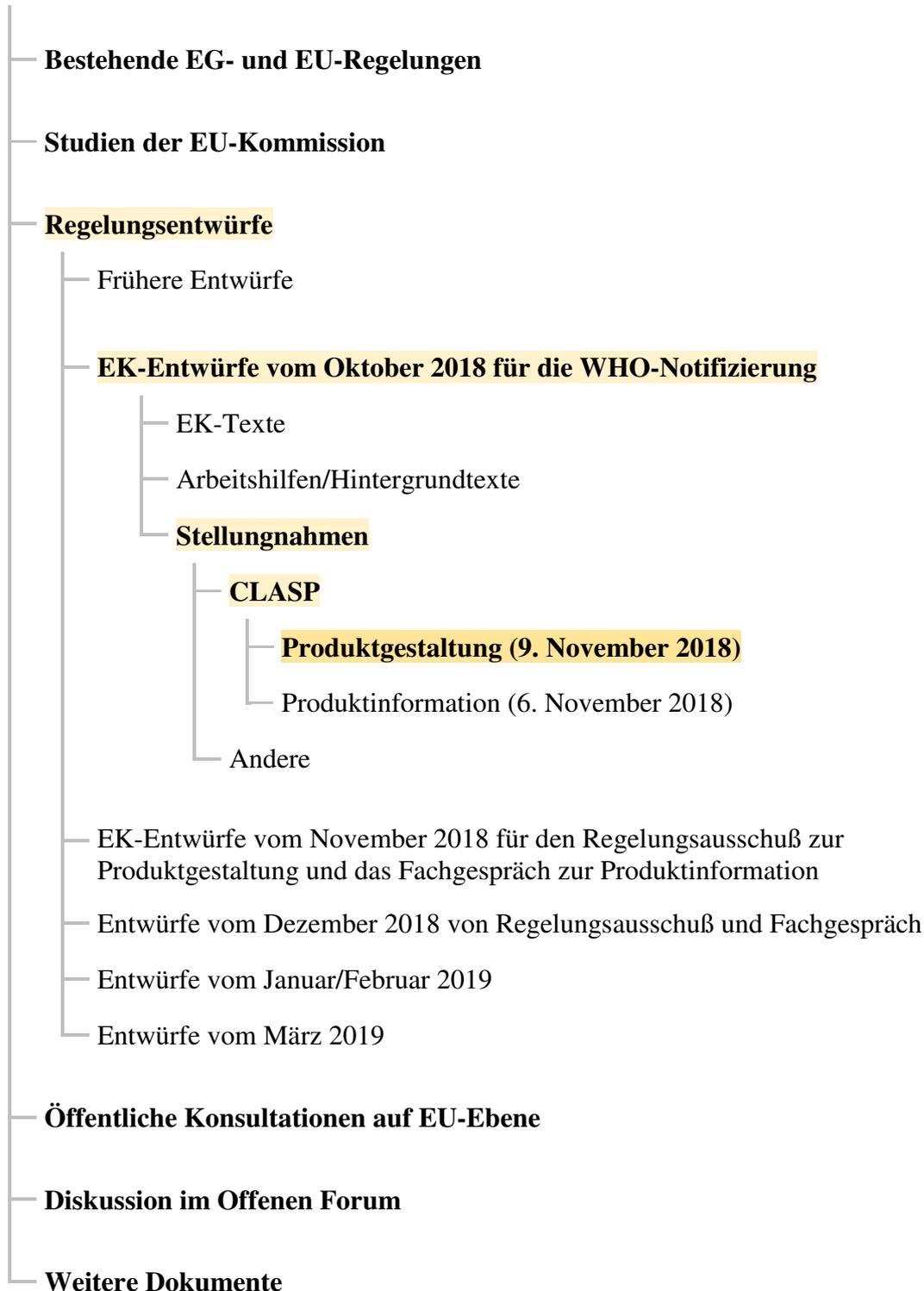
<sup>[1]</sup> <https://www.eup-network.de/de/eup-netzwerk-deutschland/offenes-forum-eu-regelungen-beleuchtung/dokumente/texte/>

<sup>[2]</sup> CLASP = Collaborative Labeling and Appliance Standards Program; <http://www.clasp.ngo>



**Texte im Offenen Forum**

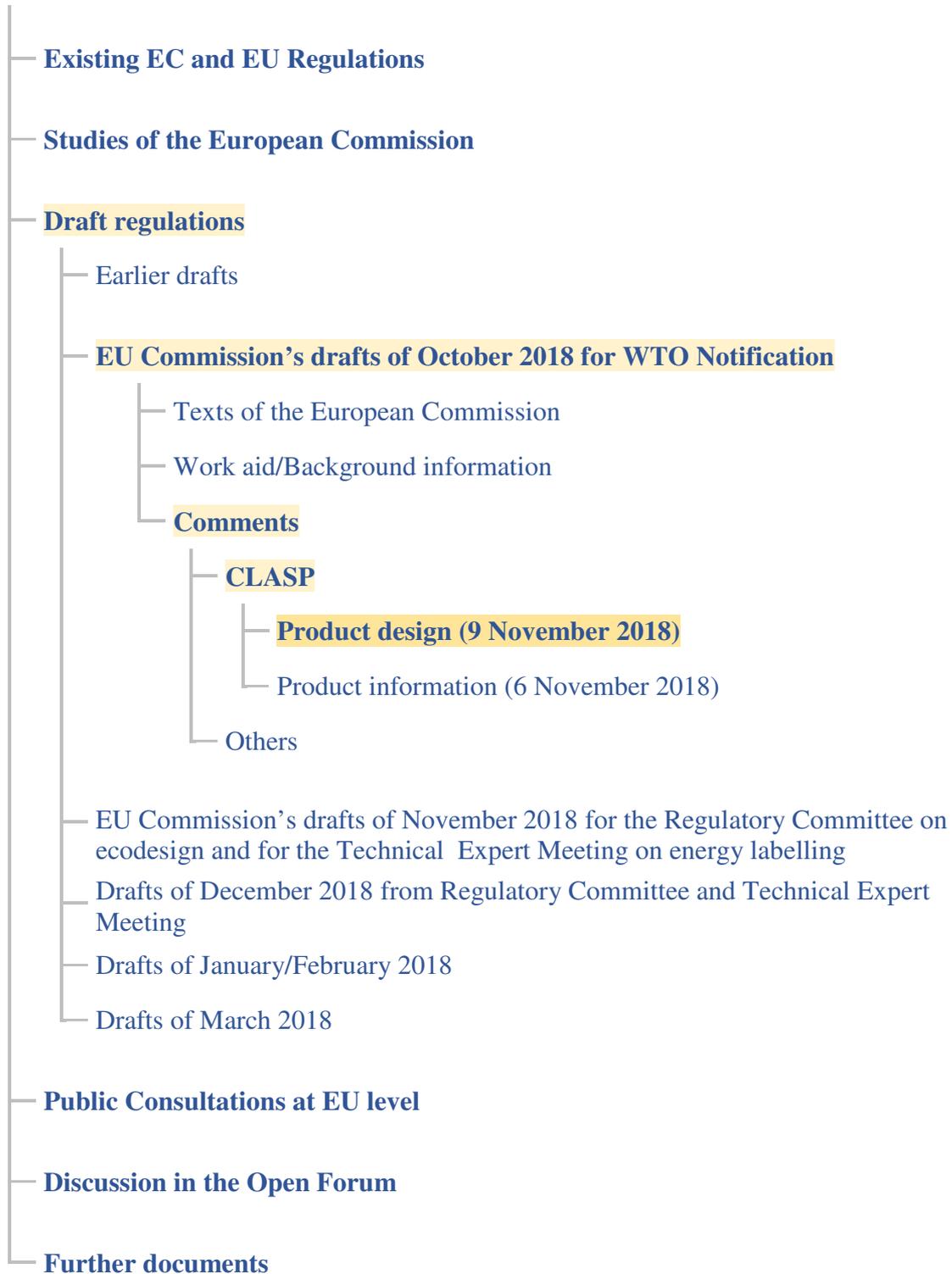
(**abc** = vorliegender Text)



Abkürzungen: • CLASP = Collaborative Labeling and Appliance Standards Program, USA (Kooperationsprogramm für Kennzeichnungs- und Gerätestandards) <https://clasp.ngo/> • EG = Europäische Gemeinschaft • EU = Europäische Union • WHO = Welthandelsorganisation

**Documents in the Open Forum**

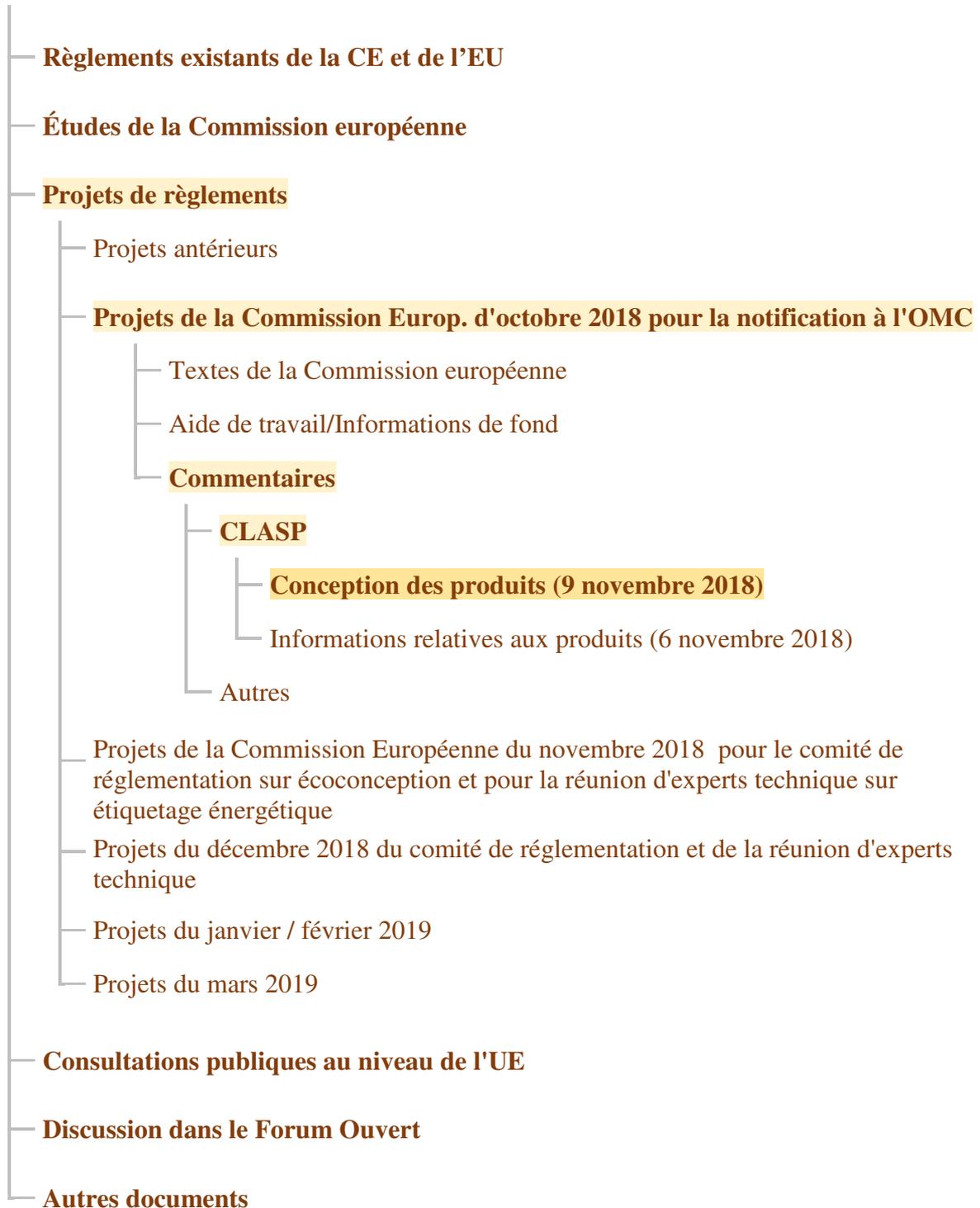
(abc = text at hand)



Abbreviations: • CLASP = Collaborative Labeling and Appliance Standards Program, USA; <https://clasp.ngo/>  
• EC = European Communities • EU = European Union • WTO = World Trade Organisation

## Documents dans le forum ouvert

(abc = présent document)



Abréviations : • CE = Communauté européenne • CLASP = Collaborative Labeling and Appliance Standards Program, États-Unis (Programme de coopération pour les normes d'étiquetage et les normes relatives aux dispositifs) <https://clasp.ngo/> • UE = Union européenne • OMC = Organisation mondiale du commerce

---

Es folgt ein unveränderter Originaltext.

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

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

---



**To:** DG ENER, European Commission

**From:** Michael Scholand, Senior Advisor, CLASP Europe  
Marie Baton, Lead, CLASP Europe

**Date:** 9 November 2018

**Subject:** Comments on Ecodesign requirements for lighting products

Thank you for this opportunity to provide comments on the draft ecodesign implementing measure for lighting. With the notable exception of the delay to the effective date of the regulation to 2021, CLASP is generally supportive of the Commission's proposal, however we have some important comments that we ask you to please take into account.

#### **Change the effective date back to 2020 as originally proposed**

CLASP strongly supported the Commission's original proposed effective date of September 2020 for the regulation, including in particular the phase-out T8 linear fluorescent lamps. Our review of the current T8 market shows that there are literally thousands of models of LED replacement lamps, made by very reputable companies (including LightingEurope members) at affordable prices, long life and excellent quality light. There are replacement lamps that operate on magnetic and HF ballasts and on mains voltage. And given that virtually all new luminaires being installed in Europe today (including refurbishments) are LED fixtures, the phase-out in 2020 of certain T8 fluorescent lamps is not only the least-life-cycle cost option, but is entirely reasonable and appropriate. For example, Philips offers a CorePro LED Tube via an on-line UK lamp retailer at £8.59 including VAT. This lamp is 14.5W and replaces a 36W linear fluorescent lamp. If we assume a replacement linear fluorescent lamp costs £3.00, then the payback from installing the LED lamp if it operates for 8 hours per day is 7 months. In 2.5 years when Tier 1 takes effect, the LED lamp will be even more efficient and less expensive – so if Tier 1 is fully cost justified with today's technology, it will be even more compelling in 2020. Clearly there is no need to delay implementation of the lighting regulation, including phase-out of certain linear fluorescent lamps. European companies and European end-users alike will benefit from this measure, not to mention the climate and the Commission's greenhouse gas reduction goals.

#### **Expand the Scope of Coverage slightly**

The Commission's proposed scope of coverage of white-light space is at risk of being exploited as a loophole. CLASP is deeply concerned that in our analysis of a German market database of 1000 non-directional lamps, 17 models fell outside the scope of coverage – meaning they are not subject to any of the performance, quality or labelling requirements. This 2% of models could very easily expand to become a larger and larger share of the market, as opportunistic suppliers seek to exploit the loop hole and undermine reputable companies following the Ecodesign policy measure. CLASP's recommended area of white-light coverage calls for a very modest expansion of the scope to prevent this loop-hole from being exploited. The equation we recommend in x,y space would be:

$$0.250 < x < 0.570 \quad \text{and} \quad -2.3172 x^2 + 2.3653 x - 0.2400 < y < -2.3172 x^2 + 2.3653 x - 0.1400$$

### **Product Quality – Temporal Light Artefacts**

Industry and stakeholders agree that temporal light artefacts (TLA) can be a problem in LED lighting. The two metrics incorporated into the current draft of ecodesign are the short term flicker metric, PstLM (IEC TR 61547-1) and stroboscopic visibility metric SVM (IEC TR 63158). CLASP welcomes the addition of the SVM requirement, as this was not included in the earlier draft, however we are concerned that the recommended levels are much too high, set at levels where approximately 50% of the population can detect them. Exposing half the population of Europe to the potential health effects of flicker including fatigue, headaches, eye strain and seizures would be problematic. Furthermore, CLASP understands that on the market today, flicker-free lamps compete side-by-side with flickering lamps at the same price points. Several European brands are among the quality flicker-free sources, and thus these companies would benefit from a measure not to undercut them with flickering lamps that put people's health at risk. CLASP also understands that the incremental cost of making a flicker-free driver is marginal – thus we recommend adopting a precautionary principle due to the concomitant health risks, and call on the Commission to adopt significantly lower values for SVM and for PstLM.

### **Lifetime Testing**

CLASP welcomes the Commission's new test method for lifetime, the 3600-hour test that combines switching cycles and lumen maintenance into one test sample of lamps. We recognise that this test cuts the lifetime testing of the current regulation (EU No 1194/2012) by nearly 50% to lower market surveillance costs and shorten testing periods. In addition, we recognise that the new test method is more representative of real life usage in the home – 2.5 hours on each cycle – putting the electronics, the solder joints and components through the typical thermal and electrical cycling that these lamps will experience in the home. This is a very significant advantage over the previous (IEC) test proposed, which had rapid switching (30 seconds on/off) and one long 6000 hour operation period (>8 months). CLASP is currently testing 100 lamps and luminaires at an accredited lab to this test standard and will share the results with the consultation forum when they are ready.

### **Delete Useful Luminous Flux for Directional Lamps**

CLASP continues to oppose the definition of useful luminous flux, and strongly recommends that the Commission consider all light output from a directional lamp to be 'useful'. Having a fixed cone of "useful flux" across the wide range of beam angles available in the market introduces an uneven quantification of product performance, and thus an uneven application of the regulatory measure. Ignoring the light emission outside of the useful cone does not represent real life usage in the home or office, where instead all forward lumens are beneficial – thus this approach represents an artificial, not realistic testing construct and rejects real life usage. Other regulatory entities around the world set requirements on directional lamps, but none use this cone of useful luminous flux. This concept of useful luminous flux is unnecessary and burdensome, adds complexity and cost, is not representative of real life, and serves no practical benefit for the European market.

### **Serviceability of Luminaires**

CLASP would recommend that the Commission require all luminaires to be 'serviceable' to ensure that one small component failure will not require the disposal of the entire fixture. Indeed, with LED drivers and LED circuit boards / light arrays, there are many components that could fail and lead to overall

catastrophic failure of the product. By having ‘serviceable’ luminaires, the resource efficiency objectives can be realised, with extended product service lives by replacing parts rather than discarding entire luminaires. CLASP welcomes the inclusion of the requirement that light sources and separate control gears must be able to be removed without being permanently damaged – this provision should be retained as a first step toward serviceable luminaires, however we recommend that the Commission go one step further and require that all luminaires be serviceable, to not only operate in a more resource-efficient environment but also to give end-users the option of repair vs. replace when one component in the system fails and causes the whole fixture to fail. Supplying spare parts is normal practice in other European industries and there is no reason such measures should not apply to lighting as well.

### **Exemption to Reconsider**

Exemption 3(l) excludes for light sources with a beam angle of less than 10 degrees: “light sources with a beam angle of less than 10° and intended for spot-lighting applications requiring a very narrow light beam;” This represents a rolling back of the requirements of EU No 1194/2012 and we do not agree that no LED replacements are available. Spending 2 minutes on Google, we were able to find several LED lamps that are 8 degrees, and one at 5 degrees.<sup>1</sup> Furthermore, CLASP was informed by a representative of the International Association of Lighting Designers (IALD) that this exemption represented “the biggest loophole imaginable” as he described exempted directional lamps manufactured with a 9 degree beam angles that would shine into a “cheap plastic lens” that would then distribute the light more widely in the room. These products would not be subject to the regulation and thus would undermine honest suppliers who are working to comply with the law rather than circumvent it. For all of these reasons, CLASP strongly recommends that the Commission delete this exemption.

---

<sup>1</sup> [https://www.alibaba.com/product-detail/3w-dicroica-led-lamp-GU10-with\\_60532946321.html?spm=a2700.7724857.normalList.78.51485fcb2WjgkK](https://www.alibaba.com/product-detail/3w-dicroica-led-lamp-GU10-with_60532946321.html?spm=a2700.7724857.normalList.78.51485fcb2WjgkK)

[https://www.alibaba.com/product-detail/Anti-Glare-Design-High-Bright-Spot\\_60440567525.html?spm=a2700.7724857.normalList.38.51485fcb2WjgkK](https://www.alibaba.com/product-detail/Anti-Glare-Design-High-Bright-Spot_60440567525.html?spm=a2700.7724857.normalList.38.51485fcb2WjgkK)

[https://www.alibaba.com/product-detail/Factory-price-3000K-8-degree-led\\_60563529344.html?spm=a2700.7724857.normalList.86.51485fcb2WjgkK](https://www.alibaba.com/product-detail/Factory-price-3000K-8-degree-led_60563529344.html?spm=a2700.7724857.normalList.86.51485fcb2WjgkK)

[https://www.alibaba.com/product-detail/AR111-led-lamp-G53-with-beam\\_60564140284.html?spm=a2700.7724857.normalList.130.51485fcb2WjgkK](https://www.alibaba.com/product-detail/AR111-led-lamp-G53-with-beam_60564140284.html?spm=a2700.7724857.normalList.130.51485fcb2WjgkK)