

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



Entwürfe der EU-Kommission vom 6. Oktober 2020

**Stellungnahme von CLASP ^[2]
vom 3. November 2020**
– Produktgestaltung –

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

The EU Commission's drafts of 6 October 2020

Comments by CLASP ^[2] as of 3 November 2020
– Product Design –

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

Les projets de la Commission Européenne du 6 octobre 2020

Commentaires de l'association de CLASP ^[2] du 3 novembre 2020
– Conception des produits –

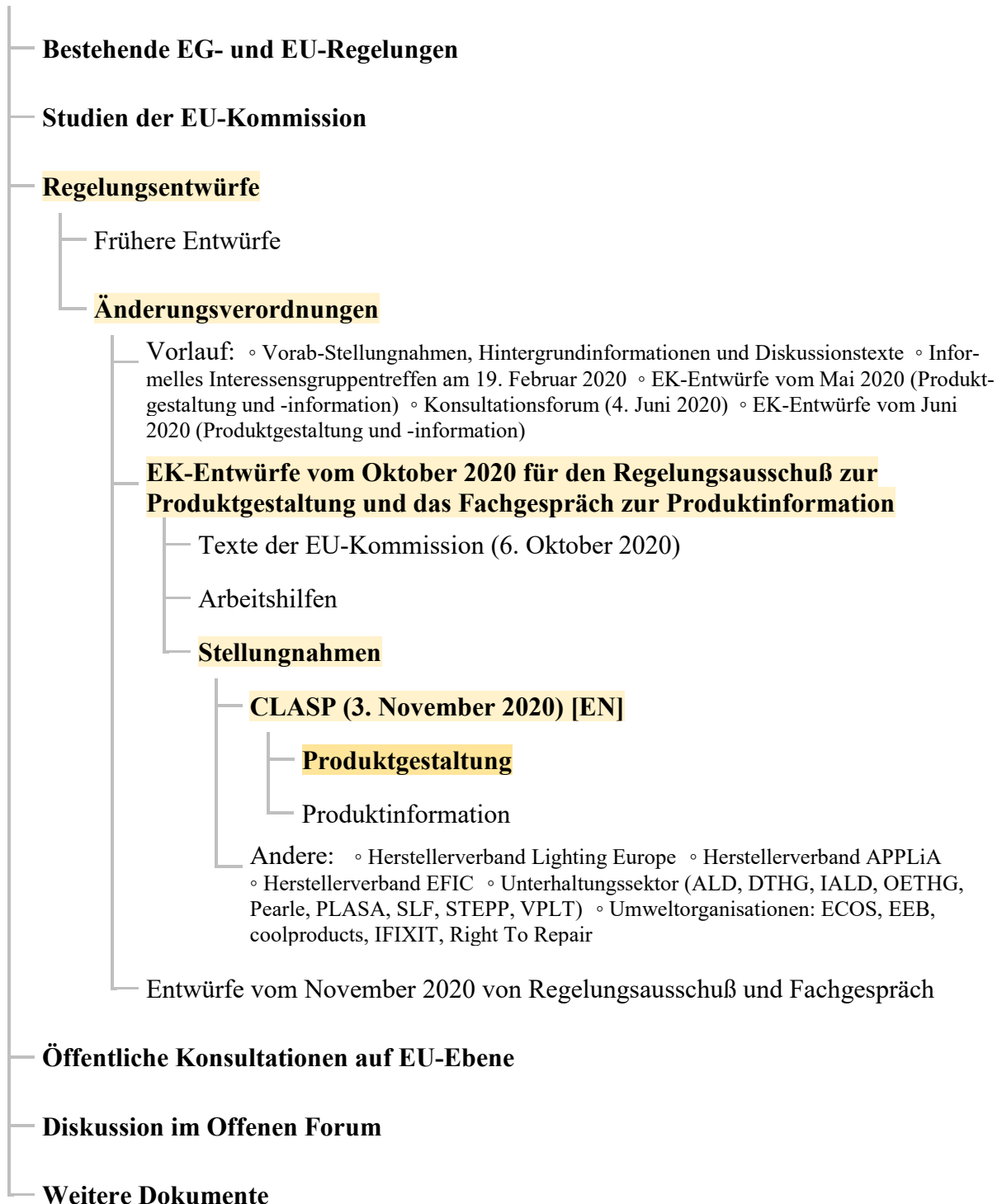
Indication : Veuillez noter que le présent texte n'est disponible qu'en anglais.

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

^[2] <http://www.clasp.ngo>

Texte im Offenen Forum

(abc = vorliegender Text)



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

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Documents in the Open Forum

(abc = text at hand)



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

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Documents dans le forum ouvert

(abc = présent document)

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- Études de la Commission européenne
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◦ Réunion informelle des parties prenantes le 19 février 2020 ◦ Projets de la Commission européenne du mai 2020 (Conception des produits et informations sur les produits) ◦ Forum consultatif (4 juin 2020) ◦ Projets de la Commission européenne du juin 2020 (Conception des produits et informations sur les produits)
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Abréviations : ● CE = Communauté européenne ● UE = Union européenne

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The following table of contents gives details only in the case of lighting products.

The points on which CLASP has commented are on marked by **(CLASP)**.

The original document contains no page numbers. For better orientation the text has been supplemented by the editor with a footer text and continuous page numbering, as shown in the example on page VII.



Ecodesign

Recitals (...)

Servers and data storage products – Regulation (EU) 2019/424

Article 1/ANNEX I (...)

Electric motors and variable speed drives – Regulation (EU) 2019/1781

Article 2/ANNEX II (...)

Refrigerating appliances – Regulation (EU) 2019/2019

Article 3 **(CLASP)** 1/15

ANNEX III **(CLASP)** 4/15

Light sources and separate control gears – Regulation (EU) 2019/2020

Article 4

(1) Article 2, point 4 **(CLASP)** 8/15

(...)

ANNEX IV

(1) Annex I (...)

(2) Annex II

(a) point 2, table 4 **(CLASP)** 9/15

(...)

→

(3) Annex III (...)

(4) Annex IV (...)

Electronic displays – Regulation (EU) 2019/2021

Article 5/ANNEX V (...)

Household dishwashers – Regulation (EU) 2019/2022

Article 6/ANNEX VI (...)

Household washing machines and household washer-dryers – Regulation (EU) 2019/2023

Article 7/ANNEX VII (...)

Refrigerating appliances with a direct sales function – Regulation (EU) 2019/2024

Article 8 (CLASP) 12/15

ANNEX VIII (CLASP) 14/15

Article 9 – Entry into force and application



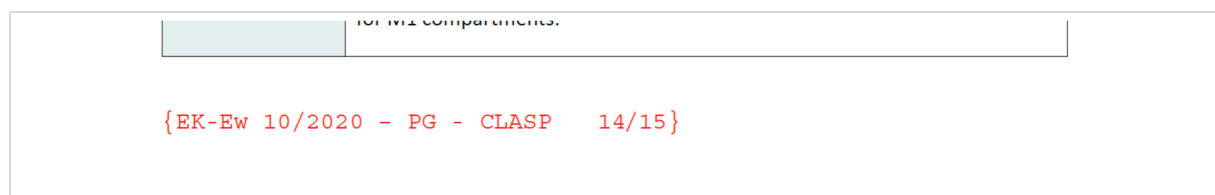
Labelling

(...)

Es folgt ein Originaltext, der keine Seitenzahlenangaben enthielt. Zur besseren Orientierung wurde der Text vom Herausgeber durch einen Fußzeilentext sowie eine Seitennumerierung ergänzt; siehe das Beispiel unten. Zwecks Unterscheidung wurden diese Ergänzungen in **{roter Schrift}** vorgenommen. Dabei verwendete Abkürzungen: • EK-Ew = Entwürfe der EU-Kommission • PG = Produktgestaltung

EN: This is followed by an original text which did not contain page numbers. For better orientation the text has been supplemented by the editor with a footer text and page numbering; see the example below. For purposes of distinction, these additions have been made in **{red}**. Here used abbreviations: • EK-Ew = EU Commission's drafts • PG = Product design

FR: Ce qui suit est un texte original qui ne contient aucun numéro de page. Pour une meilleure orientation, le texte a été complété par l'éditeur avec un texte de bas de page et une numérotation des pages ; voir l'exemple ci-dessous. À des fins de distinction, ces ajouts ont été faits en **{rouge}**. Abréviations utilisées dans ce cadre : • EK-Ew = Projets de la Commission européenne • PG = Conception des produits



To: DG Energy, European Commission

From: CLASP

Date: 3 November 2020

Re: Comments on Ecodesign Omnibus Amendment

Products covered in these comments:

- Regulation (EU) 2019/2019 – Refrigerating appliances
- Regulation (EU) 2019/2020 – Light sources and separate control gears
- Regulation (EU) 2019/2024 - Refrigerating appliances with a direct sales function

Regulation (EU) 2019/2019 – Refrigerating appliances

<p>Draft omnibus amendment</p>	<p>in Article 2, point 28 is replaced by the following:</p> <p>‘28. mobile refrigerating appliance’ means a refrigerating appliance that can be used where there is no access to the mains electricity grid and that uses extra low-voltage electricity (< 120V DC) or fuel or both as the energy source for the refrigeration functionality, including a refrigerating appliance that, in addition to extra low voltage electricity or fuel, or both, can be electric mains operated via an external AC/DC converter to be purchased separately. An appliance placed on the market with an AC/DC converter is not a mobile refrigerating appliance;’;</p>
<p>Subject and current text</p>	<p>(28) ‘mobile refrigerating appliance’ means a refrigerating appliance that can be used where there is no access to the mains electricity grid and that uses extra low-voltage electricity (< 120V DC) or fuel or both as the energy source for the refrigeration functionality, including a refrigerating appliance that, in addition to extra low voltage electricity or fuel, or both, can be electric mains operated. An appliance placed on the market with an AC/DC converter is not a mobile refrigerating appliance;</p>
<p>Comment</p>	<p>The proposed definition only allows refrigerators that “can be electric mains operated via an <u>external</u> AC/DC converter <u>to be purchased separately</u>” to be considered as mobile appliances.</p> <p>The type of product that has been identified as at risk of being unintentionally banned are thermoelectric refrigerators with a fan. Those products have a number of features that are related to their type of use as</p>

	<p>mobile appliances. These characteristics can be used to limit the risk of broadening the scope of mobile appliances in a way that would create a loophole:</p> <ul style="list-style-type: none"> - No refrigerant – leads to a better resistance to vibration and no risk of leakage; - Limited cooling capacity, leading to: <ul style="list-style-type: none"> ○ Limited volume (typically 15-90 litres) ○ Limited ΔT (around 26°C) – no frozen compartment.
<p>Recommendation</p>	<p>In order to clarify the definition and address the claims reported by the Commission, we recommend that the exemption should be based on specific technical characteristics of the product at risk of being unintentionally banned. We suggest the following text:</p> <p><i>‘mobile refrigerating appliance’ means a refrigerating appliance specifically designed and marketed to be used in vehicles or any other means of transport, and that can be used where there is no access to the mains electricity grid and that uses extra low-voltage electricity (< 120V DC) or fuel or both as the energy source for the refrigeration functionality. including a A refrigerating appliance that, in addition to extra low voltage electricity or fuel, or both, can be electric mains operated by means of an AC/DC converter that is integrated into the appliance is considered as a mobile refrigerating appliance for the purpose of this regulation if it meets one or several of the following criteria:</i></p> <ul style="list-style-type: none"> ○ <i>It contains no refrigerant gas</i> ○ <i>Its adjusted volume is smaller or equal to 90 L.</i> <p>The detailed justification for this recommendation can be found in the CLASP comments submitted in July.</p>

Draft omnibus amendment	<p>Article 6 is replaced by the following: ‘Article 6 Circumvention and software updates The manufacturer, importer or authorised representative shall not place on the market products designed to be able to detect they are being tested (for example 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 in the technical documentation or included in any documentation provided. 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 a result of rejecting the update. 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.’; (3) Annexes I to IV are amended as set out in Annex III to this Regulation.’.</p>
Subject and current text	<p>Article 6 Circumvention</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 update.</p>
Comment	<p>Important precision added.</p>
Recommendation	<p>CLASP supports the proposed modifications of the text.</p>

Annexes

Draft omnibus amendment	(1) in Annex I, the following point (38) is added: '(38) 'declared values' means the values provided by the supplier for the stated, calculated or measured technical parameters in accordance with Article 4.2, for the verification of compliance by the Member State authorities.';
Subject and current text	No definition of 'declared values'
Comment	No comment
Recommendation	CLASP supports this addition.

Draft omnibus amendment	(2) in Annex II, part 2, point (f) is replaced by the following: '(f) For 4-star compartments, the freezing time to bring the temperature of the light load from +25 to - 18 °C at an ambient temperature of 25 °C shall be such that the resulting freezing capacity complies with the requirement in Article 2, point 22.';
Subject and current text	(f) For 4-star compartments, the specific freezing capacity shall be such that the freezing time to bring the temperature of the light load (3,5 kg/100 l) from +25 to - 18 °C at an ambient temperature of 25 °C, is smaller than or equal to 18,5 h.
Comment	The edited text is simpler and avoids duplication. However, the definition in Article 2, point 22 could be more aligned with the EN/IEC standard. In the case of appliances with several compartments with a target temperature of - 18°C, it is unclear how the light load and freezing capacity should be determined <u>for each compartment</u> .
Recommendation	Clarify Article 2, point 22 for the case of appliances with several compartments with a target temperature of - 18°C.

Draft omnibus amendment	(3) in Annex III, part 1 is amended as follows: (a) point (h) is replaced by the following: '(h) the freezing capacity of a compartment is calculated as 24 times the light load weight, divided by the freezing time to bring the temperature of the light load from +25 to - 18 °C at an ambient temperature of 25 °C expressed in kg/24h and rounded to one decimal place;'; (b) the following point (j) is added: '(j) the light load weight for each 4-star compartment shall be: – 3,5 kg/100 l of the volume of the 4-star compartment evaluated, rounded up to the nearest 0,5 kg; and,
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	<p>– 2 kg for a 4-star compartment with a volume for which 3,5 kg/100 l leads to a value lower than 2 kg;</p> <p>in the case that the refrigerating appliance includes a combination of 3- and 4-star compartments, the sum of the light load weight(s) shall be increased so that the sum of the light load weights for all the 4-star compartments shall be:</p> <p>– 3,5 kg/100 l of the total volume of all 4- and 3-star compartments, rounded up to the nearest 0,5 kg; and,</p> <p>– 2 kg for a total volume of all 4- and 3-start compartments for which 3,5 kg/100 l leads to a value lower than 2 kg;’;</p>
Subject and current text	(h) the specific freezing capacity is calculated as 12 times the light load weight, divided by the freezing time to bring the temperature of the light load from +25 to -18 °C at an ambient temperature of 25 °C expressed in kg/ 12 h and rounded to one decimal place; the light load weight is 3,5 kg per 100 litre of the compartment volume of the frozen compartments, and shall be at least 2,0 kg;
Comment	The addition of a separate definition of ‘light load’ clarifies the definition of the freezing capacity. The EN/IEC standard does not refer to “a combination of 3- and 4-star compartments but simply to “the total volume of all compartments operating at –18 °C”. There is therefore a misalignment between the proposed amendment and the current measurement standards.
Recommendation	CLASP supports the clarifications made to the definitions and requirements concerning the freezing capacity and light load and recommend to further align the definitions with EN/IEC 62552:2020.

Draft omnibus amendment	(c) Table 4, footnote (b), first line, is replaced by: ‘C for combi appliances with 3- or 4-star compartments is rounded to two decimal places and determined as follows:’;
Subject and current text	C for combi appliances with 3- or 4-star compartments is determined as follows:
Comment	No comment
Recommendation	CLASP supports this addition.

Draft omnibus amendment	(4) in Annex IV is amended as follows: (a) the first paragraph is replaced by the following: ‘The verification tolerances defined in this Annex relate only to the verification by Member State authorities of the declared values and shall not be used by the manufacturer, importer or authorised representative as an allowed tolerance to establish the values in the technical documentation or in
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	interpreting these values with a view to achieving compliance or to communicate better performance by any means.’;
Subject and current text	The verification tolerances set out in this Annex relate only to the verification of the measured parameters by Member State authorities and shall not be used by the manufacturer, importer or authorised representative as an allowed tolerance to establish the values in the technical documentation or in interpreting these values with a view to achieving compliance or to communicating better performance by any means.
Comment	No comment
Recommendation	CLASP supports this addition.

Draft omnibus amendment	(b) point (7) is replaced by the following: ‘(7) The Member State authorities shall provide all relevant information to the authorities of the other Member States and to the Commission without delay after a decision being taken on the non-compliance of the model according to points 3, 6 or the second paragraph of this Annex. ’;
Subject and current text	7. The Member State authorities shall provide all relevant information to the authorities of the other Member States and to the Commission without delay once a decision has been taken on the non-compliance of the model according to points 3 or 6.
Comment	No comment
Recommendation	CLASP supports this addition.

Draft omnibus amendment	<p>(c) Table 6 is replaced by the following:</p> <p style="text-align: center;"><i>'Table 6</i> Verification tolerances</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; text-align: center;">Parameters</th> <th style="width: 50%; text-align: center;">Verification tolerances</th> </tr> </thead> <tbody> <tr> <td>Total volume and compartment volume</td> <td>The determined value^a shall not be more than 3 % or 1 litre lower — whichever is the greater value — than the declared value.</td> </tr> <tr> <td>Freezing capacity</td> <td>The determined value^a shall not be more than 10 % lower than the declared value.</td> </tr> <tr> <td>E_{32}</td> <td>The determined value^a shall not be more than 10 % higher than the declared value.</td> </tr> <tr> <td>Annual energy consumption</td> <td>The determined value^a shall not be more than 10 % higher than the declared value.</td> </tr> <tr> <td>Internal humidity of wine storage appliances (%)</td> <td>The determined value^a shall not differ from the limits of the prescribed range by more than 10 %.</td> </tr> <tr> <td>Airborne acoustical noise emission</td> <td>The determined value^a shall not be more than 2 dB(A) re 1 pW more than the declared value.</td> </tr> <tr> <td>Temperature rise time</td> <td>The determined value^a shall not be more than 15 % higher than the declared value.</td> </tr> </tbody> </table>	Parameters	Verification tolerances	Total volume and compartment volume	The determined value ^a shall not be more than 3 % or 1 litre lower — whichever is the greater value — than the declared value.	Freezing capacity	The determined value ^a shall not be more than 10 % lower than the declared value.	E_{32}	The determined value ^a shall not be more than 10 % higher than the declared value.	Annual energy consumption	The determined value ^a shall not be more than 10 % higher than the declared value.	Internal humidity of wine storage appliances (%)	The determined value ^a shall not differ from the limits of the prescribed range by more than 10 %.	Airborne acoustical noise emission	The determined value ^a shall not be more than 2 dB(A) re 1 pW more than the declared value.	Temperature rise time	The determined value ^a shall not be more than 15 % higher than the declared value.
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Airborne acoustical noise emission	The determined value ^(*) shall not be more than 2 dB(A) re 1 pW more than the declared value.																
Comment	<p>Temperature rise time was added</p> <p>E_{16} and E_{aux} were deleted.</p> <p>Auxiliary energy (kWh/a) and Daily energy consumption at 16 °C (kWh/24h) are listed in the additional information to be included in the technical documentation for the labelling regulation. Specifying no tolerance thus means that no tolerance should apply for market verification.</p>																
Recommendation	<p>CLASP supports the proposed changes</p>																

Regulation (EU) 2019/2020 – Light sources and separate control gears

<p>Draft omnibus amendment</p>	<p>Regulation 2019/2020; Article 4, Definition of Containing Product</p> <p>‘containing product’ means a product containing one or more light sources, or separate control gears, or both, including 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>Subject and current text</p>	<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>Comment</p>	<p>Problem that a vacuum cleaner, refrigerator, etc. is treated like a containing product and must be tested if the light source is not removable (N.B., this would be difficult)</p> <p>But removing “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;” removes the incentive to make luminaires serviceable</p> <p>One solution would be to add a “primary function” clause to the sentence that was proposed to be removed.</p>
<p>Recommendation</p>	<p>Consider adding a “primary function” of the containing product:</p> <p>IEC definition: “primary function - function providing the intended purpose” (IEV ref. 904-03-02)</p> <p>Alternative: “primary function - the service requires a major part of the total energy consumed by the product when in use”</p> <p>So in context, the new sentence would read: “If the primary function of the containing product is to produce light and the containing product cannot be taken apart for verification of the light source and separate control gear, then the entire containing product is to be considered a light source;”</p>

Draft omnibus amendment	<p>Ecodesign Regulation EU 2019/2020 Annexes, Annex II: temporary relaxing of SVM requirement:</p> <p>SVM \leq 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)</p> <p>From 1 September 2023: SVM \leq 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)</p>
Subject and current text	<p>SVM \leq 0,4 at full-load (except for HID with $\Phi_{use} > 4$ klm and for light sources intended for use in outdoor applications, industrial applications or other applications where lighting standards allow a CRI < 80)</p>
Comment	<p>Round-robin testing has proven technology feasibility for all lamp types (Philips, Osram, Sweden, Germany)</p> <p>Industry cites Sekulovski et al. (Signify) study which found no problem with SVM, but this study had confounding problems:</p> <p>No data reported on subject's sensitivity, so it is unknown whether the sensitive individuals were in the study;</p> <p>Experimental space had large windows and desks at varying distances from the windows, so SVM conditions to which subjects were exposed across the space and during the day is unknown and was not measured;</p> <p>Individuals moved throughout the space during the day, so total exposure duration and intensity are unknown;</p> <p>More research is needed, but in the meantime invoke the precautionary principle to be careful rather than allow any level of SVM and then find a fraction of the population badly affected later</p>
Recommendation	<p>Either reject the proposal and maintain <0.4</p> <p>OR</p> <p>Accept the Commission's proposal of 2 year relaxing of requirement to 0.9 until 2023, but <i>absolutely no higher or longer</i></p>

Draft omnibus amendment	<p>Ecodesign Regulation EU 2019/2020 Annexes, Annex III, exemption (w) for white light sources, sub-bullet 2 and specification (f):</p> <p>“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>
Subject and current text	<p>“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>
Comment	<p>Fluorescent tubes described in this exemption have absolutely no unique or special characteristics that justify or differentiate their use for studio purposes</p> <ul style="list-style-type: none"> • Standard caps (G5 or G13) • Standard diameters (T5, T12) • Standard CRI value (≥85) • Standard CCT values (2900, 3000, 3200, 5600, 6500K) <p>T12 lamps can be installed in T8 sockets, so simply requiring lamps to be “marketed” for studio lighting is inadequate protection</p> <p>Examples of LED tubes being used in television and film studio applications, see these examples of products on the market today:</p> <ul style="list-style-type: none"> • https://www.digibroadcast.com/lighting-c64/led-panels-lighting-kits-c97/came-tv-boltzen-andromeda-slim-tube-led-light-4-lights-kit-3ft-daylight-p30266 • http://www.dadcopowerandlights.com/led-lighting-systems-for-tv-and-motion-picture-production <p>https://astera-led.com/titan/</p>
Recommendation	<p>Delete sub-bullet (f) for T5 and T12 linear fluorescent lamps as it is a loophole and is completely unnecessary.</p>

Draft omnibus amendment	<p>Ecodesign Regulation EU 2019/2020 Annexes, Annex III, new exemption (x):</p> <p>(x) incandescent DLS fulfilling all of the following conditions: E27 cap, clear envelope, power ≥ 100 W and ≤ 400 W, CCT $\leq 2\,500$ K, specifically designed and exclusively marketed for infrared heating;</p>
Subject and current text	<p>This exclusion did not appear in the previous draft of the regulation.</p>
Comment	<p>“specifically designed and exclusively marketed” does not help market surveillance – remember “Not suitable for Household Room illumination”</p> <p>These characteristics are common to any mains voltage DLS - remember Heat Balls</p> <p>CCT tolerance is +/-10%, so 2750K can be declared 2500K</p> <p>2700K is standard CCT of incandescent filament</p> <p>Thus, this exemption will result in the re-introduction of high wattage, clear incandescent reflector lamps back into the European Market.</p>
Recommendation	<p>Two options:</p> <p>(1) reject addition of this loophole into the regulation (industry has already demonstrated propensity to cheat</p> <p>OR</p> <p>require red coloured lens (not clear) and CCT ≤ 2200 K. This will prevent the lamps being used for general illumination.</p>

Regulation (EU) 2019/2024 - Refrigerating appliances with a direct sales function

Draft omnibus amendment	Regulation (EU) 2019/2024 is amended as follows: (1) in Article 1(3), point (e) is replaced by the following: '(e) corner, curved and carousel cabinets;';
Subject and current text	(e) corner cabinets;
Comment	<p>Addition of curved and carousel cabinets to the list of exemptions from the requirements in point 1 (Energy efficiency requirements) and point 3(k) (Information requirements: instructions on how to find the model information in the product database) of Annex II.</p> <p>As noted below, carousel cabinets do not correspond to what is described in the definition of corner cabinets. They also do not have the particularities that justified the exemption of corner cabinets from the requirements described in requirements in point 1 and point 3(k) of Annex II and should therefore not be added to the exemption.</p>
Recommendation	Delete 'and carousel' from this exclusion, use only 'corner and curved'

Draft omnibus amendment	<p>(2) in Article 2, point 21 is replaced by the following: '21. 'corner, curved and carousel cabinet' means a refrigerating appliance with a direct sales function used to achieve geometrical continuity between two linear cabinets that are at an angle to each other and/or that form a curve. A corner, curved and carousel cabinet does not have a recognisable longitudinal axis or length since it consists only of a filling shape (wedge or similar) and is not designed to function as a stand-alone refrigerated unit. The two ends of the corner cabinet are inclined at an angle between 30 ° and 90 °;';</p>
Subject and current text	<p>21. 'corner cabinet' means a refrigerating appliance with a direct sales function used to achieve geometrical continuity between two linear cabinets that are at an angle to each other and/or that form a curve. A corner cabinet does not have a recognisable longitudinal axis or length since it consists only of a filling shape (wedge or similar) and is not designed to function as a stand-alone refrigerated unit. The two ends of the corner cabinet are inclined at an angle between 30 ° and 90 °;</p>
Comment	<p>A carousel cabinet does not correspond to the definition under point 21 of Article 21, which was meant for corner cabinets. It is designed to function as a standalone unit and not to achieve continuity between two linear cabinets.</p>
Recommendation	<p>Delete 'and carousel' from this definition, use only 'corner and curved'</p>

Annexes

Draft omnibus amendment	In Annex I, the following point (26) is added: '(26) 'declared values' means the values provided by the supplier for the stated, calculated or measured technical parameters in accordance with Article 4.2, for the verification of compliance by the Member State authorities.';
Subject and current text	No definition of 'declared values'
Comment	No comment
Recommendation	CLASP supports this addition.

Draft omnibus amendment	in Annex III, Table 5, the following is added:					
	Category	Temperature class	Highest temperature of warmest M-package (°C)	Lowest temperature of coldest M-package (°C)	Highest temperature of all M-packages (°C)	Value for C
	Vertical and combined supermarket cabinet	M0	≤ +4	≥ -1	n.a.	1,30
	Horizontal supermarket cabinet	M0	≤ +4	≥ -1	n.a.	1,13
Subject and current text	Table 5 does not include values for M0.					
Comment	<p>C is the temperature coefficient, meant to compensate for the different DT between the ambient temperature and the average temperature in each category of compartment. It should follow the same rule as for vending machines and ice-cream freezers in the same regulation and be proportional to the difference to a reference category for which the C factor is 1 (M2 in Table5).</p> <p>A 2014 CLASP study (CLASP Commercial refrigeration equipment: mapping and benchmarking) found that the average temperatures in M0, M1 and M2 compartments were 1.5°C, 2°C and 3°C, respectively. In the case of Vertical and combined supermarket cabinets, C= 1 for M2 cabinets. C was set at 1.15 for M1 compartments.</p>					

	$C_{M1} = C_{M2} + (\text{Average Temperature}_{M2} - \text{Average Temperature}_{M1}) * 1.15 = 1.15$ <p>Applying the same formula to M0 compartments:</p> $C_{M0} = C_{M2} + (\text{Average Temperature}_{M2} - \text{Average Temperature}_{M0}) * 1.15 = 1.225$ <p>Similarly, for Horizontal supermarket cabinets:</p> $C_{M1} = C_{M2} + (\text{Average Temperature}_{M2} - \text{Average Temperature}_{M1}) * 1.08 = 1.08$ <p>Applying the same formula to M0 compartments:</p> $C_{M0} = C_{M2} + (\text{Average Temperature}_{M2} - \text{Average Temperature}_{M1}) * 1.08 = 1.12$
Recommendation	CLASP recommends C values of 1.225 and 1.12 for M0 compartments of vertical cabinets and horizontal cabinets, respectively.