

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



Entwürfe der EU-Kommission vom 6. November 2015
Stellungnahme Tschechiens vom 24. Februar 2016

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 6 November 2015
Comments by Czech Republic as of 24 February 2016

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 6 novembre 2015
Commentaires de la Tchéquie du 24 février 2016

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

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

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

CZ comments on the lighting products review – Lot 8, 9, 19

The Czech Republic welcomes the Commission's effort in order to simplify the current eco-design and labelling regulatory framework for lighting products. We agree that the technological development in the lighting sector needs to be addressed. We support the idea to unify the existing eco-design regulatory measures, but more work and discussion is needed in order to be sure that all the open issues are solved. It is important to have in mind that the new regulation should be easily understandable and feasible for manufacturers and market surveillance authorities. Please find below our general comments on the regulations:

- New requirements should be reasonable and should leave more than one technology on the market. The aim is to increase energy efficiency not to promote one of the technologies (inorganic LED).
- When banning less efficient lamps, it is necessary to take into account the cost of replacing luminaires, especially in case of municipalities (street lighting) and government bodies, and respecting other factors of the circular economy. It may be sensible to postpone the ban of these mass used lighting products.
- Regarding definitions we suggest to come out of the existing legislation (for example in case of final owner). We agree with other Member States that it would be reasonable to divide lighting products to two categories only (lighting products and auxiliary parts; omitting lighting products component).
- As for the requirements we are not in favor of setting them for such a long-term perspective. Technological developments cannot be accurately foreseen and this is why we should eliminate stage 3.
- The large amount of additional technical information accompanying the lighting products may cause burden the manufacturers and may not be useful for consumers. We therefore ask the Commission to examine the amount of mandatory information also from the perspective of the market surveillance authorities and conformity assessment process.
- For conformity testing it seems necessary to define measurable values only, in order to avoid uncertainties and possible disputes at court.
- Due to the on-going revision of the energy labelling legislation, we propose to discuss the labelling requirements when the new labelling framework regulation is approved.

Petr Vozka
Ministry of Industry and Trade
of the Czech Republic
vozkap@mpo.cz

Vlastimil Hyksa
State Energy Inspection Authority
of the Czech Republic
vhyksa@sei.gov.cz