

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



## Diskussion über künftige Änderungsverordnungen (Produktgestaltung und -information)

Diskussionstext der EU-Kommission vom 10. Juni 2020:  
**Stellungnahme Tschechiens vom 29. Juni 2020**

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

**EN:** Information on EU Lighting Regulations – Ecodesign and Energy Labelling – Compilation <sup>[1]</sup> of the Federal Environment Agency (UBA), Germany

Discussion of future amending regulations  
(Product Design and Product Information)

**The EU Commission's discussion text as of 10 June 2020:  
Comments by Czech Republic as of 29 June 2020**

**FR:** Informations sur 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

Discussion sur les futurs règlements modificatifs  
(Conception des produits et informations relatives aux produits)

**Texte de discussion de la Commission européenne du 10 juin 2020 :  
Commentaires de la République tchèque 29 juin 2020**

*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/>

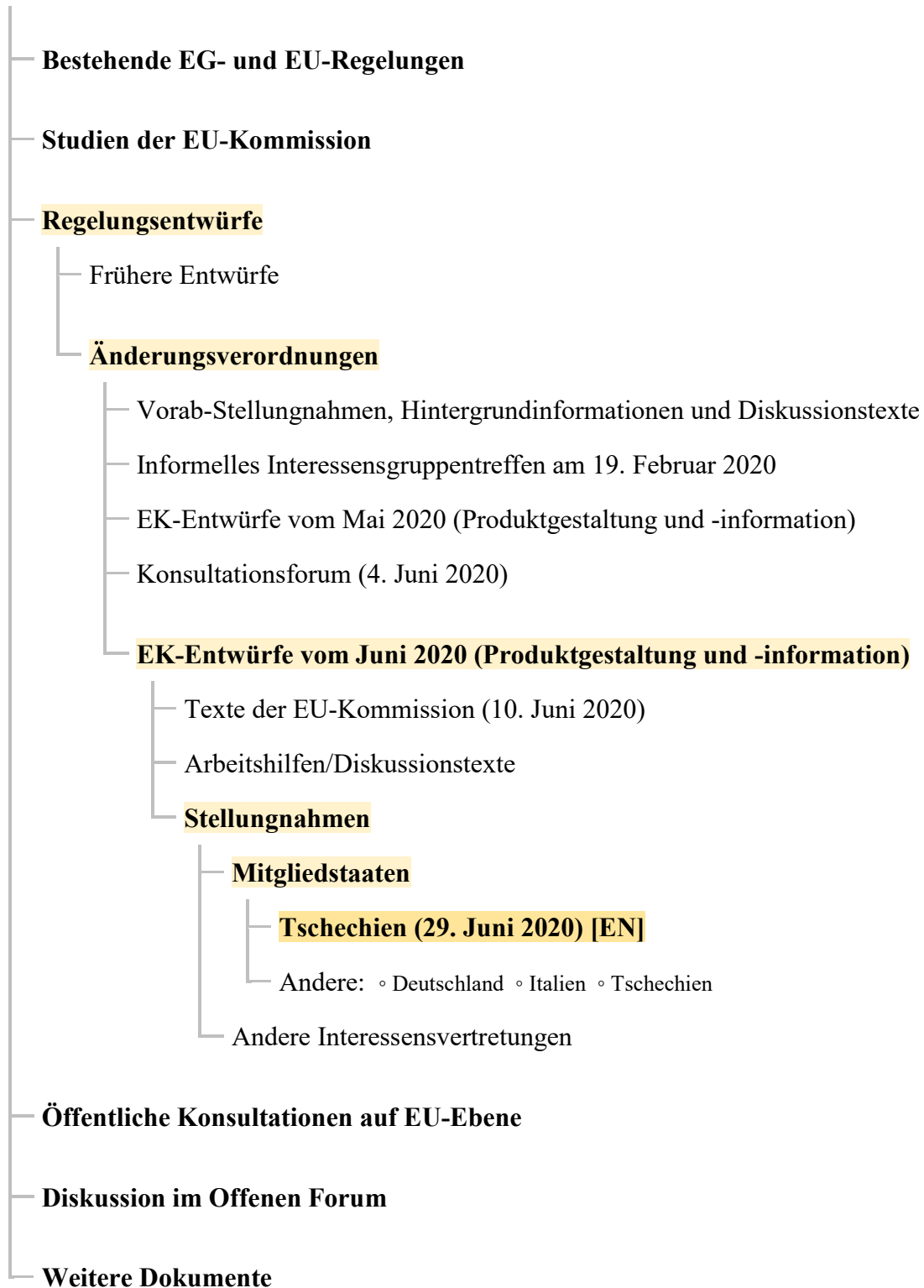
DE: ↓

EN: → page III

FR : → page IV

## Texte im Offenen Forum

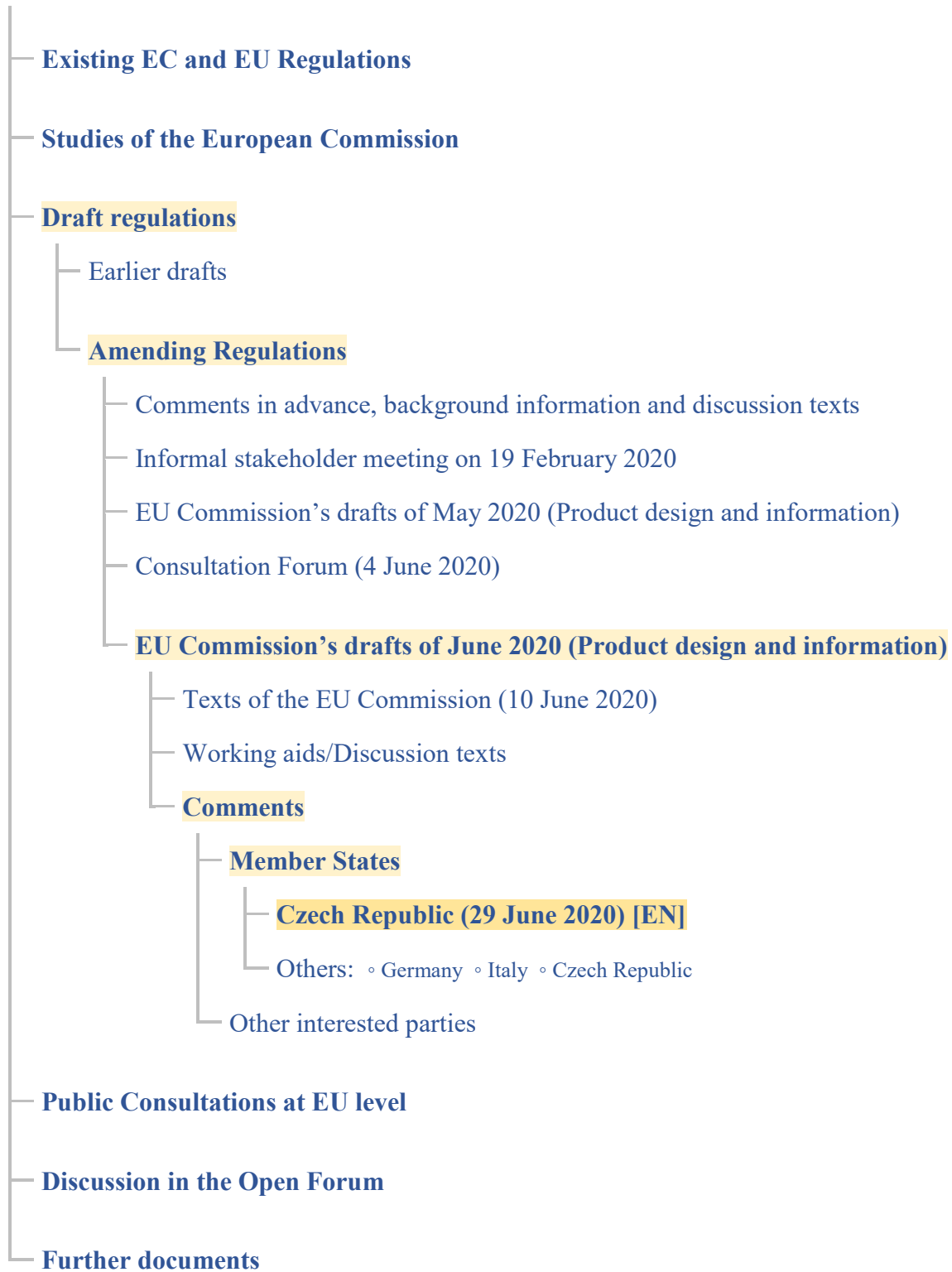
(abc = vorliegender Text)



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

**Documents in the Open Forum**

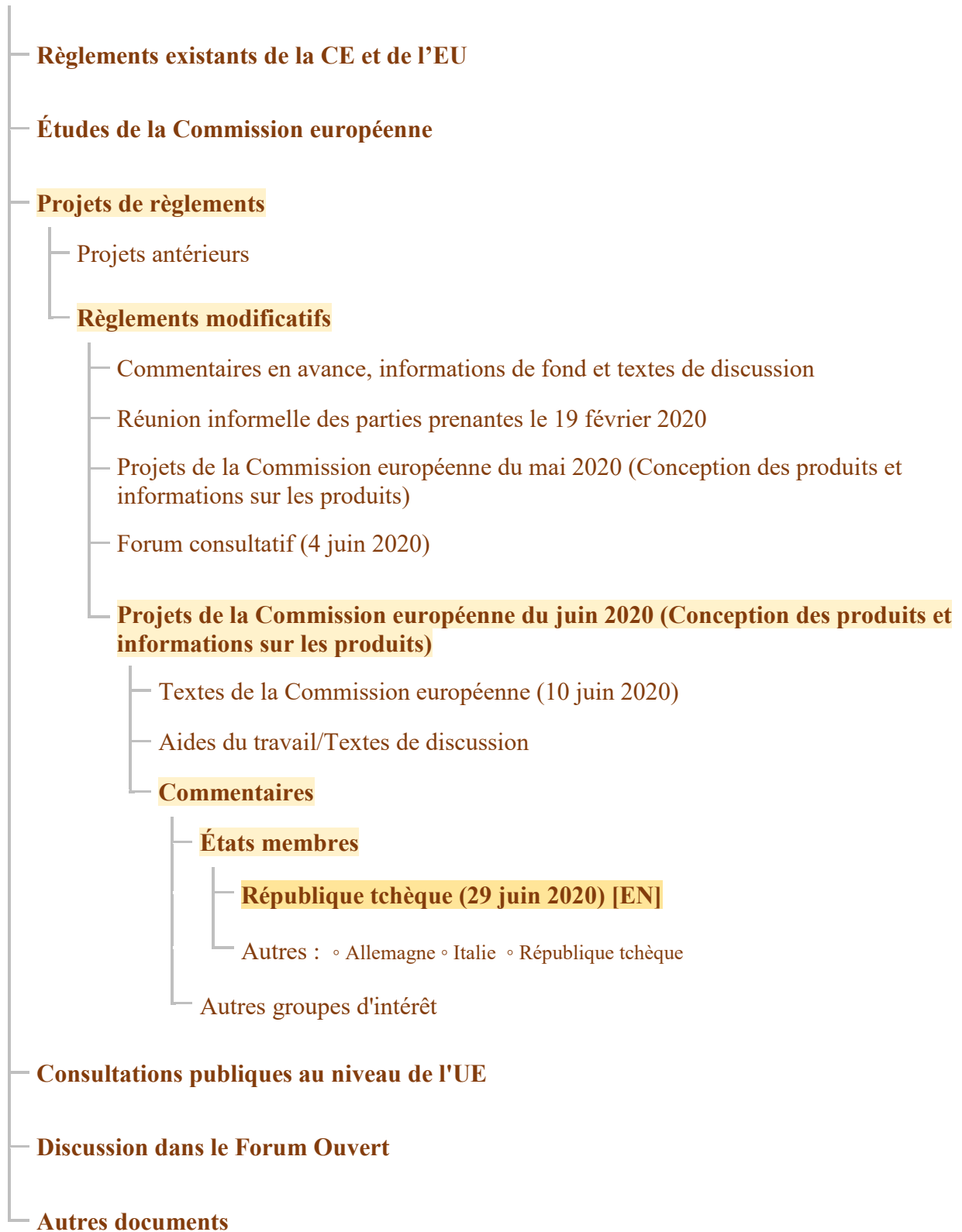
(abc = text at hand)



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

Documents dans le forum ouvert

(abc = présent document)



Abréviations : ● CE = Communauté européenne ● UE = Union européenne

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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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# **CZ comments on proposal for amending energy labelling and ecodesign regulations**

29 June 2020

The Czech Republic would like to thank the Commission for preparing the proposal to amend the energy labelling and ecodesign regulations published in the Official Journal of the EU last year. We agree with the need to amend certain provisions of the regulations to provide more clarity and to correct errors and typos. The amendments need to be finalised and published before the regulations are applicable.

Following the consultation forum held on 4 June 2020, please find below our comments.

## Specific comments to proposed amendments of the ecodesign and labelling regulations of light sources (regulations 2019/2020 and 2019/2015)

### Art. 2, definition of “containing product”

We perceive the intention of the Commission to update the definition of “*containing product*”, however we doubt that deleting the last sentence provides more clarity. A more suitable and accurate wording needs to be found.

### Annex V, table 3, adding lifetime (labelling regulation)

We can agree with adding the parameter “*Lifetime*” to the product information sheet. However, expressing lifetime in L70B50 is not ideal for some types of light sources. We suggest to express lifetime in the higher quality, which is L90B50.

### Annex II, point 2, table 4

The Czech Republic is positive about the proposal to amend the limit value for stroboscopic effect. In order to consider the fact that for some types of light sources the required value is impossible to achieve we propose to start at the  $SVM \leq 1,3$  at full load (instead of 0,9) for all types, i.e. remove bracket exemptions, and subsequently reduce the value in two-year periods.

### Annex III, point 2 new

We generally support the exemption for separate control gears and light sources that are components of household appliances, as proposed by Applia. The reason is that it is not needed to assess the energy efficiency of separate control gears and light sources separately, if the overall energy efficiency of the product containing them is assessed. However, if separate control gears and light sources that are components of household appliances are not in scope of the regulation, because they fall under the definition of “*components and sub-assemblies*” (Ecodesign Directive, Art. 2.2), then this exemption is not needed.

### Annex III, point 3(s) and 3(x)

The Czech Republic agrees with adding the new exemption 3 (x) – exemption for clear lamps used primarily for infrared heating. We also agree with the amendments proposed for the exemption 3(s), however we are in favour of extending the types of electrical interfaces as proposed by Germany by adding “*pin-base- or pin-like plug- and clamp-, metric threads*”.

### Annex III, point 3(w)

The Czech Republic supports the proposed clarification of the exemption for certain light sources used in theatre and entertainment applications. However, we cannot agree with the newly introduced limit of 180 W (letters (a) and (e)). The rationale behind the limit is not clear for us. It is going to force manufacturers to keep the power demand at 180 W or higher although it is not necessary and has higher energy consumption than products below 180 W. Furthermore, energy efficiency is expected to increase (approx. by 20 % within the next five years). We suggest to delete the value of 180 W from letters (a) and (e) or at least reduce it to 100 W.

### Annex III, adding new exemption for long-lasting FL T8

The Czech Republic supports the proposal made by Germany to add a new exemption for long-lasting FL T8 lamps. The LED lamps are not suitable for operation under all harsh conditions, mainly high temperatures, chemically aggressive atmosphere, vibration and overvoltage. Operating LED lamps in harsh conditions leads to significant shortening of their lifetimes and consequently increasing the amount of electronic waste. While there are not enough types of LED lamps suitable for harsh conditions available on the market, there is an alternative in FL T8 lamps with up to 80 000 hours lifetime. In order to allow long-lasting FL T8 lamps to the market, we suggest in line with Germany to amend the table 1 in Annex II, add definition of “*long-lasting FL T8*” to Annex I and add a new line to table 6 in Annex IV Verification tolerances.

Table 1 in Annex II

Light source description	$\eta$	L
	[lm/W]	[W]
(...)		
FL T5 circular	79,0	1,9
FL T8 (including FL T8 U-shaped <u>and long-lasting FL T8</u> )	89,7	4,5
From 1 September 2023, for FL T8 of 2-, 4- and 5-foot <u>(except for long-lasting FL T8)</u>	120	1,5
(...)		

New definition in Annex I

(xx) “long-lasting FL T8” means a linear fluorescent T8 light source with a lifetime up to 80 000 hours, which is specified as follows: The emitter weight of a single electrode coil is not less than 7.0 mg.



New line in the table 6, annex IV

Parameter	Sample size	Verification tolerances
<u>Emitter weight of long-lasting FL T8</u>	<u>5 lamps / 10 coils with emitter</u>	<u>The determined average value shall not be less than 6.8 mg [*].</u>

\* There is no tolerance associated with this metric, as it is a fixed requirement.