

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



Diskussion über künftige Änderungsverordnungen (Produktgestaltung und -information)

Diskussionstext der EU-Kommission vom 10. Juni 2020:
Stellungnahme Spaniens vom 26. 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 ^[1] 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 Spain as of 26 June 2020**

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

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 l'Espagne du 26 juin 2020**

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/>

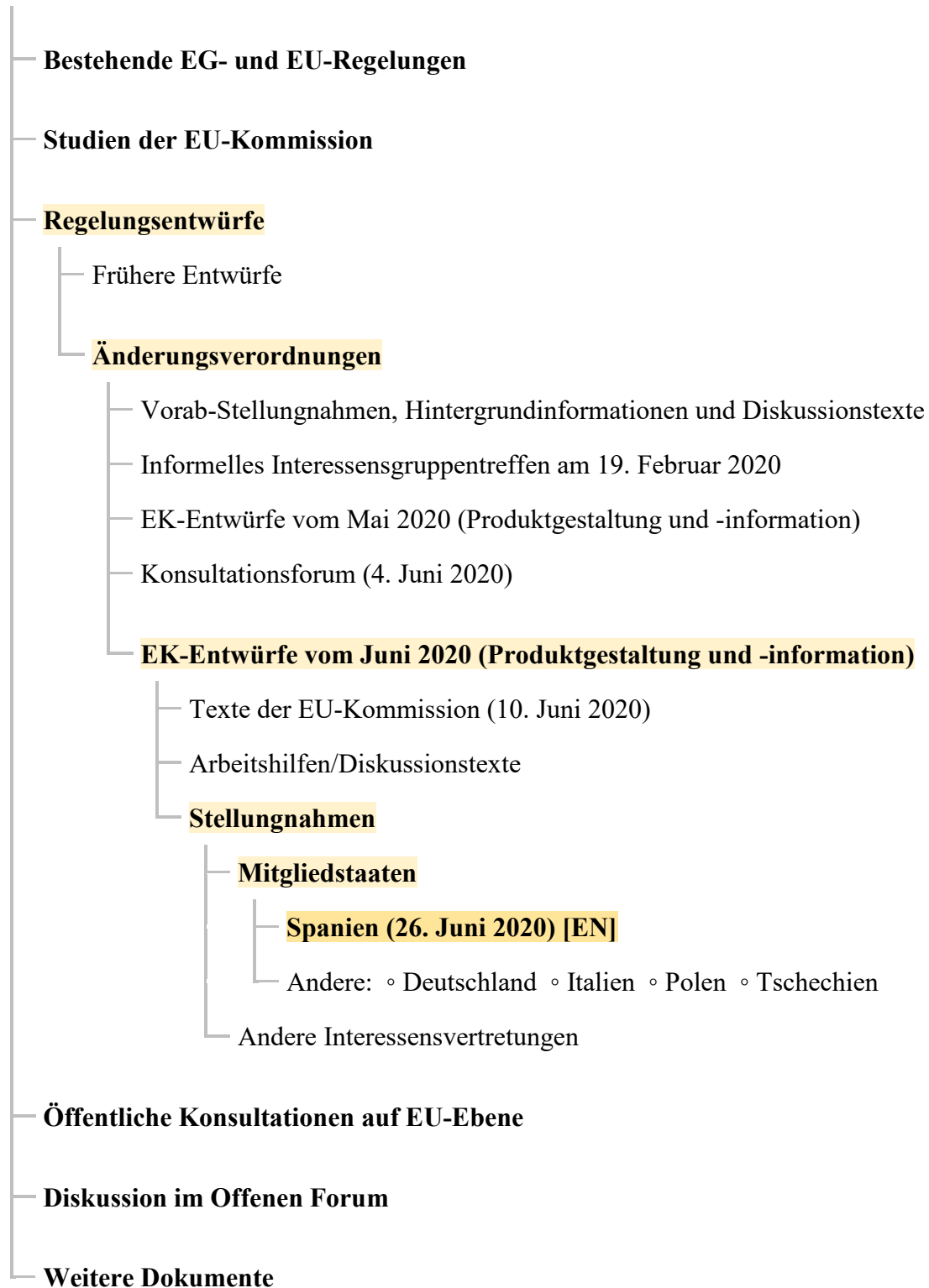
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EN: → page III

FR : → page IV

Texte im Offenen Forum

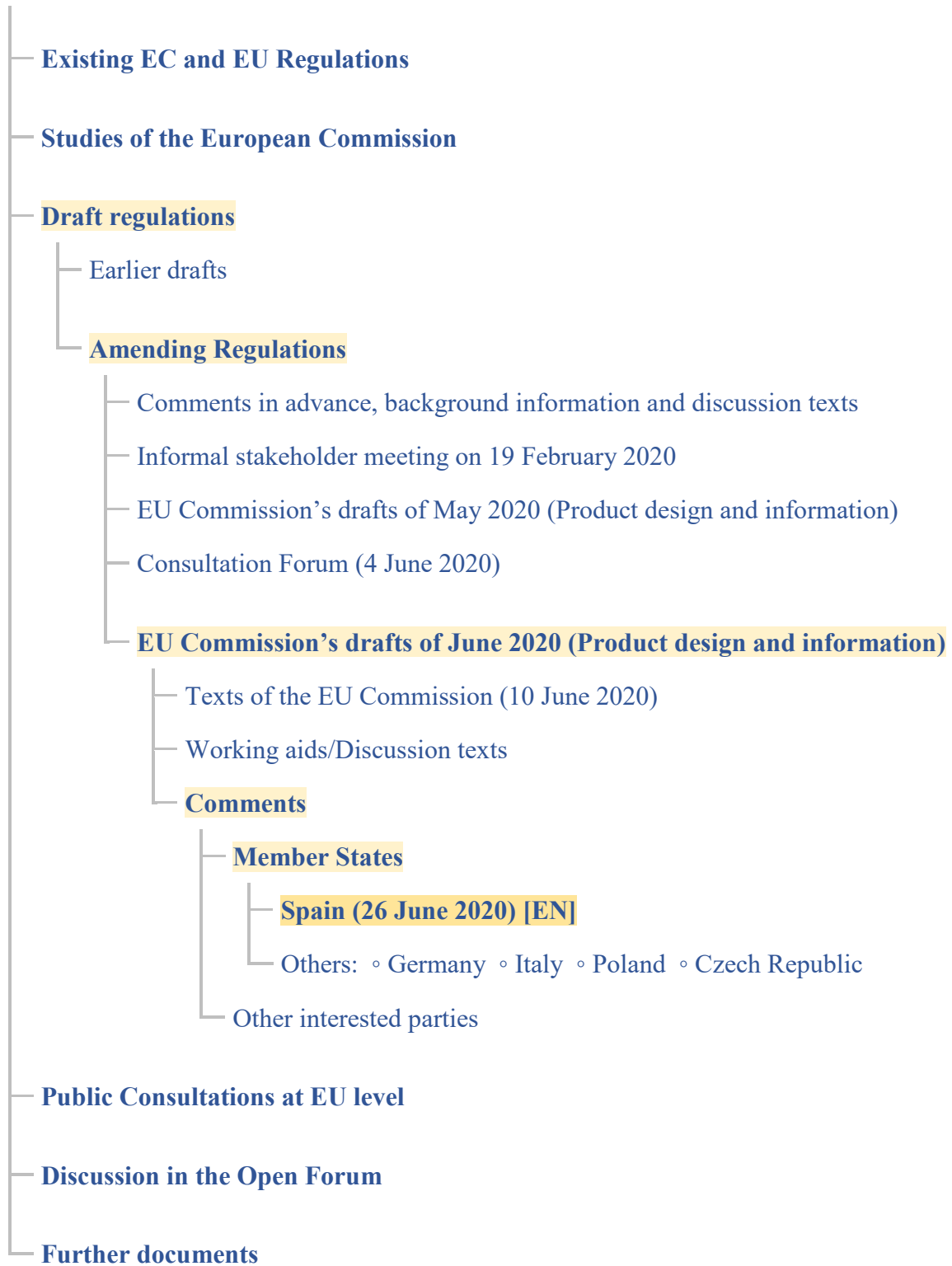
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Abkürzungen: ● EG = Europäische Gemeinschaft ● EK = EU-Kommission ● EU = Europäische Union

Documents in the Open Forum

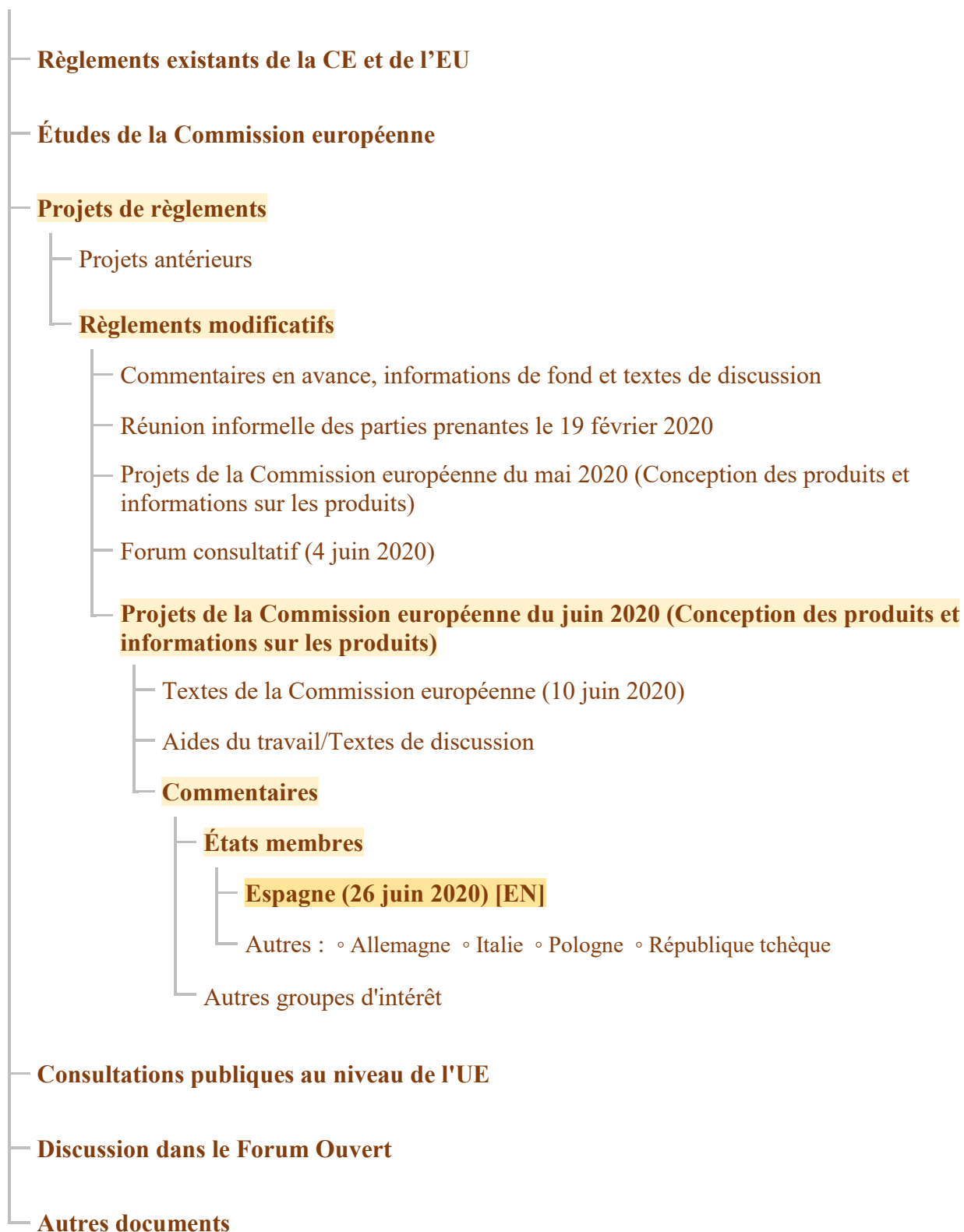
(abc = text at hand)



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

Documents dans le forum ouvert

(abc = présent document)



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

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

Discussion around SVM limits

We understand that there is a lot of discussion around this topic. The measurements made so far by SEA and by the round robin test do not cover the entire range of products that may be impacted. We understand that there will be products that are still needed that will not be allowed on the market.

We support the 2-tiered approach proposed by the European Commission.

We suggest that the limit values are increased and ask the Commission to use values that have been established in the research so far.

We also ask the Commission to include exemptions to these values for products that will not comply with the higher limits.

We support the proposal from other member states during the consultation forum to increase the tolerance for SVM and flicker, in order to allow for deviations in measurements among market surveillance authorities' labs.

Definitions of containing products and light sources

The objective of the European Commission is understood, but the current proposal runs the risk of creating a loophole for luminaires with integrated light sources.

The Commission's justification is that their revision clarifies that some products e.g. fridges and dishwashers should not be seen as light sources. Exactly the same conclusion can be reached for integrated luminaires if there is no express statement that products that cannot be taken apart for verification should be treated as light sources.

We suggest not to revise the language of the definitions for light source and containing product nor for article 4 (removability) – we have created a very delicate balance there.

We need to find another way to address the concerns of some stakeholders, for example through the list of exemptions in Annex III.

Concerns about specific lighting products/applications

We agree with the language to exclude heating lamps and address the needs of stage lighting.