

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



Entwürfe der EU-Kommission vom 6. November 2015
Stellungnahme Finnlands vom 2. 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 Finland as of 2 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 Finlande du 2 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.

2016-02-02
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FINLAND'S POSITION PAPER ON THE WORKING DOCUMENTS REGARDING THE REVIEW OF THE ECODESIGN AND ENERGY LABELLING REGULATIONS FOR LIGHTING PRODUCTS (LOT 8/9/19)

Finland welcomes the working documents and supports the work of the Commission in this issue. There are still huge saving potential on lighting sector and therefore regulation is appreciated. The proposed working document still have unclear points so therefore more discussion is needed. Therefore Finland proposes that the second consultation forum meeting is held in order to solve pending issues.

In general Finland supports the single equation approach but also sees that with proposed time schedule it will cause a huge risk for backsliding for some lighting component. Therefore Finland proposes to create transitional phase with differentiated requirements but in the long run to move towards the single equation.

COMMENTS ON ECODESIGN PROPOSAL

In principle Finland supports the single equation approach. Single equation regulation should be the main target in future. Said this, it is also very clear that at this point it is not possible to set requirement based on one equation without a backsliding effect for some products and too ambitious requirements for some. Therefore Finland proposes that there will be transitional phase with differentiated requirements for different products, but the final goal is to couple these requirements under one equation.

Finland also supports the proposal made by the Netherlands to remove the third stage and review the regulation before 2022.

Subject matter and scope

The scope of the regulation is very unclear and leaves room for interpretation. Clarification of the scope and definitions of "lighting product" and "lighting product component" is needed.

Need for exemption d) should be studied more. If there are no technical reason (like different socket used) for this exemption, it should be removed.

Exemption for "pieces of art" is very weak and very easily creates loophole. Definition should base on qualities, which are unambiguous and verifiable by market surveillance authorities.

There is a need for exemption for lighting components used in environments with ambient temperatures below -20°C or above 50°C, but proposed exemption is too weak and is potential loophole. Exemption should base on more accurate technical qualities.

Definitions

Finland proposes to add all definitions in the main text under article 2 and to avoid the use of "second step" terms (like "lighting part" and "auxiliary part")

Definitions should base on standards and/or existing legislation.

Finland proposes to include battery-operated or off-grid lighting solutions to the scope and therefore also to include products that uses direct current in to the scope.

Definitions for "standby mode", "off-mode", "lamp control gear", "control device" are missing. Finland proposes to use definitions from EU 1194/2013 for "standby mode", "lamp control gear" and "control device".

Annex II

Ra should be removed from equations.

Functionality requirements for lighting product with luminous flux higher than 10klm are very low. CRI should be greater than 70, power factor should be at least 0,7. Demand for warm-up time should also be tightened.

There are many information requirements to be shown in the physical lighting products and lighting part and on the packaging. In practice it is often hard to fit all the required information on the product or in the packaging. Therefore Finland proposes that only consumer essential information is required to be visibly displayed on the product or in the packaging and other information will be added to the web site.

Information requirements on the points c), g) and h) set in the 3.3. should not come into force until 2024 as there are no common understanding how these values should be measured and/or presented.

Annex III

Finland proposes that the current (2.c) of annex III will be modified as follows:

"If the average of measured value and the values calculated from these measurements is within the values required by this regulation"

Existing proposal says that even products outside of the tolerance could comply if the arithmetical mean is within the tolerance. This created huge risk for loophole and is not in line with the purpose of this regulation.

Tolerance value should be in line with the measurement uncertainty defined in respective standards. Proposed tolerance of 10% is too big.

COMMENTS ON ENERGY LABELLING PROPOSAL

Annex II

Proposed threshold values of energy efficiency classes do not provide needed differentiation for lighting products and lighting product components. As the main objective if the energy labelling regulation is to differentiate most energy efficient products, proposed very ambitious table does not do this. Therefore the class table should be modified in order to create more distribution between products.

The energy efficiency class of luminaires should be determined based only on the energy efficiency of the light source and the control gear. That means that the diffuser, frame and the optics would be excluded from the energy efficiency classification making luminaires comparable. This would focus development into active components where technology development has a lot to offer.

Annex III

Proposed text requires that supplier's name or trade mark and model identifier needs to be included on the energy label. As some suppliers have huge numbers of different lighting products which are sold in small quantities, this requirement could be a huge burden for them. Therefore Finland proposes that a model identifier should not need to be included on the energy label, if the model identifier is on the package and it is placed close to the energy label.



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