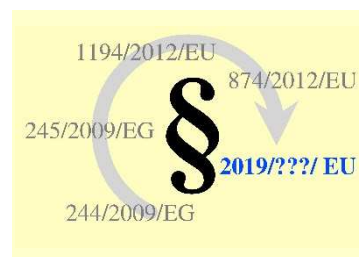


Texte zu den geplanten neuen EU-Regelungen zur umweltgerechten Produktgestaltung und zur Energieverbrauchs-kennzeichnung in der Beleuchtung – Zusammenstellung <sup>[1]</sup> des Umweltbundesamtes (UBA), Deutschland



**Entwürfe der EU-Kommission vom 8. Oktober 2018  
Stellungnahme des Herstellers Heraeus Noblelight <sup>[2]</sup>  
vom 12. Oktober 2018 **b****

*Hinweis: Dies ist die englischsprachige Version; die deutschsprachige kann heruntergeladen werden unter <sup>[3]</sup>*

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

The EU Commission's drafts of 8 October 2018

**Comments by the manufacturer Heraeus Noblelight <sup>[2]</sup>, 12 October 2018 **b****

*Please notice: This is a text in English. A version in German language can be downloaded at <sup>[3]</sup>*

**FR:** Informations sur les futures 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

Les projets de la Commission Européenne du 8 octobre 2018

**Commentaires du fabricant Heraeus Noblelight <sup>[2]</sup>, de 12 octobre 2018 **b****

*pIndication : C'est un texte en anglais. Une version allemande peut être téléchargé sous <sup>[3]</sup>*

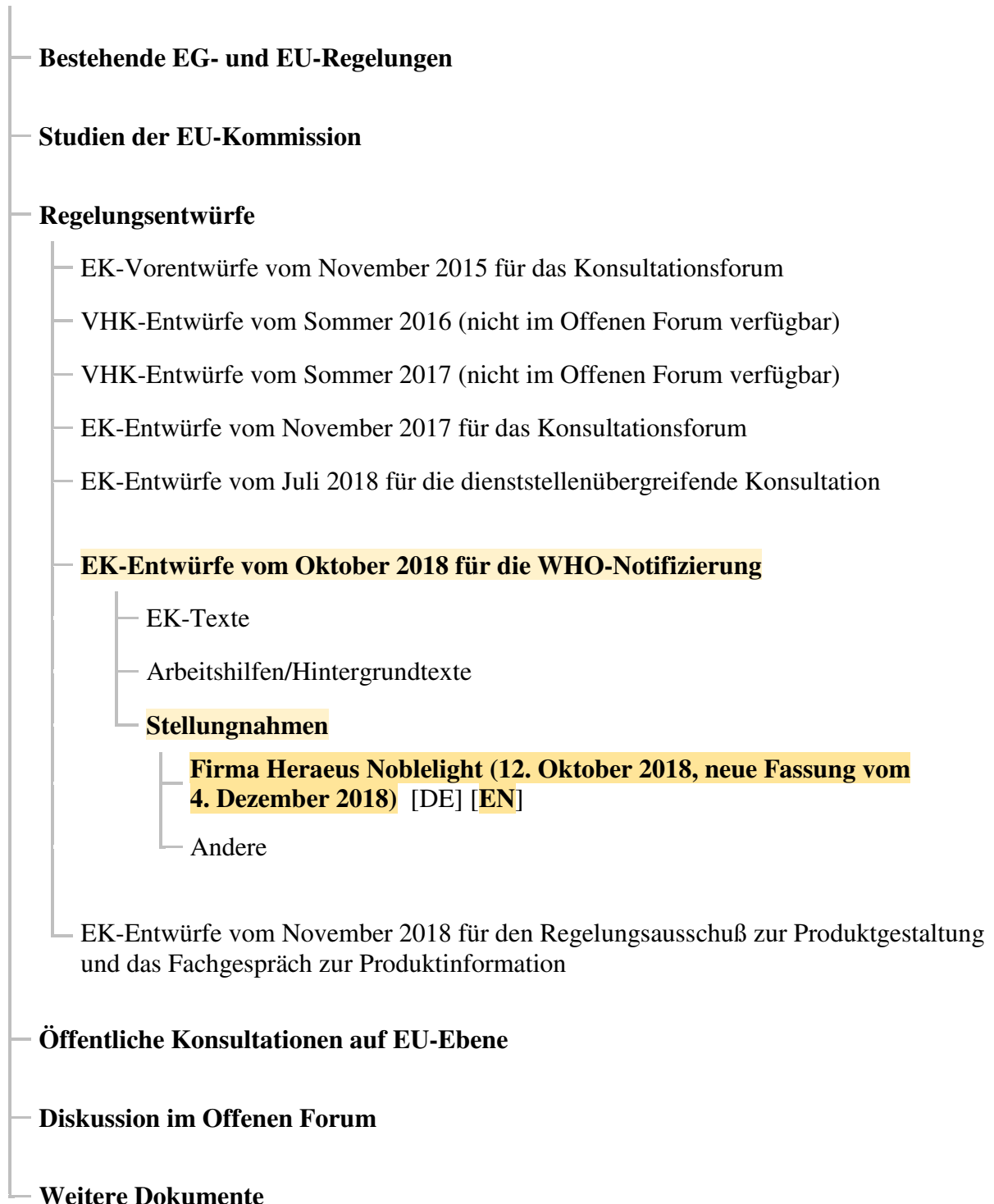
<sup>[1]</sup> <https://www.eup-network.de/de/eup-netzwerk-deutschland/offenes-forum-eu-regelungen-beleuchtung/dokumente/texte/>

<sup>[2]</sup> [https://www.heraeus.com/en/hng/home\\_hng/home\\_noblelight.aspx](https://www.heraeus.com/en/hng/home_hng/home_noblelight.aspx)

<sup>[3]</sup> [https://www.eup-network.de/fileadmin/user\\_upload/Lichtquellen\\_Stellungnahme\\_Heraeus\\_2018\\_10\\_12\\_DE.pdf](https://www.eup-network.de/fileadmin/user_upload/Lichtquellen_Stellungnahme_Heraeus_2018_10_12_DE.pdf)

**Texte im Offenen Forum**

(abc = vorliegender Text)



Abkürzungen: ● EG = Europäische Gemeinschaft ● EU = Europäische Union ● EK = EU-Kommission  
● WHO = Welthandelsorganisation ● VHK = Van Holsteijn en Kemna, <https://www.vhk.nl/>

**Documents in the Open Forum**

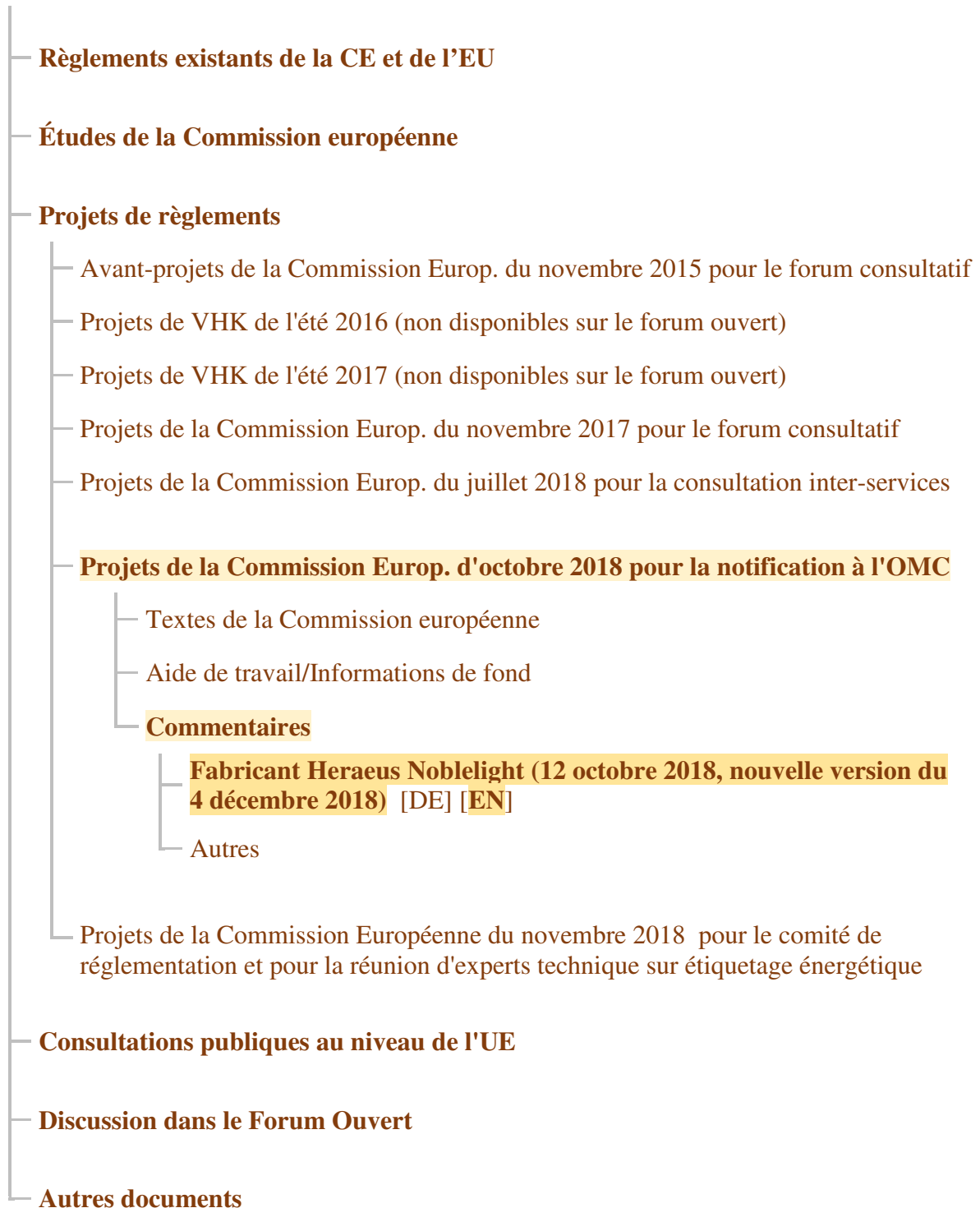
(abc = text at hand)



Abbreviations: • EC = European Communities • EU = European Union • WTO = World Trade Organisation  
• VHK = Van Holsteijn en Kemna, <https://www.vhk.nl/>

Documents dans le forum ouvert

(abc = présent document)



Abréviations : ● CE = Communauté européenne ● UE = Union européenne ● OMC = Organisation mondiale du commerce ● VHK = Van Holsteijn en Kemna, <https://www.vhk.nl/>

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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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**Draft EU Commission Regulation of 13 November 2017 laying down  
ecodesign requirements in the current version of October 2018**

**Submission of specialised light source manufacturer  
Heraeus Noblelight GmbH of 12.10.2018**

In this submission, we comment on the EU Commission's October 2018 draft regulation laying down ecodesign requirements with regard to light source exemptions for use in electric heating installations and analytical applications.

## Light Sources for use in Electric Heating Installations (Infrared)

The intended use of these lamps is not the generation of light in the visible range - in particular not for the purpose of illumination, but rather to generate infrared radiation for electric heat for use in industrial and commercial applications. According to the current version of the draft, these lamps are affected by the regulation, but the ecodesign requirements (especially the lumen / watt value) could not be complied with, since these are aimed at light-emitting lamps in the visible range. These requirements do not make sense for infrared emitters, as the purpose of infrared emitters is to generate as much radiation for heating purposes as possible (high efficiency), not to generate light as defined in Article 2 (1) of the draft. Furthermore, typical infrared emitters such as these incandescent lamps provide the maximum efficiency for the conversion of electric energy into radiation for electroheating. Halogen type lamps are a special type of incandescent lamps used for industrial electroheating.

At this point in time, we consider changes to the exemptions in Annex III, No. 3r, 3s and 3t of the latest version (October 2018) to be essential. We request that they are adapted as follows:

(r)	<del>halogen light sources</del> <b>incandescent light sources (not limited to halogen light sources)</b> fulfilling all of the following conditions: cap-type G4, GY6.35 or G9, power ≤60 W, declared suitable for operation at ambient temperature ≥300 °C, and intended for use in high temperature applications such as ovens;
(s)	<del>halogen light sources</del> <b>incandescent light sources (not limited to halogen light sources)</b> with blade contact-, metal lug-, cable-, litz wire- or non-standard customised electrical interface, specifically designed and marketed for industrial or professional electro-heating equipment (e.g. stretch blow-moulding process in PET-Industry, 3D-printing, gluing, inks, paint and coating hardening);
(t)	<del>halogen light sources</del> <b>incandescent light sources (not limited to halogen light sources)</b> fulfilling all of the following conditions: R7s cap, CCT ≤ 2 500 K, length not in the ranges 75-80 mm and 110-120 mm, specifically designed and marketed for industrial or professional electro-heating equipment (e.g. stretch blow-moulding process in PET-Industry, 3D-printing, gluing, inks, paint and coating hardening);

The following recitals of Directive 2009/125/EC establishing a framework for the setting of ecodesign requirements for energy-related products serve to justify the above-mentioned proposed amendments.

### Recital (6) and (15) Climate change:

Every effort should be made to ensure that processes based on fossil fuels emit less and become more energy-efficient. Infrared electric heating with the use of halogen-free or halogen-



based incandescent lamps is one of the technologies that is relevant to the achievement of these aims and must therefore not be banned as collateral damage.

### **Recital (8) Fair competition**

In laying down Community ecodesign requirements for energy-related products the principles of fair competition should be taken into account. There is no fair competition if only certain technologies (incandescent halogen lamps) are permitted for certain applications. The performance of the product, and not the technology, should be the decisive factor in determining if its future use should be permitted. Incandescent lamps with and without a halogen filling differ in terms of their performance only with respect to their planned lifetime (a halogen filling allows a longer lifetime at high colour temperatures while limiting the lifetime considerably at lower colour temperatures, compared to halogen-free incandescent lamps).

### **Recitals (14) Energy efficiency and (17) Best available technologies:**

In the field of infrared electric heating incandescent lamps are the only relevant technology with an energy efficiency (conversion of electric current into usable heat) of almost 100%. Minor losses are caused by heat conduction away from the emitter. Relevant losses result from the design of the installations and, where applicable, cooling of the emitters. This is different with LEDs, where it is foreseeable that conversion losses prevent their use in the field of infrared electric heating. See also the Best Available Technology (BREFs) documents of the EU Commission (e.g. Reference Document on Best Available Techniques for Energy Efficiency, code ENE; <http://eippcb.jrc.ec.europa.eu/reference/>)

### **Recital (5) Ecodesign and (10) Reduction of potential environmental impacts:**

It should be noted that the production of halogens such as bromine, chlorine or iodine, which can be present in incandescent lamps, is associated with high energy and resource consumption and emissions. Although their release as a result of lamp breakage is considered less critical, the actual production process in terms of potential environmental impact should be kept in mind. Therefore, the opportunity to use halogen-free incandescent lamps in certain applications should be permitted in future.

### **Recital (25) Toxic substances:**

Halogens such as chlorine, bromine and iodine are used in halogen lamps, whereby the release of the gas as a result of lamp breakage is less critical than the actual production of the gases, since the halogens are classified as hazardous to the environment and harmful to health or toxic according to Regulation (EC) No. 1272/2008. As already described above, the exemptions should therefore not only apply to halogen lamps, but also to halogen-free lamps.

**For these reasons, we propose to extend the mentioned exemptions (Annex III, No. 3 r-t) to include incandescent lamps in general.**

## Light sources for Analytical Applications

UV-VIS light sources are used in spectroscopic applications where a light source with a true continuous spectrum without a spectral band structure is mandated. Typical environmental applications include monitoring of exhaust gases, water analysis or NOx measurements. In the field of medicine, these light sources are used in blood analysis equipment or dermatological examination equipment. In particular, tungsten halogen lamps with un-doped quartz bulbs are used, which do not absorb the UVA components of the spectrum. At present, we are not aware of any more efficient technological alternatives with which it is possible to generate the continuous, polychromatic spectrum from the ultraviolet to the visible range required for these applications. If the draft regulation in its current form would enter into force, the placing on the market of these lamps would no longer be possible.

Therefore, in addition to the existing exemptions, we request that the following exemption be added to Annex III, No. 3:

new	Light sources for special use in spectroscopic and photometric applications, such as for example UV-VIS spectroscopy, molecular spectroscopy, atomic absorption spectroscopy, nondispersive infrared (NDIR), fourier-transform infrared (FTIR), medical analysis, ellipsometry, layer thickness measurement, process monitoring or environmental monitoring.
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The following recital in the abovementioned draft regulation provides justification for this exemption:

### **Recital (14) Light sources for special applications:**

Exemptions from the requirements set out in this draft regulation should be made for light sources with special technical features for use in specific applications, including those related to health and safety. The lamps mentioned above have special properties (continuous spectrum from UV to VIS) and are used, among other things, in medical devices used for analysis. A restriction of these lamps due to the requirements of this draft regulation threatens analytical methods used amongst others for medical procedures, environmental monitoring, governmental tasks and forensic analysis.

**For this reason we request that the exemption mentioned above be included in Annex III, No 3.**