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 des Herstellers Heraeus Noblelight [2] vom 30. Juni 2020

– Produktinformation –

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 the manufacturer Heraeus Noblelight [2], 30 June 2020

– Product information –

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 du fabricant Heraeus Noblelight [2] du 30 juin 2020
– Informations sur les produits –

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

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

[2] https://www.heraeus.com/de/hng/home_hng/home_noblelight.aspx

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Texte im Offenen Forum (**abc** = vorliegender Text)

- **Bestehende EG- und EU-Regelungen**
- **Studien der EU-Kommission**
- **Regelungsentwürfe**
  - Frühere Entwürfe
  - **Änderungsverordnungen**
    - Vorlauf: ◦ Vorab-Stellungnahmen, Hintergrundinformationen und Diskussionstexte ◦ Informelles Interessensgruppentreffen am 19. Februar 2020 ◦ EK-Entwürfe vom Mai 2020 (Produktgestaltung und -information) ◦ Konsultationsforum (4. Juni 2020)
    - **EK-Entwürfe vom Juni 2020 (Produktgestaltung und -information)**
      - Texte der EU-Kommission (10. Juni 2020)
      - Arbeitshilfen/Diskussionstexte
      - **Stellungnahmen**
        - Mitgliedstaaten
        - **Andere Interessensvertretungen**
          - **Hersteller Heraeus Noblelight (30. Juni 2020)**
            - Produktgestaltung
            - **Produktinformation**
          - Andere: ◦ Herstellerverband Lighting Europe ◦ Herstellerverband APPLiA ◦ Unterhaltungssektor ◦ Prof. Linow, Hochschule Darmstadt, DE ◦ Umweltorganisationen
- **Öffentliche Konsultationen auf EU-Ebene**
- **Diskussion im Offenen Forum**
- **Weitere Dokumente**

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

EN

Documents in the Open Forum (**abc** = text at hand)

- **Existing EC and EU Regulations**
- **Studies of the European Commission**
- **Draft regulations**
  - Earlier drafts
  - **Amending Regulations**
    - Forerun: ◦ Comments in advance, background information and discussion texts ◦ Informal stakeholder meeting on 19 February 2020 ◦ EU Commission's drafts of May 2020 (Product design and information) ◦ Consultation Forum (4 June 2020)
    - **EU Commission's drafts of June 2020 (Product design and information)**
      - Texts of the EU Commission (10 June 2020)
      - Working aids/Discussion texts
      - **Comments**
        - Member States
        - **Other interested parties**
          - **Manufacturer Heraeus Noblelight (30 June 2020)**
            - Product design
            - **Product information**
          - Others: ◦ Manufacturer association Lighting Europe ◦ Manufacturer association APPLiA ◦ Entertainment sector ◦ Prof. Linow, University of applied sciences Darmstadt, DE ◦ Environmental organisations
- **Public Consultations at EU level**
- **Discussion in the Open Forum**
- **Further documents**

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

FR

Documents dans le forum ouvert (**abc** = présent document)

- **Règlements existants de la CE et de l'EU**
- **Études de la Commission européenne**
- **Projets de règlements**
  - Projets antérieurs
  - **Règlements modificatifs**
    - Précédent : ◦ Commentaires en avance, informations de fond et textes de discussion ◦ Réunion informelle des parties prenantes le 19 février 2020 ◦ Projets de la Commission européenne du mai 2020 (Conception des produits et informations sur les produits) ◦ Forum consultatif (4 juin 2020)
    - **Projets de la Commission européenne du juin 2020 (Conception des produits et informations sur les produits)**
      - Textes de la Commission européenne (10 juin 2020)
      - Aides du travail/Textes de discussion
      - **Commentaires**
        - États membres
        - **Autres groupes d'intérêt**
          - **Fabricant Heraeus Noblelight (30 juin 2020)**
            - Conception des produits
            - **Informations sur les produits**
          - Autres: ◦ Association de producteurs Lighting Europe ◦ Association de producteurs APPLiA ◦ Secteur du divertissement ◦ Prof. Linow, haute école spécialisée Darmstadt, DE ◦ Organisations environnementales
- **Consultations publiques au niveau de l'UE**
- **Discussion dans le Forum Ouvert**
- **Autres documents**

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.

Special Light Sources Manufacturer's Statement on

The EU Commission's discussion paper on possible amendments to 2019 Commission Regulations with regard to energy labelling and ecodesign requirements (10 June 2020)[1]

COMMISSION DELEGATED REGULATION (EU) 2019/2015 supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of light sources repealing Commission Delegated Regulation (EU) No 874/2012

The requirements set in the regulations on ecodesign 2019/2020 and energy efficiency labelling 2019/2015 aim at the same product type: light sources for general lighting purposes emitting in the visible light range (380 – 780 nm). Exemptions for certain special purpose lamps which are not intended for general lighting are listed in Annex III of Regulation (EU) 2019/2020 and Annex IV of Delegated Regulation (EU) 2015/2019. Unfortunately, these Annexes are not fully aligned so that some special purpose lamps would have to meet energy efficiency labelling requirements as they are not listed in Annex IV of Delegated Regulation (EU) 2019/2015.

One example are incandescent light sources with customised electrical interface for industrial electro-heating applications (infrared emitters). These light sources do not perform as efficiently compared to other technologies as the visible light generated by incandescent electro-heating light sources is only a by-product, whereas they are the only relevant technology with an energy efficiency (conversion of electric current into usable heat (not conversion into visible light!)) of almost 100% in the field of infrared electro-heating.

For the classification of light sources (EU) 2019/2015 only considers the useful luminous flux per power consumption (lm/W, efficacy) and not the total emitted radiation. As incandescent light sources for electro heating applications are not intended to be used for general lighting/to generate lumen but to generate infrared radiation for industrial electro-heating applications the low lumen emission and high power consumption result in a low energy efficiency. Hence these emitters would only be classified into consumption class "G" which transmits a wrong image to the customer as it DOES NOT reflect the efficiency of these lamp types in their intended special applications.

As these emitters are often unique and adapted to customer needs (design, power, electrical interface), relevant measured and calculated product data according to Annex V needs to be added to the product database for each lamp. The expense is disproportionate to the benefit.

For these and other lamp types for special purposes there are exemptions existing in Regulation 2019/2020 including the ones suggested by the European Commission in the discussion paper of June 2020. For the reasons mentioned above, we suggest adding at least the following exemption to Annex IV of Regulation 2019/2015:

[1] https://www.eup-network.de/fileadmin/user_upload/Lichtquellen_EK_2020_06_10_PG_PI_Diskussion.pdf

Exemption of Annex III, 2019/2020	Exemption wording suggested by EU Commission in the discussion paper of 10 June 2020[2]
Point 3(s)	Incandescent light sources with blade contact-, metal lug-, cable-, litz wire- or non-standard customised electrical interface, encasing made from quartz-glass tubes, specifically designed and marketed for industrial or professional electro-heating equipment (e.g. stretch blow-moulding process in PET-Industry, 3D-printing, photovoltaic and electronic manufacturing processes, drying or hardening of adhesives, inks, paints or coatings);

[2] https://www.eup-network.de/fileadmin/user_upload/Lichtquellen_EK_2020_06_10_PG_PI_Diskussion.pdf

For further information, please contact

Dr. Bodo Wand

Heraeus Noblelight GmbH
Quality Management
Heraeusstraße 12-14
63450 Hanau
Germany

Phone:+49 6181 35-5925
Email: bodo.wand@heraeus.com
Web: www.heraeus-noblelight.com

Katja Perlet

Heraeus Noblelight GmbH
Quality Management
Heraeusstraße 12-14
63450 Hanau
Germany

Phone:+49 6181 35-6173
Email: katja.perlet@heraeus.com
Web: www.heraeus-noblelight.com