

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 des Herstellerverbandes LE **
vom 1. Februar 2016**
– Energieverbrauchskennzeichnung –

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 the Industry Association LE ** as of 1 February 2016
– Energy Labelling –

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 l'association de producteurs LE ** du 1 février 2016
– L'étiquetage énergétique –

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/>

** LE = Lighting Europe; <http://www.lightingeurope.org/>

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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Organization: LightingEurope	Subject: COM draft proposal for Energy Labelling Regulation	Date: 2016-02-01
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Page #	Topic	Comment	Proposed change
	General comments New EEL	<ul style="list-style-type: none"> - The Energy Label should ensure 10 years of stability to allow industry's investments in innovation and to avoid frequent changes that would confuse end users - Commission should ensure some flexibility for the lighting products - Rescaling only when top classes (A++) are saturated - Lamps are mass products (millions of pieces are on stock) with EEL printed on the immediate packaging! Applying the label over the old one is impossible and too expensive - The requirement for lighting products to have the label on packaging should be removed to avoid discrimination of the lighting products against all the other product groups: <ul style="list-style-type: none"> The label will have fulfilled its purpose when the mains voltage halogen lamps will be phased out in September 2018; by then a label on the shelf/website will be sufficient in conjunction with the product fiche and technical files. - Give up the EEL for luminaires - is misleading the consumers purchase decision 	<ul style="list-style-type: none"> - Waiting until the A++ is saturated (lighting EEL label is quite new) - Products already placed on the market can be sold off after the enforcement date - New label only for products which will be placed on the market after the enforcement date <p>Await outcome of horizontal work before changing lighting label</p>

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		<ul style="list-style-type: none"> - EU lighting industries is strongly against to have a delegated act: <ul style="list-style-type: none"> o Adoption through delegated or implementing acts is a qualifying elements of the new label, under discussion among Member states in the Council and Parliament. Why is there an urgent need for having the new label by a delegated act? Also, it would be applied from 2018. A revision should start from 2018 after a proper market assessment and the outcome from revision of framework directive under development. o Although revision date is 2015 one year delay will not cause problems due to actual validity of existing requirements o Top class (A++) will not include majority (at least 30%) of products in 2016/2017 thus the current label ensures a proper communication to consumers - 	
1	Luminaires - Domestic	Luminaire efficacy (power in vs light out) has no meaning for a decorative domestic luminaire. These are bought for a decorative AND lighting reason. In many cases the lighting reason is secondary.	Remove any requirement for luminaire labels
1	Luminaires - Non-domestic	Luminaire efficacy (power in vs light out) has no meaning for a non-domestic luminaire. These are bought for lighting function and more important parameters	Remove any requirement for luminaire labels

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		(distribution, glare etc) would apply. A basic energy label has no meaning.	
4	9 (b)	What does it mean?	lm/m ²
4	(h) pieces of art	This exclusion [lighting products or lighting product components specified to operate exclusively in (h) pieces of art] is very confusing. This needs to be fully clarified. Does it mean decorative luminaires, one-off luminaires etc.	Explain or reword the exclusion.
4	(9) Lighting Product	CRI>=0Ra	What does this mean?
4 + 5	(9) Lighting Product and (10) Lighting Product Component	These definitions are confusing and require improvement. The difference between light source and luminaire should be preserved but clarified so there is no confusion.	Improve and clarify definitions
4 + 5	(9) Lighting Product and (10) Lighting Product Component	Lighting product is mains voltage (230V), lighting product component is not specified. A mains voltage lamp is a product and a 12V lamp is a product component.	Is this the intention?
4 + 5 + 10 and 14	Lighting product	Unlike lighting product component, lighting product is not defined in terms of the final owner. However in article 4 responsibilities of dealers the clause includes the final owner In label application rules the label is to be placed on the side of the packaging the final owner is intended to see first. In Annex VI it still discusses final owner	Modify definition of lighting product to include the requirement "intended to be marketed to the final owner"
6	Article 8	1.September 2018	Flexibility for lighting products. Rescaling only if top class (A++) is saturated
8	Annex II, Table 1	Not clear	G: 0 - 84,..., B: 185 – 209, A: 210 - ...

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8	New energy classes	<p>Customers would have to deal with a very confusing situation. They would buy an old product from the shelf with A++ and the same product delivered 1 day later would only show Class D. Not understandable for customers, especially as the white ware with lower efficacy 5m away in the store shows A++ although it might have lower efficiency.</p> <p>In the draft regulation the energy efficiency classes are determined based on the rated luminous flux and the rated power consumption of a lighting product (lm/W). lm/W value is suitable to determine the energy efficiency of lamps and LED-modules but not applicable for luminaires as appropriate optic is very important for them.</p> <p>This rough generalization might lead to a situation where luminaires are design to have as high lm/W -value as possible but high glare values and thus giving suboptimal lighting quality.</p>	<p>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.</p>
		<p>No difference between lamps for direct mains operation, those with for LED-ballasts or already installed ballasts for conventional technology. No difference between modules with integrated driver or external driver. No difference between modules, lamps and luminaires (different integration steps). How to handle fixtures with changeable lamps and modules Customers will not be able to understand the energy</p>	

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		efficiency of their whole lighting system and the risk is high that customers would decide for wrong technologies, as they will not be able to calculate the whole system in a useful way. Additionally risk of competitive disadvantage for European companies.	
8	Annex II - Energy Efficiency Classes	<p>The mentioned energy efficiency classes should be applicable to lightsources only since the true energy efficiency of a luminaire is very dependent on the shape of its luminous distribution and the compatibility of this characteristic to the intended lighting application.</p> <p>For domestic/decorative luminaires there can be significant variation between the same model due to shade colour, density etc. In the case of special luminaires, one-off designs, limited numbers it would not be possible to photometer a complete luminaire to determine the energy efficiency class due to time & cost constraints.</p>	Amend the text and table title to reflect this change.
8	Annex II - Energy Efficiency Classes	The lm/W targets for energy rating should be weighted to reflect the power usage of the lighting product or component that is used exclusively to produce light. If a lighting product or component also provides additional functions (e.g. data communication; presence detection; emergency battery charging) then the power used for these functions should not affect the apparent lighting energy efficiency of the product. Increasingly new lighting products will provide auxiliary functions in addition to their primary use of producing light.	<p>The draft should reflect this situation and a standardized method to discriminate lighting power from auxiliary function power needs to be developed.</p> <p>An early proposal to address this in IEC62722-1 has been made and needs to be refined and extended.</p>

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9	ANNEX III Label	Supplier's name or trade mark and model identifier need to be included on the energy label. To fulfill this requirement energy label should be printed with a color printer on each package. Since many suppliers have huge numbers of different lighting products, costs of energy labels will rise unreasonably (same packaging could not be used for different lighting products, printers needed are very expensive etc.).	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.
13	Energy Labelling – Technical documentation	(e) the identification and signature of the person empowered to bind the supplier; What does this mean?	A further definition is required
16	Annex VIII (1)	Quantities – It is not possible to obtain 10 samples equally from 4 sources.	To clarify
16	Annex VIII (5)	This does not permit the use of any other tolerance set out in harmonized standards to be applied to member states measurements. It is a requirement that CEN/CENELEC standards contain a measure of uncertainty to aid enforcement agencies, so why ignore this?	Delete the final sentence of the draft item 5