

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



Entwürfe der EU-Kommission vom 13. November 2017

**Stellungnahme des Herstellerverbandes LE \*\*  
vom 24. Januar 2018  
– Hauptanliegen –**

*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 13 November 2017

**Comments by the Industry Association LE \*\*  
as of 24 January 2018  
– Main concerns –**

**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 13 novembre 2017

**Commentaires de l'association de producteurs LE \*\*  
du 24 janvier 2018  
– Préoccupations principales –**

*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/>

## Liste der von Lighting Europe (LE) am 24. Januar 2018 versandten Dokumente und Kennzeichnung des vorliegenden Textes

- Hauptanliegen
- Produktgestaltung
- Produktinformation

**EN:** List of the documents, sent out by Lighting Europe (LE) on 24 January 2018 and identification of the text at hand

- Main concerns
- Product design
- Product information

**FR:** Liste des documents qui Lighting Europe (LE) a envoyé le 24 janvier 2018 et marquage de le présent document

- Préoccupations principales
- Conception des produits
- Informations relatives au produit

Es folgt ein unveränderter Originaltext.

**EN:** The following is an unmodified original text.

**FR:** Ce qui suit est un texte original.

---

# Main concerns

On the European Commission's  
**eco-design** and **energy**  
**labelling** working documents  
on light sources  
(published: 13 November 2017)

24 January 2018

# Main messages

- 1. Scope**  
clarify definitions of light sources and containing products
- 2. Removability**  
clarification and impact assessment required
- 3. Timing**  
Circular Economy / T8 and small halogen lamps
- 4. Special purpose lamps**  
definition needed
- 5. Tolerances**  
take measurement difficulty and uncertainty into account
- 6. Accelerated endurance testing**  
keep 500 h early failure testing
- 7. EPREL (Energy Labelling Database)**  
reduce information requirements and administrative burden
- 8. RoHS**  
alignment needed with DG Environment

# Introduction

- Keep requirements of existing Regulations for conventional products (non-LED), including product information requirements
- Any limitation of tolerances require adaptation of requirements
- Clarify that only light sources and external control gear are in the scope
- The Ecodesign Lighting Regulation should not hamper future innovation

**For further savings, focus on LEDs instead of conventional technologies**

# 1. Scope (Labelling)

LightingEurope proposes the following adaptation for **Labelling Regulation**:

**Art. 2(1)(d), second para.:**

~~If a containing product is itself a light source, t~~**The light source to be considered for the purpose of this Regulation is the smallest physical unit that can be readily removed from the containing product without permanent mechanical damage of the light source and that meets the definition for light source. The light source to be considered for the purpose of this Regulation is the smallest physical unit, such as lamps, modules, or the part of the containing product as identified by the manufacturer partially disassembled containing product for the purpose of market surveillance.**

**Definitions of light sources and containing products need to be clarified**

# 1. Scope (Eco-design)

LightingEurope proposes the following adaptation for Ecodesign Regulation:

**Art. 2(1)(d), second para.:**

*Light source to be considered for the purpose of this Regulation is the smallest physical unit that can be readily removed from the containing product without permanent mechanical damage **of the light source** and that meets the definition for light source. The light source to be considered for the purpose of this Regulation is the smallest physical unit, such as lamps, modules, or the part of the containing product as identified by the manufacturer ~~partially disassembled containing product~~ for the purpose of market surveillance.*

*If a containing product is itself a light source, **the light source to be considered for the purpose of this Regulation is the smallest physical unit that can be readily removed from the containing product without permanent mechanical damage of the light source and that meets the definition for light source. The light source to be considered for the purpose of this Regulation is the smallest physical unit, such as lamps, modules, or the part of the containing product as identified by the manufacturer ~~partially disassembled containing product~~ for the purpose of market surveillance***

Definitions of light sources and containing products need to be clarified

## 2. Removability (1/2)

Top-down approach drives EU for Circular Economy. Here our proposal for Art. 4 Ecodesign Regulation on removability of light sources and separate control gear:

### ***(NEW) 4.1 Requirements on light sources and separate control gears related to verification for market surveillance purposes***

*Manufacturers and importers shall ensure that light sources and separate control gears in scope of this Regulation can be removed without being permanently damaged for verification purposes. For containing products, instructions should be available on request on how light sources and separate control gears can be removed for verification without these being permanently damaged.*

### ***(NEW) 4.2 Requirements on light sources and separate control gears at end of life***

*Manufacturers and importers of containing products shall ensure that light sources and separate control gears in scope of this Regulation can be dismantled from containing products. Instructions shall be available on request.*

**Removability required for verification and end-of-life purposes**

## 2. Removability (2/2)

**(NEW) 4.3** *Requirements on light sources and separate control gears for replaceability*

*Manufacturers and importers of containing products shall provide information about the replaceability or non-replaceability of light sources and control gears in scope of this Regulation by end-users or qualified persons\* without permanent damage to the containing product. Such information shall be available on free-access websites. For products sold directly to end-users, this information shall be on the packaging, at least in the form of a pictogram.*

*Any further Circular Economy aspects shall be subject to review in 2022, after a thorough impact assessment, taking current legislation into account.*

\* Reference to standard EN 60598-1

**Information is required on replaceability for end-users.**

**A pictogram will inform end-users without additional burden for industry**

## 3. Timing (1)

The market should be allowed to transition to new technologies and products at its natural pace to avoid unnecessary waste and costs.

### **No phase-out of T8 fluorescent lamps and small halogen lamps**

- LightingEurope encourages the European Commission to take into account the concerns raised by the users about the phase out of T8 and small halogen lamps

**Proposed ban of T8 and small halogen lamps is too early**

## 3. Timing (2)

The market should be allowed to transition to new technologies and products at its natural pace to avoid unnecessary waste and costs.

### **Postpone inclusion of flicker**

- Necessary to gain experience about the use of the test method for flicker (IEC TR 61547-1), published in October 2017
- The same for the upcoming IEC Technical Report 'Objectives test method for stroboscopic effects of lighting equipment' (63158 – publication expected in August 2018)
- LightingEurope encourages the European Commission to take into the suggested Stage 2, as proposed at the Consultation Forum by various stakeholders

**Flickering requirements are possible in a stage 2**

## 4. Special purpose lamps

- LightingEurope proposes a definition of special purpose lamps as a replacement of Annex I, para. (3), together with a non-exhaustive detailed list of lamps ('Annex Z' in detailed comments) that will constitute a new Annex to the Ecodesign text
- LightingEurope proposes the inclusion of architectural lighting, together with studio and theatre lighting, in para. (2)
- See LightingEurope detailed comments on EU Ecodesign proposal from 13 November 2017

**To avoid loopholes in exemptions and early ban of technologies with no LED replacement, a combined approach is proposed**

## 5. Tolerances

- Tolerances should be used for verification by authorities and not by manufacturers for specification purposes.
- The tolerance levels should be consistent with the technical difficulty of the measurement. Tolerances should ensure that a fair judgement can be made by the authorities. We propose the following:

### **Annex IV, para. (7):**

*“The Member State authorities shall only apply the verification tolerances that are set out in Table 6 and shall only use the procedure described in points 1 to 7 for the requirements referred to in this Annex.”*

Products shall be regarded non-compliant if measurement results at MSA are outside verification tolerance + MSA’s measurement uncertainty

**Next to tolerances, measurement uncertainties should be taken into account.**

## 6. Accelerated endurance testing

- Accelerated endurance tests and temperature cycle test are not acceptable as they run the risk of introducing failure modes that do not occur during normal operation.
- Therefore, LightingEurope proposes to remain with an “early failure” test of 500 or max 1,000 hours.

**“Early failure” testing is still the most effective method and should be kept in the Ecodesign Regulation lighting**

## 7. EPREL (Energy Labelling Database)

- Ensure simplification of the user interface
- Exempt luminaires (under 874/2012) and containing products (under the new Delegated Act on labelling) completely from the EPREL scope.
- Manufacturers have already done their work for labelling 3 times in the latest years due to sudden changes in legislation
- Ensure the highest level of data security
- Input shall be limited to what is essential for the generation of the label:  $I_m/W$  and Factor  $F_{TM}$

**Need to reduce administrative burden and information requirements**

## 8. RoHS

- In parallel with Ecodesign review led by Dg Energy, Dg Environment is taking decisions on RoHS exemption renewal requests for most of conventional lamps today on the market (e.g. CFL, LFL, HPS, HID and Special Purpose lamps)
- Considerations on phase out of lamps made at the Consultation Forum (for ex. on T8 lamps) by Member States, other stakeholders and DG Energy itself, should also be taken into account in the RoHS process

**The market should be allowed to transition to new technologies & products at its natural pace to avoid unnecessary waste and costs.**



# **LIGHTINGEUROPE**

THE VOICE OF THE LIGHTING INDUSTRY