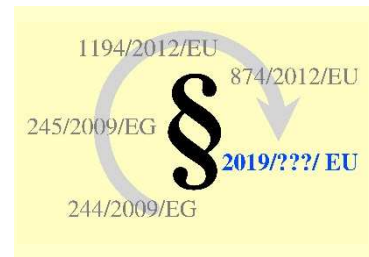


Texte zu den geplanten neuen EU-Regelungen zur umweltgerechten Produktgestaltung und zur Energieverbrauchs-kennzeichnung in der Beleuchtung – Zusammenstellung * des Umweltbundesamtes (UBA), Deutschland



Entwürfe der EU-Kommission vom 3. Juli 2018
Stellungnahme des Herstellerverbandes LE **
vom August 2018
 – Produktinformation –

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 3 July 2018

Comments by the Industry Association LE **
as of August 2018
 – Product information –

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 3 juillet 2018

Commentaires de l'association de producteurs LE ** d'août 2018
 – Informations relatives au produit –

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

* <https://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) im August 2018 versandten Dokumente und Kennzeichnung des vorliegenden Textes

- Hauptanliegen (10. August 2018)
- Produktgestaltung (29. August 2018)
- Produktinformation (29. August 2018)

EN: List of the documents, sent out by Lighting Europe (LE) in August 2018 and identification of the text at hand

- Main concerns (10 August 2018)
- Product design (29 August 2018)
- Product information (29 August 2018)

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

- Préoccupations principales (10 août 2018)
- Conception des produits (29 août 2018)
- Informations relatives au produit (29 août 2018)

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

LightingEurope – Table with comments to 3 July 2018 Commission draft text on energy labelling measures for lighting (ELR)

Date: 29 August 2018

European Commission proposal (3 Jul '18)	LightingEurope proposal	LightingEurope comments
<p>THE EUROPEAN COMMISSION,</p> <p>Having regard to the Treaty on the Functioning of the European Union,</p> <p>Having regard to Regulation (EU) 2017/1369 of the European Parliament and of the Council of 28 July 2017 setting a framework for energy labelling repealing Directive 2010/30/EU, and in particular Articles 11 and 16 thereof,</p> <p>Whereas:</p>		
<p>(1) Regulation (EU) 2017/1369 empowers the Commission to adopt delegated acts as regards the labelling or re-scaling of the labelling of product groups representing significant potential for energy savings and, where relevant, other resources.</p>		
<p>(2) Provisions on the energy labelling of lighting products, namely electrical lamps and luminaires, were established by Commission Delegated Regulation (EU) No 874/2012 of 12 July 2012 supplementing Directive 2010/30/EU and its successive amendment.</p>		
<p>(3) Lighting products are among the priority product groups mentioned in Article 11(5)(b) of Regulation (EU) 2017/1369 for which the Commission should adopt a delegated act to introduce an A to G rescaled label.</p>		
<p>(4) Regulation (EU) No 874/2012 contains a review clause in Article 7 requiring the Commission to review the regulation in light of technological progress.</p>		
<p>(5) The Commission has reviewed Regulation (EU) No 874/2012 and analysed technical, environmental and economic aspects of as</p>		

<p>well as real-life user behaviour. The review was undertaken in close cooperation with stakeholders and interested parties from the Union and third countries. The results of the review were made public and presented to the Consultation Forum established by Article 14 of Regulation (EU) 2017/1369.</p>		
<p>(6) The review concluded that there was a need for the introduction of revised energy labelling requirements for lighting products, namely for light sources.</p>		
<p>(7) The environmental aspect of light sources, identified as significant for the purposes of this Regulation, is energy consumption in the use phase.</p>		
<p>(8) The review has shown that the electricity consumption of products subject to this Regulation can be further significantly reduced by implementing energy label measures.</p>		
<p>(9) As this Regulation discontinues the energy label specifically dedicated to luminaires in Regulation (EU) 874/2012, suppliers of luminaires should be exempted from the obligations related to the product database established under Regulation (EU) 2017/1369.</p>		<p>There is a gap between 1 January 2019 (applicability of EPREL) and the entry-into-force of this Regulation, creating confusion and uncertainty for luminaire producers.</p>
<p>(10) The measures provided for in this Regulation were discussed by the Consultation Forum and the Member States' experts in accordance Articles 14 and 18 of Regulation (EU) 2017/1369.</p>		
<p>(11) Regulation (EU) No 874/2012 should be repealed and new provisions should be laid down by this Regulation.</p>		
<p>HAS ADOPTED THIS REGULATION:</p>		
<p>Article 1: Subject matter and scope</p>		

<p>This Regulation establishes requirements for the labelling of, and the provision of supplementary product information on, light sources, with or without integrated control gear. The requirements also apply to light sources placed on the market in a containing product.</p> <p>This Regulation shall not apply to light sources specified in Annex IV points 1 and 2. Light sources specified in Annex IV point 3 shall only be subject to the requirements of Annex V point 4.</p>	<p>This Regulation establishes requirements for the labelling of, and the provision of supplementary product information on, light sources, with or without integrated control gear. The requirements also apply to light sources placed on the market in a containing product.</p> <p>This Regulation shall not apply to light sources specified in Annex IV points 1 and 2. Light sources specified in Annex IV point 3 shall only be subject to the requirements of Annex V point 4.</p> <p>This Regulation also shall not apply to light sources (lamps and LED modules) marketed as part of a contained product and not intended to be removed by the end-user, except when they are offered for sale, hire or hire purchase or displayed separately to the end user, for example as spare parts;</p>	<p>Labelling of light sources not intended to be replaced by the end-user is not useful for professional users; furthermore, this would increase the number of models to be uploaded in EPREL, with the relevant consequences.</p> <p>Labelling for light sources even when they are into a containing product imposes to suppliers disproportionate conditions (unreasonable huge burdens) if compared with the objectives set by this regulation, for the following reasons:</p> <ul style="list-style-type: none"> - Implications for the EPREL database (data entry, data retention, time to market of the containing product); - Need to test all the modules to determine each single energy class for all lights source mounted in the luminaire (usually a luminaire operates with more than one LED light source); - No use of such light source information for the end user, particularly in the professional sector where the only need for the market is to work with luminaires data.
<p>Article 2: Definitions</p>		
<p>In addition to the definitions laid down in Article 2 of Regulation (EU) 2017/1369 and the definitions laid down in Annex I of this Regulation, the following definitions shall apply for the purposes of this Regulation:</p>		
<p>1. 'light source' means an electrically operated product intended to emit and/or be possibly tuned to emit light with all of the following optical characteristics:</p> <p>(a) chromaticity coordinates x and y in the range $0,270 < x < 0,530$ and $- 2,3172 x^2 + 2,3653 x - 0,2199 < y < - 2,3172 x^2 + 2,3653 x - 0,1595$;</p>		

<p>(b) a luminous flux < 500 lm per mm² of projected light-emitting surface area as defined in Annex I;</p>		
<p>(c) a luminous flux between 60 and 82 000 lumen;</p>		
<p>(d) a colour rendering index (CRI) Ra > 0;</p>		
<p>using incandescence, fluorescence, high-intensity discharge, inorganic light emitting diodes (LED) or organic light emitting diodes (OLED), or their combinations as lighting technology, and that can be verified as a light source according to the procedure of Annex V.</p>		
<p>High-pressure sodium light sources that do not fulfil condition (a) are anyway considered light sources in the sense of this Regulation.</p>		
<p>For the purpose of this Regulation, the following products are not considered to be light sources: (a) LED dies or LED chips; (b) LED packages; (c) products containing light source(s) from which these light source(s) can be removed for verification; (d) light-emitting parts contained in a light source from which these parts cannot be removed for verification as a light source.</p>		
<p>2. 'control gear' means one or more devices, possibly integrated in a light source, intended to prepare the mains electricity supply for the electric format required by one or more specific light sources within boundary conditions set by electric safety and electromagnetic compatibility. It may include transforming the supply and starting voltage, limiting operational and preheating current, preventing cold starting, correcting the power factor and/or reducing radio interference;</p>		

<p>3. 'containing product' means a product containing one or more light sources and/or separate control gears. Examples of containing products are luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s), and other products that cannot be practically verified as light source themselves, so that the contained light source(s) have to be considered;</p>	<p>3. 'containing product' means a product containing one or more light sources and/or separate control gears that can be removed for verification. Examples of containing products are luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s), and other products that cannot be practically verified as light source themselves, so that the contained light source(s) have to be considered. If a containing product cannot be taken apart for verification of the light source and separate control gear, then the entire product is to be considered a light source;</p>	<p>If a containing product is sealed-for-life and has to be considered as a light source and has to be measured as such, this should be clearly stated: one should not have to read between the lines to understand the meaning of legislation. LightingEurope has already agreed on this.</p> <p>NOTE: by definition, an empty luminaire without light source and/or control gear is neither containing product nor light source.</p>
<p>4. 'light' means electromagnetic radiation with a wavelength between 380 nm and 780 nm;</p>		
<p>5. 'LED die or LED chip' means a small block of light-emitting semiconducting material on which a functional light emitting diode (LED) circuit is fabricated;</p>		
<p>6. 'LED package' means a single electric part comprising principally at least one LED die. It does not include (parts of) a control gear, does not include a cap, is not connected directly to the supply voltage, and does not include active electronic components. It is used as a part of an LED module or of an LED lamp. It can include one or more of the following: optical elements, light converters (phosphors), thermal, mechanical and electric interfaces, parts to address electrostatic discharge concerns. So called Chip-on-Board (CoB) packages, and similar light-emitting devices that are intended to be used directly in an LED luminaire, are not</p>		

<p>considered to be LED packages, but LED modules;</p>		
<p>7. 'chromaticity' means the property of a colour stimulus defined by its chromaticity coordinates (x and y);</p>		
<p>8. 'luminous flux' or 'flux' (Φ), expressed in lumen (lm), means the quantity derived from radiant flux (radiant power) by evaluating the electromagnetic radiation in accordance with the spectral sensitivity of the human eye. It refers to the total flux emitted by a light source in a solid angle of 4π steradians under conditions (e.g. current, voltage, temperature) specified in applicable standards. It refers to the initial flux for the undimmed light source after a short operating period, unless it is clearly specified that the flux in a dimmed condition or the flux after a given period of operation is intended. For light sources that can be tuned to emit different light spectra and/or different maximum light intensities, it refers to the flux in the 'reference control settings' as defined in Annex II;</p>		
<p>9. 'colour rendering index' (CRI) is the average Ra of the colour rendering for the first 8 test colours (R1-R8) defined in standards, and means the effect of an illuminant on the colour appearance of objects by conscious or subconscious comparison with their colour appearance under the reference illuminant;</p>		
<p>10. 'incandescence' means a phenomenon where light is produced from heat, in light sources typically produced through a threadlike conductor ('filament') which is heated by the passage of an electric current. Incandescent light sources are either GLS - General Lamp Shape light sources or halogen light sources. Halogen light source</p>	<p>10. 'incandescence' means a phenomenon where light is produced from heat, in light sources typically produced through a threadlike conductor ('filament') which is heated by the passage of an electric current. Incandescent light sources are either GLS - General Lamp Shape light sources or halogen light sources. Halogen light source</p>	<p>"Incandescent light sources are either GLS General Lamp Shape" - this is not true, other technologies can also have General Lamp Shape. GLS can also mean General Lighting Service and usually refers to a particular bulb shape.</p>

<p>means an incandescent light source with a threadlike conductor made from tungsten surrounded by gas containing halogens or halogen compounds;</p>	<p>means an are also incandescent light source with a threadlike conductor made from tungsten surrounded by gas containing halogens or halogen compounds;</p>	
<p>11. 'fluorescence' or 'fluorescent light source' (FL) means the phenomenon or a light source using an electric gas discharge of the low-pressure mercury type in which most of the light is emitted by one or more layers of phosphors excited by the ultraviolet radiation from the discharge. Fluorescent light sources may have one ('single-capped') or two ('double-capped') connections ('caps') to their electricity supply. For the purposes of this Regulation, magnetic induction light sources are also considered as fluorescent light sources;</p>		
<p>12. 'high intensity discharge' (HID) means an electric gas discharge in which the light-producing arc is stabilised by wall temperature and the arc chamber has a bulb wall loading in excess of 3 Watts per square centimetre. 'Gas discharge' means a phenomenon where light is produced, directly or indirectly, by an electric discharge through a gas, plasma, metal vapour or mixture of gases and vapours. For the purpose of this Regulation, HID light sources are limited to metal halide, high-pressure sodium and mercury vapour types as defined in Annex I;</p>	<p>12. 'high intensity discharge' (HID) means an electric gas discharge in which the light-producing arc is stabilised by wall temperature and the arc chamber has a bulb wall loading in excess of 3 Watts per square centimetre. 'Gas discharge' means a phenomenon where light is produced, directly or indirectly, by an electric discharge through a gas, plasma, metal vapour or mixture of gases and vapours. For the purpose of this Regulation, HID light sources are limited to metal halide, high-pressure sodium and mercury vapour types as defined in Annex I;</p> <p>'Gas discharge' means a phenomenon where light is produced, directly or indirectly, by an electric discharge through a gas, plasma, metal vapour or mixture of gases and vapours.</p>	<p>This should be a separate definition because it is used in the 'fluorescence' definition as well.</p>
<p>13. 'inorganic light emitting diode' (LED) means a technology in which light is produced from</p>		

<p>a solid state device embodying a p-n junction of inorganic material. The junction emits optical radiation when excited by an electric current;</p>		
<p>14. 'organic light emitting diode' (OLED) means a technology in which light is produced from a solid state device embodying a p-n junction of organic material. The junction emits optical radiation when excited by an electric current;</p>		
<p>15. 'high-pressure sodium light source' (HPS) means a high intensity discharge light source in which the light is produced mainly by radiation from sodium vapour operating at a partial pressure of the order of 10 kilopascals. HPS light sources may have one ('single-ended') or two ('double-ended') connectors to their electricity supply;</p>		
<p>16. 'point of sale' means a physical location where the product is displayed or offered for sale, hire or hire-purchase to the end-user.</p>		
<p>17. 'end-user' means a natural person buying or expected to buy a product for purposes which are outside his trade, business, craft or profession.</p>		
<p>Article 3 – Obligations of suppliers</p>	<p>Propose to limit the information for custom built B2B light sources to Annex V.1 (technical information for verification purposes).</p>	<p>Regarding slides in the PPT on Product Information and Technical Information: we consider the Product Information Data (Annex V) not to be relevant for custom (built to spec) B2B light sources, as they are not available on the general market. This would have impact on administrative burden (with 0 added value), and also disclose commercially sensitive information of custom designs.</p>
<p>1. In addition to the obligations of suppliers laid down in Regulation (EU) 2017/1369, suppliers of light sources shall ensure that:</p>		
<p>(a) Each light source which is placed on the market as an independent product (i.e.</p>		

<p>not in a containing product) and in a packaging containing information to be visibly displayed to potential buyers prior to their purchase, is supplied with a printed label in the format as set out in Annex III;</p>		
<p>(b) the parameters of the product information sheet, as set out in Annex V, are entered into the product database established by Regulation (EU) 2017/1369;</p>		<p>EPREL should be able to generate such information sheet, if necessary.</p> <p>Does this mean that a separate information sheet has to be created for each single product? Why cannot the system (EPREL) generate it?</p>
<p>(c) if requested by the dealer, the product information sheet shall be made available in printed form;</p>	<p>(c) if requested by the dealer, the product information sheet shall be made available in printed form;</p>	<p>Dealers should be able to generate it directly from the data base.</p> <p>Try to simplify and rationalise the requirements.</p> <p>Electronic form should be sufficient. Printed form not practicable</p>
<p>(d) the content of the technical documentation uploaded into the product database is according to Annex VI;</p>		
<p>(e) any visual advertisement for a specific model of light source, including on the Internet, contains the energy efficiency class and the range of efficiency classes available on the label in accordance with Annex X;</p>		<p>There is no Annex X.</p>
<p>(f) any technical promotional material concerning a specific model of light source, including on the Internet, which describes its specific technical parameters includes the energy efficiency class of that model and the range of efficiency classes available on the label, in accordance with Annex X;</p>		<p>There is no Annex X.</p>
<p>(g) an electronic label in the format and containing the information as set out in</p>	<p>(g) an electronic label in the format and containing the information as set out in</p>	<p>Typo.</p>

<p>Annex VIII shall be made available to dealers for each light source model;</p>	<p>Annex VIII III shall be made available to dealers for each light source model;</p>	<p>NOTE: EPREL should be able to generate this label.</p>
<p>(h) an electronic product information sheet as set out in Annex VIII is made available to dealers for each light source model;</p>	<p>(h) an electronic product information sheet as set out in Annex VIII III is made available to dealers for each light source model;</p>	<p>Typo. NOTE: Dealers should be able to generate this sheet directly from EPREL. See point (c) - needs simplification and rationalisation of requirements.</p>
<p>(i) on request of dealers in accordance with Article 4(e), printed labels to rescale products are provided as a sticker, of the same size as the one which is already on the package;</p>	<p>Delete requirements, or find more reasonable solutions to give information at the retailer on the pre-existing and the existing energy classes.</p>	<p>The requirement for the products already on the market is unfeasible (e.g.: stickering on shelf; opening of boxes of containing products).</p> <p>Only information at the point of sale about the equivalence between the old and new energy classes should be made available by the supplier (in Art. 3(1)(i)) and information at the point of sale about the equivalence between the old and new energy classes should be displayed (in Art. 4(e)).</p> <p>The requirement for re-labelling the packaging of products already placed on the market is disproportionate and unachievable (many millions of pieces having infinite different sizes and dimensions); therefore, it should be complete deleted or, alternatively, it should be replaced by a more reasonable measure such as information at the point of sale about the equivalence between the old and new energy classes.</p>
<p>(j) products shall not be placed on the market that have been designed so that a model's performance is automatically altered in test conditions with the objective of reaching a more favourable level for any of the parameters specified in the relevant delegated act or included in the documentation provided the product.</p>	<p>(j) products shall not be placed on the market that have been designed so that a model's performance is automatically altered in test conditions with the objective of reaching a more favourable level for any of the parameters specified in the relevant delegated act or included in the documentation provided the product.</p>	<p>Delete: this clause is already contained in the obligations of the supplier in regulation 2017/1369 (Art. 3 (5)). Moreover, the text has not been edited - it still says "... in the relevant delegated act ...". This is the delegated act.</p>
<p>2. Suppliers of containing products shall:</p>	<p>Delete the requirement specified in Annex V about information on the product packaging.</p>	<p>The information will not be available to end-users for a lot of containing products/luminaires (e.g. furniture, products displayed without packaging,</p>

<p>(a) provide information on the contained light source(s) as specified in Annex V point 3.2.</p>	<p>At least allow the use of black and white arrow.</p> <p>2. Suppliers of containing products shall: (a) provide information on the contained light source(s) as specified in Annex V point 3.2 2.2.</p>	<p>professional luminaires, large products...). The coloured arrow would be a further burden for containing product manufacturers, because marking on packaging is often black and white only.</p> <p>Also: wrong reference.</p>
<p>(b) as specified in Annex IX, on request by market surveillance authorities, provide information on how light sources can be removed for verification without permanent damage, and without permanent damage to the containing product.</p>		
<p>3. The energy efficiency class shall be based on the total mains efficacy calculated in accordance with Annex II.</p>	<p>3. The energy efficiency class shall be based on the total mains efficacy calculated in accordance with Annex II.</p>	<p>Mains power input does not apply to NMLS.</p>
<p>Article 4: Obligations of dealers</p>		
<p>In addition to the obligations of dealers laid down in Regulation (EU) 2017/1369, dealers shall ensure that:</p> <p>(a) each light source, at the point of sale, bears the label provided by suppliers in accordance with Article 3(a) displayed as indicated in Annex III, in such a way as to be clearly visible;</p>		
<p>(b) the label and product information sheet are provided in the case of distance selling in accordance with Annexes VII and VIII;</p>		
<p>(c) any visual advertisement for a specific model of light source contains the energy efficiency class and the range of efficiency classes available on the label, in accordance with Annex X;</p>		<p>There is no Annex X.</p>
<p>(d) any technical promotional material concerning a specific model of light source, including on the Internet, which describes its specific technical parameters includes the energy efficiency class of that model and the</p>		<p>There is no Annex XX.</p>

range of efficiency classes available on the label, in accordance with Annex XX;		
(e) existing labels on light sources at points of sale are replaced by the rescaled labels that shall be attached to the packages in such a way as to cover the existing label by nine months from the application of this Regulation.	Delete requirements, or find more reasonable solutions to give information at the retailer on the pre-existing and the existing energy classes	The requirement for the products already on the market is unfeasible (e.g.: stickering on shelf; opening of boxes of containing products).
Article 5: Measurement methods		
The information to be provided pursuant to Articles 3 and 4 shall be obtained by reliable, accurate and reproducible measurement and calculation methods, which take into account the recognised state-of-the-art measurement and calculation methods, as set out in Annex II.		
Article 6: Verification procedure for market surveillance purposes		
Member States shall apply the procedure laid down in Annex IX when assessing the conformity of the light sources.		
Article 7: Revision		
The Commission shall review this Regulation in the light of technological progress and present the results of this review to the Consultation Forum no later than five years after its entry into force. The review shall in particular assess the energy efficiency classes and the possibility to introduce requirements on circular economy. In addition, the Commission shall review the label to rescale it when the requirements in Article 11 of Regulation (EU) 2017/1369 are met.		
Article 8: Repeal		
Regulation (EU) No 874/2012 is repealed as of 31 August 2021, with the exception of Articles 3.2 and 4.2 of Regulation (EU) No 874/2012, which are repealed as of the day of entry into force of this Regulation.		
Article 9: Entry into force and application		

<p>1. This Regulation shall enter into force on the 20th day following its publication in the Official Journal of the European Union.</p>		
<p>2. It shall apply from 1 September 2021. However: (a) For the purpose of the obligations laid down in Articles 3(1)(a), 3(1)i and 4(e), this Regulation shall apply from 1 June 2022;</p>		
<p>(b) For the purpose of the obligations laid down in Article 3(1)(b) this Regulation shall apply from 1 May 2021.</p>	<p>(b) For the purpose of the laid-down obligations in Article 3(1)(b) and in Article 4 of Regulation 2017/1369, this Regulation shall apply from 1 May 2021</p>	<p>There is a gap between 1 January 2019 (applicability of EPREL) and the entry-into-force of the ELR, creating confusion and uncertainty for luminaire producers. How are luminaires going to be exempted from EPREL starting from 1 January 2019?</p>
<p>This Regulation shall be binding in its entirety and directly applicable in all Member States. Done at Brussels, <i>For the Commission</i> Jean-Claude JUNCKER <i>The President</i></p>		

ANNEXES

ANNEX I – Definitions applicable for the Annexes		
(1) 'mains light source (MLS)' means a light source that can be operated directly on the mains electricity supply. Light sources that operate directly on the mains, and can also operate indirectly on the mains using a separate control gear, shall be considered to be mains light sources;		
(2) 'non-mains light source (NMLS)', means a light source that is not a mains light source. These light sources require a separate control gear to operate on the mains;		
(3) 'separate control gear', means a control gear that is not physically integrated with a light source and is placed on the market as a separate product or as a part of a containing product		
(4) 'directional light source' (DLS) means a light source having at least 80% of total luminous flux within a solid angle of π sr (corresponding to a cone with angle of 120°);		
(5) 'non-directional light source' (NDLS) means a light source that is not a directional light source;		
(6) 'connected light source' (CLS) means a light source including data-connection parts that are physically or functionally inseparable from the light emitting parts to maintain the 'reference control settings'; The light source can have physically integrated data-connection parts in a single inseparable housing, or the light source can be combined with physically separate data-connection parts placed on the market		

together with the light source as a single product;		
(7) 'data-connection parts' means parts that perform any one of the following functions:		
(a) reception or transmission of wired or wireless data signals and the processing thereof (either used to control the light emission function or otherwise),		
(b) sensing and processing of the sensed signals (either used to control the light emission function or otherwise),		
(c) actuation by audio control (including voice control),		
(d) a combination of these;		
(8) 'colour-tuneable light source' (CTLS) means a light source that can be set to emit light with a large variation of colours outside the range defined in article 2(1) but can also be set to emit white light inside the range defined in article 2(1) for which the light source is in scope of this Regulation;		
The term does not include tuneable-white light sources that can only be set to emit light, with different correlated colour temperatures, within the range defined in Article 2(1).		
The term also does not include dim-to-warm light sources, that shift their white light output to lower correlated colour temperature when dimmed, simulating the behaviour of incandescent light sources;		
(9) 'colour purity index': a percentage computed for a CTLS set to emit light of a certain colour, using a procedure further defined in standards, by drawing a straight line on an (x,y) colour space graph from a point with colour coordinates $x=0.313$ and $y=0.330$		

<p>(D65 reference point, point 1), going through the point representing the (x,y) colour coordinates of the light source (point 2), and ending on the outer border of the colour space (locus; point 3). The colour purity index is computed as the distance between points 1 and 2 divided by the distance between points 1 and 3. The full length of the line represents 100% colour purity (point on the locus). The D65 reference point represents 0% colour purity (white light);</p>		
<p>(10) '<i>lighting control parts</i>' means parts that are integrated in a light source, or physically separated but marketed together with a light source as a single product, that are not strictly necessary for the light source to emit light at full-load, but that enable manual- or automatic-, direct- or remote-, control of luminous intensity, chromaticity, correlated colour temperature, light spectrum and/or beam angle. Dimmers shall also be considered as lighting control parts.</p> <p>The term also includes data-connection parts, but the term does not include devices within the scope of Commission Regulation (EC) No 1275/20081;</p>		
<p>(11) '<i>non-lighting parts</i>' means parts that are integrated in a light source, or physically separate but marketed together with a light source as a single product, that are not necessary for the light source to emit light at full-load, and that are not 'lighting control parts'. Examples include, but are not limited to: speakers (audio), cameras, repeaters for communication signals to extend the range (e.g. WiFi), parts supporting grid balance (switching to own internal batteries when necessary), battery charging, visual</p>		

notification of events (mail arriving, door bell ringing, alert), use of Light Fidelity (Li-Fi, a bidirectional, high-speed and fully networked wireless communication technology);		
(12) 'useful luminous flux' (Φ_{use}), means the part of the luminous flux of a light source that is considered when determining its energy efficiency:		
– for non-directional light sources it is the total flux emitted in a solid angle of 4π sr (corresponding to a 360° sphere);		
– for directional light sources with beam angle $\geq 90^\circ$ it is the flux emitted in a solid angle of π sr (corresponding to a cone with angle of 120°);		
– for directional light sources with beam angle $< 90^\circ$ it is the flux emitted in a solid angle of 0.586π sr (corresponding to a cone with angle of 90°);		
(13) 'beam angle' of a directional light source means the angle between two imaginary lines in a plane through the optical beam axis, such that these lines pass through the centre of the front face of the light source and through points at which the luminous intensity is 50 % of the centre beam intensity, where the centre beam intensity is the value of luminous intensity measured on the optical beam axis;		
For light sources that have different beam angles in different planes, the largest beam angle shall be the one taken into account;		
For light sources with user-controllable beam angle, the beam angle corresponding to the 'reference control setting' shall be the one taken into account;		
(14) 'full-load' means the condition of a light source, within the declared operating		

<p>conditions, in which it emits the maximum (undimmed) initial luminous flux;</p>		
<p>(15) 'standby mode' means the condition of a light source, where it is connected to the power supply but the light sources are intentionally not emitting light, and the light source is awaiting a control signal (from a source different from a network) to return to a state with light emission. Lighting control parts enabling the standby function shall be in their control mode. Non-lighting parts shall be disconnected or switched off or their power consumption shall be minimized following manufacturer's instructions;</p>		
<p>(16) 'networked standby mode' means the condition of a connected light source (CLS) where it is connected to the power supply but the light source is intentionally not emitting light and is awaiting a remotely initiated trigger (from a network) to return to a state with light emission. Lighting control parts shall be in their control mode and data-connection parts shall be in a state enabling the networked standby function. Non-lighting parts shall be disconnected or switched off or their power consumption shall be minimized following manufacturer's instructions;</p>		
<p>(17) 'control mode' means the condition of lighting control parts where they are connected to the light source and performing their functions in such a way that a control signal can be internally generated or a remotely initiated trigger can be received, by wire or wireless, and processed to lead to a change in the light emission of the light source;</p>		

<p>(18) 'remotely initiated trigger' means a signal that comes from outside the light source via a network;</p>		
<p>(19) 'control signal' means an analogue or digital signal transmitted to the light source wirelessly or wired either via voltage modulation in separate control cables or via a modulated signal in the supply voltage. The signal transmission is not through a network but e.g. from an internal source or from a remote control delivered with the product;</p>		
<p>(20) 'remotely initiated trigger' means a signal that comes from outside the light source or separate control gear via a network;</p>	<p>(20) 'remotely initiated trigger' means a signal that comes from outside the light source or separate control gear via a network;</p>	<p>Duplicate, see (18).</p>
<p>(21) 'network' means a communication infrastructure with a topology of links, an architecture, including the physical components, organisational principles, communication procedures and formats (protocols);</p>		
<p>(22) 'on-mode power' (P_{on}), expressed in Watt, is the electric power consumption of a light source in full-load with all lighting control parts and non-lighting parts disconnected. If these parts cannot be disconnected they shall be switched off or their power consumption shall be minimised following the manufacturer's instructions;</p> <p>In case of a non-mains light source (NMLS) that requires a separate control gear to operate, P_{on} can be measured directly on the input to the light source, or P_{on} is determined using a control gear with known efficiency, whose electric power consumption is subsequently subtracted from the measured mains power input value;</p>		

<p>(23) 'standby power' (P_{sb}), expressed in Watts, is the electric power consumption of a light source in standby mode;</p>		
<p>(24) 'networked standby power' (P_{net}), expressed in Watts, is the electric power consumption of a connected light source (CLS) in networked standby mode;</p>		
<p>(25) 'reference control settings' (RCS) means a control setting or a combination of control settings that is used to verify compliance of a light source with this Regulation. These settings are relevant for light sources that allow the end-user to control, manually or automatically, directly or remotely, the luminous intensity, colour, correlated colour temperature, spectrum, and/or beam angle of the emitted light.</p>		
<p>In principle, the reference control settings shall be those predefined by the manufacturer as factory default values, and encountered by the user at first installation (out-of-the-box values). If the installation procedure foresees an automatic software update during first installation, or if the user has the option to perform such an update, the resulting change in settings (if any) shall be taken into account.</p> <p>If the out-of-the-box value is deliberately set differently from the reference control setting (e.g. at low power for safety purposes), the manufacturer shall indicate in the technical documentation how to recall the reference control settings for compliance verification.</p>		
<p>The light source manufacturer shall define the reference control settings such that:</p> <ul style="list-style-type: none"> – the light source is in scope of this Regulation according to Art.2(1) and none of the conditions for exemption of Annex I 		

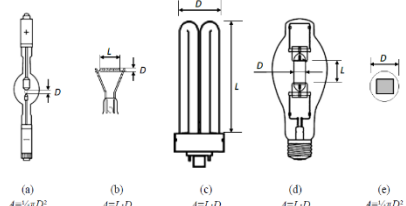
applies (if this is not possible, the light source is out-of-scope or exempted);		
– the power consumption of lighting control parts and non-lighting parts is minimal (if these parts cannot be disconnected or switched-off);		
– the full-load condition is obtained (maximum initial luminous flux given the other chosen settings);		
– when the end-user opts to reset factory defaults, the reference control settings are obtained.		
For light sources that allow the manufacturer of a containing product to make implementation choices that influence light source characteristics (e.g. definition of the operating current(s); thermal design), and that cannot be controlled by the end-user, the reference control settings need not be defined. In that case the test conditions defined in applicable standards apply;		
(26) 'high-pressure mercury light source' means a high intensity discharge light source in which the major portion of light is produced, directly or indirectly, by radiation from predominantly vaporized mercury operating at a partial pressure in excess of 100 kilopascals;		
(27) 'metal halide light source' (MH) means a high intensity discharge light source in which the light is produced by radiation from a mixture of metallic vapour, metal halides and the products of the dissociation of metal halides. MH light sources may have one ('single-ended') or two ('double-ended') connectors to their electricity supply. The material for the arc tube of MH light sources can be quartz (QMH) or ceramic (CMH);		

<p>(28) 'compact fluorescent light source' (CFL) means a single-capped fluorescent light source with a bent-tube construction designed to fit in small spaces. CFLs may be primarily spiral-shaped (i.e. curly forms) or primarily shaped as connected multiple parallel tubes, with or without a second bulb-like envelope. CFLs are available with (CFLi) or without (CFLni) physically integrated control gear;</p>		
<p>(29) 'T2', 'T5', 'T8', 'T9' and 'T12' means a tubular light source with diameter of approximately 7, 16, 26, 29 and 38 mm respectively, as defined in harmonised standards. The tube can be straight (linear) or bent (e.g. U-shaped, circular);</p>		
<p>(30) 'LFL T5-HE' means a high-efficiency linear fluorescent T5 light source with driving current lower than 0.2 A;</p>		
<p>(31) 'LFL T5-HO' means a high-output linear fluorescent T5 light source with driving current higher than or equal to 0.2 A;</p>		
<p>(32) 'HL R7s' is a mains-voltage, double capped, linear halogen light source with a cap-diameter of 7 mm;</p>		
<p>(33) 'battery-operated' means a product that operates only on direct current (DC) supplied from a source contained in the same product, without being connected directly or indirectly to the mains electricity supply;</p>		
<p>(34) 'second envelope' means a second outer envelope on a HID light source that is not required for the production of light, such as an external sleeve for preventing mercury and glass release into the environment in case of lamp breakage. In determining the presence of a second envelope, the HID arc tubes shall not count as an envelope;</p>		

<p>(35) 'non-clear envelope' for a HID light source means a non-transparent outer envelope or outer tube in which the light producing arc tube is not visible;</p>		
<p>(36) 'anti-glare shield' means a mechanical or optical reflective or non-reflective impervious baffle designed to block direct visible radiation emitted from the light emitter in a directional light source, in order to avoid temporary partial blindness (disability glare) if viewed directly by an observer. It does not include surface coating of the light emitter in the directional light source;</p>		
<p>(37) 'flicker' means the perception of visual unsteadiness induced by a light stimulus the luminance or spectral distribution of which fluctuates with time, for a static observer in a static environment. The fluctuations can be periodic and non-periodic and may be induced by the light source itself, the power source or other influencing factors.</p> <p>The metric for flicker used in this Regulation is the 'Pst LM', where 'st' stands for short term and 'LM' for light flickermeter method, as defined in standards. A value Pst LM=1 means that the average observer has a 50% probability of detecting flicker;</p>		
<p>(38) 'stroboscopic effect' means a change in motion perception induced by a light stimulus the luminance or spectral distribution of which fluctuates with time, for a static observer in a non-static environment. The fluctuations can be periodic and non-periodic and may be induced by the light source itself, the power source or other influencing factors.</p> <p>The metric for the stroboscopic effect used in this Regulation is the 'SVM' (Stroboscopic</p>		

<p>Visibility Measure), as defined in standards. SVM=1 represents the visibility threshold for an average observer;</p>		
<p>(39) 'R9' means the colour rendering index for a red coloured object as defined in standards</p>		
<p>(40) 'declared value' for a parameter means the value given by the manufacturer or importer in the technical documentation pursuant to Article 3(3) of Regulation 2017/1369;</p>		
<p>(41) 'luminous intensity' (candela or cd) means the quotient of the luminous flux leaving the source and propagated in the element of solid angle containing a given direction, by the element of solid angle;</p>		
<p>(42) 'correlated colour temperature' (CCT [K]) means the temperature of a Planckian (black body) radiator whose perceived colour most closely resembles that of a given stimulus at the same brightness and under specified viewing conditions;</p>		
<p>(43) 'colour consistency' means the maximum deviation of the initial (after a short period of time), spatially averaged chromaticity coordinates (x and y) of a single light source from the chromaticity centre point (cx and cy) declared by the manufacturer or the importer, expressed as the size (in steps) of the MacAdam ellipse formed around the chromaticity centre point (cx and cy);</p>		
<p>(44) 'displacement factor (cos ϕ_1)' means the cosine of the phase angle ϕ_1 between the fundamental harmonic of the mains supply voltage and the fundamental harmonic of the mains current. It is used for mains light sources using LED- or OLED-technology.</p> <p>The displacement factor is measured at full-load, for the reference control settings where applicable, with any lighting control parts in</p>		

<p>control mode and non-lighting parts disconnected, switched off or set to minimum power consumption according to the manufacturer's instructions;</p>		
<p>(45)'lumen maintenance factor' (LMF) means the ratio of the luminous flux emitted by a light source at a given time in its life to the initial luminous flux;</p>		
<p>(46)'survival factor' (SF) means the defined fraction of the total number of light sources that continue to operate at a given time under defined conditions and switching frequency;</p>		
<p>(47)'lifetime' for LED and OLED light sources means the time in hours between the start of their use and the moment when for 50% of a population of light sources the light output has gradually degraded to a value below 70% of the initial luminous flux. This is also referred to as the L70B50 lifetime;</p>		
<p>(48)'equivalent model' means a model with the same relevant technical and performance characteristics as another model placed on the market under a different commercial code;</p>		
<p>(49)'projected light-emitting surface area (A)' is the surface area in mm² (square millimetres) of the view in an orthographic projection of the light-emitting surface from the direction with the highest light intensity, where the light-emitting surface area is the surface area of the light source that emits light with the declared optical characteristics, such as the approximately spherical surface of an arc (a), cylindrical surface of a filament coil (b) or a gas discharge lamp (c, d), flat or semi-spherical envelope of a light-emitting diode (e).</p>		

<p>For light sources with a non-clear envelope or with anti-glare shield, the light-emitting surface area is the entire area through which light leaves the light source.</p>															
<p>For light sources containing more than one light emitter, the projection of the smallest gross volume enveloping all emitters shall be taken as the light-emitting surface.</p>															
<p>For HID light sources definition (a) applies, unless the dimensions defined in (d) apply with $L > D$, where L is the distance between the electrode tips and D the inner diameter of the arc tube.</p> 															
<p>ANNEX II – Energy Efficiency classes and calculation method</p>															
<p>The energy efficiency class of light sources shall be determined on the basis of the efficacy values expressed in total mains efficacy η_{TM}, which is defined as the total initial luminous flux (in lm) divided by mains power input (in W) – (lm/W) – as set out in Error! Reference source not found.</p>	<p>The energy efficiency class of light sources shall be determined on the basis of the efficacy values expressed in luminous efficacy total mains efficacy η_{TM}, which is defined as the total initial luminous flux (in lm) divided by mains power input (in W) – (lm/W) corrected by factor FTM – as set out in Error! Reference source not found.</p>	<p>Mains power input does not apply to NMLS.</p>													
<p>Table 1: Energy efficiency classes of XXX</p>		<p>What is XXX?</p>													
<table border="1"> <thead> <tr> <th>Energy Efficiency Class</th> <th>Total mains efficacy η_{TM} (lm /W)</th> </tr> </thead> <tbody> <tr> <td>A (most efficient)</td> <td>$210 \leq \eta_{TM}$</td> </tr> <tr> <td>B</td> <td>$185 \leq \eta_{TM} < 210$</td> </tr> <tr> <td>C</td> <td>$160 \leq \eta_{TM} < 185$</td> </tr> </tbody> </table>	Energy Efficiency Class	Total mains efficacy η_{TM} (lm /W)	A (most efficient)	$210 \leq \eta_{TM}$	B	$185 \leq \eta_{TM} < 210$	C	$160 \leq \eta_{TM} < 185$		<table border="1"> <thead> <tr> <th>Energy Efficiency Class</th> <th>Total mains efficacy η_{TM} η_{TM} (lm /W)</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> </tbody> </table>	Energy Efficiency Class	Total mains efficacy η_{TM} η_{TM} (lm /W)			<p>Typo</p>
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D	$135 \leq \eta_{TM} < 160$												
E	$110 \leq \eta_{TM} < 135$												
F	$85 \leq \eta_{TM} < 110$												
G (least efficient)	$\eta_{TM} < 85$												
<p>The total mains efficacy η_{TM} is calculated by dividing the declared useful luminous flux ϕ_{use} (expressed in lm) by the declared on-mode power consumption P_{on} (expressed in W) and multiplying by the applicable factor FTM of Table 2, i.e.:</p> $\eta_{TM} = (\phi_{use} / P_{on}) * FTM \text{ (lm/W)}.$		<p>The total mains efficacy η_{TM} is calculated by dividing the declared useful luminous flux ϕ_{use} (expressed in lm) by the declared on-mode power consumption P_{on} (expressed in W) and multiplying by the applicable factor FTM of Table 2, i.e.:</p> $\eta_{TM} = (\phi_{use} / P_{on}) * FTM * R \text{ (lm/W)}, \text{ where } R \text{ is the CRI factor } R=(CRI+80)160 \text{ for CRI } >25 \text{ and } 0,65 \text{ for CRI}<25 \text{ from Ecodesign Requirements Annex II}$											
<p>Table 2: Factors FTM to be used for determination of $\eta_{TM} = (\phi_{use} / P_{on}) * FTM$ (lm/W)</p> <table border="1"> <thead> <tr> <th>Light source type</th> <th>Factor FTM</th> </tr> </thead> <tbody> <tr> <td>Non-directional mains light source (NDLS, MLS)</td> <td>1,000</td> </tr> <tr> <td>Non-directional non-mains light source (NDLS, NMLS)</td> <td>0,926</td> </tr> <tr> <td>Directional mains light source (DLS, MLS)</td> <td>1,176</td> </tr> <tr> <td>Directional non-mains light source (DLS, NMLS)</td> <td>1,089</td> </tr> </tbody> </table>		Light source type	Factor FTM	Non-directional mains light source (NDLS, MLS)	1,000	Non-directional non-mains light source (NDLS, NMLS)	0,926	Directional mains light source (DLS, MLS)	1,176	Directional non-mains light source (DLS, NMLS)	1,089		
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<p>ANNEX III – Label for light sources</p>													
<p>1. LABEL FOR LIGHT SOURCES (1) Label: Label design to be introduced after consumer study finalised in July 2018, including for small packaging.</p>													

<p>(2) The following information shall be included in the label for light sources:</p> <p>I. supplier's name or trade mark;</p>		
<p>II. supplier's model identifier, meaning the code, usually alphanumeric, which distinguishes a model from other models with the same trade mark or supplier's name;</p>		
<p>III. the energy efficiency class determined in accordance with Annex II; the head of the arrow containing the energy efficiency class shall be placed at the same height as the head of the arrow of the relevant energy efficiency class;</p>		
<p>IV. QR-code redirecting to the product database;</p>		
<p>V. the energy consumption (XYZ), expressed in kWh of electricity consumption per 1000 hours of light source on-mode operation.</p>		
<p>(3) Label design Label design to be introduced after consumer study finalised in July 2018, including for small packaging.</p>		
<p>ANNEX IV - Exemptions</p>		
<p>1. This Regulation shall not apply to light sources specifically tested and approved to operate:</p> <p>(a) in radiological and nuclear medicine installations, as defined in Article 3 of Directive 2009/71/EURATOM (2);</p>		
<p>(b) in or on military or civil defence establishments, equipment, ground vehicles, marine equipment or aircraft as set out in Member States' Regulations or in documents issued by the European Defence Agency;</p>		

<p>(c) in or on motor vehicles, their trailers and systems, components and separate technical units intended therefore, as set out in Regulation (EC) No 661/20093, Regulation (EU) No 167/20134, Regulation (EU) No 168/20135 and their amendments;</p>		
<p>(d) in or on non-road mobile machinery intended as set out in Regulation (EU) 2016/1628/EU6 and their amendments;</p>		
<p>(e) in or on civil aviation aircrafts as set out in Commission Regulation 748/20127;</p>		
<p>(f) in railway vehicle lighting as set out in Directive 2008/57/EC8 and its amendments, as well as relevant Member State legislation;</p>		
<p>(g) in marine equipment as set out in Council Directive 2014/90/EU9 and its amendments or recasts;</p>		
<p>(h) in medical devices as set out in Council Directive 93/42/EEC (10) and in vitro medical devices as set out in Directive 98/79/EC (11) and their amendments.</p>		
<p>For the purpose of this point, 'specifically tested and approved' means that the light source:</p> <ul style="list-style-type: none"> - has been specifically tested for the mentioned operating condition or application, according to the European legislation mentioned or related implementing acts, relevant Member State legislation, and/or relevant European or international standards; 		

<ul style="list-style-type: none"> - is accompanied by evidence, in the form of a certificate, a type approval mark, a test report or other documentation, that the product has been specifically approved for the mentioned operating condition or application; and 		
<ul style="list-style-type: none"> - is placed on the market specifically for the mentioned operating condition or application, as evidenced at least by the technical documentation, information on the packaging and any advertising or marketing materials. 		
<p>2. In addition, this Regulation shall not apply to:</p> <p>(a) electronic displays (e.g. televisions, computer monitors, notebooks, tablets, mobile phones, e-readers, game consoles), including but not limited to displays in scope of Commission Regulation (EU) No 617/201312, Commission Decision (EU) 2015/140213, Commission Regulation (EC) No 642/200914, Commission Decision (EU) 2016/175615, European Commission COM(2015)17816;</p>		
<p>(b) Range hoods in the scope of Commission Delegated Regulation (EU) No 65/2014;</p>		
<p>(c) light sources in battery-operated products, including but not limited to e.g. torches, mobile phones with</p>		

	integrated torch light, toys including light sources, desk lamps operating only on batteries, armband lamps for cyclists, solar-powered garden lamps;		
(d)	light sources on bicycles and other non-motorized vehicles;		
(e)	light sources that do not comply with requirements becoming applicable with Regulation <i>[XXX to insert the new ecodesign regulation for lighting]</i> implementing Directive 2009/125/EC of the European Parliament and of the Council.		
3.	Any light source in scope of this Regulation shall be exempt from the requirements of Articles 3 and 4, with the exception of Annex V point 4, if it has a specific technical design for its intended use in at least one of the following applications:	3.	Any light source in scope of this Regulation shall be exempt from the requirements of Articles 3 and 4, with the exception of Annex V point 4 2.3 , if it has a specific technical design for its intended use in at least one of the following applications:
(a)	signalling (including, but not limited to, road-, railway-, marine- or air traffic- signalling, traffic control or airfield lamps);		
(b)	image capture and image projection (including, but not limited to, photocopying, printing (directly or in pre-processing), lithography, film and video projection, holography);		
(c)	light sources with specific effective ultraviolet power >2 mW/klm and intended for use in applications requiring high UV-content;		
(d)	light sources having the peak radiation around 253.7 nm and intended for germicidal use (destruction of DNA);		

<p>(e) light sources emitting 5% or more of total radiation power of the range 250-800 nm in the range of 250-315 nm and/or 20% or more of total radiation power of the range 250-800 nm in the range of 315-400 nm, and intended for disinfection or fly trapping;</p>		
<p>(f) light sources having the primary purpose to emit radiation around 185.1 nm and intended to be used for the generation of ozone;</p>		
<p>(g) light sources emitting 40% or more of total radiation power of the range 250-800 nm in the range of 400-480 nm, and intended for coral zooxanthellae symbioses;</p>		
<p>(h) FL light sources emitting 80% or more of total radiation power of the range 250-800 nm in the range of 250-400 nm, and intended for sun-tanning;</p>		
<p>(i) HID light sources emitting 40% or more of total radiation power of the range 250-800 nm in the range of 250-400 nm, and intended for sun-tanning;</p>		
<p>(j) light sources with a photosynthetic efficacy >1.2 mmol/J, and/or emitting 25% or more of total radiation power of the range 250-800 nm in the range of 700-800 nm, and intended for use in horticulture.</p>		
<p>ANNEX V – Product information</p>	<p>Simplify the list and include only the parameters which required for the energy efficiency and are useful for the consumers/end-users</p>	<p>The information required is far too much and far too complicated. LightingEurope does not see any reason nor any added value in this. It is only generating a huge administrative burden for the manufacturers and importers without helping the market surveillance authorities. It goes against the</p>

		<p>aim of having simple and easily enforceable Regulations in place. Art. 12(7) (a) of 2017/1369 says: <i>7. The product database shall be established in accordance with the following criteria:</i> <i>(a) minimising the administrative burden for suppliers and other database users</i></p> <p>The new delegated act is going completely against this.</p>
1. Product information sheet		
<p>1.1. The product information sheet to be provided by the supplier of a light source, including when the light source is a part in a containing product, pursuant to Article 3(d) shall contain the information entered in the public part of the product database established by Regulation (EU) 2017/1369 in the following order and shall be included in the product brochure or other literature provided with the product:</p>	<p>1.1. The product information sheet to be provided by the supplier of a light source, including when the light source is a part in a containing product, pursuant to Article 3(d) 3(b) shall contain the information entered in the public part of the product database established by Regulation (EU) 2017/1369 in the following order and shall be included in the product brochure or other literature provided with the product:</p>	<p>Wrong reference</p> <p>NOTE: The system should be able to generate this data sheet.</p>
(a) supplier's name or trade mark, address, contact details and other legal identification of the supplier;		
(b) supplier's model identifier, meaning the code, usually alphanumeric, which distinguishes a specific light source model from other models with the same trade mark or supplier's name;		
(c) the energy label according to Annex III in electronic format;		<p>The system should be able to generate the label.</p> <p>This should be optional, the system should generate the label and suppliers may also create their own label if they want to.</p>
(d) the energy efficiency class according to Annex II;		

(e)	the energy consumption expressed in kWh of electricity consumption per 1000 h of light source on-mode operation;		
(f)	the lighting technology used, i.e. HL, LFL T5 HE, LFL T5 HO, CFLni, other FL, HPS, MH, other HID, LED, OLED, mixed, other;		
(g)	if the light source is non-directional (NDLS) or directional (DLS) in the sense of this Regulation;		
(h)	if the light source is a mains light source (MLS) or a non-mains light source (NMLS) in the sense of this Regulation;		
(i)	if the light source is a connected light source (CLS) in the sense of this Regulation;		
(j)	if the light source is a colour-tuneable light source (CTLS) in the sense of this Regulation;		
(k)	if the light source has a second envelope, a non-clear envelope and/or an anti-glare shield in the sense of this Regulation;		
(l)	the date (day, month, year) of last update of the information;		
(m)	the date (month, year) of first production of the light source for the EU market;	(m) the date (month, year) of first production of the light source for the EU market	This information is not available and we will not be able to have it. Showing the customer that this light source is a new one will lead to a lot of "new" light sources that are technically the same as the older ones.
(n)	if the light source is still in production for sale on the EU-market (yes/no);	(n) if the light source is still in production for sale on the EU-market (yes/no);	This information is not available and we will not be able to have it. The database should be sustainable and easy to maintain. Parameters which require supervision

		require extra resources as well and this means additional burden for the suppliers. Thousands of products will need to be continuously supervised.
(o) if the light source is no longer in production for sale on the EU-market, the date (month, year) when production for the EU market stopped;	(o) if the light source is no longer in production for sale on the EU-market, the date (month, year) when production for the EU market stopped;	The database should be sustainable and easy to maintain. Parameters which require supervision require extra resources as well and this means additional burden for the suppliers. Thousands of products will need to be continuously supervised.
(p) the information specified in point 2.1 of this Annex;		
(q) the outer dimensions in mm, without separate control gear, lighting control parts and non-lighting parts, if any;		
(r) the mass in grams of the light source, without packaging, and without separate control gear, lighting control parts and non-lighting parts, if any and if they can be physically separated from the light source;	(r) the mass in grams of the light source, without packaging, and without separate control gear, lighting control parts and non-lighting parts, if any and if they can be physically separated from the light source;	How is this parameter related to energy efficiency?
(s) the spectral power distribution in the range 250 nm to 800 nm, at full-load;	(s) the spectral power distribution in the range 380 250 nm to 780 800 nm, at full-load;	
(t) the displacement factor, $\cos(\phi_1)$, (for LED and OLED mains light sources);		
(u) the chromaticity coordinates (x,y);	(u) the chromaticity coordinates (x,y);	Next to the remarks made above related to “Better Regulation” and the Preamble paras. (7) and (17) - 0.01 or 0.005 units are not even measurable - these two requirements related to colour consistency and colour point, contradict each other: 1. These are two different and conflicting measurements for same topic colour consistency. 2. Shape does not match: MacAdam ellipses have the shape of an ellipse, chromaticity coordinates result in a square shape. 3. Does not fit with the requirements in Table 4: Table 6 should support the measurement of the performance criteria from Table 4. You can only

		<p>compare a MacAdam ellipse requirement with a MacAdam ellipse measurement.</p> <p>4. Causing confusion: how can you verify an ellipse requirement with a square measurement?</p> <p>The allowed deviation from the declared value is not consistent with the functional demand on the colour variation expressed as the 6 step MacAdam ellipse. The size of this ellipse depends on the location of the colour point. This fact expresses the sensitivity of the human eye for colour differences at different colour temperatures.</p> <p>It is enough to include these details in the technical documentation.</p>
(v)	the colour consistency in McAdam ellipses (for LED and OLED mains light sources);	
(w)	the R9 colour rendering index value (for LED and OLED light sources);	
(x)	the peak luminous intensity for directional light sources (in cd);	
(y)	the lumen maintenance factor for FL and HID light sources at 2 000 h, 4 000 h, 6 000 h, 8 000 h, 12 000 h, 16 000 h and 20 000 h (up to 8 000 h only for new light sources on the market where no data is yet available), indicating which operation mode of the light source was used for the test if both 50 Hz and High Frequency operation are possible;	
(z)	the survival factor for FL and HID light sources at 2 000 h, 4 000 h, 6 000 h, 8 000 h, 12 000 h, 16 000 h and 20 000 h (up to 8 000 h only for new light sources on the market where no data is yet available),	

	indicating which operation mode of the light source was used for the test if both 50 Hz and High Frequency operation are possible;		
(aa)	the lumen maintenance factor for LED and OLED;		
(bb)	the survival factor for LED and OLED;		
(cc)	the reference control settings, and instructions how they can be implemented, where applicable;		
(dd)	instructions how to remove lighting control parts and/or non-lighting parts, if any, or how to switch them off or minimize their power consumption during light source testing;		
(ee)	if it is dimmable, a list of dimmers it is compatible with, and the light source – dimmer compatibility standard(s) it is compliant with, if any;		
(ff)	if it contains mercury, instructions on how to clean up the lamp debris in case of accidental breakage;		
(gg)	recommendations on how to dispose of it at the end of its life for recycling in line with Directive 2012/19/EU.		
	For light sources that can be tuned to emit light at full-load with different characteristics, the values of parameters that vary with these characteristics shall at least be reported at the reference control settings.		
	1.2. One product information sheet may cover a number of light sources supplied by the same supplier.		
	2. Information to be displayed on the packaging		

<p>2.1. Light source</p> <p>If a light source is placed on the market, not in a containing product, in a packaging containing information to be visibly displayed at a point-of-sale prior to its purchase, the following information shall be clearly and prominently displayed on the packaging in addition to the energy label of Annex III:</p>		
<p>(a) the useful luminous flux (Φ_{use}) in a font at least twice as large as the display of the on-mode power (P_{on}), clearly indicating if it refers to the flux in a sphere (360°), in a wide cone (120°) or in a narrow cone (90°);</p>	<p>(a) the useful luminous flux (Φ_{use}) in a font at least twice as large as the display of the on-mode power (P_{on}); clearly indicating if it refers to the flux in a sphere (360°), in a wide cone (120°) or in a narrow cone (90°);</p>	<p>Delete the second part, as it has no practicality for end-users.</p>
<p>(b) the correlated colour temperature CCT in K, rounded to the nearest 100 K, also expressed graphically or in words, or the range of correlated colour temperatures that can be set;</p>		
<p>(c) the beam angle in degrees (for directional lamps), or the range of beam angles that can be set;</p>		
<p>(d) electrical interface details, e.g. cap- or connector-type, type of power supply (e.g. 230 V AC 50 Hz, 12 V DC);</p>		
<p>(e) the L70B50 lifetime for LED and OLED light sources, expressed in hours;</p>		
<p>(f) the on-mode power (P_{on}), expressed in W;</p>		
<p>(g) the standby power (P_{sb}), expressed in W and rounded to the second decimal. If the value is zero, it may be omitted from the packaging;</p>		
<p>(h) the networked standby power (P_{net}) for CLS, expressed in W and</p>		

	rounded to the second decimal. If the value is zero, it may be omitted from the packaging;		
(i)	the colour rendering index CRI, rounded to the nearest integer, or the range of CRI-values that can be set;		
(j)	if CRI<80, and the light source is intended for use in outdoor applications, industrial applications or other applications where lighting standards allow a CRI<80, a clear indication to this effect. For HID light sources with useful luminous flux > 4000 lm this indication is not mandatory;		
(k)	if the light source is designed for optimum use in non-standard conditions (such as ambient temperature $T_a \neq 25 \text{ }^\circ\text{C}$ or specific thermal management is necessary), information on those conditions;		
(l)	a warning if the light source cannot be dimmed or can be dimmed only with specific dimmers or with specific wired or wireless dimming methods. In the latter cases a list of compatible dimmers and/or methods could be provided on the manufacturer's website;		
(m)	if it contains mercury, a warning about it including the mercury content in mg rounded to the first decimal place;		Picture with "Hg" and content is enough for the Commission to fulfil the requirements?
(n)	if it is in scope of Directive 2012/19/EU or contains mercury, a warning that it should not be disposed of in the general waste stream;		

<p>(o) in addition to the QR-code included in the energy label of Annex III, the internet address for the supplier's website(s) could be provided.</p>		
<p>Items (a) to (d) shall be displayed on the packaging in the direction meant to face prospective buyers; for other items this is also recommended, if space permits.</p>		
<p>For light sources that can be set to emit light with different characteristics, the information shall be reported for the reference control settings. In addition a range of obtainable values may be indicated.</p>		
<p>The information does not need to use the exact wording on the list above. In addition, it may be displayed in the form of graphs, drawings or symbols.</p>	<p>The information does not need to use the exact wording on the list above. In addition Alternatively, it may be displayed in the form of graphs, drawings or symbols</p>	<p>Make clear that either text or picto etc. is sufficient. Now it can be read as if text is always mandatory and picto etc. could also be added additionally (no alternative). As an example: in Annex V 2.2 it is clearly written that the text can be replaced by a picto.</p>
<p>If the packaging is too small to accommodate all required information, following Annex III, a standard size or larger label shall be attached or placed in close proximity to the packaging, and some of the information not required to face the prospective buyer may be displayed on the same physical carrier as the label instead of on the packaging.</p>		
<p>2.2. Light source in a containing product If a light source is placed on the market as a part in a containing product the technical documentation for the containing product shall clearly identify the contained light source(s), including the energy efficiency class.</p>		
<p>If a light source is placed on the market as a part in a containing product in a</p>	<p>If a light source is placed on the market as a part in a containing product in a</p>	<p>The information will not be available to end-users for a lot of containing products / luminaires (e.g.</p>


<p>packaging containing information to be visibly displayed at a point-of-sale prior to its purchase, the following text shall be displayed, clearly legible, on the outside of the containing product's packaging:</p> <p><i>'This product contains a light source of energy efficiency class <X>'</i></p> <p>where <X> shall be replaced by the energy efficiency class of the contained light source according to Annex III.</p>	<p>packaging containing information to be visibly displayed at a point-of-sale prior to its purchase.,the following text shall be displayed, clearly legible, on the outside of the containing product's packaging:</p> <p>'This product contains a light source of energy efficiency class <X>'</p> <p>where <X> shall be replaced by the energy efficiency class of the contained light source according to Annex III.</p>	<p>furniture, products displayed without packaging, professional luminaires, large products). The coloured arrow would be a further burden for containing product manufacturers, because marking on packaging is often black and white only.</p> <ul style="list-style-type: none"> - Delete the requirement of information on the product packaging - At least allow the use of black and white arrow
<p>The text can be replaced by a pictogram representing a light source and including the arrow of Annex VII.</p> <p>In case the product contains more than one light source, the sentence can be in plural, or repeated per light source, as suitable. If pictograms are used, they can be repeated per light source.</p> <p>The text shall be present in any advertisement, formal price quote or tender offer disclosing energy-related or price information on the containing product and in any technical promotional material for the containing product, which describes specific technical parameters.</p>	<p>The text can be replaced by a pictogram representing a light source and including the arrow of Annex VII.</p> <p>In case the product contains more than one light source, the sentence can be in plural, or repeated per light source, as suitable. If pictograms are used, they can be repeated per light source.</p> <p>The text shall be present in any advertisement, formal price quote or tender offer disclosing energy-related or price information on the containing product and in any technical promotional material for the containing product, which describes specific technical parameters</p>	
<p>2.3. Information for products specified in Annex IV point 3</p> <p>For the light sources specified in Annex IV point 3, the intended purpose shall be stated on all forms of packaging, product information and advertisement, together with a clear indication that the light source is not intended for use in other applications.</p> <p>The technical documentation file drawn up for the purposes of conformity</p>		



<p>assessment in accordance with Article 3.3 of Regulation 2017/1369 shall list the technical parameters that make the product design specific to qualify for the exemption</p>		
<p>ANNEX VI – Technical documentation</p>		<p>Technical documentation should be limited to energy labelling, the rest should be available on request.</p> <p>Is this the compliance part of the database? Who is using it? Does it mean that every single product should have a separate technical documentation or the technical parameters listed in this annex are going to be fields in the database that need to be filled? If so, then why should we enter some information again (e.g. the name and address, model identifier)? Again, this is a huge administrative burden for the suppliers, we are talking about huge amount of products, not just a few.</p>
<p>1. The technical documentation referred to in Article 3(d) shall include:</p> <p>(a) the name and address of the supplier;</p>		
<p>(b) supplier’s model identifier, meaning the code, usually alphanumeric, which distinguishes a specific light source model from other models with the same trade mark or supplier’s name;</p>		
<p>(c) the model identifier of all equivalent models already placed on the market</p>		
<p>(d) identification and signature of the person empowered to bind the supplier;</p>		
<p>(e) technical parameters for measurements, including the declared values, as follows:</p>		

(1) useful luminous flux (ϕ_{use}) in lm;		
(2) colour rendering index (CRI);		
(3) on-mode power (P_{on}) in W;		
(4) beam angle in degrees, for directional light sources (DLS);		
(5) correlated colour temperature (CCT) in K, for FL and HID light sources;		
(6) standby power (P_{sb}) in W, including when it is zero;		
(7) networked standby power (P_{net}) in W, for connected light sources (CLS);		
(8) displacement factor (DF, $\cos(\phi_1)$), for LED and OLED mains light sources;		
(9) colour consistency in MacAdam ellipse steps, for LED and OLED light sources;		
(10) flicker metric PstLM, for LED and OLED light sources;	(10) flicker metric PstLM, for LED and OLED light sources;	<p>We propose to delete points (10) and (11). The IEC documents available are still at TRs level (61547-1 and 63158 have been recently published); that means that experience is needed to use such documents. Furthermore, the needs regarding flicker and stroboscopic effect differ according to the needs for the different environments and the various activities carried out, also in relation to indoor and outdoor environments.</p> <p>Furthermore, we propose to delete point (13) because it is too vague and leads to misunderstanding and possible disputes with market surveillance authorities about their activities.</p>

<p>(11) stroboscopic effect metric SVM, for LED and OLED light sources;</p>	<p>(11) stroboscopic effect metric SVM, for LED and OLED light sources;</p>	<p>Idem.</p>
<p>(12) colour purity index, only for CTLS, for the following colours and dominant wavelength within the given range: Colour Dominant wave-length range Blue 440nm – 490nm Green 520nm – 540nm Red 610nm – 670nm</p>		
<p>(13) other measurable parameters from the public part of the product database.</p>	<p>(13) other measurable parameters from the public part of the product database.</p>	<p>Idem.</p>
<p>(f) the calculations performed with the measured parameters, including the determination of the energy efficiency class according to Annex IV;</p>		
<p>(g) references to the harmonised standards applied or other measurements standards used;</p>		
<p>(h) testing conditions if not described sufficiently in point (f);</p>		
<p>(i) the reference control settings, and instructions how they can be implemented, where applicable;</p>		
<p>(j) instructions how to remove lighting control parts and/or non-lighting parts, if any, or how to switch them off or minimize their power consumption during light source testing;</p>		

<p>(k) specific precautions that shall be taken when the model is assembled, installed, maintained or tested.</p>		
<p>ANNEX VII – Information to be provided in visual advertisements, in promotional material, in distance selling except distance selling on the internet</p>		
<p>1. In visual advertisements, for the purposes of ensuring conformity with the requirements laid down in Article 3(1)(e) and Article 4(1)(c), the energy class and the range of efficiency classes available on the label shall be shown with an arrow matching the letter of the energy class, as indicated in Figure 1.</p>		
<p>2. In promotional material, for the purposes of ensuring conformity with the requirements laid down in Article 3(1)(f) and Article 4(1)(d), the energy class and the range of efficiency classes available on the label shall be shown with an arrow matching the letter of the energy class, as indicated in Figure 1.</p>	<p>2. In promotional material, for the purposes of ensuring conformity with the requirements laid down in Article 3(1)(f) and Article 4(1)(d), the information about the energy class and the range of efficiency classes available on the label shall be provided shown with an arrow matching the letter of the energy class, as indicated in Figure 1.</p>	<p>Regulation 874/2012 requires to provide “the information contained in the label.” A change of this requirement would imply a lot of changes in the “structure” of the documents already available (catalogues, price lists, advertisements...).</p>
<p>3. Any paper based distance selling must show the energy class and the range of efficiency classes available on the label with an arrow matching the letter of the energy class, as indicated in Figure 1.</p>		
<p>4. Telemarketing based distance selling must specifically inform the customer of the energy class of the product and of the range of energy classes available on the label, and that they can access the full label and the product information sheet through a free access website, or by requesting a printed copy.</p>		

 <p>Figure 1: Coloured arrow example, with range of energy classes indicated</p>		
<p>For all the situations mentioned in points 1 to 4, it must be possible for the customer to access the full label and the product information sheet through a link to the product database website, or to request a printed copy.</p>	<p>For all the situations mentioned in point 1 to 4, it must be possible for the customer to access the full label and the product information sheet of the light source in the containing product through a link to the product database website, or to request a printed copy</p>	
<p>ANNEX VIII – Information to be provided in the case of distance selling through the Internet</p>		
<p>1. The appropriate label made available by suppliers in accordance with Article 3(1)(g) shall be shown on the display mechanism in proximity to the price of the product. The size shall be such that the label is clearly visible and legible and shall be proportionate to the size specified in point 2 of Annex III. The label may be displayed using a nested display, in which case the image used for accessing the label shall comply with the specifications laid down in point 3 of this Annex. If nested display is applied, the label shall appear on the first mouse click, mouse roll-over or tactile screen expansion on the image.</p>		
<p>2. The image used for accessing the label in the case of nested display shall:</p> <p>(a) be an arrow in the colour corresponding to the energy efficiency class of the product on the label;</p>		
<p>(b) indicate on the arrow energy efficiency class of the product in</p>		

<p>white in a font size equivalent to that of the price; and</p>		
<p>(c) have one of the following two formats:</p> <div style="display: flex; justify-content: space-around; align-items: center; margin-top: 10px;">   </div>		
<p>3. In the case of nested display, the sequence of display of the label shall be as follows:</p> <p>(a) the image referred to in point 2 of this Annex shall be shown on the display mechanism in proximity to the price of the product;</p>		
<p>(b) the image shall link to the label;</p>		
<p>(c) the label shall be displayed after a mouse click, mouse roll-over or tactile screen expansion on the image;</p>		
<p>(d) the label shall be displayed by pop up, new tab, new page or inset screen display;</p>		
<p>(e) for magnification of the label on tactile screens, the device conventions for tactile magnification shall apply;</p>		
<p>(f) the label shall cease to be displayed by means of a close option or other standard closing mechanism;</p>		
<p>(g) the alternative text for the graphic, to be displayed on failure to display the label, shall be the energy efficiency class of the product in a font size equivalent to that of the price.</p>		
<p>4. The appropriate product information sheet made available by suppliers in accordance with Article 3(1)(h) shall be shown on the display mechanism in proximity to the price of the product. The size shall be such that</p>		

<p>the product information sheet is clearly visible and legible. The product information sheet may be displayed using a nested display or by referring to the product registration database established under Regulation (EU) 2017/1369, in which case the link used for accessing the product information sheet shall clearly and legibly indicate 'Product information sheet'. If nested display is used, the product information sheet shall appear on the first mouse click, mouse roll-over or tactile screen expansion on the link.</p>		
<p>ANNEX IX – Verification procedure for market surveillance purposes</p>		
<p>The verification tolerances set out in this Annex relate only to the verification of the measured parameters by Member State authorities and shall not be used by the supplier as an allowed tolerance to establish the values in the technical documentation. The values and classes on the label or in the product fiche shall not be more favourable for the supplier than the values reported in the technical documentation.</p>		
<p>When verifying the compliance of a product model with the requirements laid down in this Delegated Regulation, the authorities of the Member States shall apply the following procedure:</p>		
<p>1. The Member State authorities shall verify one single unit of the model for 2(a) and 2(b).</p> <p>The Member State authorities shall verify 10 units of the light source model or 3 units of the separate control gear model for 2(c). For light sources, if the acquisition costs for the 10 units would exceed 500 euros, Member State authorities may reduce the sample size</p>	<p>1. The Member State authorities shall verify one single unit of the model for 2(a) and 2(b).</p> <p>The Member State authorities shall verify 10 units of the light source model or 3 units of the separate control gear model for 2(c). For light sources, if the acquisition costs for the 10 units would exceed 500 euros, Member State authorities may reduce the sample size to</p>	<p>Why are control gears included in the labelling?</p>

<p>to 3 units. The verification tolerances are laid down in Table 6</p>	<p>3 units. The verification tolerances are laid down in Table 6</p>	
<p>2. The model shall be considered to comply with the applicable requirements if:</p> <p>(a) the values given in the technical documentation pursuant to Article 3.3 of Regulation (EU) 2017/1369 (declared values), and, where applicable, the values used to calculate these values, are not more favourable for the supplier than the corresponding values given in the test reports; and</p>		
<p>(b) the values published on the label and in the product information sheet are not more favourable for the supplier than the declared values, and the indicated energy efficiency class is not more favourable for the supplier than the class determined by the declared values; and</p>		
<p>(c) when the Member State authorities test the units of the model, the determined values comply with the respective verification tolerances as given in Table 6, where 'determined value' means the arithmetical mean over the tested units of the measured values for a given parameter or the arithmetical mean of parameter values calculated from other measured values.</p>		
<p>3. If the results referred to in point 2(a) or (b) are not achieved, the model and all models that have been listed as equivalent models in the manufacturer's or importer's technical documentation shall be considered not to comply with this Delegated Regulation.</p>		

<p>4. If the result referred to in point 2(c) is not achieved, the model and all models that have been listed as equivalent models in the manufacturer's or the importer's technical documentation shall be considered not to comply with this Delegated Regulation.</p>													
<p>5. The Member State authorities shall provide all relevant information to the authorities of the other Member States and to the Commission without delay after a decision being taken on the non-compliance of the model according to points 3 and 4.</p>													
<p>The Member State authorities shall use the measurement and calculation methods set out in Annex II.</p> <p>The Member State authorities shall only apply the verification tolerances that are set out in Table 6 and shall use only the procedure described in this Annex. No other tolerances, such as those set out in harmonised standards or in any other measurement method, shall be applied.</p>													
<p style="text-align: center;">Table 6</p> <table border="1" data-bbox="203 890 795 1380"> <thead> <tr> <th data-bbox="203 890 468 954">Parameter</th> <th data-bbox="468 890 600 954">Sample size</th> <th data-bbox="600 890 795 954">Verification tolerances</th> </tr> </thead> <tbody> <tr> <td data-bbox="203 954 468 1018">Full-load on-mode power $P_{on}[W]$</td> <td data-bbox="468 954 600 1018"></td> <td data-bbox="600 954 795 1018"></td> </tr> <tr> <td data-bbox="203 1018 468 1233" rowspan="2" style="text-align: center;">$P_{on} \leq 2W$</td> <td data-bbox="468 1018 600 1233" style="text-align: center;">3</td> <td data-bbox="600 1018 795 1233" style="text-align: center;">The determined value shall not exceed the declared value by more than 0.20 W</td> </tr> <tr> <td data-bbox="468 1233 600 1380" style="text-align: center;">10</td> <td data-bbox="600 1233 795 1380" style="text-align: center;">The determined value shall not exceed the declared</td> </tr> </tbody> </table>	Parameter	Sample size	Verification tolerances	Full-load on-mode power $P_{on}[W]$			$P_{on} \leq 2W$	3	The determined value shall not exceed the declared value by more than 0.20 W	10	The determined value shall not exceed the declared		
Parameter	Sample size	Verification tolerances											
Full-load on-mode power $P_{on}[W]$													
$P_{on} \leq 2W$	3	The determined value shall not exceed the declared value by more than 0.20 W											
	10	The determined value shall not exceed the declared											

		value by more than 0.20 W		
2W < Pon ≤ 5W	3	The determined value shall not exceed the declared value by more than 10 %		
	10	The determined value shall not exceed the declared value by more than 10 %		
5W < Pon ≤ 25W	3	The determined value shall not exceed the declared value by more than 10 %		
	10	The determined value shall not exceed the declared value by more than 5 %.		
5W < Pon ≤ 25W	3	The determined value shall not exceed the declared value by more than 10 %		

	10	The determined value shall not exceed the declared value by more than 5 %.		
25W < Pon ≤ 100W	3	The determined value shall not exceed the declared value by more than 7.5 %.		
	10	The determined value shall not exceed the declared value by more than 5 %.		
100W < Pon	3	The determined value shall not exceed the declared value by more than 5 %.		
	10	The determined value shall not exceed the declared value by more than 2.5 %.		
Displacement factor [0-1]	3	The determined value shall		

		not be less than the declared value minus 0.1 units				
	10	The determined value shall not be less than the declared value minus 0.1 units				
Useful luminous flux Φ_{use} [lm]	3	The determined value shall not deviate from the declared by more than 10 %.	Useful luminous flux Φ_{use} [lm]	3	The determined value shall not deviate from the declared by more than 10 %.	The tolerance should be 10 % regardless of sample size. The luminous flux measurement of lamps does have an intrinsic uncertainty of 10 % coming from testing equipment, test procedure and lamp-to-lamp variations. Decreasing the samples number from 20 to 10 could lead to an additional uncertainty of test values, so tolerances should not be further decreased.
	10	The determined value shall not deviate from the declared by more than 5 %.		10	The determined value shall not deviate from the declared by more than 10 5 %.	
Standby power P_{sb} and Networked standby power P_{net} [W]	3	The determined value shall not exceed the declared				

		value by more than 0.10 W.			
	10	The determined value shall not exceed the declared value by more than 0.10 W.			
CRI and R9 [0-100]	3	The determined value shall not be less than the declared value by more than 3,0 units.	CRI and R9 [0-100]	3	The determined value shall not be less than the declared value by more than 3,0 units.
	10	The determined value shall not be less than the declared value by more than 2,0 units.		10	The determined value shall not be less than the declared value by more than 3.0 2,0 units.
Flicker [Pst LM] and Stroboscopic effect [SVM]	3	The determined value shall not exceed the declared value by more than 10 %.	Flicker [Pst LM] and Stroboscopic effect [SVM]	3	The determined value shall not exceed the declared value by more than 10 %.
	10	The determined value shall not exceed the declared		10	The determined value shall not exceed the declared
					The tolerance should be 3.0 units regardless of sample size.
					We recommend to adhere to a few parameters that can be well enforced, instead of a long list of parameters of which some are not yet fully defined nor measurable, like flicker and stroboscopic effects. Furthermore, some outdoor and some indoor lighting applications do not need such requirements.

		value by more than 10 %.			value by more than 10 %.	
Colour Consistency <i>[MacAdam ellips steps]</i>	3	The determined number of steps shall not exceed the declared number of steps.				
	10	The determined number of steps shall not exceed the declared number of steps.				
Beam angle <i>(degrees)</i>	3	The determined value shall not deviate from the declared value by more than 25 %				
	10	The determined value shall not deviate from the declared value by more than 25 %.				
Efficacy [lm/W]	3	The determined value (quotient)	Efficacy [lm/W]	3	The determined value (quotient)	The tolerance should be 10 % regardless of sample size (see the comment about the luminous flux). Why the lm/W came in when both

		shall not be less than the declared value minus 10 %.			shall not be less than the declared value minus 10 %.	the lm and the W are already separately included?
	10	The determined value (quotient) shall not be less than the declared value minus 5 %.		10	The determined value (quotient) shall not be less than the declared value minus 10 5 %.	
L70B50 lifetime (for LED and OLED)	3	The determined value shall not be less than the declared value minus 20 %				How to determine L70B50 from a 3,000 h test?
	10	The determined value shall not be less than the declared value minus 10 %				
Lumen Maintenance Factor (for LED and OLED)	3	The determined XLMF% of the sample following the test in Annex V shall not be less than				

	10	XLMF, MIN% according to Regulation <i>[XXX to insert the new ecodesign regulation for lighting]</i>		
Survival Factor (for LED and OLED)	3	All 3 light sources of the test sample must be operational after completing the endurance test in Annex V of Regulation <i>[XXX to insert the new ecodesign regulation for lighting].</i>	Delete and maintain 500 h early failure test	See comments to row "Lumen maintenance factor (for LED and OLED)" of Table 4 in Annex II of the proposed Regulation on eco-design measures for lighting products.
	10	At least 9 light sources of the test sample must be operational after completing the endurance test in Annex V of Regulation <i>[XXX to insert the new</i>		

		<i>ecodesign regulation for lighting]</i>		
Lumen Maintenance Factor (for FL and HID)	3	The determined value shall not be less than 90% of the declared value	Delete and maintain 500 h early failure test	Idem.
	10	The determined value shall not be less than 90% of the declared value		
Survival factor (for FL and HID)	3	The determined value shall not be less than the declared value	It should be 10 % regardless of sample size	Since we are talking about statistical data, the wording 'the determined value shall not be less than the declared value' cannot be interpreted in real life. Keep the 10 % as it is in 245/2009.
	10	The determined value shall not be less than the declared value		
Colour Purity Index [%]	3	The determined value shall not be less than the declared		

		value minus 10 %				
	10	The determined value shall not be less than the declared value minus 5 %				
Chromaticity coordinates (x,y) [-]	3	The determined x and y values shall not deviate from the declared values by more than 0,01 units	Chromaticity coordinates (x,y) [-]	3	The determined x and y values shall not deviate from the declared values by more than 0,01 units	See earlier comments on Annex V, Point 1.1.
	10	The determined x and y values shall not deviate from the declared values by more than 0,005 units		10	The determined x and y values shall not deviate from the declared values by more than 0,005 units	
Correlated Colour Temperature [K]	3	The determined value shall not deviate from the declared value by more than 10 %	Correlated Colour Temperature [K]	3	The determined value shall not deviate from the declared value by more than 10 %	The tolerance should be 10 % regardless of sample size (see above comments on tolerances).
	10	The determined		10	The determined	

		value shall not deviate from the declared value by more than 5 %			value shall not deviate from the declared value by more than 10.5 %	
Luminous peak intensity [cd]	3	The determined value shall not deviate from the declared value by more than 25 %.				
	10	The determined value shall not deviate from the declared value by more than 25 %.				
Suppliers of containing products shall provide information on request on how light sources can be removed for verification without these being permanently damaged and without permanent damage to the containing product.			Suppliers of containing products shall provide information on request on how light sources can be removed for verification without these being permanently damaged and without permanent damage to the containing product, even if the containing product could be damaged.			See comments to Art. 4(1) of the proposed Regulation on eco-design measures for lighting.
For light sources with linear geometry which are scalable but of very long length, such as LED strips or strings, verification testing of market surveillance authorities shall consider a length of 50 cm, or, if the light source is not scalable there, the nearest value to 50 cm. The light source manufacturer shall indicate which control gear is suitable for this length.						