

Texte zu EU-Regelungen zur umweltgerechten Produktgestaltung und zur Energieverbrauchskennzeichnung in der Beleuchtung – Zusammenstellung ^[1] des Umweltbundesamtes (UBA), Deutschland



Diskussion über eine künftige Änderungsverordnung (Produktgestaltung)

Produktgestaltung und –information – verschiedene Themen:
Stellungnahme des Herstellerverbandes LE ^[2]
vom 13. März 2020

Hinweis: Bitte beachten Sie, daß der angehängte Text nur in Englisch verfaßt ist.

EN: Information on EU Lighting Regulations – Ecodesign and Energy Labelling – Compilation ^[1] of the Federal Environment Agency (UBA), Germany

Discussion of a future amending regulation (Product Design and Product Information)

Various issues:
Comments by the Industry Association LE ^[2] as of 13 March 2020

FR: Informations sur réglementations de l'UE concernant l'éclairage – l'écoconception et l'étiquetage énergétique – Compilation ^[1] de l'Agence Fédérale de l'Environnement (UBA), Allemagne

Discussion d'un futur règlement modificatif (Conception des produits et informations sur les produits)

Sujets variés :
Commentaires de l'association de producteurs LE ^[2] du 13 mars 2020

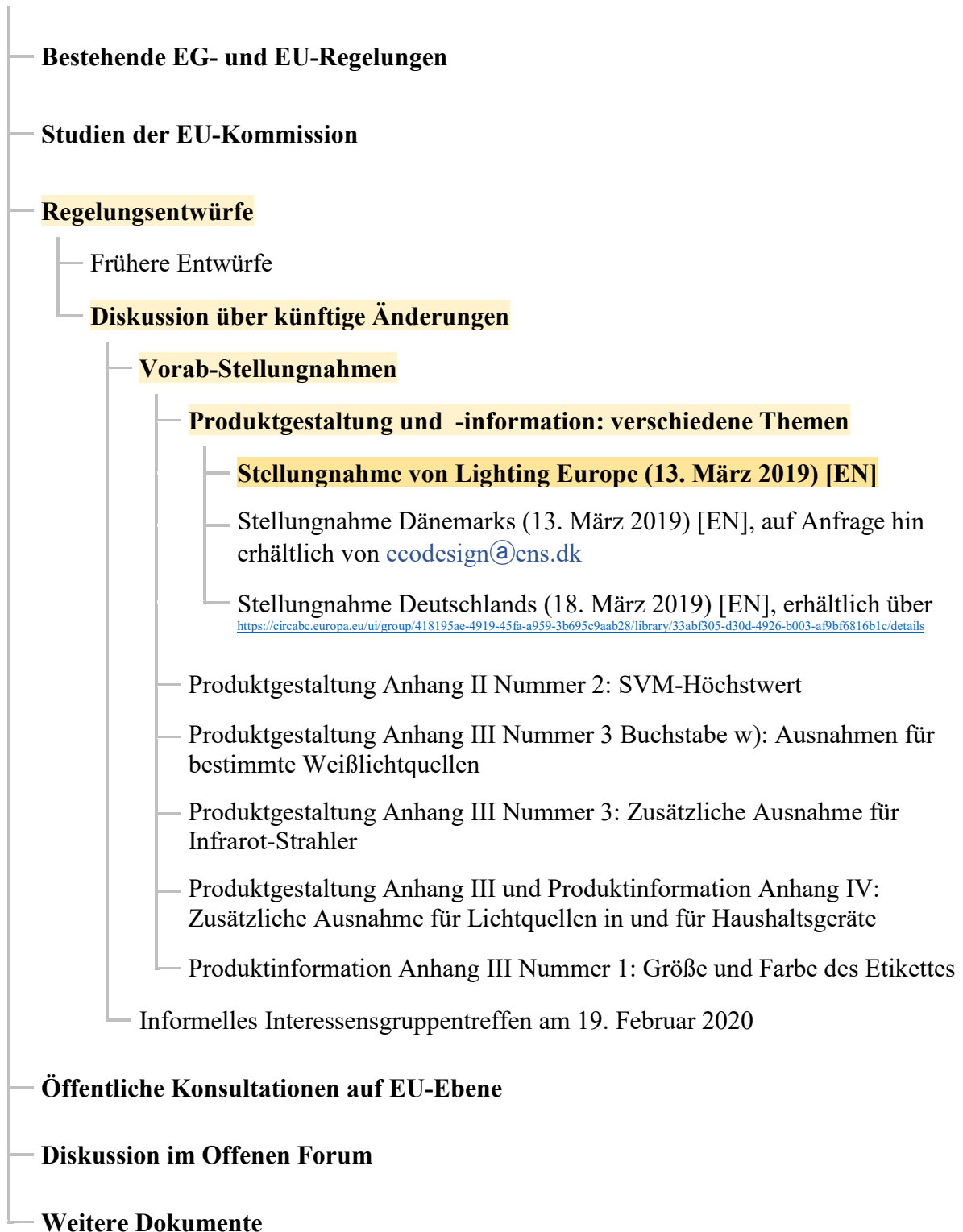
Indication : Veuillez noter que le présent texte n'est disponible qu'en anglais.

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

^[2] LE = Lighting Europe; <http://www.lightingeurope.org/>

Texte im Offenen Forum

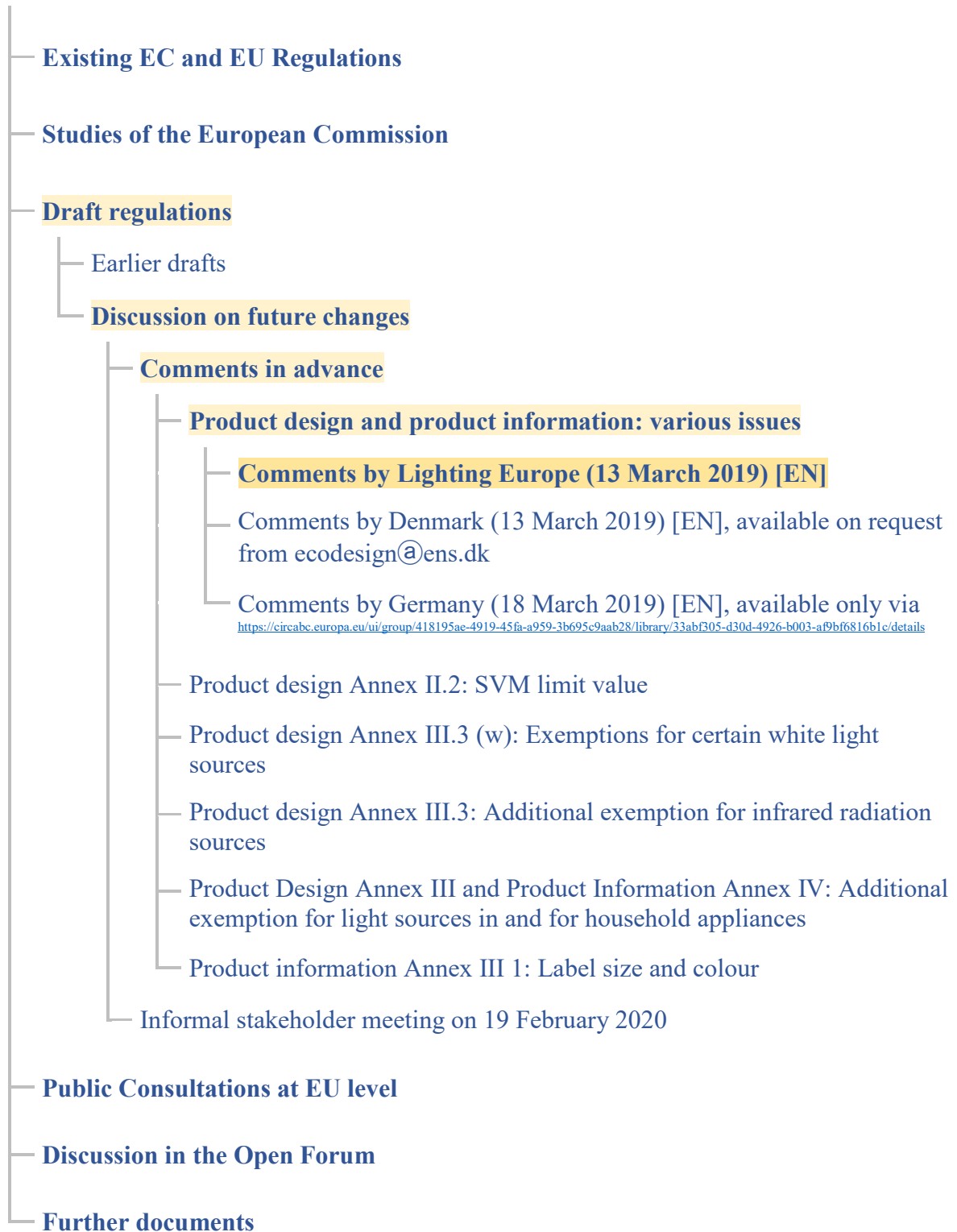
(abc = vorliegender Text)



Abkürzungen: ● EG = Europäische Gemeinschaft ● EU = Europäische Union ● SVM: Maß für die Sichtbarkeit des Stroboskopeffektes

Documents in the Open Forum

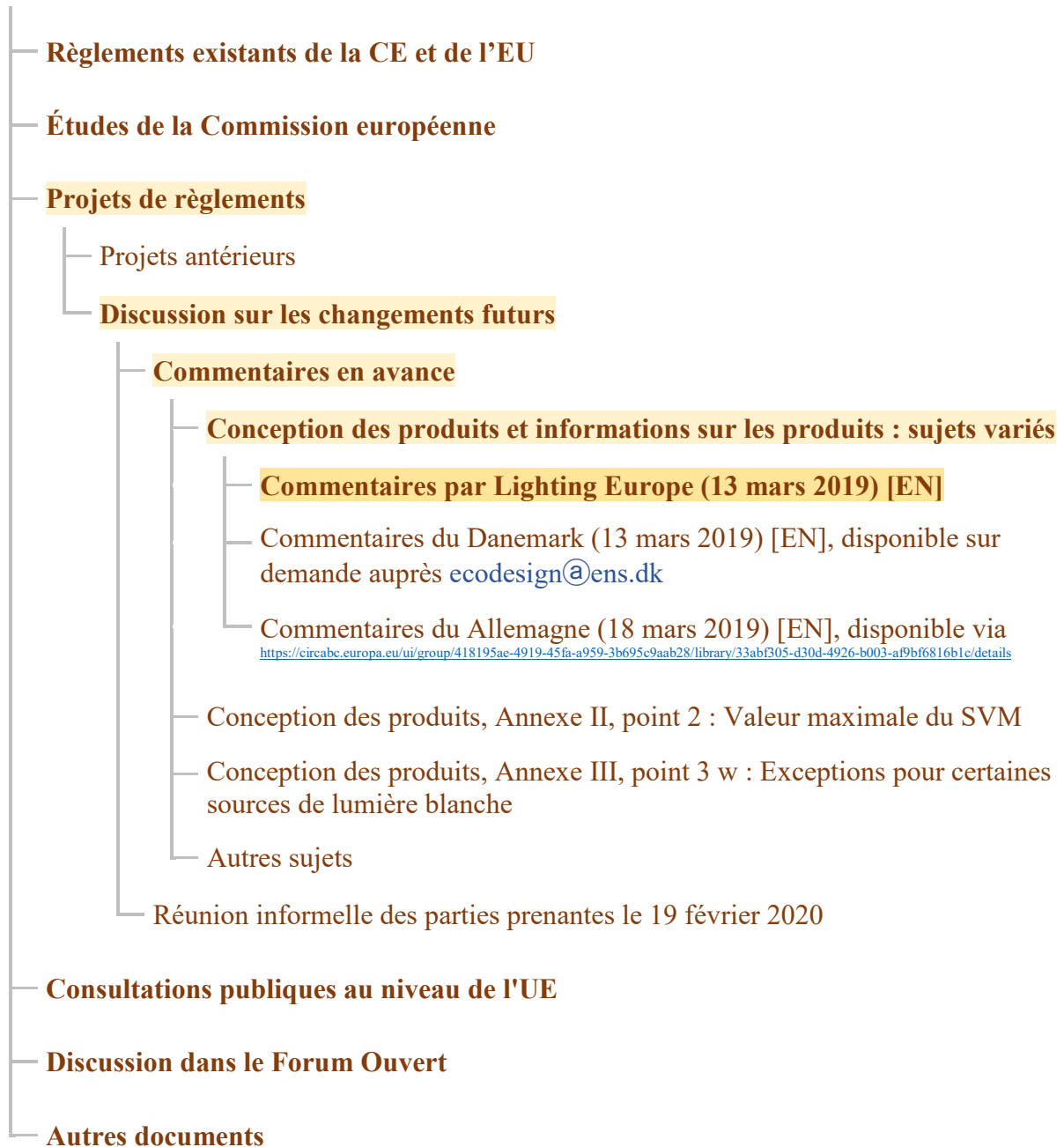
(abc = text at hand)



Abbreviations: ● EC = European Communities ● EU = European Union ● SVM = Stroboscopic Visibility Measure

Documents dans le forum ouvert

(abc = présent document)



Abréviations : ● CE = Communauté européenne ● UE = Union européenne ● SVM : Indice de visibilité de l'effet stroboscopique

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

LightingEurope – written feedback:

Feedback to APPLiA concerns

While we understand some of the concerns of our colleagues in APPLiA and had discussed the implications of some of the new concepts introduced in the new rules during the negotiation phase, LightingEurope does not support the APPLiA recommendations to revise the rules on lighting. We have serious concerns that any such changes would dismantle the definitions of light sources and containing products, would create new significant loopholes and undermine a level playing field among all actors placing light sources on the EU market.

Some of the valid concerns raised by APPLiA have already been addressed in our Guidelines, which are freely accessible on the LightingEurope website.

Regarding the confusion APPLiA has expressed about the interaction between spare parts requirements in home appliance rules and article 4 of the ecodesign rules for lighting, perhaps the Commission can clarify this in a future FAQ.

Feedback to comments made by German UBA

I attach an overview of our feedback to some of the comments – see attached excel file, the slide numbers refer to the longer more detailed slides shared by UBA with us and not the file shown during the meeting.

Slide No	Topic	LightingEurope Comments
1-13	Definitions	LightingEurope does not support these proposals. They constitute fundamental changes to the SLR and ELR that could undermine the entire structure of the legislation and the cohesion of the requirements. We do not believe now is the time to discuss such fundamental changes.
15	Annex III.3(w)(2)	LightingEurope supports this proposal.
20	Table 4, SVM	LightingEurope believes tha the SVM value should be amended as a matter of priority. The proposed deletion is OK for LightingEurope.
24	Annex II.3(b)	LightingEurope does not support this proposal, as it could lead to an unjustified and unnecessary extension of the scope of the requirement to all packaging.
25	Annex III.1(c)	LightingEurope recommends that the Commission explores this concern further to confirm there is indeed a missing reference and if so to correct this.