

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



Diskussion über künftige Änderungsverordnungen (Produktgestaltung und -information)

Diskussionstext der EU-Kommission vom 10. Juni 2020:

Stellungnahme des Herstellerverbandes LE ^[2] vom 12. Juni 2020

– 1. Teil: Zu verschiedenen Themen –

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

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

Discussion of future amending regulations
(Product Design and Product Information)

**The EU Commission's discussion text as of 10 June 2020:
Comments by the Industry Association LE ^[2] as of 12 June 2020**

– 1st Part: on various issues –

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

Discussion sur les futurs règlements modificatifs
(Conception des produits et informations relatives aux produits)

**Texte de discussion de la Commission européenne du 10 juin 2020 :
Commentaires de l'association de producteurs LE ^[2] de 12 juin 2020**

– Première partie : des sujets variés –

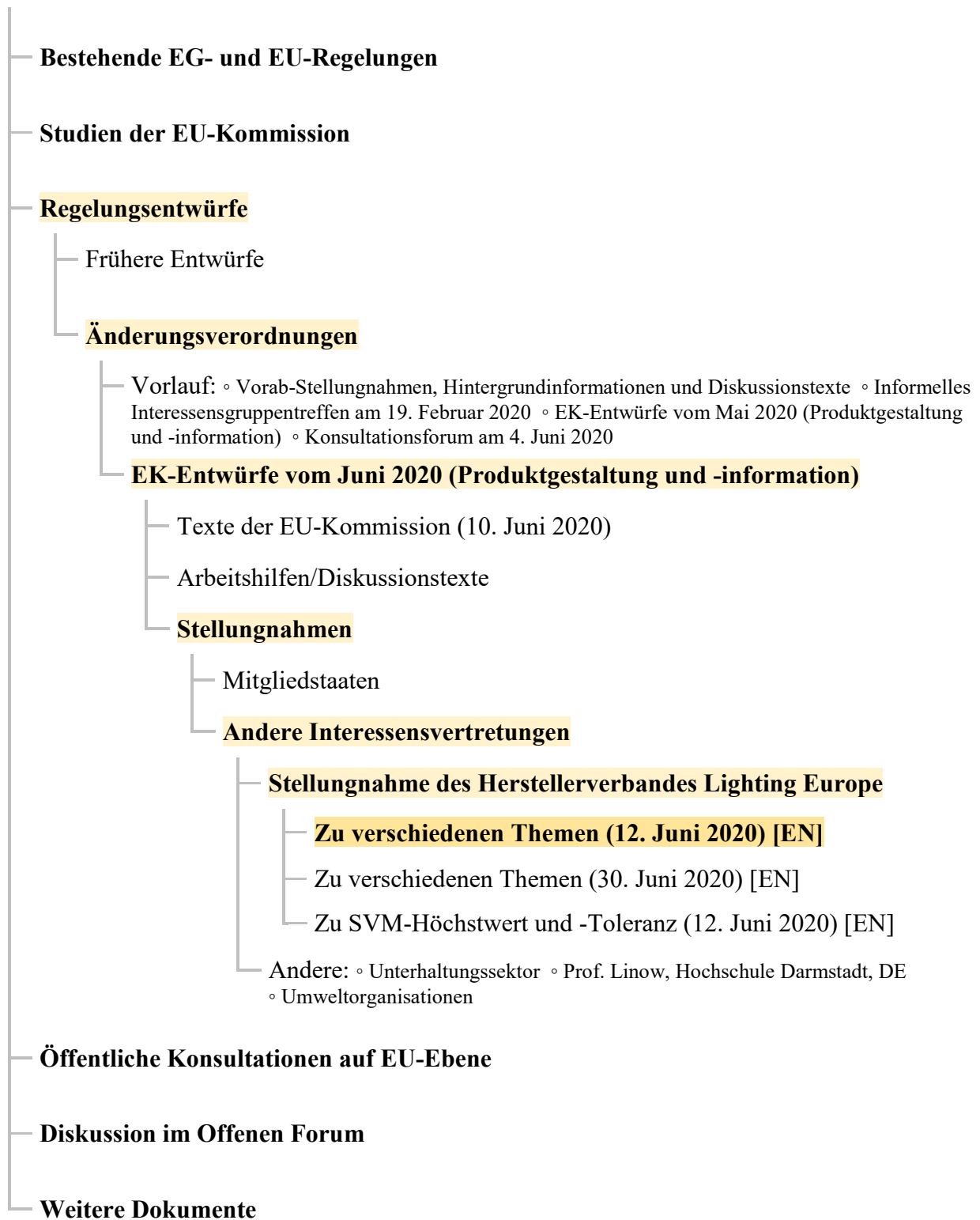
Indication : Veuillez noter que le présent texte n'est disponible qu'en anglais.

^[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 ● EK = EU-Kommission ● EU = Europäische Union
● SVM : Maß für die Sichtbarkeit des Stroboskopeffektes

Documents in the Open Forum

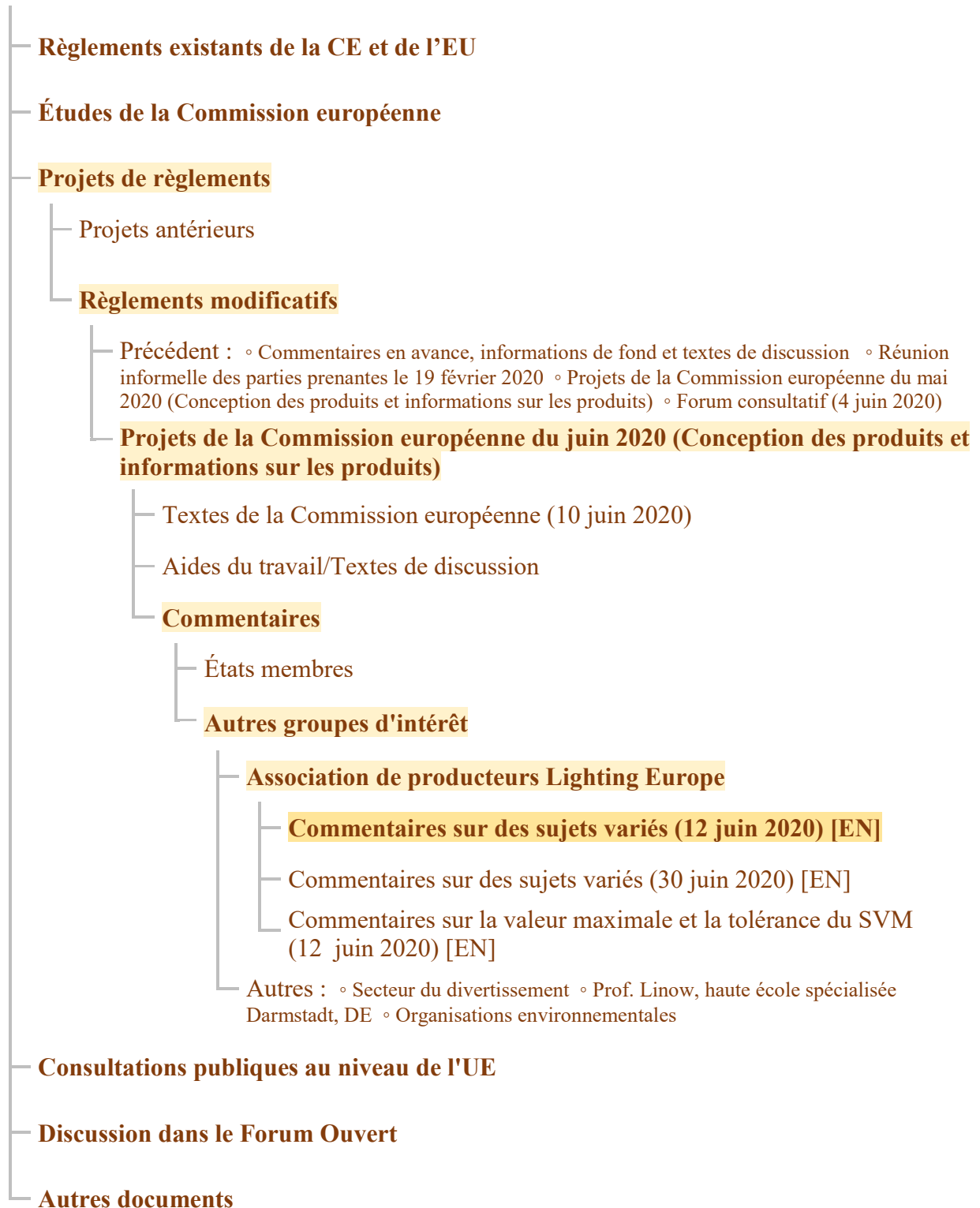
(abc = text at hand)



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

Documents dans le forum ouvert

(abc = présent document)



Abréviations : ● CE = Communauté européenne ● SVM : mesure de la visibilité stroboscopique
 ● UE = Union européenne

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

LightingEurope – **Comments to the Commission’s omnibus amendment proposals as circulated on 10 June 2020**

Date: 12 June 2020

This file contains four tables:

1. Changes in LightingEurope feedback compared to the previous version of comments dated 29 May 2020 p. 1
2. Declared vs measured values (same proposals for all product legislations) p. 6
3. Proposals for Reg. 2019/2015 on energy labelling for lighting p. 9
4. Proposals for Reg. 2019/2020 on ecodesign for lighting p. 14

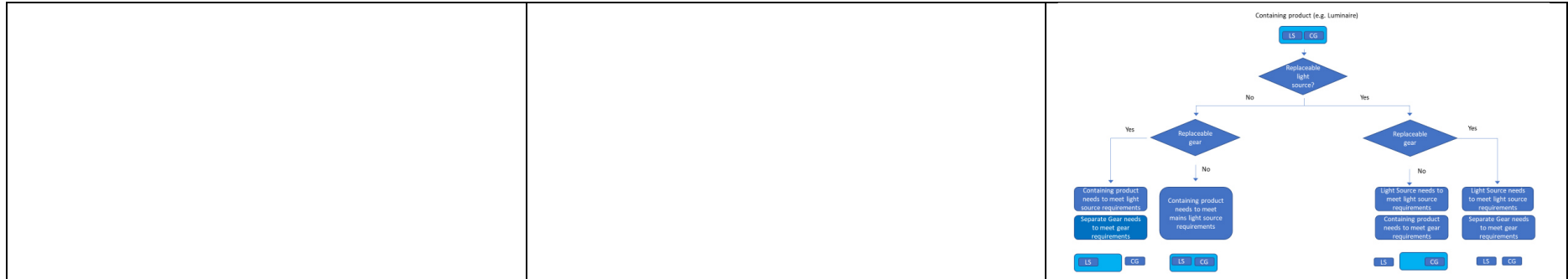
1. Changes in our feedback compared to the previous version of comments dated 29 May 2020

Reg. 2019/2015 and Reg. 2019/2020	Commission proposal of 10 June 2020	LightingEurope comments
<p>Annex V.1, Table 7 of Reg. 2019/2015 Rated light source luminous flux Φ (lm)</p>	<p>Annex V.1, Table 7 of Reg. 2019/2015 Rated light Light source luminous flux Φ (lm)</p>	<p>Throughout the regulation, ‘rated’ has been replaced by ‘declared.’ In order to avoid confusion about whether to fill in the declared or measured value, we propose to use the wording ‘Declared light source luminous flux.’</p>
<p>Art. 2(3) of Reg. 2019/2015 ‘containing product’ means a product containing one or more light sources, or separate control gears, or both.</p> <p>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). If a containing product cannot be taken apart for verification of the light source and separate control gear, the entire containing product is to be considered a light source;</p>	<p>Art. 2(3) of Reg. 2019/2015 ‘containing product’ means a product containing product for one or more light sources or a containing product for separate control gears or both.</p> <p>‘containing product for light sources’ means a product containing one or more light sources, from which all contained light sources can be removed for verification.</p> <p>‘containing product for separate control gears’ means a product containing one or more separate control gears, from which</p>	<p>The proposed changes lead to confusion on the definition for light sources. The proposal states that products with built-in light sources are not seen as containing products, but as the light source cannot be removed from the product itself it is also not considered a light source for testing. As far as this definition is concerned, a luminaire with non-removable light sources or control gear is treated the same as a fridge.</p> <p>Therefore, LightingEurope absolutely does not accept the change in definition (both the additions and removals). Any exemption for specific product groups should be managed through the list of exemptions</p>

	<p>all contained separate control gears can be removed for verification.</p> <p>Examples of 'containing products for light sources' 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). If a containing product cannot be taken apart for verification of the light source and separate control gear, the entire containing product is to be considered a light source</p>	<p>(e.g., by referring to the product scope of specific legislation), and not by adjusting the general definitions with far-reaching unintended consequences for the complete lighting sector. Changing the definitions will undo the fabric of the legislative review of the past five years and affect the basis on which the rest of the legislation has been built (limits, parameters, etc.). Removing the last sentence will especially create loopholes.</p> <p>By following the Diagram 1 on p. 17 of our Guidelines on energy labelling for lighting, there are no contradictions or issues in terms of scope unclarities.</p> <p>Diagram 1 of the LightingEurope Guidelines on energy labelling for lighting:</p>
<p>Art. 2(4) of Reg. 2019/2020 'containing product' means a product containing one or more light sources, or separate control gears, or both.</p>	<p>Art. 2(4) of Reg. 2019/2020 'containing product' means a product containing product for one or more light sources or a containing product for separate control gears or both.</p>	<p>This text is not aligned with what has been proposed for Reg. 2019/2015, so LightingEurope proposes to remove the highlighted part for consistency within this</p>

<p>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). If a containing product cannot be taken apart for verification of the light source and separate control gear, the entire containing product is to be considered a light source;</p>	<p>‘containing product for light sources’ means a product containing one or more light sources, from which all contained light sources can be removed for verification, such as . 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).</p> <p>‘containing product for separate control gears’ means a product containing one or more separate control gears, from which all contained separate control gears can be removed for verification.</p> <p>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). If a containing product cannot be taken apart for verification of the light source and separate control gear, the entire containing product is to be considered a light source;</p>	<p>Article and between Regs. 2019/2015 and 2019/2020.</p> <p>The proposed changes lead to confusion on the definition for light sources. The proposal states that products with built-in light sources are not seen as containing products, but as the light source cannot be removed from the product itself it is also not considered a light source for testing. As far as this definition is concerned, a luminaire with non-removable light sources or control gear is treated the same as a fridge.</p> <p>Therefore, LightingEurope absolutely does not accept the change in definition. Any exemption for specific product groups should be managed through the list of exemptions (e.g., by referring to the product scope of specific legislation), and not by adjusting the general definitions with far-reaching unintended consequences for the complete lighting sector. Changing the definitions will undo the fabric of the legislative review of the past five years and affect the basis on which the rest of the legislation has been built (limits, parameters, etc.). Removing the last sentence will especially create loopholes.</p> <p>By following the Diagram 1 on p. 21 of our Guidelines on ecodesign for lighting, there are no contradictions or issues in terms of scope unclarities.</p>
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		<p>Diagram 1 of the LightingEurope Guidelines on ecodesign for lighting:</p> <pre> graph TD Start[Containing product (e.g. Luminaire)] --> LS_CG[LS CG] LS_CG --> Q1{Removable light source?} Q1 -- No --> Q2{Removable gear?} Q1 -- Yes --> Q3{Removable gear?} Q2 -- Yes --> Box1[Containing product needs to meet light source requirements Separate Gear needs to meet gear requirements] Q2 -- No --> Box2[Containing product needs to meet mains light source requirements] Q3 -- No --> Box3[Light Source needs to meet light source requirements Containing product needs to meet gear requirements] Q3 -- Yes --> Box4[Light Source needs to meet light source requirements Separate Gear needs to meet gear requirements] </pre> <p>Concerning the definition of containing products, LightingEurope also cannot accept any changes to Art. 4 of Regulation 2019/2020, as it is the result of long-lasting careful consideration by the Commission, Member States, and industry. Any eventual unclarities can be explained through guidelines, as has already been done in LightingEurope's Guidelines on the application of the ecodesign requirements for lighting.</p> <p>Diagram 3 on p. 28 of the LightingEurope Guidelines explaining the applicability of Article 4 of the ecodesign regulation:</p>
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2. Declared vs measured values (same proposals for all product legislations)

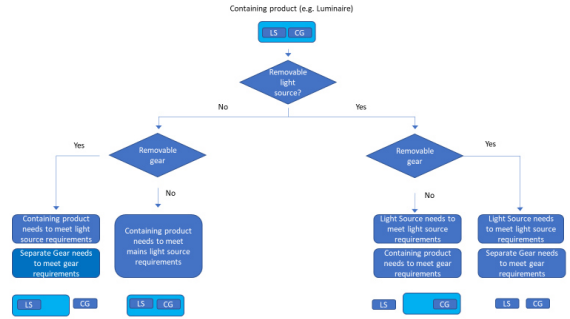
Reg. 2019/2015 and Reg. 2019/2020	Commission proposal of 10 June 2020	LightingEurope comments
<p>Preamble of Reg. 2019/2015 [NEW RECITAL IN PREAMBLE]</p>	<p>Preamble of Reg. 2019/2015 Technical documentation should be sufficient to allow market surveillance authorities to check the values published on the label and in the product information sheet. In accordance with Article 12 of Regulation 2017/1369, values for the measured and calculated parameters of the model should be entered into the product database.</p>	
<p>Preamble of Regs. 2019/2015 & 2019/2020 [NEW RECITAL IN PREAMBLE]</p>	<p>Preamble of Regs. 2019/2015 & 2019/2020 To improve the effectiveness and credibility of this Regulation and to protect consumers, products that automatically alter their performance in test conditions with the objective of reaching a more favourable level for any of the parameters specified in this Regulation should not be allowed to be placed on the market.</p>	
<p>Art. 3(1)(b) of Reg. 2019/2015 the parameters of the product information sheet, as set out in Annex V, are entered into the product database;</p>	<p>Art. 3(1)(b) of Reg. 2019/2015 the values of the parameters ofincluded in the product information sheet, as set out in Annex V, are entered into the public part of the product database;</p>	
<p>Annex I.42 of Reg. 2019/2015 'declared value' for a parameter means the value given by the supplier in the technical documentation pursuant to Article 3(3) of Regulation (EU) 2017/1369;</p>	<p>Annex I.42 of Reg. 2019/2015 'declared value' for a parameter means the value given by the supplier in the technical documentation pursuant to Article 3(3) of Regulation (EU) 2017/1369; 'declared values' means the values provided by the supplier for the stated, calculated or measured technical</p>	

	parameters, in accordance with Article 3(1)(d) and Annex VI, for the verification of compliance by the Member State authorities;	
Annex VI.1(e) of Reg. 2019/2015 the declared and measured values for the following technical parameters:	Annex VI.1(e) of Reg. 2019/2015 the declared and measured -values for the following technical parameters; these values are considered as the declared values for the purpose of the verification procedure in Annex IX;	
Annex IX of Reg. 2019/2015 [NEW 1 st SENTENCE]	Annex IX of Reg. 2019/2015 The verification tolerances set out in this Annex relate only to the verification by Member State authorities of the declared values and shall not be used by the supplier as an allowed tolerance to establish the values in the technical documentation.	
Preamble, Recital 20 of Reg. 2019/2020 To improve the effectiveness of this Regulation and to protect consumers, products that automatically alter their performance in test conditions to improve the declared parameters should be prohibited.	Preamble, Recital 20 of Reg. 2019/2020 To improve ensure the effectiveness and credibility of this Regulation and to protect consumers, products that automatically alter their performance in test conditions to improve with the objective of reaching a more favourable level for any of the declared parameters specified in this Regulation should be prohibited not be allowed to be placed on the market.	
Art. 7 of Reg. 2019/2020 [NEW PARAGRAPH]	Art. 7 of Reg. 2019/2020 A software update shall never have the effect of changing the product's performance in a way that makes it non-compliant with the ecodesign requirements applicable for the declaration of conformity.	
Annex I.52 of Reg. 2019/2020	Annex I.52 of Reg. 2019/2020	

<p>'declared value' for a parameter means the value given by the manufacturer or importer in the technical documentation pursuant to point 2 of Annex IV to Directive 2009/125/EC;</p>	<p>'declared value' for a parameter means the value given by the manufacturer or importer in the technical documentation pursuant to point 2 of Annex IV to Directive 2009/125/EC; 'declared values' means the values provided by the supplier for the stated, calculated or measured technical parameters in accordance with Article 5.2 and Article 5.4, for the verification of compliance by the Member State authorities;</p>	
<p>Annex IV of Reg. 2019/2020 [NEW 1st SENTENCE]</p>	<p>Annex IV of Reg. 2019/2020 The verification tolerances defined in this Annex relate only to the verification by Member State authorities of the declared values and shall not be used by the manufacturer, importer or authorised representative as an allowed tolerance to establish the values in the technical documentation or in interpreting these values with a view to achieving compliance or to communicate better performance by any means.</p>	

3. Proposals for Reg. 2019/2015 on energy labelling for lighting

Reg. 2019/2015	Commission proposal of 10 June 2020	LightingEurope comments
<p>Preamble of Reg. 2019/2015 [NEW RECITAL IN PREAMBLE]</p>	<p>Preamble of Reg. 2019/2015 The relevant product parameters should be measured or calculated using reliable, accurate and reproducible methods. Those methods should take into account recognised state-of-the-art measurement methods including, where available, harmonised standards adopted by the European standardisation bodies, as listed in Annex I to Regulation (EU) No 1025/2012 of the European Parliament and of the Council.</p>	
<p>Art. 2(3) of Reg. 2019/2015 'containing product' means a product containing one or more light sources, or separate control gears, or both.</p> <p>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). If a containing product cannot be taken apart for verification of the light source and separate control gear, the entire containing product is to be considered a light source;</p>	<p>Art. 2(3) of Reg. 2019/2015 'containing product' means a product containing product for one or more light sources or a containing product for separate control gears or both.</p> <p>'containing product for light sources' means a product containing one or more light sources, from which all contained light sources can be removed for verification.</p> <p>'containing product for separate control gears' means a product containing one or more separate control gears, from which all contained separate control gears can be removed for verification.</p> <p>Examples of 'containing products for light sources' are luminaires that can be taken apart to allow separate verification of the</p>	<p>The proposed changes lead to confusion on the definition for light sources. The proposal states that products with built-in light sources are not seen as containing products, but as the light source cannot be removed from the product itself it is also not considered a light source for testing. As far as this definition is concerned, a luminaire with non-removable light sources or control gear is treated the same as a fridge.</p> <p>Therefore, LightingEurope absolutely does not accept the change in definition (both the additions and removals). Any exemption for specific product groups should be managed through the list of exemptions (e.g., by referring to the product scope of specific legislation), and not by adjusting the general definitions with far-reaching unintended consequences for the complete lighting sector. Changing the definitions will</p>

	<p>contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s). If a containing product cannot be taken apart for verification of the light source and separate control gear, the entire containing product is to be considered a light source</p>	<p>undo the fabric of the legislative review of the past five years and affect the basis on which the rest of the legislation has been built (limits, parameters, etc.). Removing the last sentence will especially create loopholes.</p> <p>By following the Diagram 1 on p. 17 of our Guidelines on energy labelling for lighting, there are no contradictions or issues in terms of scope unclarities.</p> <p>Diagram 1 of the LightingEurope Guidelines on energy labelling for lighting:</p>  <pre> graph TD Start[Containing product (e.g. Luminaire) LS CG] --> Q1{Removable light source?} Q1 -- No --> Q2{Removable gear?} Q1 -- Yes --> Q3{Removable gear?} Q2 -- Yes --> B1[Containing product needs to meet light source requirements Separate Gear needs to meet gear requirements] Q2 -- No --> B2[Containing product needs to meet main light source requirements] Q3 -- No --> B3[Light Source needs to meet light source requirements Containing product needs to meet gear requirements] Q3 -- Yes --> B4[Light Source needs to meet light source requirements Separate Gear needs to meet gear requirements] B1 --> LS1[LS] B1 --> CG1[CG] B2 --> LS2[LS CG] B3 --> LS3[LS] B3 --> CG2[CG] B4 --> LS4[LS] B4 --> CG3[CG] </pre>
<p>Annex III.1 of Reg. 2019/2015 The label shall be: - for the standard-sized label at least 36 mm wide and 75 mm high; - for the small-sized label (width less than 36 mm) at least 20 mm wide and 54 mm high.</p>	<p>Annex III.1 of Reg. 2019/2015 The label shall be: - for the standard-sized label at least 36 mm wide and 75 72 mm high; - for the small-sized label (width less than 36 mm) at least 20 mm wide and 54 mm high.</p>	
<p>Annex IV.1(a) of Reg. 2019/2015 in radiological and nuclear medicine installations, as defined in Article 3 of Council Directive 2009/71/Euratom ⁽¹⁾;</p>	<p>Annex IV.1(a) of Reg. 2019/2015 in radiological and nuclear medicine installations, as defined in Article 3 of that are subject to radiation safety standards as set out in Council Directive 2009/71 2013/59/Euratom ⁽¹⁾;</p>	

<p>(¹) Council Directive 2009/71/Euratom of 25 June 2009 establishing a Community framework for the nuclear safety of nuclear installations (OJ L 172, 2.7.2009, p. 18).</p>	<p>(¹) Council Directive 2009/71/2013/59/Euratom of 25 June 2009 5 December 2013 establishing a Community framework for the nuclear safety of nuclear installations (OJ L 172, 2.7.2009, p. 18) laying down basic safety standards for protection against the dangers arising from exposure to ionising radiation (OJ L 13, 17.1.2014, p. 1).</p>			
<p>Annex V.1, Table 3 of Reg. 2019/2015 Energy consumption in on-mode (kWh / 1,000 h)</p>	<p>Annex V.1, Table 3 of Reg. 2019/2015 Energy consumption in on-mode (kWh / 1,000 h), rounded up to the nearest integer</p>			
<p>Annex V.1, Table 3 of Reg. 2019/2015 Correlated colour temperature (...) [x/x...x]</p>	<p>Annex V.1, Table 3 of Reg. 2019/2015 Correlated colour temperature (...) [x/x...x/x or x (or x...)]</p>			
<p>Annex V.1, Table 3 of Reg. 2019/2015 [NEW ROW]</p>	<p>Annex V.1, Table 3 of Reg. 2019/2015</p> <table border="1" data-bbox="831 842 1379 911"> <tr> <td>Lifetime (L₇₀B₅₀) expressed in hours</td> <td>x</td> </tr> </table>	Lifetime (L ₇₀ B ₅₀) expressed in hours	x	<p>This change is acceptable, as long as it is specified that it only applies to LED and OLED.</p> <p>The LightingEurope Guidelines (p. 64) explain how lifetime can be expressed in L₉₀B₅₀ values as well, as L₇₀B₅₀ is not ideal. Therefore, we propose to add a line that lifetime values higher than L₇₀ are also acceptable.</p> <p>The LightingEurope Guidelines on ecodesign measures for lighting mention on p. 64: <i>In January 2018, LightingEurope published a guideline on evaluating the performance of LED-based luminaires. This document elaborates on the L70B50 lifetime for LED</i></p>
Lifetime (L ₇₀ B ₅₀) expressed in hours	x			

		<p><i>and OLED light sources. The guideline is available online.</i></p> <p><i>LED lifetimes based on characteristics better than L70B50 provided by the manufacturer (e.g., L90B50) are accepted without additional qualification (so long as the manufacturer complies with the required minimum lumen maintenance based on the L70B50 declared life). This is because the claimed lifetime will always be less than what would be achieved using the less onerous L70B50 rating.</i></p>
<p>Annex V.1, Table 7 of Reg. 2019/2015 Rated light source luminous flux Φ (lm)</p>	<p>Annex V.1, Table 7 of Reg. 2019/2015 Rated light Light source luminous flux Φ (lm)</p>	<p>Throughout the regulation, 'rated' has been replaced by 'declared.' In order to avoid confusion about whether to fill in the declared or measured value, we propose to use the wording '<i>Declared light source luminous flux.</i>'</p>
<p>Annex VI.1(e) of Reg. 2019/2015 [NEW TEXT]</p>	<p>Annex VI.1(e) of Reg. 2019/2015 (4a) peak luminous intensity in cd for directional light sources (DLS); (7a) R9 colour rendering index value for LED and OLED light sources; (7b) survival factor for LED and OLED light sources; (7c) lumen maintenance factor for LED and OLED light sources; (7d) lifetime L₇₀B₅₀ for LED and OLED light sources;</p>	
<p>Annex VI.1(e)(5) of Reg. 2019/2015 correlated colour temperature (CCT) in K for FL and HID light sources;</p>	<p>Annex VI.1(e)(5) of Reg. 2019/2015 correlated colour temperature (CCT) in K for FL and HID light sources;</p>	
<p>Annex IX of Reg. 2019/2015 [NEW TEXT]</p>	<p>Annex IX of Reg. 2019/2015 Where a model has been designed to be able to detect it is being tested (e.g. by</p>	

		recognising the test conditions or test cycle), and to react specifically by automatically altering its performance during the test with the objective of reaching a more favourable level for any of the parameters specified in this Regulation or included in the technical documentation or included in any of the documentation provided, the model and all equivalent models shall be considered not compliant.												
Annex IX.1, 2nd sent. of Reg. 2019/2015 The Member State authorities shall verify 10 units of the light source model for point 2(c) of this Annex. The verification tolerances are laid down in Table 6 of this Annex.		Annex IX.1, 2nd sent. of Reg. 2019/2015 The Member State authorities shall verify 10 units of the light source model for point 2(c) of this Annex. The verification tolerances are laid down in Table 6 9 of this Annex.												
Annex IX, Table 9 of Reg. 2019/2015 Flicker [P_{st}^{LM}] and stroboscopic effect [SVM] (...) The determined value shall not exceed the declared value by more than 10 %.		Annex IX, Table 9 of Reg. 2019/2015 Flicker [P_{st}^{LM}] and stroboscopic effect [SVM] (...) The determined value shall not exceed the declared value by more than 10% 0.1 .	The SVM round-robin test (RRT) deviations show that at least a tolerance of 0.3 is necessary for Flicker and SVM. A lower tolerance value can only be feasible if a higher SVM value is adopted.											
Annex IX, Table 9 of Reg. 2019/2015 <table border="1"> <tr> <td>Lumen maintenance factor (for FL and HID)</td> <td>10</td> <td>The determined value shall not be less than 90 % of the declared value.</td> </tr> <tr> <td>Survival factor (for FL and HID)</td> <td>10</td> <td>The determined value shall not be less than the declared value.</td> </tr> </table>	Lumen maintenance factor (for FL and HID)	10	The determined value shall not be less than 90 % of the declared value.	Survival factor (for FL and HID)	10	The determined value shall not be less than the declared value.	Annex IX, Table 9 of Reg. 2019/2015 <table border="1"> <tr> <td>Lumen maintenance factor (for FL and HID)</td> <td>10</td> <td>The determined value shall not be less than 90 % of the declared value.</td> </tr> <tr> <td>Survival factor (for FL and HID)</td> <td>10</td> <td>The determined value shall not be less than the declared value.</td> </tr> </table>	Lumen maintenance factor (for FL and HID)	10	The determined value shall not be less than 90 % of the declared value.	Survival factor (for FL and HID)	10	The determined value shall not be less than the declared value.	
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Annex IX, Table 9 of Reg. 2019/2015 Luminous peak intensity [cd]		Annex IX, Table 9 of Reg. 2019/2015 Luminous peak Peak luminous intensity [cd]												

4. Proposals for Reg. 2019/2020 on ecodesign for lighting

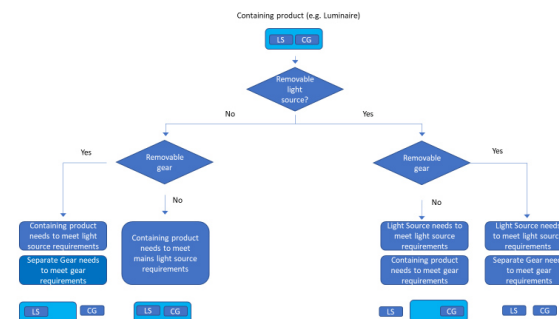
Reg. 2019/2020	Commission proposal of 10 June 2020	LightingEurope comments
<p>Art. 2(4) of Reg. 2019/2020 'containing product' means a product containing one or more light sources, or separate control gears, or both.</p> <p>Examples of containing products are luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s). If a containing product cannot be taken apart for verification of the light source and separate control gear, the entire containing product is to be considered a light source;</p>	<p>Art. 2(4) of Reg. 2019/2020 'containing product' means a product containing product for one or more light sources or a containing product for separate control gears or both.</p> <p>'containing product for light sources' means a product containing one or more light sources, from which all contained light sources can be removed for verification, such as . 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).</p> <p>'containing product for separate control gears' means a product containing one or more separate control gears, from which all contained separate control gears can be removed for verification.</p> <p>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). If a containing product cannot be taken apart for verification of the light source and</p>	<p>This text is not aligned with what has been proposed for Reg. 2019/2015, so LightingEurope proposes to remove the highlighted part for consistency within this Article and between Regs. 2019/2015 and 2019/2020.</p> <p>The proposed changes lead to confusion on the definition for light sources. The proposal states that products with built-in light sources are not seen as containing products, but as the light source cannot be removed from the product itself it is also not considered a light source for testing. As far as this definition is concerned, a luminaire with non-removable light sources or control gear is treated the same as a fridge.</p> <p>Therefore, LightingEurope absolutely does not accept the change in definition. Any exemption for specific product groups should be managed through the list of exemptions (e.g., by referring to the product scope of specific legislation), and not by adjusting the general definitions with far-reaching unintended consequences for the complete lighting sector. Changing the definitions will undo the fabric of the legislative review of the past five years and affect the basis on which the rest of the legislation has been built (limits, parameters,</p>

~~separate control gear, the entire containing product is to be considered a light source;~~

etc.). Removing the last sentence will especially create loopholes.

By following the Diagram 1 on p. 21 of our [Guidelines](#) on ecodesign for lighting, there are no contradictions or issues in terms of scope unclarities.

Diagram 1 of the LightingEurope Guidelines on ecodesign for lighting



Concerning the definition of containing products, LightingEurope also cannot accept any changes to Art. 4 of Regulation 2019/2020, as it is the result of long-lasting careful consideration by the Commission, Member States, and industry. Any eventual unclarities can be explained through guidelines, as has already been done in LightingEurope's Guidelines on the application of the ecodesign requirements for lighting.

		<p>Diagram 3 on p. 28 of the LightingEurope Guidelines explaining the applicability of Article 4 of the ecodesign regulation:</p> <pre> graph TD A[Containing product (e.g. Luminaire)] --> B{Replaceable light source?} B -- No --> C{Replaceable gear?} B -- Yes --> D{Replaceable gear?} C -- Yes --> E[Containing product needs to meet light source requirements Separate Gear needs to meet gear requirements] C -- No --> F[Containing product needs to meet mains light source requirements] D -- Yes --> G[Light Source needs to meet light source requirements Containing product needs to meet gear requirements] D -- No --> H[Light Source needs to meet light source requirements Separate Gear needs to meet gear requirements] </pre>
<p>Article 7 of Reg. 2019/2020 The manufacturer, importer or authorised representative shall not place on the market products designed to be able to detect they are being tested (e.g. by recognising the test conditions or test cycle), and to react specifically by automatically altering their performance during the test with the aim of reaching a more favourable level for any of the parameters declared by the manufacturer, importer or authorised representative in the technical documentation or included in any of the documentation provided.</p> <p>The energy consumption of the product and any of the other declared parameters shall not deteriorate after a software or firmware update when measured with the same test standard originally used for the declaration of conformity, except with explicit consent of the end-user prior to the update.</p>	<p>Article 7 of Reg. 2019/2020 The manufacturer, importer or authorised representative shall not place on the market products designed to be able to detect they are being tested (e.g. by recognising the test conditions or test cycle), and to react specifically by automatically altering their performance during the test with the aim of reaching a more favourable level for any of the parameters declared by the manufacturer, importer or authorised representative in the technical documentation or included in any of the documentation provided.</p> <p>The energy consumption of the product and any of the other declared parameters shall not deteriorate after a software or firmware update when measured with the same test standard originally used for the declaration of conformity, except with explicit consent of the end-user prior to the update. No</p>	

	<p>performance change shall occur as result of rejecting the update.</p> <p>A software update shall never have the effect of changing the product's performance in a way that makes it non-compliant with the ecodesign requirements applicable for the declaration of conformity.</p>					
<p>Annex II.2, Table 4 of Reg. 2019/2020</p> <table border="1" data-bbox="212 534 777 873"> <tr> <td data-bbox="212 534 409 873">Stroboscopic effect for LED and OLED MLS</td> <td data-bbox="409 534 777 873">SVM ≤ 0,4 at full-load (except for HID with $\Phi_{use} > 4 \text{ klm}$ and for light sources intended for use in outdoor applications, industrial applications or other applications where lighting standards allow a CRI < 80)</td> </tr> </table>	Stroboscopic effect for LED and OLED MLS	SVM ≤ 0,4 at full-load (except for HID with $\Phi_{use} > 4 \text{ klm}$ and for light sources intended for use in outdoor applications, industrial applications or other applications where lighting standards allow a CRI < 80)	<p>Annex II.2, Table 4 of Reg. 2019/2020</p> <table border="1" data-bbox="831 534 1377 1278"> <tr> <td data-bbox="831 534 1028 873">Stroboscopic effect for LED and OLED MLS</td> <td data-bbox="1028 534 1377 1278"> <p>SVM ≤ 0,4 0,9 at full-load (except for HID with $\Phi_{use} > 4 \text{ klm}$ and for light sources intended for use in outdoor applications, industrial applications or other applications where lighting standards allow a CRI < 80)</p> <p>From 1 September 2023: SVM ≤ 0,4 at full-load (except for light sources intended for use in outdoor applications, industrial applications or other applications where lighting standards allow a CRI < 80)</p> </td> </tr> </table>	Stroboscopic effect for LED and OLED MLS	<p>SVM ≤ 0,4 0,9 at full-load (except for HID with $\Phi_{use} > 4 \text{ klm}$ and for light sources intended for use in outdoor applications, industrial applications or other applications where lighting standards allow a CRI < 80)</p> <p>From 1 September 2023: SVM ≤ 0,4 at full-load (except for light sources intended for use in outdoor applications, industrial applications or other applications where lighting standards allow a CRI < 80)</p>	<p>LightingEurope does not agree with the limit values proposed by the European Commission and refers to the LightingEurope proposal on SVM, which proposes steps to lower the SVM limit to ≤ 1.0.</p> <p>We agree with the removal of the HID reference in the requirements. We absolutely cannot accept the SVM values that are not in line with the outcomes of the SVM RRT nor based on science.</p> <p>To avoid loopholes, we propose to remove bracket exemptions as well.</p> <p>LightingEurope fully supports the need for an adequate and good quality of light. To this end, as already outlined in Art. 9 of this regulation, the metrics and threshold values might best be worked out during the review process of this regulation during the next few years. This review should ideally be based on scientific research and standards.</p>
Stroboscopic effect for LED and OLED MLS	SVM ≤ 0,4 at full-load (except for HID with $\Phi_{use} > 4 \text{ klm}$ and for light sources intended for use in outdoor applications, industrial applications or other applications where lighting standards allow a CRI < 80)					
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<p>Annex II.3(d)(1) of Reg. 2019/2020 The information specified in point 3(c)(2) of this Annex shall also be contained in the</p>	<p>Annex II.3(d)(1) of Reg. 2019/2020 The information specified in point 3(c)(21) of this Annex shall also be contained in the</p>					

<p>technical documentation file drawn up for the purposes of conformity assessment pursuant to Article 8 of Directive 2009/125/EC.</p>	<p>technical documentation file drawn up for the purposes of conformity assessment pursuant to Article 8 of Directive 2009/125/EC.</p>	
<p>Annex III.1(c) of Reg. 2019/2020 in radiological and nuclear medicine installations, as defined in Article 3 of Council Directive 2009/71/Euratom ⁽¹⁾;</p> <p>(¹) Council Directive 2009/71/Euratom of 25 June 2009 establishing a Community framework for the nuclear safety of nuclear installations (OJ L 172, 2.7.2009, p. 18).</p>	<p>Annex III.1(c) of Reg. 2019/2020 in radiological and nuclear medicine installations, as defined in Article 3 of that are subject to radiation safety standards as set out in Council Directive 2009/712013/59/Euratom ⁽¹⁾;</p> <p>(¹) Council Directive 2009/712013/59/Euratom of 25 June 2009 5 December 2013 establishing a Community framework for the nuclear safety of nuclear installations (OJ L 172, 2.7.2009, p. 18) laying down basic safety standards for protection against the dangers arising from exposure to ionising radiation (OJ L 13, 17.1.2014, p. 1).</p>	
<p>Annex III.2 of Reg. 2019/2020 [NEW EXEMPTION]</p>	<p>Annex III.2 of Reg. 2019/2020 (f) separate control gears specifically used in: refrigerating appliances as defined in Commission Regulation (EU) 2019/2019 ^(16a), dishwashers as defined in Commission Regulation (EU) 2019/2022 ^(16b), washing machines and washer-dryers as defined in Commission Regulation (EU) 2019/2023 ^(16c), refrigerating appliances with a direct sales function as defined in Commission Regulation (EU) 2019/2024 ^(16d), domestic ovens, hobs and range hoods as defined in Commission Regulation (EU) No 66/2014 ^(16e).</p>	

	<p>(^{16a}) Commission Regulation (EU) 2019/2019 of 1 October 2019 laying down ecodesign requirements for refrigerating appliances pursuant to Directive 2009/125/EC of the European Parliament and of the Council and repealing Commission Regulation (EC) No 643/2009 (OJ L 315, 5.12.2019, p. 187).</p> <p>(^{16b}) Commission Regulation (EU) 2019/2022 of 1 October 2019 laying down ecodesign requirements for household dishwashers pursuant to Directive 2009/125/EC of the European Parliament and of the Council amending Commission Regulation (EC) No 1275/2008 and repealing Commission Regulation (EU) No 1016/2010 (OJ L 315, 5.12.2019, p. 267).</p> <p>(^{16c}) Commission Regulation (EU) 2019/2023 of 1 October 2019 laying down ecodesign requirements for household washing machines and household washer-dryers pursuant to Directive 2009/125/EC of the European Parliament and of the Council, amending Commission Regulation (EC) No 1275/2008 and repealing Commission Regulation (EU) No 1015/2010 (OJ L 315, 5.12.2019, p. 285).</p> <p>(^{16d}) Commission Regulation (EU) 2019/2024 of 1 October 2019 laying down ecodesign requirements for refrigerating appliances with a direct sales function pursuant to Directive 2009/125/EC of the European Parliament</p>	
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	<p>and of the Council (OJ L 315, 5.12.2019, p. 313).</p> <p>(^{16e}) Commission Regulation (EU) No 66/2014 of 14 January 2014 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to eco-design requirements for domestic ovens, hobs and range hoods (OJ L 29, 31.1.2014, p. 33).</p>	
<p>Annex III.3(s) of Reg. 2019/2020 halogen light sources with blade contact-, metal lug-, cable-, litz wire- or non-standard customised electrical interface, specifically designed and marketed for industrial or professional electro-heating equipment (e.g. stretch blow-moulding process in PET-Industry, 3D-printing, gluing, inks, paint and coating hardening);</p>	<p>Annex III.3(s) of Reg. 2019/2020 Halogen Incandescent light sources with blade contact-, metal lug-, cable-, litz wire- or non-standard customised electrical interface, specifically designed and marketed for industrial or professional electro-heating equipment (e.g. stretch blow-moulding process in PET-Industry, 3D-printing, photovoltaic and electronic manufacturing processes, drying or hardening of adhesives, gluing, inks, paint and or coatings hardening);</p>	
<p>Annex III.3(w) of Reg. 2019/2020 white light sources which</p> <p>(1) are designed and marketed specifically for scene-lighting use in film-studios, TV-studios and locations, and photographic-studios and locations, or for stage-lighting use in theatres, during concerts or other entertainment events;</p> <p>and which:</p>	<p>Annex III.3(w) of Reg. 2019/2020 white light sources which that</p> <p>(1) are designed and marketed specifically for scene-lighting use in film-studios, TV-studios and locations, and photographic-studios and locations, or for stage-lighting use in theatres, during concerts or other entertainment events;</p> <p>and which that:</p>	

<p>(2) provide two or more of the following specifications:</p> <ul style="list-style-type: none"> (a) LED with high CRI > 90; (b) GES/E40, K39d socket with changeable Colour Temperature down to 1 800 K (undimmed), used with low voltage power supply; (c) LED rated at 180W and greater and arranged to direct output to an area smaller than the light emitting surface; (d) DWE lamp type which is a tungsten lamp defined by its wattage (650 W) voltage (120 V) and terminal type (pressure screw terminal); (e) white bi-colour LED sources; (f) fluorescent tubes: Min BI Pin T5 and Bi Pin T12 with CRI ≥ 85 and CCT 2 900, 3 000, 3 200, 5 600 or 6 500 K. 	<p>(2) provide two or more meet at least one of the following specifications:</p> <ul style="list-style-type: none"> (a) LED with power ≥ 180 W and high CRI > 90; (b) GES/E40, K39d socket with changeable Colour Temperature down to 1 800 K (undimmed), used with low voltage power supply; (c) LED rated at with power ≥ 180W and greater and arranged to direct output to an area smaller than the light emitting surface; (d) DWE lamp type which is a tungsten lamp defined by its wattage (650 W) voltage (120 V) and terminal type (pressure screw terminal) Incandescent light source that is DWE type and has 650 W power, 120 V voltage and pressure screw terminal; (e) white bi-colour LED sources LED with power ≥ 180 W that allows the user to set different correlated colour temperatures for the emitted light; (f) fluorescent tubes: Min BI Pin T5 and Bi Pin T12 LFL T5 with G5 cap and LFL T12 with G13 cap, with CRI ≥ 85 and CCT 2 900, 3 000, 3 200, 5 600 or 6 500 K. 	
<p>Annex III.3(x) of Reg 2019/2020 [NEW POINT 3(x)]</p>	<p>Annex III.3(x) of Reg 2019/2020 incandescent DLS fulfilling all of the following conditions: E27 cap, clear envelope, power ≥ 100 W and ≤ 400 W, CCT ≤ 2 500 K, specifically designed and marketed for infrared heating.</p>	

<p>Annex IV, Table 6 of Reg. 2019/2020 Flicker [P_{st}^{LM}] and stroboscopic effect [SVM] (...) </p> <p>The determined value shall not exceed the declared value by more than 10 %.</p>	<p>Annex IV, Table 6 of Reg. 2019/2020 Flicker [P_{st}^{LM}] and stroboscopic effect [SVM] (...) </p> <p>The determined value shall not exceed the declared value by more than 10% 0.1.</p>	<p>The SVM RRT deviations show that a tolerance of at least 0.3 is necessary for Flicker and SVM. A lower tolerance value can only be feasible if a higher SVM value is adopted.</p>
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