

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



Studien der EU-Kommission

Anträge auf Erneuerung verschiedener Ausnahmeregelungen nach Richtlinie 2011/65/EU (RoHS) ^[2]:

Studie vom 10. Juli 2020

– Stellungnahme des Herstellerverbandes LE ^[3]
vom 17. Juli 2020: Originalversion –

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

Studies of the EU Commission

Requests for renewal of various exemptions under Directive 2011/65/EU (RoHS) ^[2]

– Study of 10 July 2020: Comments by the Industry Association LE ^[3]
as of 17 July 2020: Original version –

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

Études de la Commission européenne

Demandes de renouvellement pour diverses exemptions pertinentes accordées par la directive 2011/65/UE (LdSD) ^[2]

– Étude du 10 juillet 2020 : Commentaires de l'association de producteurs LE ^[3]
de 17 juillet 2020 : Version originale –

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

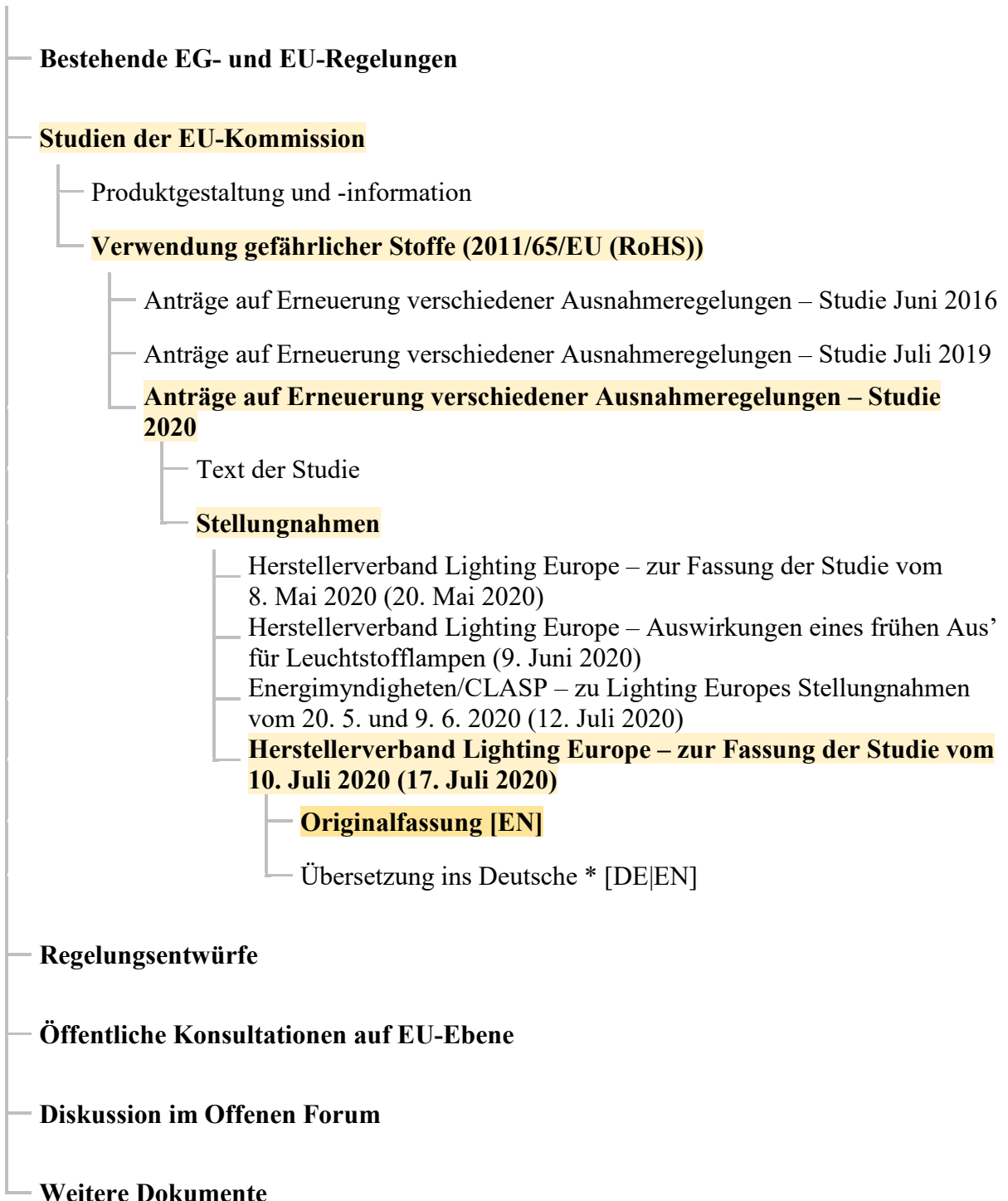
^[1] <https://www.eup-network.de/de/eup-netzwerk-deutschland/offenes-forum-eu-regelungen-beleuchtung/dokumente/texte/>

^[2] https://www.eup-network.de/fileadmin/user_upload/Lichtquellen_RL_2011_65_DE.pdf; *EN.pdf; *FR.pdf

^[3] LE = Lighting Europe; <http://www.lightingeurope.org/>

Texte im Offenen Forum

(abc = vorliegender Text)

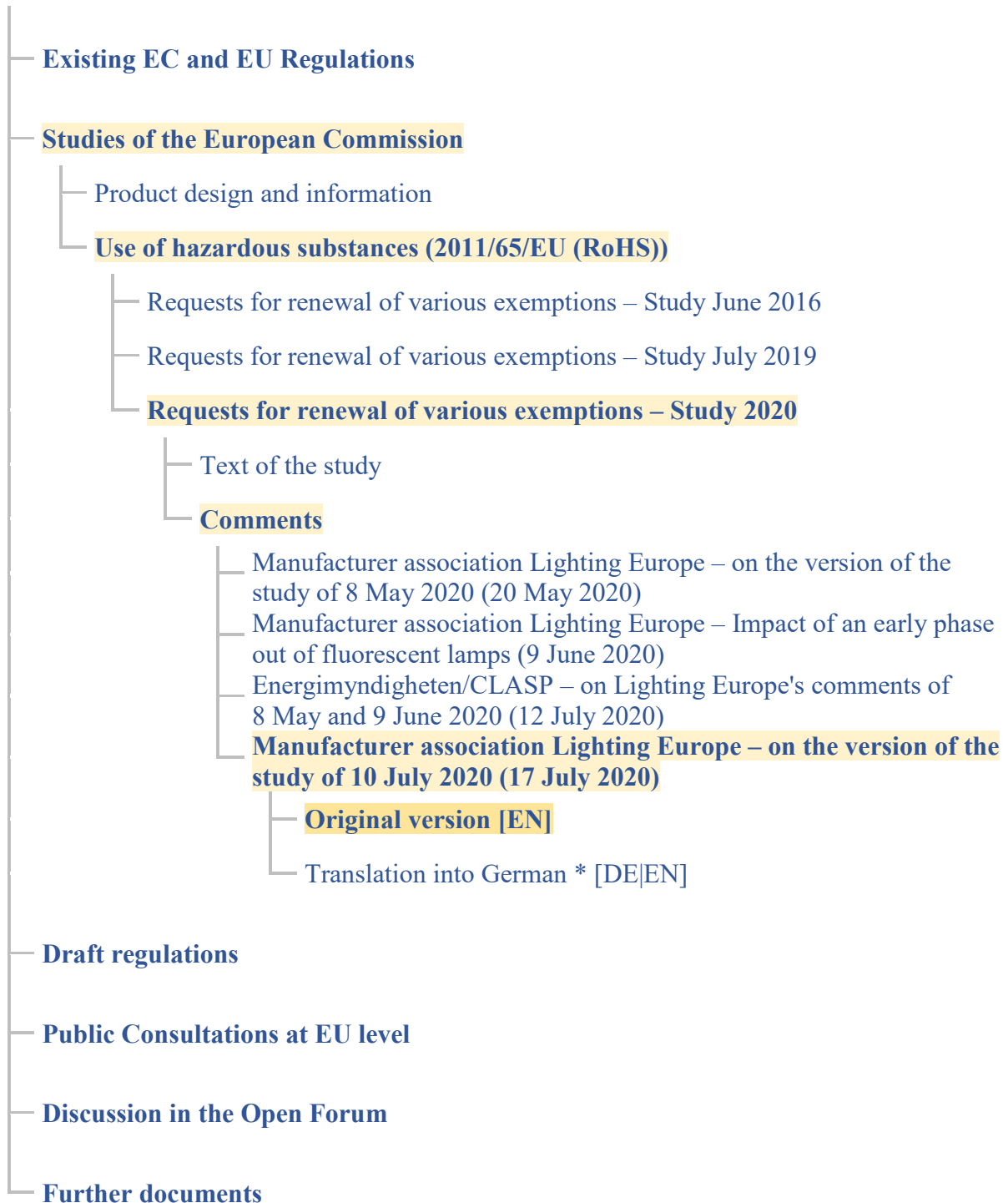


* Stand 16. Juli 2021: Dieser Text steht noch nicht zur Verfügung.

Abkürzungen: ● EG = Europäische Gemeinschaft ● EU = Europäische Union

Documents in the Open Forum

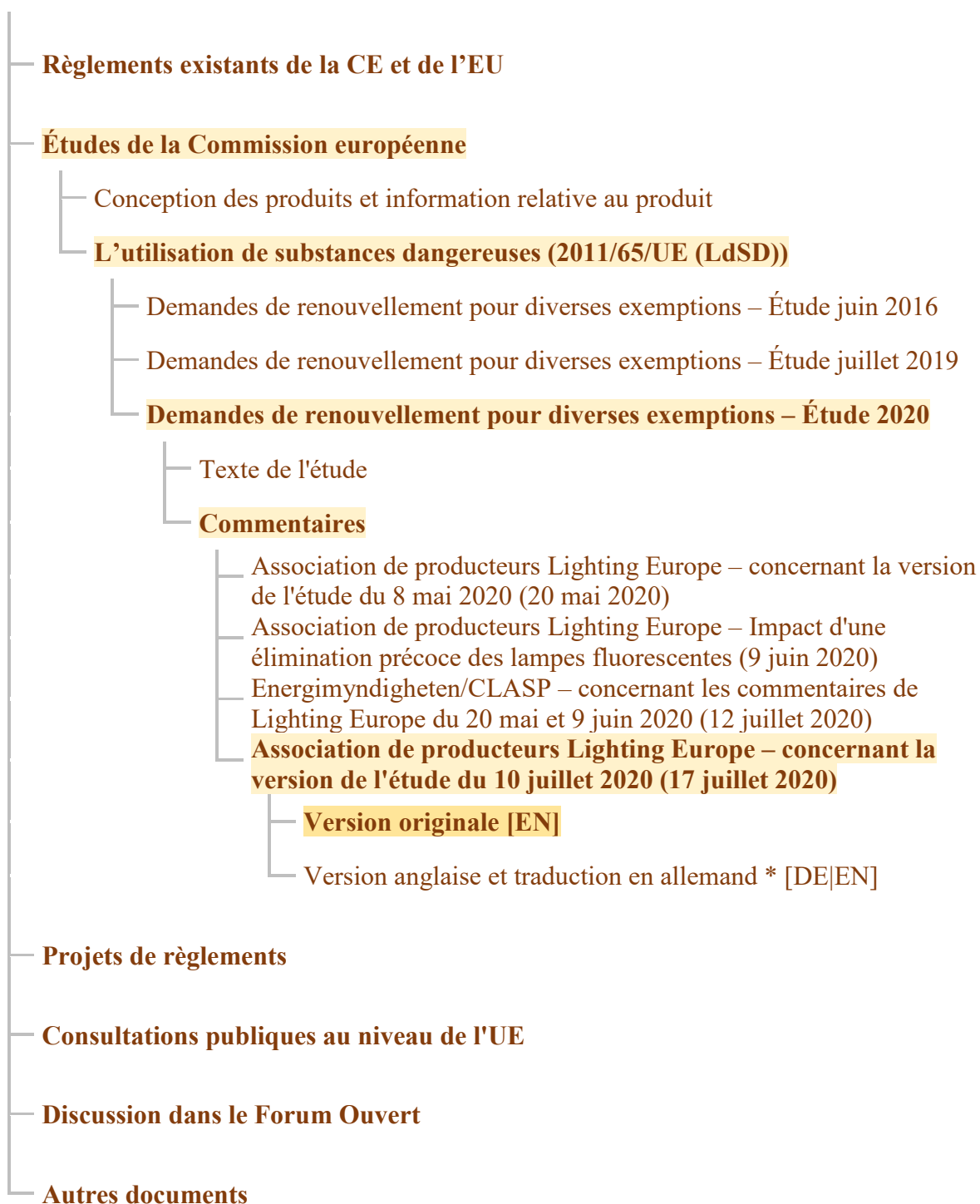
(abc = text at hand)



* Status as of 16 July 2021: This text is not yet available.

Documents dans le forum ouvert

(abc = présent document)



* État au 16 juillet 2021 : Ce texte n'est pas encore disponible.

Abréviations : ● CE = Communauté européenne ● UE = Union européenne

Nach Seite VI folgt ein unveränderter Originaltext.

EN: After page VI follows an unchanged original text.

FR: Après la page VI suit un texte original inchangé.



LIGHTINGEUROPE
THE VOICE OF THE LIGHTING INDUSTRY

LightingEurope Key Comments to the July 2020 publications by the Oeko Institute and CLASP/SwEA

LightingEurope would like to summarise our key comments in response to:

- the revisions shared by the Oeko Institute on the report “Update of the data provided by the analysis model developed in the course of the `Study to assess socio-economic impact of substitution of certain mercury-based lamps currently benefiting of RoHS 2 exemptions in Annex III”,
- the CLASP/SwEA clarifications on the LightingEurope comments of July 2020,

and to reiterate our conclusion that the RoHS Article 5 criteria are satisfied and a renewal of the exemptions is justified.

We will keep our feedback limited and high level and remain available for details, to not add to the extensive input you have all received over the past couple of days.

We remind you that Member States have already evaluated the impact and decided in 2019 on a staged phase out of a large part of the general lighting products that are addressed by the Oeko and CLASP/SwEA documents. This evaluation took place under EU ecodesign rules and addressed the social, economic and environmental impact of the phase out. The timetable was communicated already in December 2018 and was officially published in October 2019, and the market (both the customers/consumers of these products and their manufacturers globally) is working towards this agreed timetable of phasing out some products by 1 September 2021 and 2023 respectively, and maintaining the remaining products on the market for longer.

A premature phaseout, that does not respect this decision, will create confusion in the market and increase the risk of (unintended) non-compliance, stockpiling of conventional products and the creation of unnecessary and avoidable waste of well-functioning lighting fixtures and lamps.

LightingEurope Comments on the revised Oeko Institute Update report published on 10 July 2020

- The newly introduced **sensitivity analysis is more realistic** with regard to LightingEurope’s estimations of availability of compatible substitutes.
- The **energy savings are misrepresented** – a large part of the savings generated are attributed to the phase out of T8s, which has already been voted upon by Member States and will take effect as of 1 September 2023. This timeline has already been communicated to the global market by the EU and European users of these products,

are working towards this agreed timeline by anticipating the huge impact in building renovation plans, and organizing the necessary human and financial resources.

- The **timeline adopted is too long**- it evaluates possible benefits over the next 15 years until 2035. We question the highly speculative values, e.g. for efficiency increases of up to 190 lumen/Watt. Additionally, in practice no consumer or professional customer would accept payback periods for energy efficiency for more than a few years.
- The **benefits of potential energy savings are too high**, because of speculative efficiency increases assumed for the next 15 years. LightingEurope calculations, based on OEKO sensitivity data of 2021 (from the July 2020 report), show as an example, that a forced LED investment in 2021, results in a payback period of 18 years for a LED luminaire and a payback period for a LED tube of 5 years, which might/will face substantial opposition by consumers and professional users in the EU, the same way that users were significantly opposed to, the former ban of incandescent lamps despite their short payback period of typically half a year.
- **Investment costs are not clearly highlighted** in the conclusions of the report. Oeko estimates a cost of 57 Billion Euros in the sensitivity analysis– LightingEurope estimates the cost of a premature phase out for Member States to be 133 Billion Euros, mainly to be borne in the next 5 years.
- The **mercury calculations are too high** – the revised mercury calculations do not take into account the average recycling rates of 50% and take the maximum mercury limits (the mercury values should be 1/3 lower than the maximum mercury content). In practice, LightingEurope projections show a drastic reduction of mercury towards < 0.1 % of the total EU release in the environment by 2026 without premature ban of lamps.
- **Only parts of the LightingEurope input is taken into account**- the revised update does not take into account the findings of the Socio economic impact study conducted by independent consultants EPPA in the LightingEurope exemption renewal requests of January 2020, which indicate the socio economic costs and waste impact outweigh substantially the projected health cost, while impacting 12350 jobs in Europe. A direct extract from that LCA states that *“the cost effectiveness of the non-renewal of the exemption is totally disproportionate for the EU society “*

LightingEurope comments to the CLASP/SwEA clarifications of 12 July 2020

- The **compatibility assumptions are not realistic and rely on marketing claims of lamps** found via an online search that are **not available on the EU market, nor clear whether they are compliant with EU product and safety requirements**. They also disregard the guidance documents of major LightingEurope manufacturers on feasibility, warranty and the safety warnings related to insurance requirements for buildings.

We invite you to follow these links, such as [this one](#), [this link](#) and [another](#) – you will note that these products are not available for purchase, there is no information on whether they comply to actual EU legislation or when these products will be available. LightingEurope invites CLASP/SwEA to make publicly available their individual product conformity and functionality assessments of the above-mentioned products.

LightingEurope compatibility estimates are based on technical facts and not on marketing claims that are backed by an intangible product.

The European Consumer Organisation- [BEUC estimates](#) that 2/3 of all products available online do not comply with EU rules and may pose a risk to consumers.

In the [EEPliant 1 project](#), co-financed by the EU, 14 market surveillance authorities made a targeted selection and tested 141 LED lamps bearing the CE marking: only 14% of the tested products were fully compliant, the main problems identified were insufficient luminous flux (they were not bright enough) and poor lifetime performance.

LightingEurope concludes that the renewal criteria of RoHS Article 5 are satisfied:

LightingEurope reiterates that

- Alternatives usually contain the RoHS Annex II substance lead, like most of the LED lamps listed as potential substitutes in the Oeko 2019 and 2020 reports and in the CLASP/SwEA comments. Using a T8 LED substitute lamp results in the de facto substitution of Annex III exemption 2(a)3 by the Annex III exemptions 7(a) and 7(c)-I,
- (Reliable) substitutes are not available for all applications, lengths or colour temperatures,
- the socio-economic costs and waste impact outweigh the projected health and environmental costs.

LightingEurope calls for a smooth and sustainable transition to LED technology

LightingEurope has already shared a proposal to ensure a smooth and manageable transition of the market to alternatives that will deliver a 40% reduction in mercury over the period 2020-2022, in line with the objectives of RoHS. Therefore, LightingEurope calls for a sustainable transition to avoid:

- unnecessary waste,
- market disruption by non-feasible products,
- supply shortages,
- price increases,
- unsafe products and
- frustrated consumers and professional users.

For further information on this topic, please contact: Ourania Georgoutsakou, Secretary General (Ourania.georgoutsakou@lightingeurope.org) and Roumiana Santos, Senior Policy Officer (Roumiana.santos@lightingeurope.org)

About LightingEurope

LightingEurope is the voice of the lighting industry, based in Brussels and representing 33 companies and national associations. Together these members account for over 1,000 European companies, a majority of which are small or medium-sized. They represent a total European workforce of over 100,000 people and an annual turnover exceeding 20 billion euro. LightingEurope is committed to promoting efficient lighting that benefits human comfort, safety and well-being, and the environment. LightingEurope advocates a positive business and regulatory environment to foster fair competition and growth for the European lighting industry. More information is available at www.lightingeurope.org.