

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



## Diskussion über künftige Änderungsverordnungen (Produktgestaltung und -information)

Diskussionstext der EU-Kommission vom 10. Juni 2020:  
**Stellungnahme Polens vom 30. Juni 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 <sup>[1]</sup> 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 Poland as of 30 June 2020**

**FR:** Informations sur réglementations de l'UE concernant l'éclairage – l'écoconception et l'étiquetage énergétique – Compilation <sup>[1]</sup> 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 Pologne 30 juin 2020**

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

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

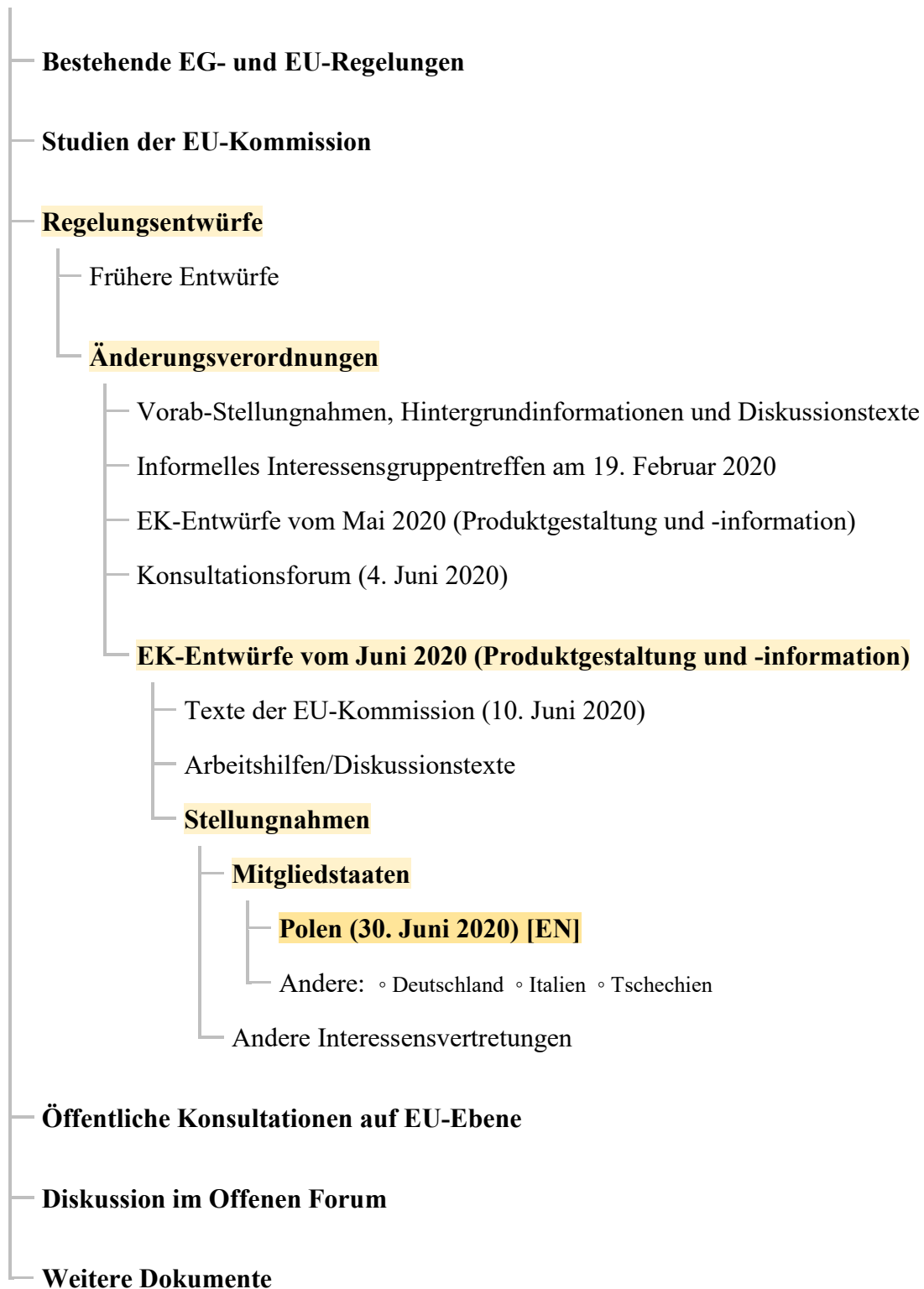
DE: ↓

EN: → page III

FR : → page IV

## Texte im Offenen Forum

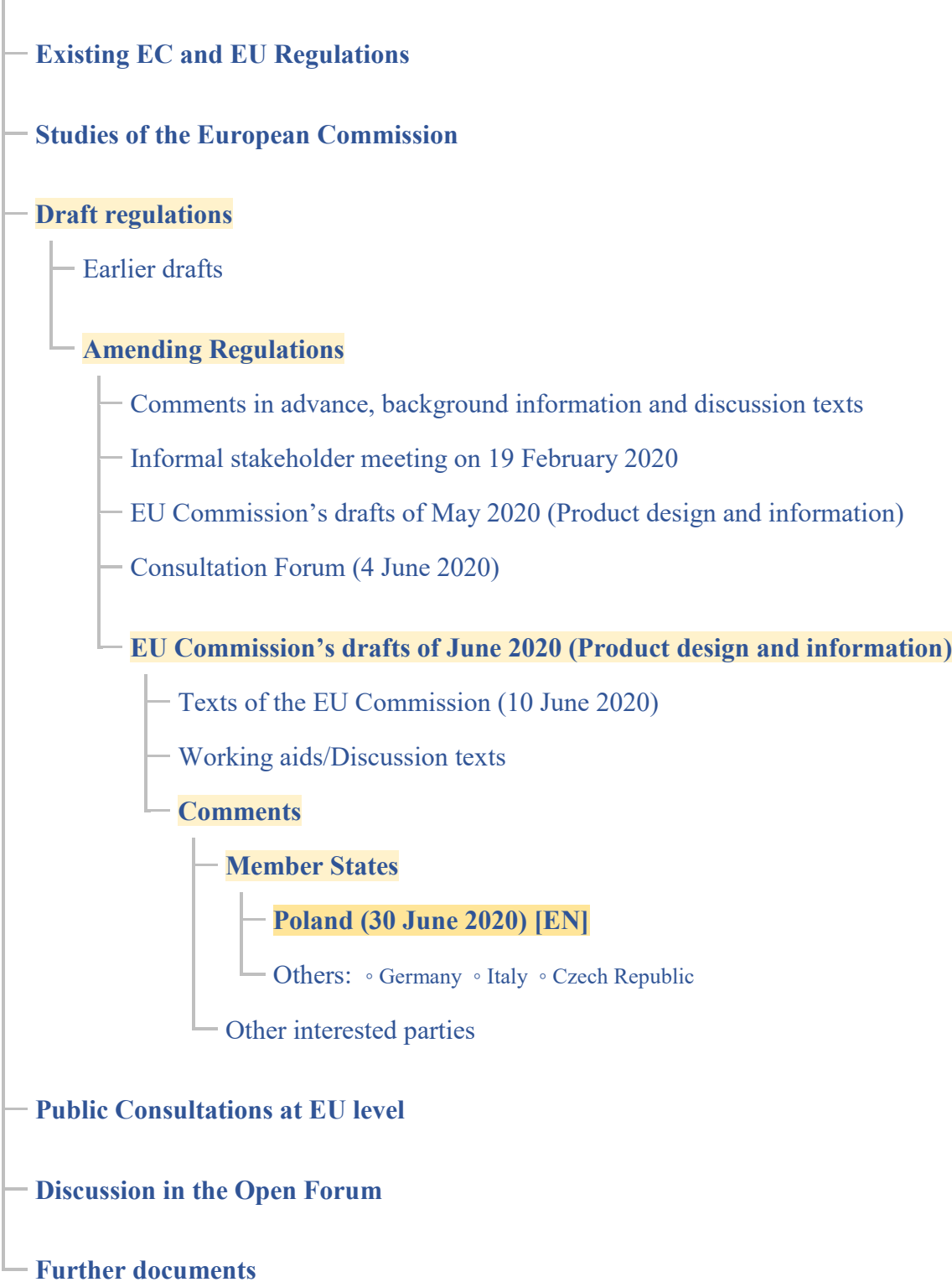
(abc = vorliegender Text)



Abkürzungen: ● EG = Europäische Gemeinschaft ● EK = EU-Kommission ● EU = Europäische Union

Documents in the Open Forum

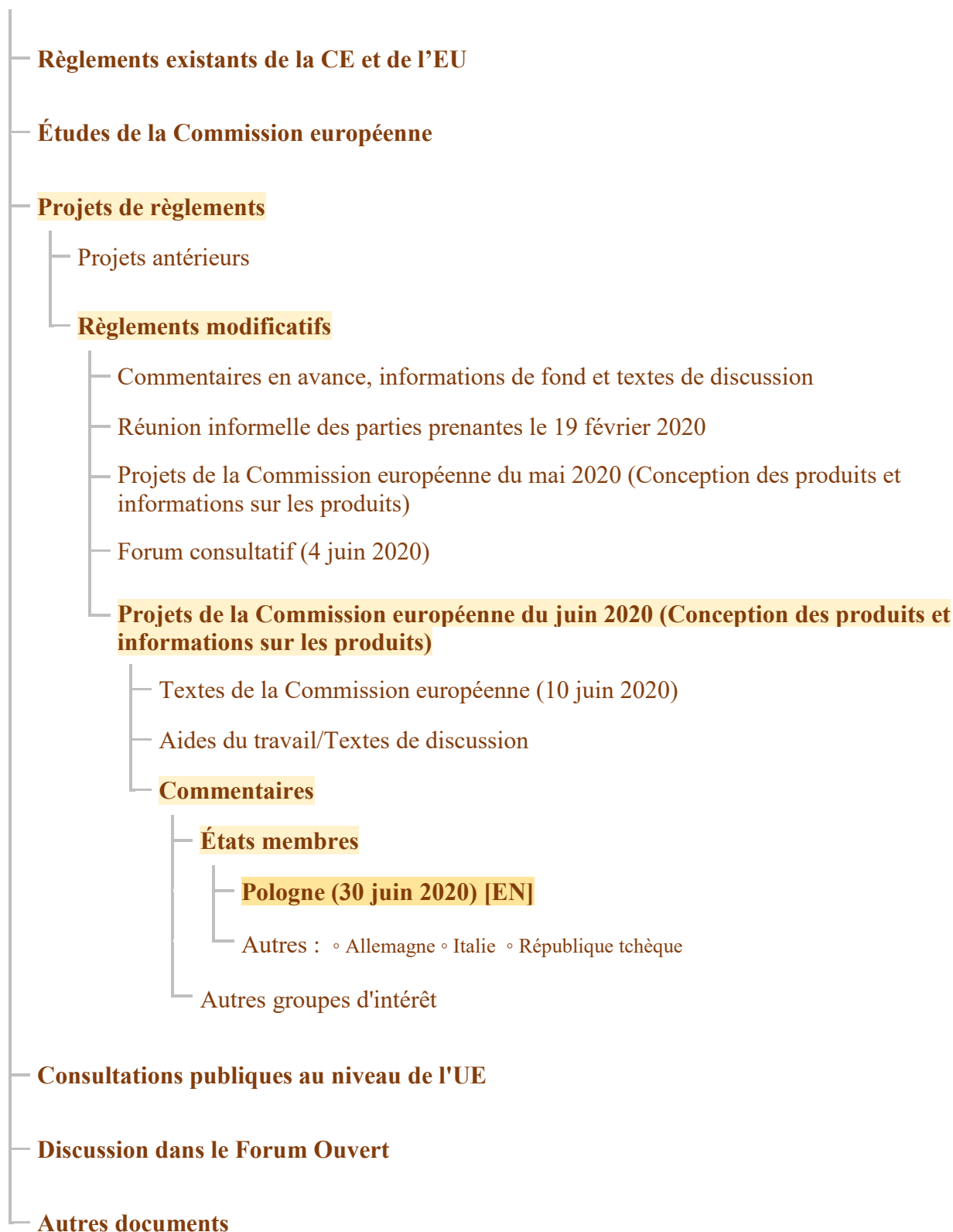
(abc = text at hand)



Abbreviations: ● EC = European Communities ● EU = European Union

## Documents dans le forum ouvert

(abc = présent document)



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

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Es folgt ein unveränderter Originaltext.

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

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

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## **PL comments on the COM Discussion Paper on possible amendments to the Regulations on light sources and separate control gears**

### **SVM**

The Ecodesign Regulation is designed in the first place to determine energy efficiency requirements. The SVM requirement is a light quality measure. A too strict SVM requirement can even lead to less energy efficiency.

Poland is in favour to support a gradual introduction of SVM as it is a completely new criterion. We understand the initial proposal of the SVM value set at 1,6 was a starting point for the market situation we have today. SVM 1,6 is the recommended limit in NEMA 77:2017, the only globally available standard for indoor applications.

Poland supports the gradual introduction of SVM, for example starting from 1,6 or 1,3 and then going towards 1,0 (the scientific visibility threshold) in a final stage. Poland believes that the “precautionary principle” is already covered in such gradual approach, based on the provided scientific evidence.

We know that SVM is just one out of many other important technical requirements for electronics for lighting. SVM is a measure predicting the visibility of stroboscopic effect in laboratory conditions being the worst case realistic scenario for an sensitised observer, with high contrast moving stimulus and without daylight or other light sources. But we cannot neglect the other important technical requirements for electronics for lighting such as: energy efficiency, lifetime, dimmability, EMC, harmonics, size and more.

### **Long lasting T8**

Poland supports the additional exemption for long lasting T8 lamps in the Ecodesign Regulation. There are several operations designed on the fluorescent lamp technology, in which the LED substitutes will not work properly or will not work at all (e.g. emergency systems). Additionally in harsh conditions, the use of LED lamps instead of the fluorescent lamps will significantly impact the lifetime of LED substitutes, which will result to frequent replacement cycles, increased flow of electronic waste and higher costs for end-users.

Usually the operation under the harsh conditions applies to petrochemical and chemical industry, steel works, glass works etc. In most of these industries there are many precautions in order to mitigate the potential safety risks. Shortening the replacement cycle of light sources is a very important safety concern in such applications. T8 Fluorescent lighting has appeared to be the proven technology in such applications. Additional requirement for long life up to 80 000 hours will have a positive impact on both: critical applications, where LED lighting is not working properly and further risk mitigation due to long lasting T8 fluorescent lamps.