

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 6. November 2015
Stellungnahme Portugals vom 3. Februar 2016

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 6 November 2015
Comments by Portugal as of February 3 2016

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 6 novembre 2015
Commentaires du Portugal du 3 février 2016

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

* <http://www.eup-network.de/de/eup-netzwerk-deutschland/offenes-forum-eu-regelungen-beleuchtung/dokumente/texte/>

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

PT preliminary comments on the working documents concerning eco-design requirements and energy labelling of lighting products

General comments

PT welcomes the new drafts concerning the eco-design requirements and energy labelling of lighting products and thanks the Commission for the efforts put into the simplification of the regulatory framework for lighting products.

Nevertheless and as other Member States pointed out there are still a number of open issues that need further discussion. For that purpose we need the active involvement of Member States and Stakeholders, within another round of the Consultation Forum. This approach on the process will be very beneficial for the needed outcome. Indeed we think that only recently the discussion process is starting to reach some *momentum* through active and thorough participation and further time should be granted to a more extensive and fruitful discussion.

Ecodesign regulation draft

Article 1 – Subject matter and scope

This draft refers to the “*placing on the market and putting into service...*”. Considering that current Ecodesign Regulations for lighting refer only to placing on the market we find that this wording might add unnecessary complexity. It might be useful if the Commission could further explain the aim of adding this extra condition to the scope.

It is very important for the sake of market surveillance and for preventing loopholes that the scope is well defined and contained. We think that further discussion should be granted to the exemptions provided in order to clarify them as far as possible.

Article 2 – Definitions

(7) “**final owner**”- it is advisable to have a common approach on this definition throughout the regulations. Currently Regulation 1194 and 874 refer to “final owner” and “end user”. The draft Regulation for Energy Labelling (revision of energy labelling directive) refers to “costumer”.

(10) “**lighting product component**” – we tend to agree with other Member States that refer as reasonable to deal only with lighting products, consisting of lighting parts and auxiliary parts.

Article 3 – Ecodesign requirements

(2) Concerning the stages for eco-design requirements we suggest to eliminate stage 3, due to the uncertainty about future developments in the lighting market.

Annex II – Ecodesign requirements



**Direção Geral
de Energia e Geologia**

1- Energy efficiency requirements

Energy efficiency requirements are set according to the maximum allowed power consumption, taking into account luminous flux and CRI. We support the view of some Member States that refer to the importance of taking into account other properties of light, like colour temperature, distribution of light, etc.

2- Functionality requirements

Further reflection should be made concerning the impact of functional requirements, namely warm up time, in the consequent phasing out of CFL from the market.

Energy labelling regulation draft

It is our view that it would be more productive that the discussion on the energy labelling regulation draft will take place only when the revision of the label directive will be more advanced and after in-depth discussion of the eco-design regulation draft.