

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 20. Mai 2020:
Stellungnahme Schwedens vom 4. 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 ^[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 20 May 2020:
Comments by Sweden, 4 June 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 sur les futurs règlements modificatifs
(Conception des produits et informations relatives aux produits)

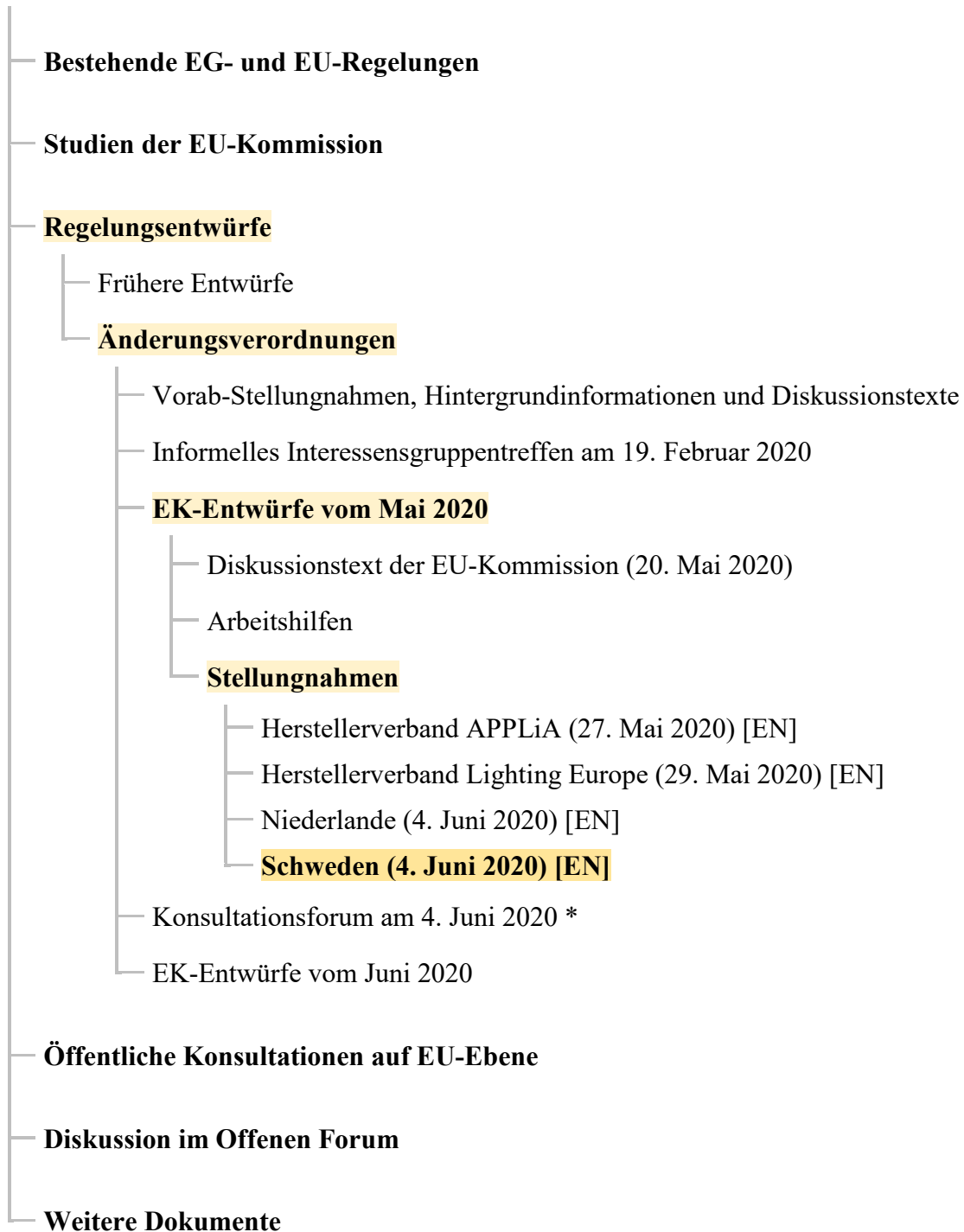
**Texte de discussion de la Commission européenne du 20 mai 2020 :
Commentaires de la Suède du 4 juin 2020**

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/>

Texte im Offenen Forum

(abc = vorliegender Text)



* Stand 15. Juni 2020: Dieser Text steht noch nicht zur Verfügung.

Documents in the Open Forum

(abc = text at hand)

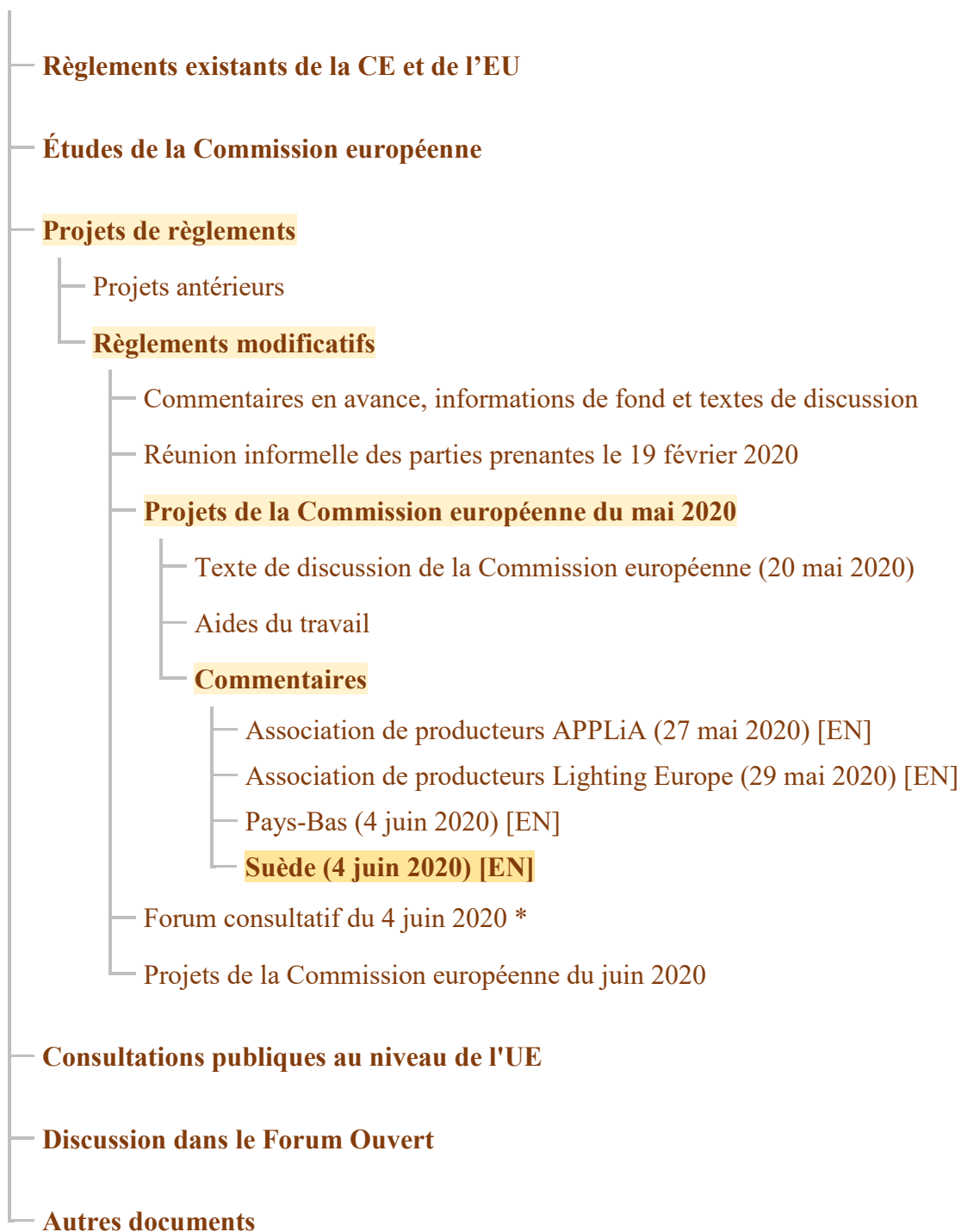


* Status as of 15 June 2020: This text is not yet available.

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

Documents dans le forum ouvert

(abc = présent document)



* État au 15 juin 2020 : Ce texte n'est pas encore disponible.

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

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.



*SE preliminary comments on the
amendments for lighting*

Peter Bennich, Jonas Pettersson and Christofer Silfvenius
Swedish Energy Agency

Consultation Forum (online) 4 June 2020

Pst and SVM – rationale for requirements

- Rationale: There is a need to have product requirements on temporal light modulation (TLM) for consumer protection.
- Pst and SVM have been proposed as appropriate measures and hence included in the revised regulation.
- Question: *what levels are appropriate?*
- Different studies available:
 - First of all, distinguish between long-term effects and immediate effects on pleasure and comfort. Long-term effects known to be difficult to study, due to multiple-parameter influence, including the role of daylight.
 - Office studies (LE referenced): intended to study long-term effects: no real influence of SVM up to SVM = 1.3 *Caution*: no control over the daylight in at least one of the studies
 - Lab environment studies: eg <https://ssl.iea-4e.org/news/svm-report> : Annoyingness increases from SVM = 0.4 to 0.9
- SE-conclusion: Precautionary principle *remains valid, and the "SSL-study" motivates low levels of Pst and SVM*

Pst and SVM – SE conclusions on the Round-robin test

- Quick reminder of the history – a moving target...
 - LE comments after the vote Dec 2018: Not possible to achieve the low levels of Pst and SVM in the regulation for six lamp models
 - SEA et al: 2018/19 tests found that yes, it is – plenty on the market already
 - LE comments in the fall 2019: *also* have to consider *existing* EMC-requirements (*NB: a separate regulation*)
 - SEA et al: test report in Feb 2020: can still find lamps that do comply with Pst, SVM and EMC...
 - LE comments during and after the TF 19 Feb 2020: *also* have to consider revised requirements on harmonics (*NB: a separate regulation*)
 - SEA, Hessen and LE common RR-test: can still find lamps that comply with Pst, SVM and the harmonic requirements
- SE *agrees* with LE that a common RR-test was a good exercise and welcome similar exercises in the future
- SE *disagrees* with the conclusions regarding the levels and the tolerance – see next page

Pst and SVM – SE conclusions on the Round-robin test (cont)

- In principle, SE concludes that:
 - The results support what has been stated since 2018: there already exists light sources that do comply with all requirements.
 - In particular, the original statement by LE on Pst and SVM is not valid: there are plenty of lamps from all six categories that do have very low values of Pst and SVM.
 - This is also supported by recent measurements on more than 200 lamp models, including on LED-tubes, by SEA, where we find an overall pass rate of ca 75%. [Data will be shared together with SE comments](#)
 - However, it varies a lot between manufacturers, which support our hypothesis it is mainly a question of competence
 - The deviation (of measurements) between 3 out of the 4 labs is very low. One lab is a clear outlier, indicating a systematic "error". (In larger RR-tests, this is normal – see eg <https://ssl.iea-4e.org/testing-standards/laboratory-comparability>)
 - In particular, the uncertainty of the Pst and SVM is actually very low and is mostly due to the test conditions rather than the measurement or equipment itself (see next pages)
 - The original proposed tolerance of 10 % doesn't make sense for very low values, hence the RR-group discussed a fixed tolerance of 0.1 (cf standby power)
 - LE proposal of 0.3 is unmotivated and should be disregarded (eg: measured value of SVM = 0.1 -> allowed tolerance = 300%..!)
- That said, SE can support the COM proposal with a two-tier approach for the SVM (0.9 and 0.4) and a tolerance of 0.1

Swedish Energy Agency (SEA) test equipment (1)

- Everfine LFA 3000
- Operates standalone or from PC
- Complete measurement takes 3+3 minutes
- Flicker Percent
- Flicker Index
- Modulation Depth
- IEEE risk rating
- PST (IEC 61547)
- SVM (CIE)
- Measures up to kHz range



Swedish Energy Agency (SEA) test equipment (2)

- GigaHerz BTS256-EF
- Operates standalone or from PC
- Complete measurement takes 3+3 minutes
- Flicker Percent
- Flicker Index
- PST (IEC 61547)
- SVM (CIE)
- Measures up to kHz range

- Consistent results with Everfine LFA 3000,
much less deviation than 0.1



Other comments

- L70B50:

SE find this problematic since the test standard assumes a testing time of 6000 h, which is what we try to avoid by the newly proposed accelerated 3600 h-test. SE will provide detailed comments.
- Exemptions:
 - *Annex III, new point 3(x): “Incandescent DLS fulfilling all of the following conditions: E27 cap, clear envelope, power ≥ 100 W and ≤ 400 W, CCT $\leq 2\,500$ K, specifically designed and marketed for infrared heating.”*

SE accepts but propose this should be assessed during the next revision, to check for possible abuse (“the return of the heatballs...”)
 - *(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; and...*
 - *f) “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”*

SE: Do not agree; LED-alternatives are available + obvious risk for a loophole! Will probably clash with the RoHS exemptions as well.
- Containing products:

SE will send in comments later