

Texte zu den geplanten neuen EU-Regelungen zur umweltgerechten Produktgestaltung und zur Energieverbrauchskennzeichnung in der Beleuchtung – Zusammenstellung * des Umweltbundesamtes (UBA), Deutschland



Entwürfe der EU-Kommission vom 13. November 2017
**Stellungnahme des Verbandes der Chemischen Industrie e. V.
 (VCI) vom 22. Januar 2018**

*Hinweis: Dies ist die englischsprachige Version; die deutschsprachige kann heruntergeladen werden unter ***

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 13 November 2017
**Comments of the German Chemical Industry Association (VCI) as
 of 22 January 2018**

*Please notice: This is a text in English. A version in German language can be downloaded at ***

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 13 novembre 2017
**Commentaires de la Fédération des Industries Chimiques Allemandes
 (VCI) du 22 janvier 2018**

*Indication: Indication: C'est un texte en anglais. Une version allemande peut être téléchargé sous ***

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

** http://www.eup-network.de/fileadmin/user_upload/Lichtquellen_Stellungnahme_VCI_2018_01_22_DE.pdf

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

Translation / Original: German

Preliminary VCI position on the EU Commission's draft of 13 November 2017 regarding the ecodesign requirements for light sources

Introductory Remarks

The German chemical industry association Verband der Chemischen Industrie (VCI) is committed to the sustainable production of chemicals and chemical products, reflecting the state-of-the art. The association represents the interests of around 1,700 companies (over 90 percent of the chemical industry in Germany). The VCI has surveyed its membership about the EU Commission's draft of 13 November 2017 regarding the ecodesign requirements for light sources. The feedback is summed up in the following preliminary position.

Tight schedule: Technology is not (yet) sufficiently mature

According to the Commission draft of 13 November 2017, the new ecodesign requirements for light sources are to apply already from 1 September 2020, so that solutions may be placed on the market only if they fulfil the minimum requirements to energy efficiency. Appraisals by industry show that the minimum requirements under Annex III cannot be achieved for some lighting systems. In the medium term, it is quite possible that these requirements are met only by LED light sources.

In terms of eco-efficiency, the use of LED technology is welcomed – this technology has high energy efficiency values under laboratory conditions. Therefore, already now a changeover to LED light sources is taking place in all fields where this is possible. But the lifespans that suppliers state for LED products are only based on calculations; they do not rely on measuring under all-day practical conditions. It is deplorable that it is too early to generally implement such a full changeover at the current moment in time, because of the points described below:

- Technology is not (yet) sufficiently mature: Operating conditions in chemical plants (e.g. high temperatures) or a chemical atmosphere (e.g. ammonia) can put limits to the possibilities for the use of light sources.
- High replacement rate: Due to the fact described in point 1, an above-average replacement rate can render the use of LEDs more difficult or even impossible in certain fields. This is not conducive to sustainability.
- Standardised solutions are not available at present: In most cases, replacing LED lamps would necessitate replacing the entire module. This is because standardised solutions are not yet available on the market at present, and usually the deployed technology is already obsolete when a replacement becomes necessary. This increases costs and reduces economic efficiency.
- CE conformity is not ensured: Replacing individual units might cause the loss of the manufacturer's CE conformity for the entire module.
- Rules for special solutions are unclear: Particularly in the chemical industry there can be high requirements to the durability and resistance of materials (e.g. temperature, pH value or corrosion) that have to be combined with the requirements, for example, of explosion protection. For this reason, the companies still need to examine in detail to what extent the new ecodesign requirements will impact their installations in areas with explosion risk and other safety-relevant areas. For instance, it is not possible to use LEDs in explosion protected areas with temperature classes T5 and T6. Well-established special solutions (including some niche products which are available on

the market in relatively small numbers of items) might be no longer usable in the new conditions. Consequently, implementing the new ecodesign requirements for special solutions calls for exemption rules or longer transitional periods.

Summary and Recommendation

The possible consequences of the new ecodesign requirements are not compatible with sustainable design, as pursued by the EU with the package of measures for a circular economy. For the above-described reasons, the deadline set in the Commission draft cannot be implemented in the (chemical) industry.

Such a fast changeover of light sources is not viable, neither economically nor ecologically. A potential timeframe of 15 to 20 years seems rather more realistic, depending on technical developments and taking into account sustainability aspects.

Giving a recommendation, the VCI would ask the Commission to abandon its tight schedule in favour of a realistic deadline with workable transitional periods. In view of the above points, there should be an overall stocktaking. On the one hand, this exercise should give consideration to energy savings from the use of LEDs. On the other hand, the material consumption of LEDs due to higher replacement rates should be taken into account. Concretely, the efficiency of light sources should be examined throughout their entire lifecycle. Furthermore, it is essential for such stocktaking to include – in the overall context of ecodesign – conformity and standards as well as the special features of safety and integrated structures. The only definite statement that can be made at the current stage is that the (chemical) industry needs more time to look into the details of the remaining open points and then get the full picture of the consequences.

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- Identification no. in the EU Transparency Register: 15423437054-40
- The VCI is registered in the public listing „öffentliche Liste über die Registrierung von Verbänden und deren Vertretern“ of German Parliament (Deutscher Bundestag)

The VCI represents the politico-economic interests of around 1,700 German chemical companies and German subsidiaries of foreign businesses. For this purpose, the VCI is in contact with politicians, public authorities, other industries, science and media.

The VCI stands for more than 90 percent of the chemical industry in Germany. In 2017 the German chemical industry realised sales of ca. 195 billion euros and employed over 451,000 staff.