

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



Diskussion über eine künftige Änderungsverordnung (Produktgestaltung und -information)

Informelles Interessensgruppentreffen am 19. Februar 2020:
Lichtquellen in Haushaltsgeräten: Vortrag von Herrn Florian Walbert, APPLiA und BSH

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 a future amending regulation (Product Design and Information)

**Informal stakeholder meeting on 19 February 2020: Presentation
Light sources in household appliances: Presentation by
Mr. Florian Walbert, APPLiA and BSH**

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 d'un futur règlement modificatif (Conception des produits et informations sur les produits)

**Réunion informelle des parties prenantes le 19 février 2020 :
Les sources lumineuses dans les appareils ménagers : Exposé par
M. Florian Walbert, APPLiA et BSH**

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/>

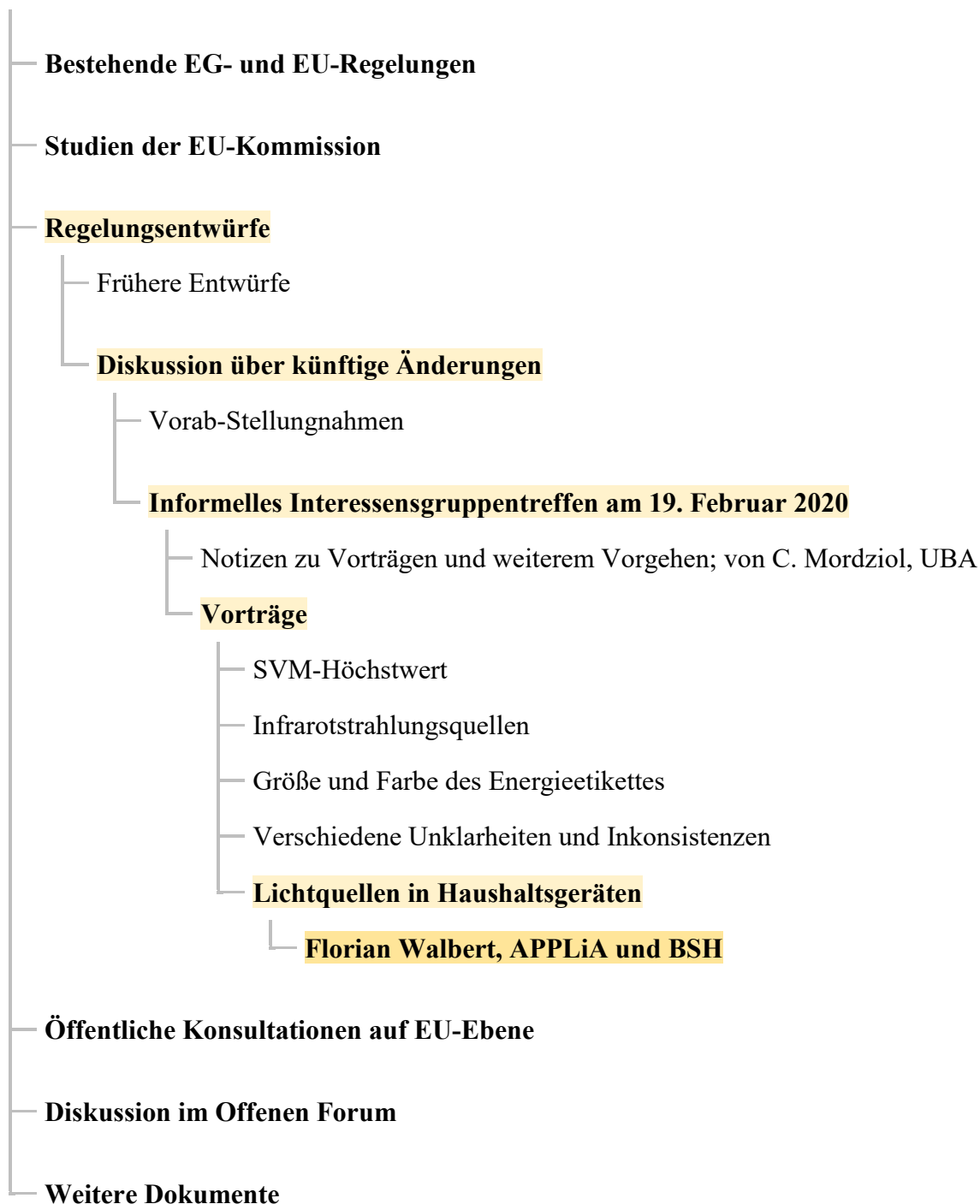
DE: ↓

EN: → page III

FR : → page IV

Texte im Offenen Forum

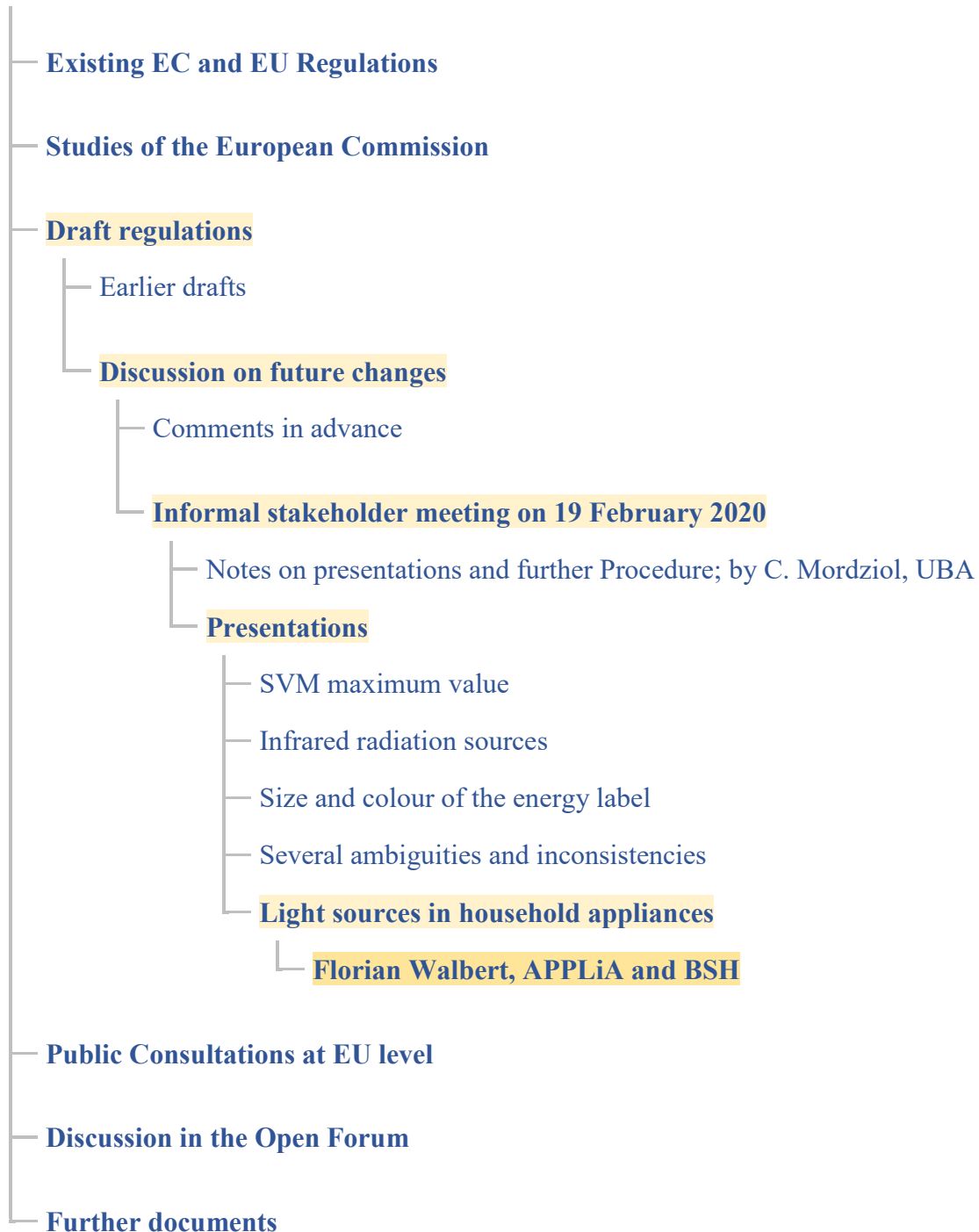
(abc = vorliegender Text)



Abkürzungen: • APPLiA: Europäischer Verband der Hersteller von Elektro-Haushaltsgeräten; <https://www.applia-europe.eu/> • BSH = BSH Hausgeräte GmbH, Deutschland; <https://www.bsh-group.com/de/>
• EG = Europäische Gemeinschaft • EU = Europäische Union • SVM : Maß für die Sichtbarkeit des Stroboskopeffektes • UBA = Umweltbundesamt

Documents in the Open Forum

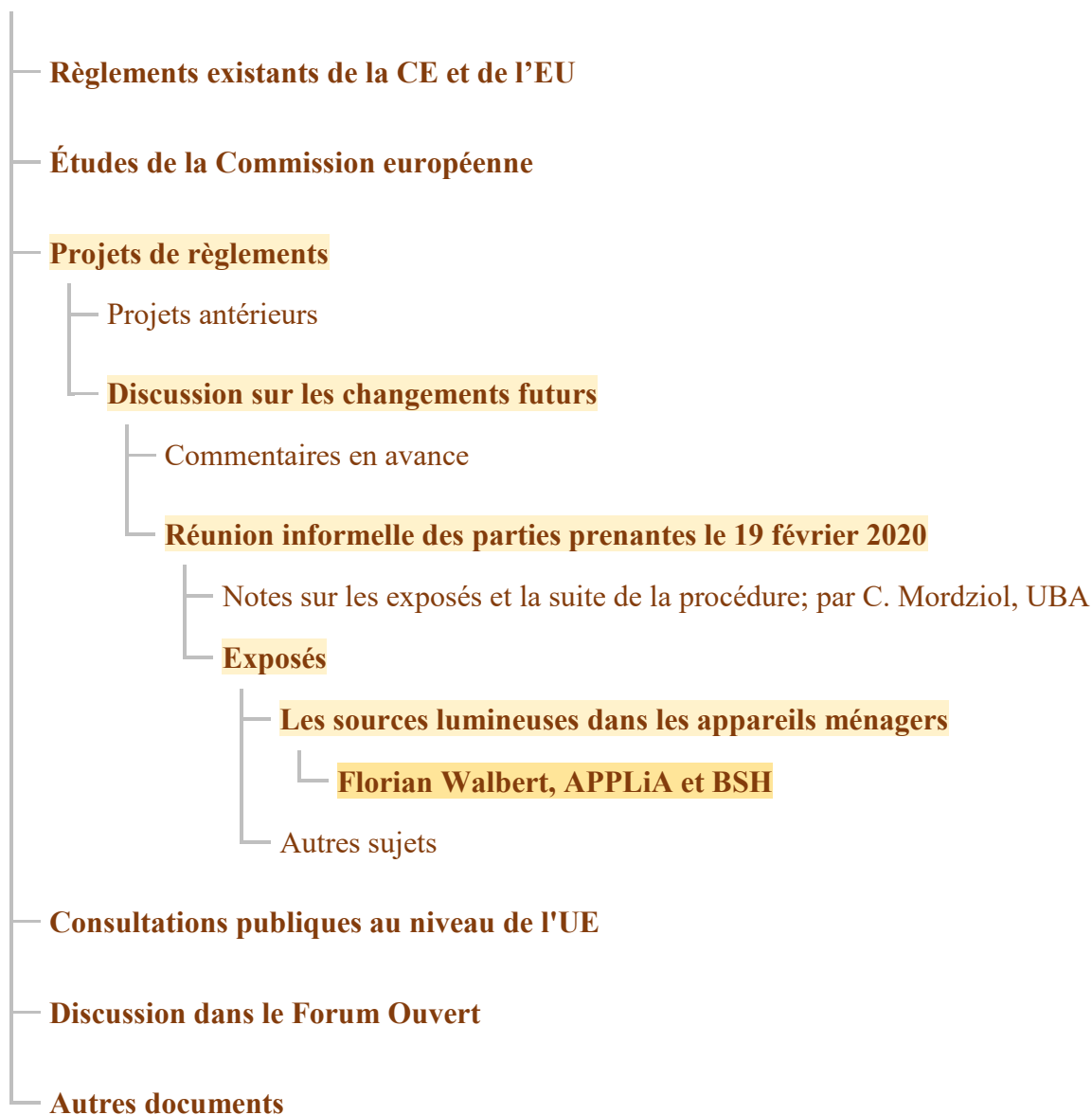
(**abc** = text at hand)



Abbreviations: • APPLiA = European association of manufacturers of electrical household appliances;
<https://www.applia-europe.eu/> • BSH = BSH Hausgeräte GmbH, Germany (household appliances);
<https://www.bsh-group.com/> • EC = European Communities • EU = European Union • SVM = Stroboscopic
 Visibility Measure • UBA = Umweltbundesamt (Federal Environment Agency, Germany)

Documents dans le forum ouvert

(**abc** = présent document)



Abréviations : ● APPLiA : Association européenne des fabricants d'appareils électroménagers ; <https://www.applia-europe.eu/> ● BSH = BSH Hausgeräte GmbH, Allemagne ; <https://www.bsh-group.com/fr/> ● CE = Communauté européenne ● SVM : Indice de visibilité de l'effet stroboscopique ● UBA = Umweltbundesamt (Agence Fédérale de l'Environnement, Allemagne) ● UE = Union européenne

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

**POTENTIAL
ISSUES WITH
REGARD TO THE
ECODESIGN AND
ENERGY
LABELLING
REGULATIONS ON
LIGHT SOURCES,
(EU) 2019/2020
AND
(EU) 2019/2015**



Why Are We Here?



- APPLiA welcomes and appreciates the European Commission's push towards more **energy efficiency of appliances**;
- APPLiA actively supports and collaborates with the Commission to achieve the ambitious goals set by the **Ecodesign Working Plan**;
- However, we feel that the regulations (EU) 2019/2020 and (EU) 2019/2015 and their explicit inclusion of light sources and separate control gears included in containing products have **disproportionate side effects** on household appliances that have not been fully taken into account during the legislative process (see technical examples in next slides);
- APPLiA found several **contradictions, errors and uncertainties** in the wording of the Regulation that need a prompt clarification.

Main Issues



- Household appliances' main purpose is not lighting
 - very different conditions apply compared to traditional lighting applications (limited on-time as per standby regulation, lifetime, safety, moisture, vibrations, ...)
- Manufacturers of household appliances might implicitly become manufacturers of light sources – which in principle we are not

Nevertheless:

1. in the lighting regulation we become **suppliers of light sources** as we are importing components;
2. Definition of containing products in certain cases imply that **an appliance becomes a light source**. It seems in conclusion that a washing machine should be treated and tested as light source (EL Article 2 (3)).

Treatment as Manufacturers of Light Sources/Control Gears



- Certain scenarios of sourcing of components are penalized

From the EC Discussion Paper "ECODESIGN FOR ENERGY RELATED PRODUCTS INTEGRATED INTO OTHER ENERGY RELATED PRODUCTS", 09.03.2015:

Eight cases have to be considered:

Case	Location of component manufacturer	Location of containing product manufacturer	Location of Consumer
1	EEA*	EEA	EEA
2	EEA	EEA	Non-EEA
3	EEA	Non-EEA	EEA
4	Non-EEA	EEA	EEA
5	EEA	Non-EEA	Non-EEA
6	Non-EEA	EEA	Non-EEA
7	Non-EEA	Non-EEA	EEA
8	Non-EEA	Non-EEA	Non-EEA

Cases 2, 5, 6 and 8:

Uncritical as consumer is outside of the EEA, see EU Commission Blue Guide, 2.2: **supply of products** whether for further distribution, for incorporation into a final product, or for further processing or refinement **with the aim to export the final product outside the Union market is not considered as making available.**

Case 1: Light source manufacturer places the component on the union market and has to fulfill all duties

Case 3: Component is exported outside of EEA to be integrated in a containing product, then the containing product is imported into the EEA → no placing on the EEA market for component manufacturer. Manufacturer of containing product imports component into EEA and must thus fulfill all requirements in Article 3.

Case 4: Import of component before integration into containing product → depends on **who** imports it. If manufacturer of containing product, then Case 3 applies, if component manufacturer, then Case 1.

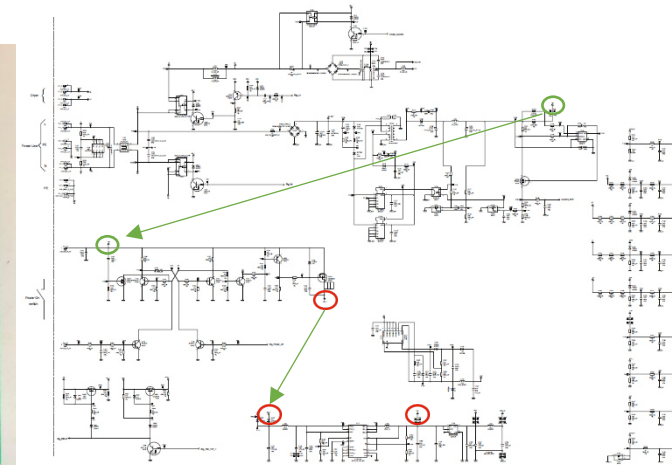
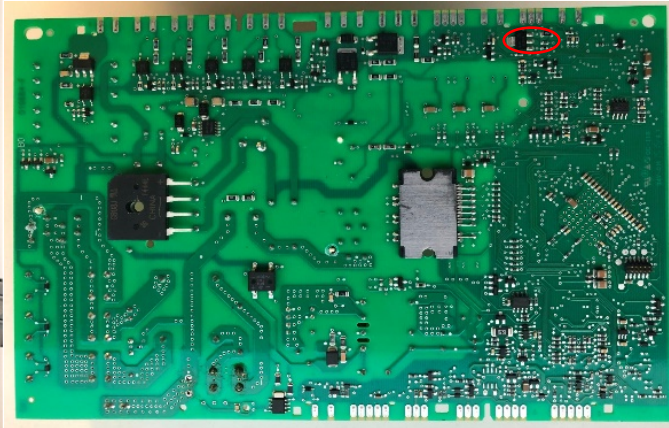
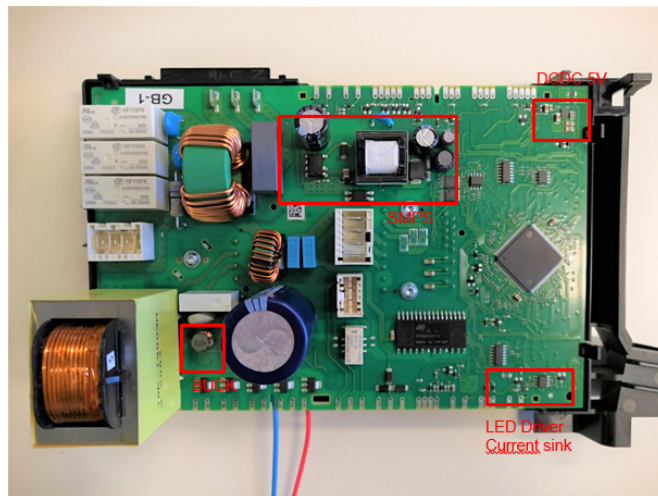
Case 7: The containing product manufacturer imports the component within the containing product into the EEA and is thus responsible for all requirements in the component regulation.

Control Gears in Household Appliances



- State of the art and most resource efficient solution: embedded Control Gears in other electronic components
→ manufacturer of containing products = manufacturer of separate control gears

Example: Washing Machine



Technical Distribution	
Nominal Power SMPS	15W
Max. Light (in theory)	1 W
Share:	6,6%
Percentage of PCB area:	~10%

- Verification procedure for separate control gears
 - many parts serve multiple purposes and the lighting path alone can never be completely isolated
 - control gears are mostly controlled by proprietary bus messages/TTL patterns/... that cannot be reproduced in an isolated setting at MSAs
 - A dedicated mode for verification outside of the appliance (non-lighting parts, 90% of the PCBs, switched off) would **require serious and disproportionate** development efforts

Light Sources in Household Appliances - Proportionality



- Appliance specific ecodesign requirements already consider the relevant energy consumption of an appliance
- Off-mode requirements ensure that light does not remain on for an indefinite amount of time
- Lighting share on annual energy consumption*:

	Dishwasher 1	Dishwasher 2	Fridge 1	Fridge 2	Fridge 3	Oven 1	Oven 2	Washing machine	Dryer
Annual Energy Consumption Appliance	237 KWh	237 KWh	150 KWh	300 KWh	75 KWh	261 KWh	230 KWh	137 KWh	244 Kwh
Annual Energy Consumption Light Source(s)	0,035 KWh	0,093 KWh	0,37 KWh	2,43 KWh	0,37 KWh	0,90 KWh	0,90 KWh	0,03 KWh	0,02 KWh
Share of Light Sources on total consumption	0.01 %	0.04 %	0.25 %	0.81 %	0.49 %	0.34 %	0.39 %	0.02 %	0.01%

- **DIRECTIVE 2009/125/EC, Article 15**
 - 2. (b): “the product shall, considering the quantities placed on the market and/or put into service, have a significant environmental impact within the Community,”
 - 5. (f): “no excessive administrative burden shall be imposed on manufacturers.”
- **REGULATION (EU) 2017/1369, Article 16**
 - 2. (a): “according to the most recently available figures and considering the quantities placed on the Union market, the product group shall have significant potential for saving energy and where relevant, other resources;”

Further Contradictions/Uncertainties



- Light sources/separate control gears need not to be replaceable if technically justified (ED Art. 4 1.)
 - (EU) 2019/2019 requires light sources as spare parts for refrigerating appliances (Annex II 3. (a)(1))
- EL (EU) 2019/2015 Article 3.1 puts obligations for data entry into EPREL only for light sources (assumption: light source is removable, hence containing product not a light source).
 - However Annex V – which refers to Article 3.1 (b) - stipulates that information of the product information shall be entered into EPREL “including when the light source is part of a containing product.”
 - Article 3.2 clearly spells out the obligations of suppliers of containing products. As it is listed as a separate point under Article 3, the obligations of suppliers of containing products are not to be seen as on top of the obligations of suppliers of light sources.
- EL (EU) 2019/2015 Article 3.1 leaves open to further interpretation whether the supplier of the light source to the manufacturer of the containing product has a respective upload obligation into EPREL (“shall ensure” vs. “shall”).

Conclusion



We are concerned in particular for the following provisions set in the regulation:

- Manufacturers of home appliances **fall into the definition of suppliers of light sources** when importing single components;
- **Definitions of light source and containing product contradict each other** (Art 2(1)(d)). According to definition of containing products, an appliance can become a light source. How shall we handle the obligations?
- Several **other contradictions** of the regulation which add uncertainty on the provisions (e.g. *removability requirement for verification, definition of control gear, ...*).

These points need to be clarified in the legal text.

Thank You

APPLiA
Home Appliance Europe



www.applia-europe.eu

