

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)

**Produktgestaltung Anhang III und Produktinformation Anhang IV:
Zusätzliche Ausnahme für Lichtquellen in und für Haushaltsgeräte:
Stellungnahme des Herstellerverbandes APPLiA ^[2]
vom 13. März 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 a future amending regulation (Product Design and Information)

**Product Design Annex III and Product Information Annex IV: Additional
exemption for light sources in and for household appliances:
Comments by the Industry Association APPLiA ^[2] as of 13 March 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 d'un futur règlement modificatif (Conception des produits et informations sur les produits)

**Conception des produits, annexe III et informations sur les produits,
annexe IV : exemption supplémentaire pour les sources lumineuses dans et
pour les appareils ménagers :
Commentaires de l'association de producteurs APPLiA ^[2] de 13 mars 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/>

^[2] <https://www.applia-europe.eu/>

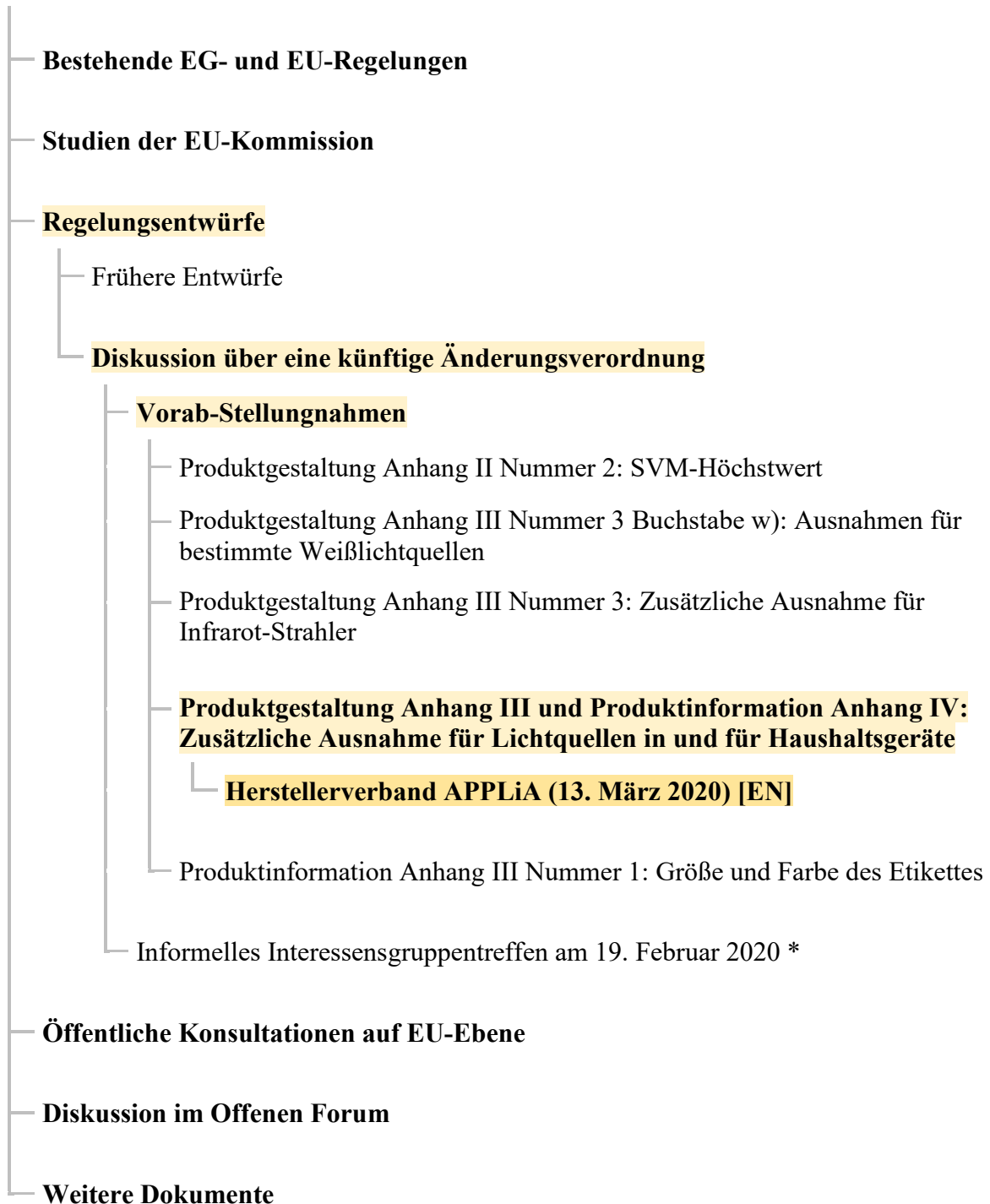
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Texte im Offenen Forum

(abc = vorliegender Text)

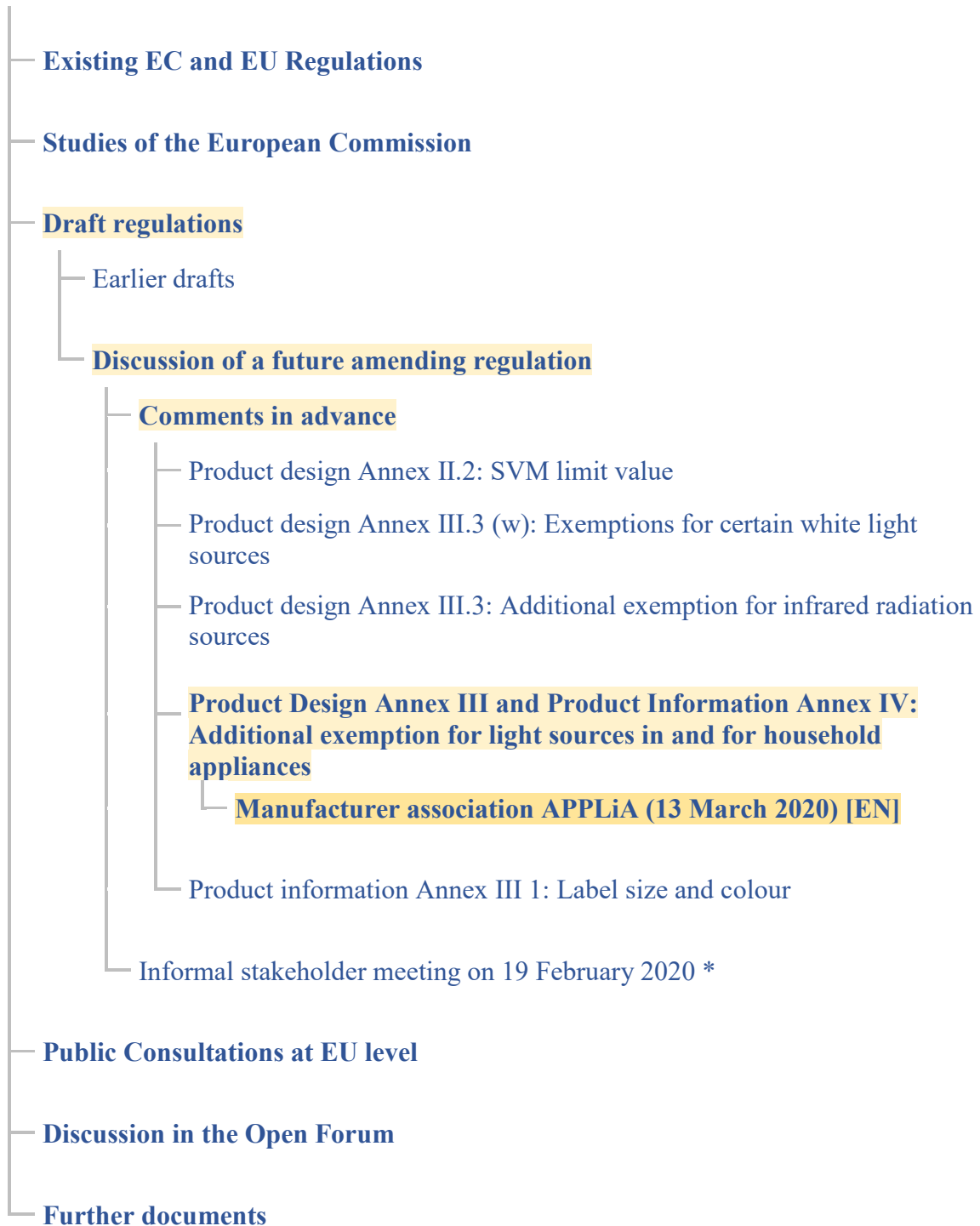


* Stand 20. März 2020: Diese Texte stehen noch nicht zur Verfügung.

Abkürzungen: ● EG = Europäische Gemeinschaft ● EU = Europäische Union ● SVM : Maß für die Sichtbarkeit des Stroboskopeffektes

Documents in the Open Forum

(**abc** = text at hand)

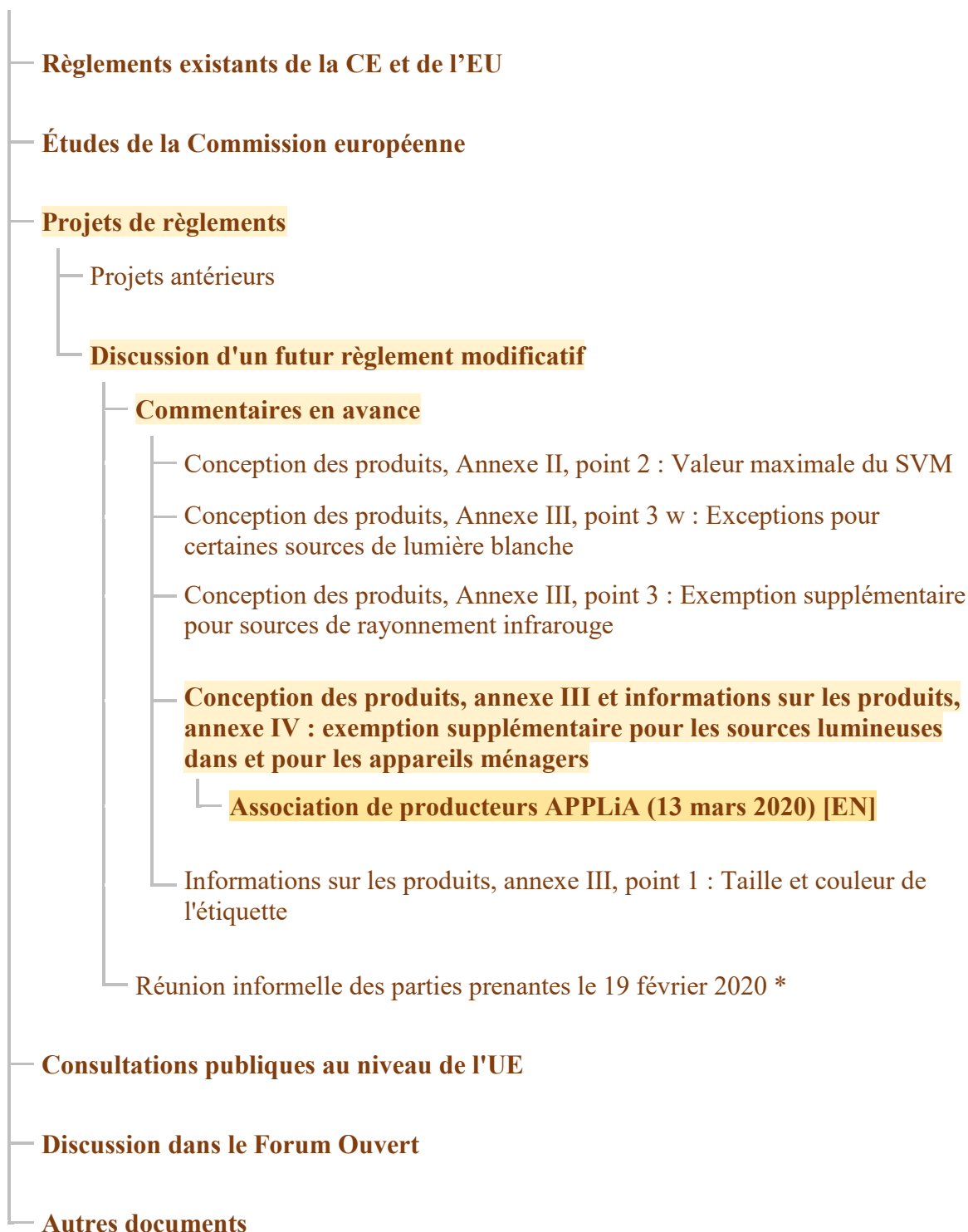


* Status as of 20 March 2020: These texts are not yet available.

Abbreviations: ● EC = European Communities ● EU = European Union ● SVM = Stroboscopic Visibility Measure

Documents dans le forum ouvert

(abc = présent document)



* État au 20 mars 2020 : Ces textes ne sont pas encore disponibles.

Abréviations : ● CE = Communauté européenne ● SVM : mesure de la visibilité stroboscopique
● UE = Union européenne

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

Home Appliances' proposal to amend Lighting Regulations

Summary

Following the Informal Stakeholder meeting on the 19 February organized by the European Commission, APPLiA would like to submit written comments on the issues faced by manufacturers of home appliances in enforcing the requirements set out in (EU) 2019/2020 and (EU) 2019/2015 on light sources and separate control gears.

APPLiA is willing to find a common solution that can allow manufacturers of home appliances to comply with the Regulation to the appropriate extent. Therefore, we recommend amending the Regulation in order to exclude from the scope containing products such as household appliances.

1. Why is APPLiA involved?

APPLiA welcomes and appreciates the European Commission's push towards more energy efficiency of appliances and is actively supporting and collaborating with the Commission to achieve the ambitious goals set by the Ecodesign Working Plan.

Nevertheless, we feel that the ED and EL Regulations on light sources and separate control gears, respectively (EU) 2019/2020 and (EU) 2019/2015, and their explicit inclusion of light sources and separate control gears included in containing products, have **unforeseen and disproportionate side effects** on household appliances that may have not been fully realized and taken into account during the legislative process.

We have also found several contradictions and uncertainties in the wording of the Regulation.

These need to be addressed promptly as some of the legal obligations start to apply already in May 2021.

2. The main issues

As it is easy to understand, household appliances' main purpose is not lighting.

There are indeed very different conditions that apply to light sources integrated in household appliances compared to traditional lighting applications (e.g. *limited on-time* as per standby regulation, the required *lifetime* – intermittent short-time illuminated only when the appliance is running or e.g. when a door is opened, *safety*, *resistance to moisture and high temperature*, *vibrations*, etc.).



The current wording of the published regulations implicitly renders manufacturers of household appliances with the same legal status as manufacturers of light sources, which in principle they are not.

For example:

1. In the lighting regulation EU manufactures of household appliances become **suppliers of light sources** as they are importing components (which in most cases are custom-made products or in-house production and never sold directly to the end-user) into the European Economic Area (EEA);
2. The light source components that manufacturers of household appliances import to the EEA are in the majority of cases of such nature that they **cannot be used for any other application** or directly by the consumer for another purpose. These are for instance very special PCBs (Printed Circuit Boards) with mounted LEDs and these will only operate when connected to the dedicated main PCB of the appliance.
3. Definition of containing products in certain cases implies that **an appliance becomes a light source**. It seems in conclusion that a washing machine should therefore be treated and tested as a light source (EL Article 2 (3)).
4. Separate **control gears that are deeply embedded** in other PCBs in household appliances cannot be verified independently from the other non-lighting parts on the board. Many parts on the PCB serve multiple purposes and the lighting path alone can never be completely isolated. Control gears are mostly controlled by proprietary bus messages/TTL-patterns, etc. that cannot be reproduced in an isolated setting at MSAs.

3. Other issues

There are also other provisions in the Regulations which are not fully clear.

1. Article 4.1 Ecodesign

According to ED Art. 4.1, light sources/separate control gears need not to be replaceable if technically justified. However, the ED for refrigerators (EU) 2019/2019 requires light sources as spare parts for refrigerating appliances (Annex II 3. (a)(1)).

It is not clear which Regulation prevails and which provision manufacturers of home appliances/containing products shall consider.

2. Article 3.2 Energy Labelling

According to EL (EU) 2019/2015 Art. 3.1, there are obligations for data entry into EPREL only for light sources (assumption: light source is removable, hence containing product not a light source).

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.”*

As article 3.2 clearly spells out the obligations of suppliers of containing products. As it is listed as a separate point under Article 3, we assume that the obligations of suppliers of containing products are not to be seen as on top of the obligations of suppliers of light sources.

3. Annex V Ecodesign

In Annex V, the endurance test is defined: the lifetime test requires a test of min. 3000h on-time.

Unlike in traditional lighting applications, 3000h is far beyond the necessary lifetime of a light source in an appliance (where the lamp e.g. is only on when a door is opened). The required test time would



seriously affect product development of household appliances without a related real-life benefit for consumers (test period of 3600h leads to approx. 6 months incl. administrative work).

If it is absolutely necessary, we propose to set a lifetime requirement for light sources in appliances that is relevant for the on-time for light sources used in household appliances.

4. Solution: amend the Regulations

We recommend amending both the EL and ED regulations in the following manner:

1. Remove household appliances whose primary purpose is not lighting from the scope (with the use of an exhaustive list to not create loopholes); **and**
2. Exempt from the Regulations light sources intended for use in the household appliances when placed on the market.

5. Conclusion

In conclusion, APPLiA is calling for amending both Ecodesign and Energy Labelling Regulations to ensure proportionate requirements for light sources contained in household appliances.

We remain open to further discuss in detail possible solutions to ensure that ecodesign and energy labelling measures achieve the most appropriate and proportionate energy saving potentials for each product category.

APPLiA - Home Appliance Europe represents home appliance manufacturers from across Europe. By promoting innovative, sustainable policies and solutions for EU homes, APPLiA has helped build the sector into an economic powerhouse, with an annual turnover of EUR 44 billion, investing over EUR 1.4 billion in R&D activities and creating nearly 1 million jobs.



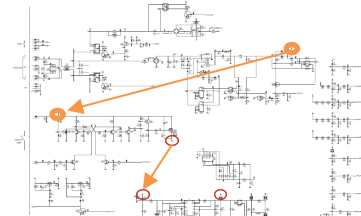
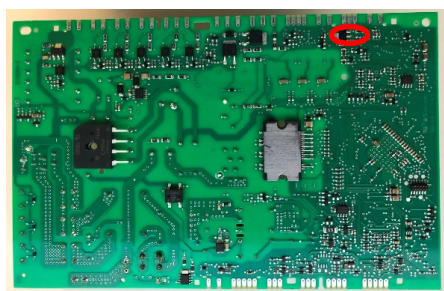
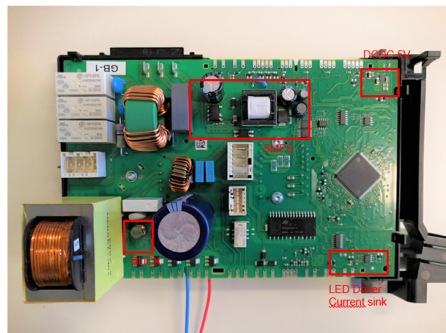


6. Annexes

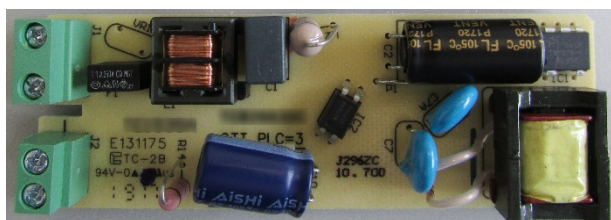
6.1 Annex A: Examples of light sources and control gears used in appliances

1. Control gears in appliances (e.g. ovens and dishwashers) vs control gear in regular application (e.g. spotlight to light the kitchen)

1.1 Control gears for Household or similar appliances:



1.2 Off the shelf separate control gear

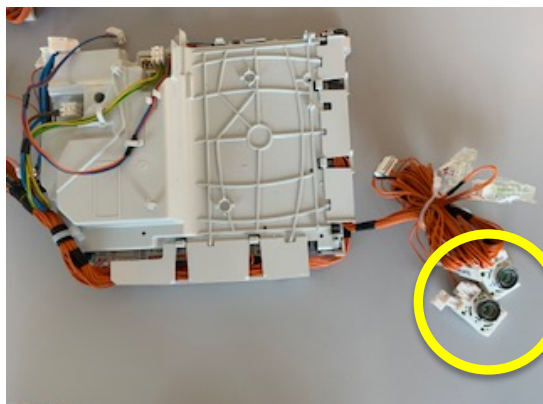


1.3 Control gear to light - for instance - the kitchen:



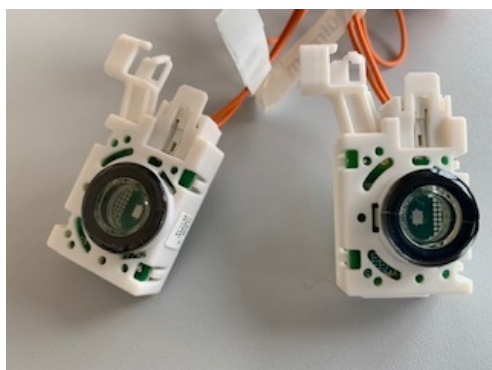


2. Example of light source with small PCB (e.g. dishwasher):



3. Example of LED light bulb used in a dishwasher vs regular LED light bulb:

3.1 LED light bulb (e.g. dishwashers)



3.2 Regular LED Light bulb:





6.2 Annex B: APPLiA's proportional analysis of potential energy saving from current light sources used in appliances¹

	Dishwasher 1	Dishwasher 2	Fridge 1	Fridge 2	Fridge 3	Oven 1	Oven 2	Washing machine	Dryer
Annual Energy Consumption Appliance ¹	237 KWh	237 KWh	150 KWh	300 KWh	75 KWh	261 KWh	230 KWh	137 KWh	244 KWh
Annual Energy Consumption Light Source(s) ²	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%

Appliance specific ecodesign requirements already consider the relevant energy consumption of an appliance and off-mode requirements ensure that light does not remain on for an indefinite amount of time.

¹(In the table, first row) - It refers to the standard annual energy consumption.

²(in the table, second row) - Calculations made by APPLiA according to respective EL/ED regulations for AEC, light for DW 10min/cycle, fridges 20min/d, Ovens 300h per year, WM+TD 10min/cycle