

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



Diskussion über eine künftige Änderungsverordnung (Produktinformation)

Anhang III Nummer 1 – Größe und Farbe des Etiketts: **Stellungnahme des Herstellerverbandes LE ^[2] vom 18. Dezember 2019**

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 Information)

Annex III 1 – Label size and colour: Comments by the Industry Association LE ^[2] as of 18 December 2019

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 (Informations relatives au produit)

Annexe III 1 – Taille et couleur de l'étiquette : Commentaires de l'association de producteurs LE ^[2] de 18 décembre 2019

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] LE = Lighting Europe; <http://www.lightingeurope.org/>

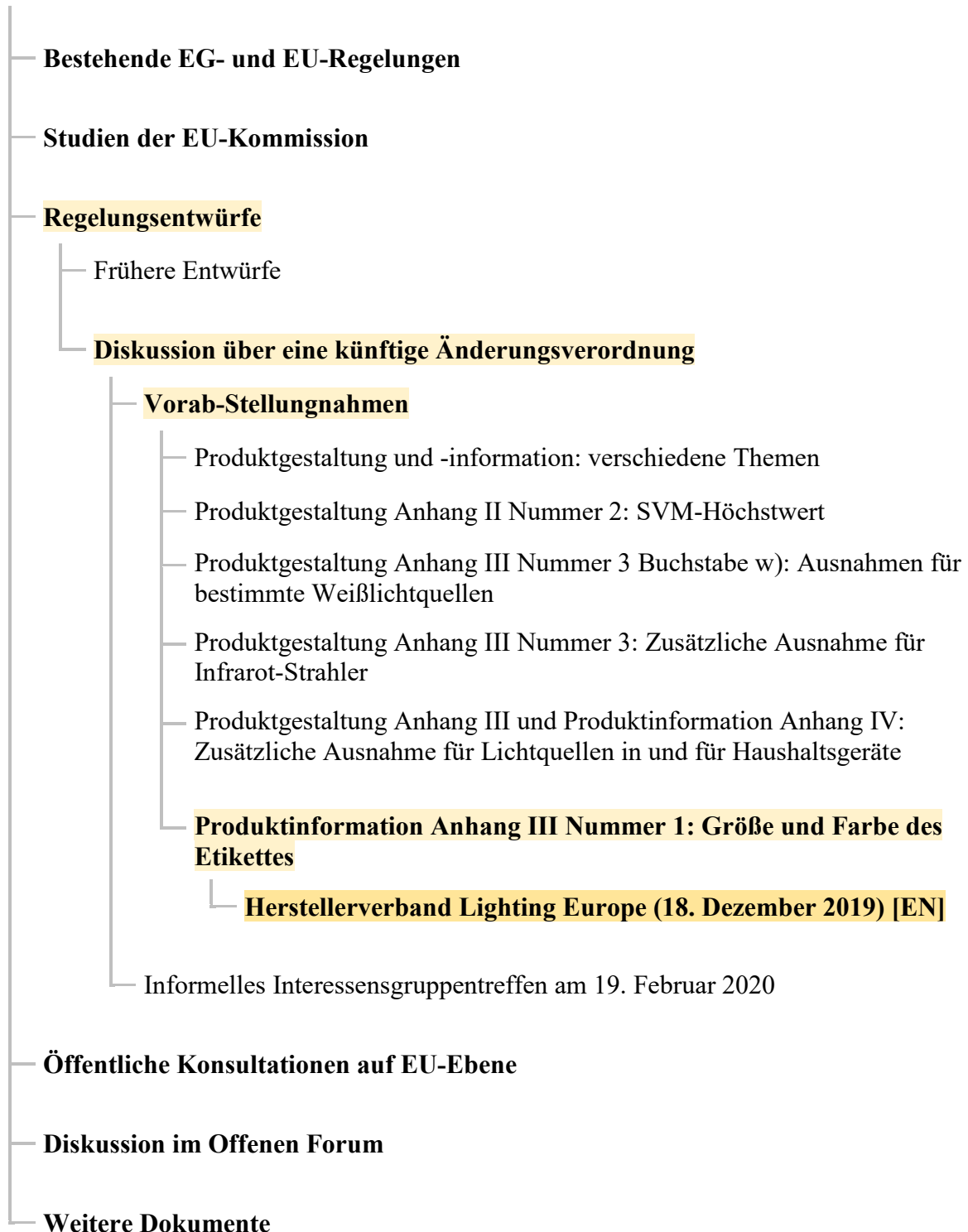
DE: ↓

EN: → page III

FR : → page IV

Texte im Offenen Forum

(abc = vorliegender Text)



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

Documents in the Open Forum

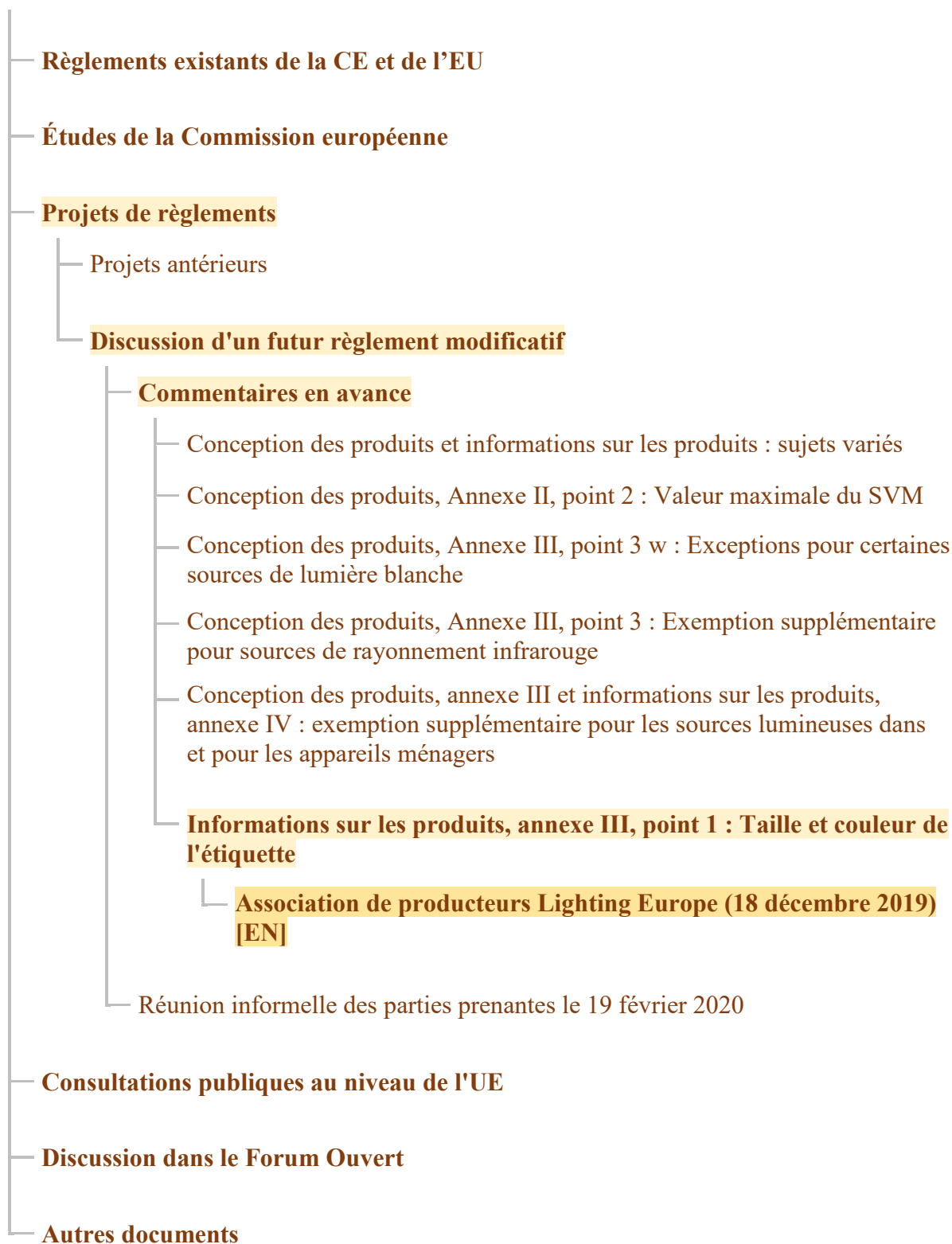
(**abc** = text at hand)



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

Documents dans le forum ouvert

(abc = présent document)



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.

Amending Annex III.1 ELR: labelling colour (1/2)



Proposal to amend Regulation 2019/2015 on the energy labelling of light sources

Introduction

- **What:** allow the use of monochrome energy efficiency label on pre-printed coloured (individual) packaging
- **Why:** continuation of the way of working allowed under Reg. 874/2012 and preventing major packaging setup changes (i.e., investments) for manufacturers, suppliers, and importers
- **When:** same timeline as the regular implementation of Reg. 2019/2015

Issue

- The requirement under Reg. 2019/2015 is limited to a white background for both the multicoloured and monochrome label
- Reg. 2019/2015 has an additional and new requirement for monochrome labels: it may only be used when all the other information, including graphics, are also monochrome

Proposal

Allow the use of pre-printed (individual) coloured packaging in combination with a monochrome energy label

Amending Annex III.1 ELR: labelling colour (2/2)



Proposal to amend Regulation 2019/2015 on the energy labelling of light sources

Amendment for Annex III, Point 1

If the light source is intended to be marketed through a point of sale, a label produced in the format and containing information as set out in this Annex is printed on the individual packaging.

Suppliers shall choose a label format between point 1.1 and point 1.2 of this Annex.

The label shall be:

- for the standard-sized label at least 36 mm wide and 75 mm high;*
- for the small-sized label (width less than 36 mm) at least 20 mm wide and 54 mm high.*

The packaging shall not be smaller than 20 mm wide and 54 mm high.

Where the label is printed in a larger format, its content shall nevertheless remain proportionate to the specifications above. The small-sized label shall not be used on packaging with a width of 36 mm or more.

The label and the arrow indicating the energy efficiency class may be printed in monochrome as specified in points 1.1 and 1.2, ~~only if all other information, including graphics, on the packaging is printed in monochrome.~~

Amending Annex III.1 ELR: packaging size (1/2)



Proposal to amend Regulation 2019/2015 on the energy labelling of light sources

Issue

Annex III.1 states: *“The packaging shall not be smaller than 20 mm wide and 54 mm high”*

There are many products (e.g., G4, GY6.35, G9, MR11, R7s, T5, and a range of special types) that are small or thin, and either the width or the height of their boxes is smaller than respectively 20 mm and 54 mm.

The size of the packaging depends on the size of the product. It doesn't make sense to unnecessarily increase the size of the packaging and produce more waste not just by increasing the size of the box but also by filling the empty space in the packaging with extra material in order to make it safe.

Moreover, the Packaging and Packaging Waste Directive 94/62/EC, Annex II.1 requires:

1. *Requirements specific to the manufacturing and composition of packaging*
 - *Packaging shall be so manufactured that the packaging volume and weight be limited to the minimum adequate amount to maintain the necessary level of safety, hygiene and acceptance for the packed product and for the consumer*

Amending Annex III.1 ELR: packaging size (2/2)

Proposal to amend Regulation 2019/2015 on the energy labelling of light sources

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Suppliers shall choose a label format between point 1.1 and point 1.2 of this Annex.

The label shall be:

- for the standard-sized label at least 36 mm wide and 75 mm high;
- for the small-sized label (width less than 36 mm) at least 20 mm wide and 54 mm high.

~~The packaging shall not be smaller than 20 mm wide and 54 mm high.~~ **Except for packages of smaller size where the supplier name, model identifier, and QR code can be included somewhere else on the packaging than on the label.**

