

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



Entwurf der EU-Kommission vom Januar 2023
Stellungnahme des Herstellerverbandes LE ^[2]
vom 14. März 2023

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

The EU Commission's draft of January 2023

Comments by the Industry Association LE ^[2] as of 14 March 2023

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

Le projet de la Commission Européenne du janvier 2023

Commentaires de l'association de producteurs LE ^[2] du 14 mars 2023

Indication : Veuillez noter que le présent texte n'est disponible qu'en anglais.

^[1] <https://bscw.bund.de/pub/bscw.cgi/193290000/index.html>

^[2] LE = Lighting Europe; <http://www.lightingeurope.org/>

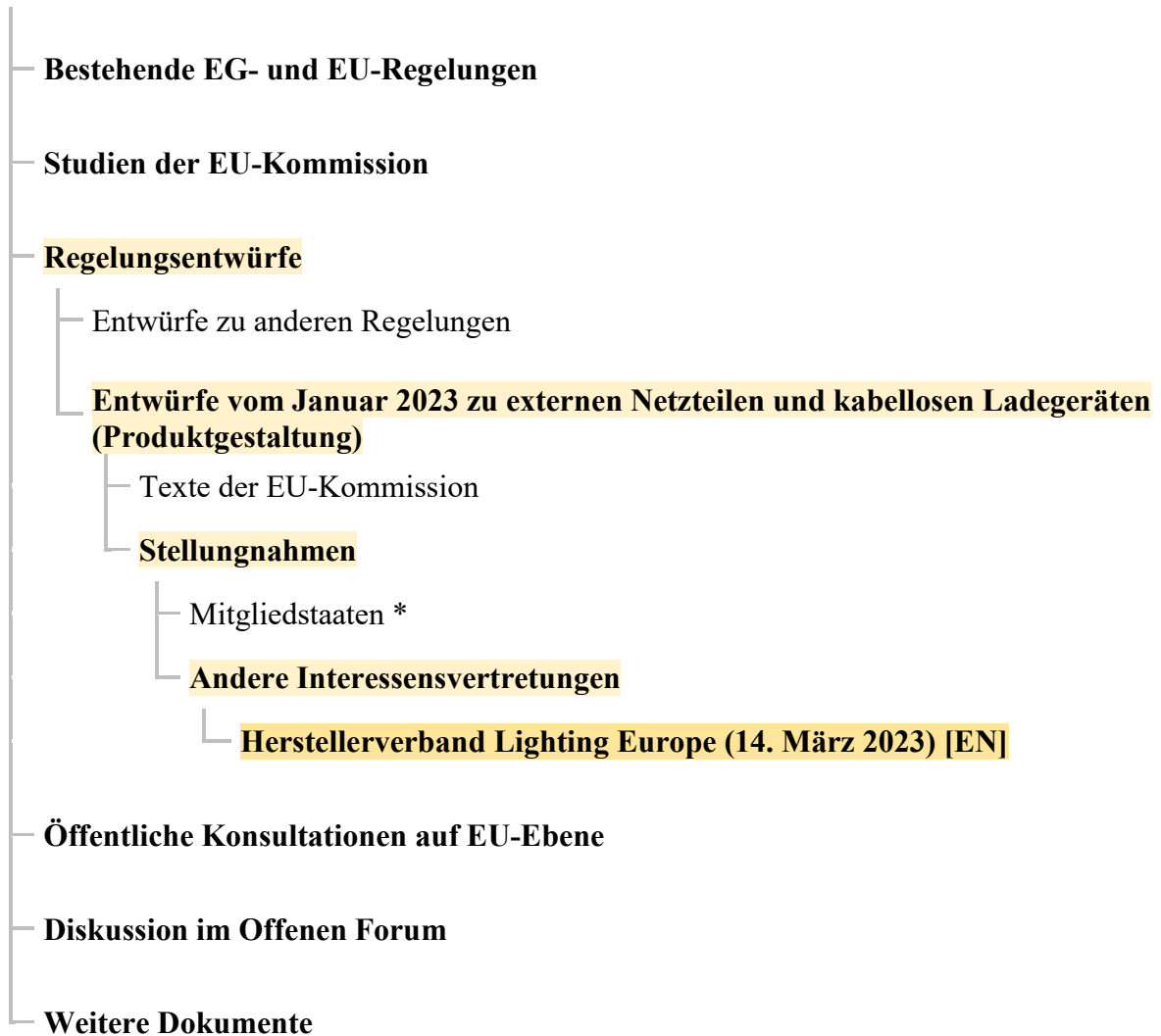
DE: ↓

EN: → page III

FR : → page IV

Texte im Offenen Forum

(**abc** = vorliegender Text)

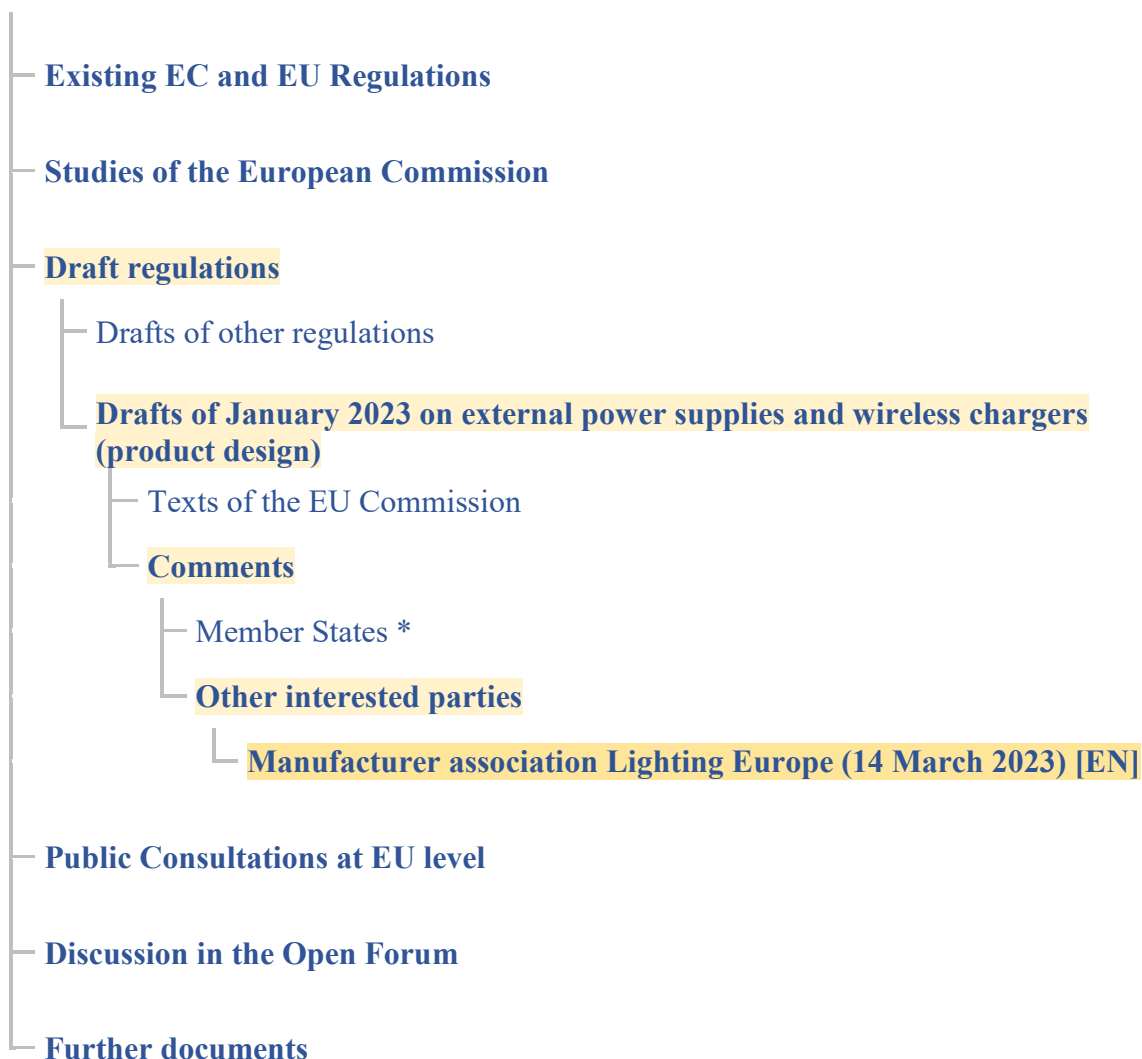


* Stand 5. April 2023: Dieser Text steht noch nicht zur Verfügung.

Abkürzungen: ● EG = Europäische Gemeinschaft ● EU = Europäische Union

Documents in the Open Forum

(**abc** = text at hand)

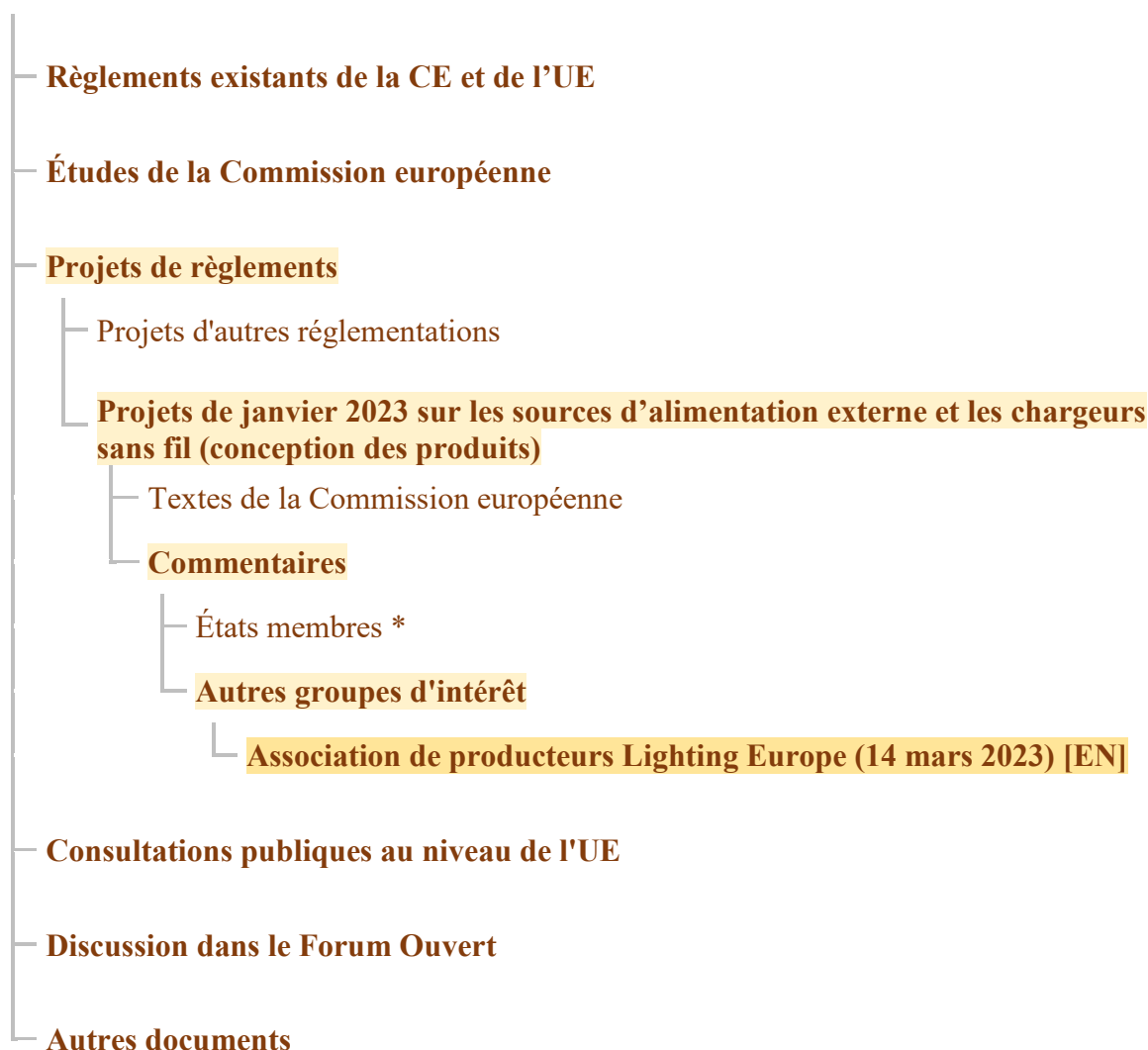


* Status as of 5 April 2023: This text is not yet available.

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

Documents dans le forum ouvert

(**abc** = présent document)



* État au 5 avril 2023 : 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.

Comments on the proposed review of the Regulation (EU) 2019/1782 of 1 October 2019, laying down ecodesign requirements for external power supplies

Introduction

This paper has been prepared by LightingEurope in response to a working document¹ for a future Commission's proposal for setting down ecodesign requirements for external power supplies and the European Commission Ecodesign Consultation Forum that took place on 16 February 2023.

As lighting products are proposed to be included in the scope, we would like to share some comments and proposals to address the unclear scope and definitions, the possible mandatory requirements on USB receptacles and our remarks on the proposed energy efficiency requirements, which look particularly ambitious compared to the existing ones in Regulation (EU) 2019/2020 for light sources.

Scope: our proposal for lighting products in Annex I

Lack of clarity regarding which lighting products are explicitly in scope

The scope as proposed in the working document is unclear. While the Commission's intention is to include some household lighting products in the scope, we still have some doubts regarding which products are included.

- 1) **What is meant by 'Other Household Appliances' and 'Other Consumer Electronics'?** Annex I includes 'Other Household Appliances' and 'Other Consumer Electronics' into the scope without a definition of the terms 'Household Appliances' or 'Consumer Electronics'. In order to ensure a level playing field, these terms need to be clearly and unambiguously defined either in this regulatory text or by reference to another source where they are defined. In our

¹ Shared by the European Commission to the members of the Ecodesign Consultation forum at the end of 2022.

understanding, lighting equipment, including light sources, luminaires, control gear and controls, are not included in this category.

- 2) **Is Annex I an exhaustive list?** We have doubts whether the product categories listed in Annex I “List of electrical and electronic household and office equipment” are the only ones in scope or not.
- 3) **Which lighting products are explicitly in scope?** If product categories in the above-mentioned list in Annex I are the only ones in scope, we still have doubts concerning which products are included in the proposed lighting-related categories of Point 7 in Annex I.

Our proposal to the List of electrical and electronic equipment

Given the lack of clarity of the draft text, we propose to delete the reference to ‘Table-top LED lighting equipment’ and ‘Lighting equipment with rechargeable batteries for use in household environments’ and to focus only on the products that raised the attention of Market Surveillance authorities, i.e. night lights and power strips as clarified during the Consultation Forum on 16 February. The current text could be modified as proposed below:

Annex I - List of electrical and electronic equipment

Commission’s working document	LightingEurope proposal
<p>7. Lighting equipment:</p> <ul style="list-style-type: none"> — Table-top LED lighting equipment; - Lighting equipment with rechargeable batteries for use in household environments. 	<p>7. Lighting equipment:</p> <ul style="list-style-type: none"> - Power supplies with an USB output or used in products with USB output

Below some pictures with examples of power supplies with an USB output or used in products with USB output.



Definitions: our proposal on containing product

Inconsistencies with existing Ecodesign regulations

The introduction of containing product in the current proposal leads to confusion with the definition of control gear in other regulations and potentially brings many kinds of luminaires in scope.

At definition level we note some inconsistencies with existing legislation, particularly:

- **‘Light converter’** may cause confusion with the term Separate Control Gear in Regulation (EU) 2019/2020 and its definition. This could lead to multiple and conflicting requirements for the same kind of product arising from different regulations (Standby Power, Reg. EU 2019/2010, External Power Supplies).
- **‘Containing product’**: the definition in the proposal conflicts with the one in Regulation (EU) 2019/2020. A luminaire is also a 'containing product' that could include an external power supply and a light source as part of the same product.
- **‘Low voltage external power supply’**: the definition conflicts with the current definition of Low Voltage at EU level.

Our proposal on containing products and on other definitions

LightingEurope proposes not to introduce the definition of containing product. The definition, as it is written in the current proposal, will lead to confusion with the one of control gear in other pieces of legislation and could, for example, bring emergency lighting equipment in scope. Instead, we propose to keep the current definition of external power supply as in Regulation (EU) 2019/1782 and to explicitly mention the products in scope in the Annex (for the latter, please see the above section for our proposal to clarify the scope).

For the other definitions, we propose that, when possible, they are replaced by the existing ones in EU (EN) standards.

USB receptacles and the risk of re-designing luminaires

The current text seems to require that power supplies designed for lighting equipment shall be equipped with USB

The current working document suggests that lighting products in scope (Table top LED and Lighting equipment with rechargeable batteries for use in household environments) shall be equipped with USB.²

In Regulation (EU) 2019/2020, 'Separate control gears' that provide the necessary power for lighting products are allowed to use USB, but this is not mandatory.

Mandating the use of USB would create a burden to modify products already designed to comply with all the currently applicable requirements for control gears.

As an example, control gears designed for constant current to drive the LEDs require additional electronics to first derive the appropriate constant voltage delivered by the USB-C power supply and then convert that again in the correct constant current required by the LED. **A further example** is a control gear designed for constant voltage (12/24/48V), higher than the constant voltage used for USB connections. Redesigning would cause additional costs and additional energy use due to the additional electronics required for the double conversion.

Our proposal: USB power supplies should remain optional to power lighting equipment

LightingEurope recommends allowing the use of USB power supplies to power lighting equipment, but not to mandate it. However, if a power supply with a USB connector is used to power lighting equipment, that power supply shall comply with the proposed legislation.

Our proposal: an exemption for Power Supplies intended for use in inaccessible locations

Power supplies can be designed and marketed for use in inaccessible locations such as behind walls or above ceilings in buildings where they are expected to remain untouched for many years of reliable service. We are concerned that the electromechanical connection made by USB plug/socket systems, for some applications, is not reliable enough to perform properly over such long-installed lifetimes, potentially leading to failure and early maintenance activities that would be avoided by hard-wired power supply cables.

This confirms our position that USB should not be mandated for lighting products, but the problem is more of a general nature, beyond lighting products. Therefore, we propose introducing an exemption to this USB requirement for products designed and marketed solely for use in inaccessible locations.

Too ambitious limits for no load and low load conditions

We have concerns that the proposed limits for no load and low load are too ambitious. In the table below, on the left, you can compare the differences in the efficiency values calculated with the Lighting EU 2019/2020 regulation A.C./D.C.; on the right are shown

² According to the proposed requirements for the different stages in Annex II about products listed in Annex I of the same Regulation.

the values calculated with the limits proposed in the working document on the Regulation on External Power Supply.

Regulation 2019/2020 A.C./D.C. At full load only			New Regulation power supply A.C./D.C. (1<Po<49W) Average among values at 100%; 75%; 50% and 25% load		
W	h_{min}		W	h_{min}	
2	0,437101		2	0,716413	
3	0,512168		3	0,743801	
4	0,563951		4	0,762827	
5	0,602325		5	0,77727	
6	0,632133		6	0,788815	
7	0,656082		7	0,79836	
8	0,675818		8	0,80644	
9	0,692411		9	0,813403	
10	0,706588		10	0,819484	
11	0,718863		11	0,824851	
12	0,729609		12	0,829628	
13	0,739108		13	0,833911	
14	0,747574		14	0,837773	
15	0,755173		15	0,841272	

Contact

For further information on this topic, please contact Elena Scaroni, Policy Director, through elena.scaroni@lightingeurope.org.

LightingEurope is the voice of the lighting industry, based in Brussels and representing 30 companies and national associations. Together these members account for over 1,000 European companies, a majority of which are small or medium-sized. They represent a total European workforce of over 100,000 people and an annual turnover exceeding 20 billion euro. LightingEurope is committed to promoting efficient lighting that benefits human comfort, safety and wellbeing, and the environment. LightingEurope advocates a positive business and regulatory environment to foster fair competition and growth for the European lighting industry. More information is available at www.lightingeurope.org.