

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



**Entwurf der EU-Kommission vom Januar 2023**  
**Stellungnahme der Niederlande <sup>[2]</sup>**  
**vom 2. 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 <sup>[1]</sup> of the Federal Environment Agency (UBA), Germany

The EU Commission's draft of January 2023  
**Comments by the Netherlands <sup>[2]</sup> as of 2 March 2023**

**FR:** Informations sur réglementations de l'UE concernant l'éclairage – l'écoconception et l'étiquetage énergétique – Compilation <sup>[1]</sup> de l'Agence Fédérale de l'Environnement (UBA), Allemagne

Le projet de la Commission Européenne du janvier 2023  
**Commentaires des Pays-Bas <sup>[2]</sup> du 2 mars 2023**

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

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

<sup>[2]</sup> <https://www.rvo.nl/>

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EN: → page III

FR : → page IV

## Texte im Offenen Forum

(**abc** = vorliegender Text)



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

## Documents in the Open Forum

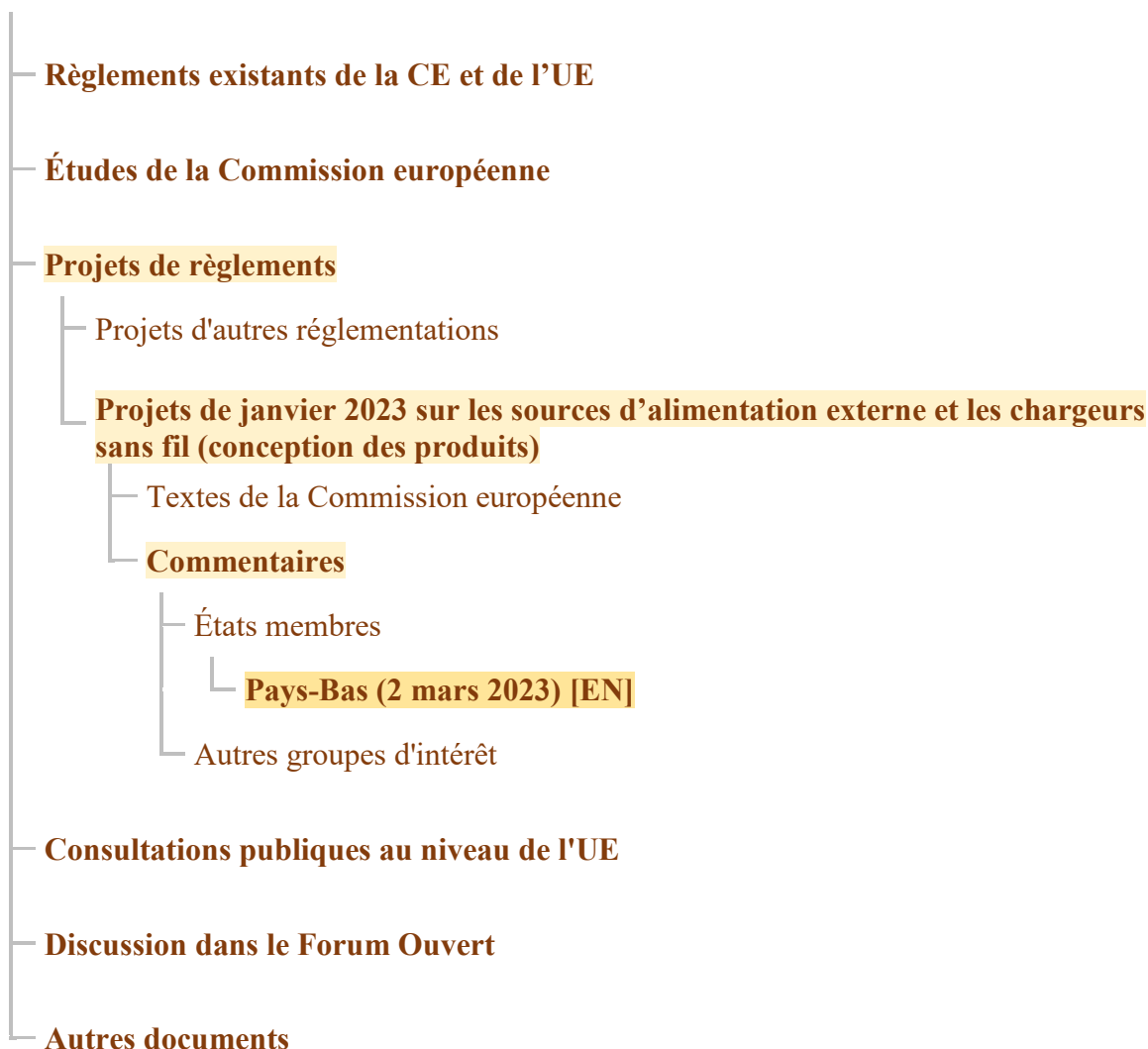
(**abc** = text at hand)



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

## Documents dans le forum ouvert

(abc = présent document)



Abréviations : ● CE = Communauté européenne ● UE = Union européenne

Der Inhalt des folgenden Originaltextes bezieht sich nur in Teilen auf Beleuchtungsprodukte. Der Herausgeber hat Textteile mit Bezug zu Beleuchtungsprodukten durch gelbe Hinterlegung hervorgehoben, damit diese schnelle gefunden werden können.

**EN:** The content of the following original text refers only in part to lighting products. The publisher has highlighted parts of the text that refer to lighting products in yellow so that they can be found quickly.

**FR :** Le contenu du texte original suivant ne se rapporte qu'en partie aux produits d'éclairage. L'éditeur a surligné en jaune les parties du texte qui se rapportent aux produits d'éclairage afin de pouvoir les retrouver rapidement.

# Comments on the proposal for revision of the ecodesign EPS regulation

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Hans-Paul Siderius (Netherlands Enterprise Agency) – 2 March 2023

## Introduction – main comments

The Netherlands welcome the revision of the ecodesign EPS regulation ((EC) 278/2009). The main comments are:

- We agree with the extension of the **scope**, but not with the inclusion (in general) of ‘containing products’. On the other hand lighting equipment in general should be included in Annex I to cover external power supplies used with this equipment, noting that external power supplies are not control gear as defined in Article 2(2) of (EU) 2019/2020.
- In our opinion, a requirement on **idle no-load power** consumption is not feasible because this power consumption is to a large extent determined by the product and not by the external power supply.
- The **design requirement for charging equipment** is too restrictive, i.e. this requirement should only apply if these products are used with an external power supply.
- Since the intention of the regulation is to enable interoperable use of external power supplies, in our opinion all external power supplies should be able to safely function in all household environments (dry and wet), unless this would to significant extra costs for consumers.
- Please add a definition of ‘**declared values**’ and ensure that the term ‘declared’ is only used in the requirements for the content of the technical documentation.

In order not to delay the entry into force of the revised regulation, we ask the Commission to do their best to publish the revised regulation before the ESPR enters into force.

Further detailed comments and suggestions are included in the working documents in track changes.

## Scope (Articles 1-2 and Annex I)

We agree with the extension of the scope as indicated by Annex I. However, the clear distinction between the *external* power supply and the (part of the) product that is powered by the EPS is not always maintained. A table-top lighting equipment is mentioned as containing product (Article 2.27) and it is mentioned in Annex I as a product that can be used with an external power supply: the first one is a table-top lighting equipment with external power supply function, the second one is a table-top lighting with USB receptables powered by an external power supply. However, the second variant would be covered twice: as external power supply and as table-top lighting equipment.

According to Article 1.1 wireless chargers are in scope, but they are not mentioned in Annex II. Only wireless charging pads are mentioned under design requirements. It also seems that there is no link between wireless charger (Article 2.21) and wireless charging pad (Article 2.22). Furthermore, the definition of charger (Article 2.20) seems superfluous, since it is not used (note that in Annex II.2 charging equipment is used).

We do not agree with the definition of ‘containing product’ (Article 2.27). This definition is too broad; it would include e.g. monitors and laptops that have an USB port that can power other products. Also from the definition it is unclear whether a containing product *is* an external power supply and therefore would be covered by the requirements. It seems that the definition wants to express that

external power supplies in products that have other functions are covered. We suggest to remove the definition of containing product and – if necessary – explicitly define products like wall sockets with USB receptacles and indicate that these are covered too.

We agree with the inclusion of lighting equipment in Annex I. However, the list of lighting products is very limited. How is the relation with the light source regulation (EU) 2019/2020? In the definition of control gear (Article 2(2) of (EU) 2019/2020) (external) power supplies are considered *not* to be control gear; the same holds for Power over Ethernet switches. The definition of non-mains light source (NMLS) (Annex I (2) of (EU) 2019/2020) indicates that a NMLS requires a separate control gear, however this cannot be a external power supply. Therefore, lighting equipment in general should be included in Annex I in order to cover external power supplies used with this equipment. It can be clarified in a recital that external power supplies are not control gear as defined in Article 2(2) of (EU) 2019/2020.

## Circumvention and software updates (Article 6)

We suggest to separate the requirements on circumvention and software updates in two articles since these are different requirements.

## Requirements

### Energy efficiency requirements (Annex II.1)

At the Consultation Forum meeting on 16 February 2023, it was remarked that some external power supplies do not function at low load, i.e. they switch off below a load of e.g. 20%. With regard to the interoperability of external power supplies, it is questionable whether this should be allowed. If such functionality is needed by the product, then the *product* should be designed in a way that below a certain load no power is requested from the external power supply. All non-adaptive external power supplies should be able to deliver power at 10% load. An external power supply that is not able to deliver power at the 10% load point (or at any of the other specified load points) does not comply with the regulation.

Point 1(b) contains a power consumption requirement for the idle no-load condition, i.e. the condition where the load is connected to the external power supply but is not providing any main function<sup>1</sup>. However, this is not a no-load condition since the idle condition involves some load. This power consumption is (to a large extent) not determined by the external power supply but by the product connected to the external power supply. Therefore, it does not seem feasible to set this requirement in this regulation. We suggest to delete this requirement. Note that setting a requirement on the efficiency at low load (10%) should give some reassurance that the power provided at the idle condition is delivered at a minimum efficiency.

What could be investigated is whether it is useful to set a requirement on the no-load condition with cable connected to the external power supply but not to the product<sup>2</sup>. In principle the power consumption in this condition should not be different from the power consumption in the no-load condition without cable connected.

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<sup>1</sup> Note however that the idle no-load condition is not defined.

<sup>2</sup> This is a relevant situation where consumers keep the external power supply connected to the mains and connect a product, e.g. a smart phone or laptop, when it needs to be charged, especially in the (future) situation where one external power supply can be used to charge various product (consecutively).

## Design requirements (Annex II.2)

The requirement in Point 2(h) implies that wireless charging pads, battery chargers (except those with an integrated non-detachable cordless AC power plug), charging stations and docking stations for autonomous appliances shall have an external power supply. How would this work for these products that have an input power higher than 250 W? In general, this seems a too restrictive requirement. More appropriate would be to require this only if these products are to be used with an external power supply.

During the Consultation Forum meeting on 16 February 2023 the issue of requiring a USB receptacle for external power supplies for use in other than dry environments was discussed. Since the intention of the regulation is to enable interoperable use of external power supplies, we think that either all external power supplies should be able to safely function in all household environments or a clear distinction should be made between external power supplies for dry and those for other environments. This distinction should be clear for consumers. Unless the first option (all power supplies can function in all household environments) comes with significant extra costs for consumers, we would prefer the first option. Note that in both cases the assumption is that external power supplies comply with (existing) safety regulations; i.e. the ecodesign regulation should not try to “correct” or “compensate” for possible unsafe situations caused by not complying with safety regulations.

## Information requirements (Annex II.3)

The information requirements include information that should be freely available (Point 3(d)) and information that is to be included in the technical documentation (Point 3(e)). Please note the following:

- A definition of declared values is missing.
- The technical documentation (and not the information for end-users) should contain declared values. Therefore, the word ‘declared’ should not be used in the table in Point 3(d).
- The word ‘measured’ in the tables in Point 3(e) should not be used, since this could give the impression that the values from the test report would need to be provided here. However, these are the declared values which can be “worse” (for the manufacturer) than the measured values, e.g. to take into account production variation. Annex IV 2(a) and (b) clarify the relation between measured values, declared values, information values and requirements.

Further note that since the average active efficiency is – by definition – calculated from the efficiencies in load conditions 1-4, it should be decided whether the verification is on the efficiencies in the load conditions 1-4, on the average active efficiency or on both.

## Verification procedure (Annex IV)

We do not agree with the use of the wording ‘implicit verification tolerance’. Setting a tolerance of zero is not an ‘implicit’ tolerance.

Note that if a requirement at the idle no-load level is set, a verification tolerance for this parameter is needed.