

EURIC comments

Concerning the draft Regulation for lighting products, our only comment relates to the **Article 4: “Removal of light sources and separate control gears”**.

At recycling stage, the WEEE Directive (2012/19/EU) requires to remove the lamps from WEEE as part of the depollution stage (Annex VII), and the Ecodesign requirements should mirror those of the WEEE Directive, in the sense that the design of products should facilitate their treatment at end-of-life.

However, the wording “readily removable” that is used within this article is not ideal. The term “readily” has been used in the Batteries Directive (2006/66/EC) and the [report](#) “*Regulatory barriers for the Circular Economy – Lessons from ten case studies*” specifically identified it as “*lacking concreteness*”: “*The key barrier in this case is the lacking concreteness of these design requirements: The wording in the Directive especially leaves open the question of how “readily removable” should be defined.* We therefore urge the Commission to find a more adequate wording and refrain from using this term in any other draft Ecodesign Regulation.

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