



**ECODESIGN CONSULTATION FORUM  
ON THE REVIEW OF THE ECODESIGN AND ENERGY LABELLING REGULATIONS FOR  
LIGHTING PRODUCTS**

**MEETING 07-12-2017**

**PT COMMENTS, on the basis of the above referred meeting and the documents  
distributed**

**General comments**

We thank the Commission for the effort to further reflect on the review of these documents and to streamline the regulatory approach through the unification of the ecodesign regulation and the revision of the energy labelling regulation for lighting products.

**Specific comments**

**Draft Ecodesign Regulation and draft Energy labelling regulation – common aspects**

- Definitions of “**light sources**”, “**containing products**” and “**separate control gears**” need to be clarified, in order to avoid loop-holes and ambiguities. Furthermore the list referring to lighting technologies 1 (d) of the definition “light sources” should be rephrased “using namely...” to avoid an outdated wording, in case new lighting technologies/products emerge.
- Definitions must be aligned between both texts. For example - the definition of “**portable battery-operated product**” uses a different wording in ED and EL.
- We ask to exempt light sources that are placed on the market in a containing product already covered by ecodesign or energy labelling regulation.

**Draft Ecodesign Regulation**

A transition to new technologies and products, without undesired/unexpected disruptions, should be pursued. With that in mind:

- We underline the opportunity of a further scrutiny on the exemptions provided by the draft Regulation, in order to test if the proposed exemptions are adjusted, namely, to the necessities of special uses, especially in professional lighting applications and also on some temporary (transitional) exemptions, for specific and exceptional cases, like T8, where replacements might not be already available for all applications (**article 1 and Annex I**);
- We appreciate that the Commission presents an “accelerated endurance test” (**Annex V**) in order to reduce the duration and costs of testing, however “Early failure” testing is still the most effective method. Accelerated endurance tests and temperature cycle test run the risk of introducing failure modes that do not occur during normal operation. We also think that the proposal from CLASP on LED life time testing,



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considering switching cycles, lumen maintenance and premature failure rates could be taken for further discussion.

- Although we welcome an approach that may drive some issues of circular economy in the EU (**Article 4**), we question the obligation that light sources and/or control gears can be readily removed from any product if the life span of the containing product is shorter than the lighting product.

On **Annex II**, the definition 11 “useful luminous flux” refers to a fraction of the total luminous flux that depends on the specific application. Therefore it would be more precise and less prone to bias to use “total luminous flux”.

On **Annex III**, we can support the comment made by other Member States on functional requirements, asking the Commission to consider switching to R 1-14 when assessing the colour rendering of a light source, due to the fact that the currently used Ra does not address sufficiently the need of the consumer. This applies especially for LED where there is a tendency to optimize leaving out R9 which leads to less acceptance of LED light by consumers.

Furthermore we think that the following comments from CLASP are worth further consideration:

- ED 3) – switch to CIE uniform colour space and expand scope of coverage slightly;
- ED.10) Eliminating CFLni pin-based lamps.

### **Draft Energy labelling regulation**

As a general comment we would like to highlight that consistency should be taken into account, between delegated regulations and the framework regulation for energy labelling, not repeating obligations already stated in the framework regulation.

On **article 3** – “obligations of suppliers”:

- Exempt luminaires (under 874/2012) from EPREL scope (to register data for luminaires into the product database). Therefore we tend to agree with other Member States suggesting to repeal articles 3.2 and 4.2 of Regulation (EU) N° 874/2012 as of the day of entry into force of the new Regulation and not as the day of its application, in order to make clear that there will be no obligation to enter data for luminaires in the product data base.
- Exempt “containing products” from the EPREL scope.

On **article 4** – “obligation of dealers” and taking into account the possibility referred in paragraph 13, article 11 of the framework Regulation, on specific rules for energy labels printed on the packaging, we think that the time to relabel products in this specific case needs to be adjusted to reality, *i.e.*, the shops, some of them SMEs will be overwhelmed by a large number of units to be relabelled with a sticker on the package. We support the proposal of other Member States on this issue, to allow for six weeks to relabel and to let the shops put up



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billboard signs with the new label, as from day 1 of the rescaling process during, at least, the six week period, as a way to inform the consumer.

On **Annex III**, “label for light sources”, we also consider useful that the results from the consumer survey should be taken into account.

On **product information (Annex V)**, like other Member States suggested we also think it would be adequate to maintain the tables of equivalence to incandescent lamps in order to prevent inappropriate advertising statements and to help a smooth transition, not disrupting the terms of comparison for final consumers.