

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



**Entwürfe der EU-Kommission vom 6. Oktober 2020
Stellungnahme des Herstellerverbandes EFIC ^[2]
vom 3. November 2020**

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 drafts of 6 October 2020

Comments by the Industry Association EFIC ^[2] as of 3 November 2020

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

Les projets de la Commission Européenne du 6 octobre 2020

Commentaires de l'association de producteurs EFIC ^[2] du 3 novembre 2020

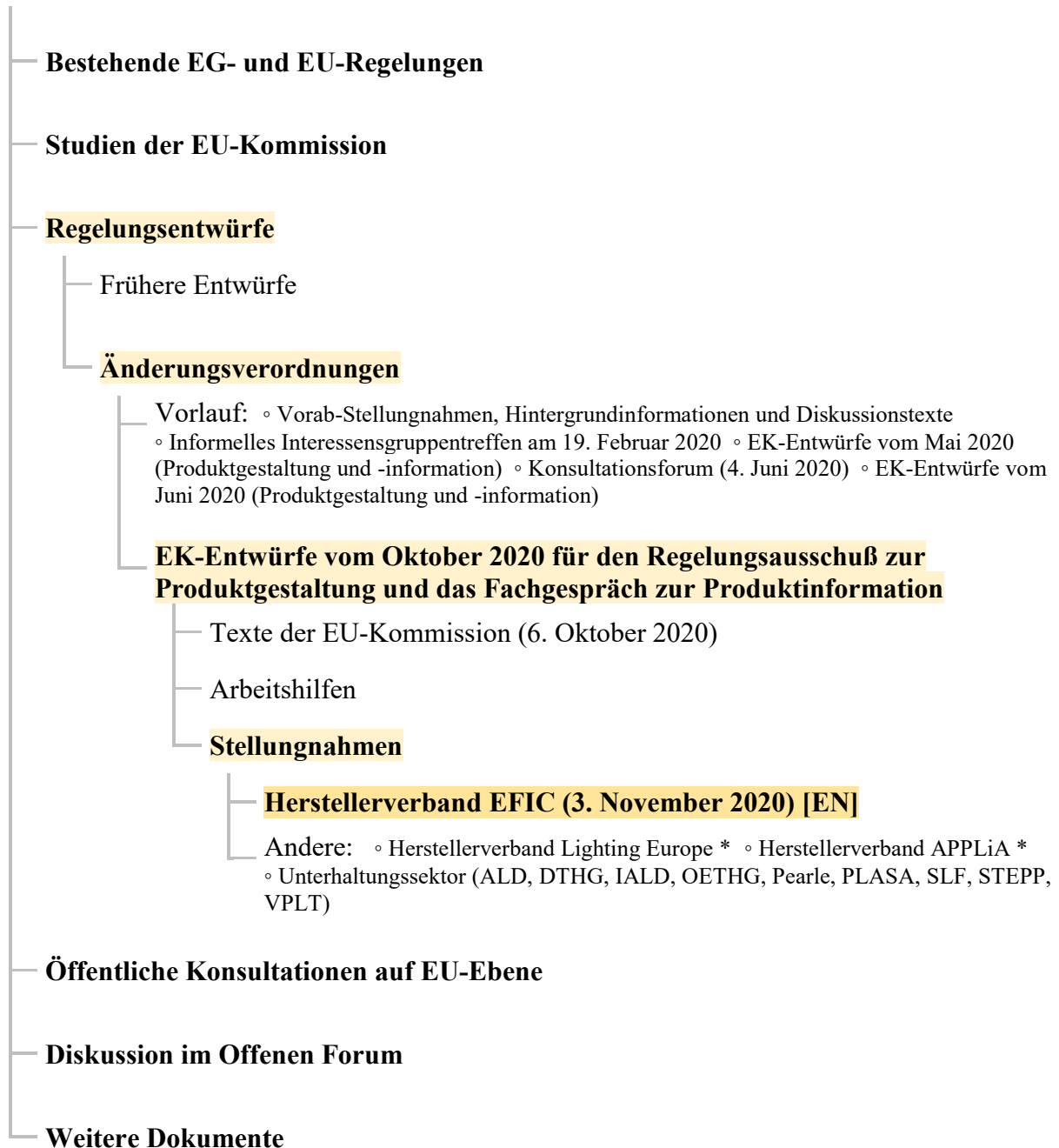
Indication : Veuillez noter que le présent texte n'est disponible qu'en anglais.

^[1] <https://www.eup-network.de/de/eup-netzwerk-deutschland/offenes-forum-eu-regelungen-beleuchtung/dokumente/texte/>

^[2] <https://www.efic.eu/>

Texte im Offenen Forum

(abc = vorliegender Text)



* Stand 5. November 2020: Dieser Text steht noch nicht zur Verfügung.

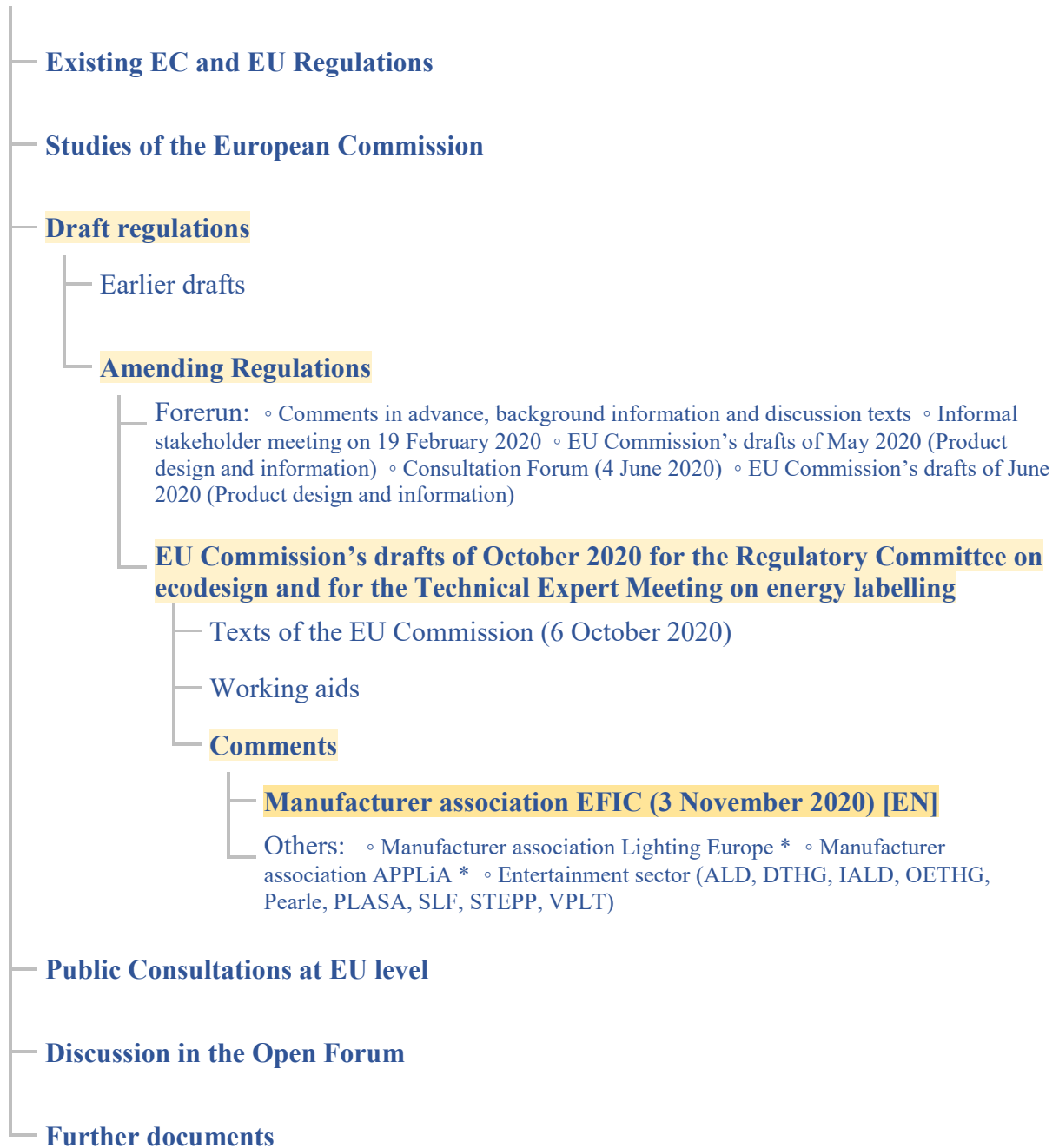
Abkürzungen: ● EG = Europäische Gemeinschaft ● EU = Europäische Union

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Documents in the Open Forum

(abc = text at hand)



* Status as of 5 November 2020: This text is not yet available.

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

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Documents dans le forum ouvert

(abc = présent document)

- Règlements existants de la CE et de l'EU
- Études de la Commission européenne
- **Projets de règlements**
 - Projets antérieurs
 - **Règlements modificatifs**
 - Précédent : ◦ Commentaires en avance, informations de fond et textes de discussion
◦ Réunion informelle des parties prenantes le 19 février 2020 ◦ Projets de la Commission européenne du mai 2020 (Conception des produits et informations sur les produits) ◦ Forum consultatif (4 juin 2020) ◦ Projets de la Commission européenne du juin 2020 (Conception des produits et informations sur les produits)
 - **Projets de la Commission Européenne d'octobre 2020 pour le comité de réglementation sur écoconception et pour la réunion d'experts technique sur étiquetage énergétique**
 - Textes de la Commission européenne (6 octobre 2020)
 - Aides du travail
 - **Commentaires**
 - **Association de producteurs EFIC (3 novembre 2020) [EN]**
 - Autres: ◦ Association de producteurs Lighting Europe * ◦ Association de producteurs APPLiA * ◦ Secteur du divertissement (ALD, DTHG, IALD, OETHG, Pearle, PLASA, SLF, STEPP, VPLT)
- Consultations publiques au niveau de l'UE
- Discussion dans le Forum Ouvert
- Autres documents

* État au 5 novembre 2020 : Ce texte n'est pas encore disponible.

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

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Contents list

The following table of contents gives details only in the case of lighting products.

The points on which the association EFIC has commented are marked by **(EFIC)**.



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Article 9 – Entry into force and application



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(...)

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Other product groups (...)

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

Consultations on updated EU rules on ecodesign and energy labelling EFIC feedback

3 November 2020

In view of the two ongoing consultations^{1 2} updating EU ecodesign and energy labelling rules, the European Furniture Industries Confederation (EFIC) is hereby providing comments and suggestions to the text of the draft Regulations.

Commission Regulation (EU) .../.... of XXX amending Regulation (EU) 2019/ 2020

Article 4, paragraph 1:

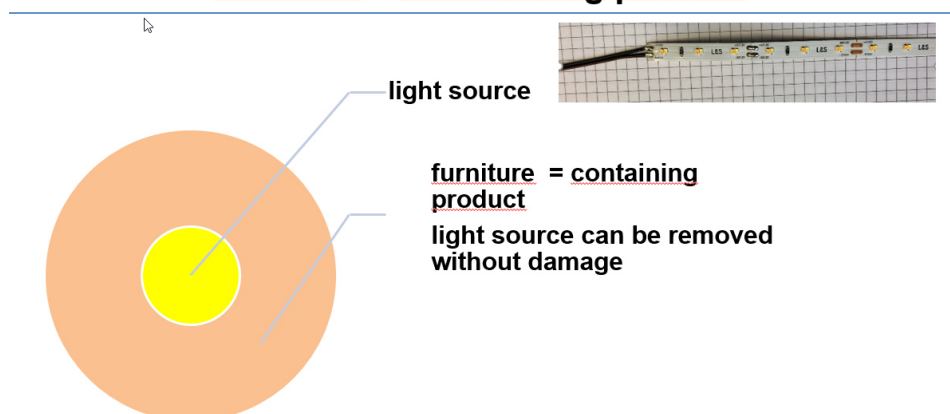
(1) in Article 2, point 4 is replaced by the following:

'4. 'containing product' means a product containing one or more light sources, or separate control gears, or both, including luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s).'

Commentary:

The proposed text clarifies from our point of view that furniture with light sources contained in it is always a "containing product".

System light source <> surrounding product furniture = surrounding product

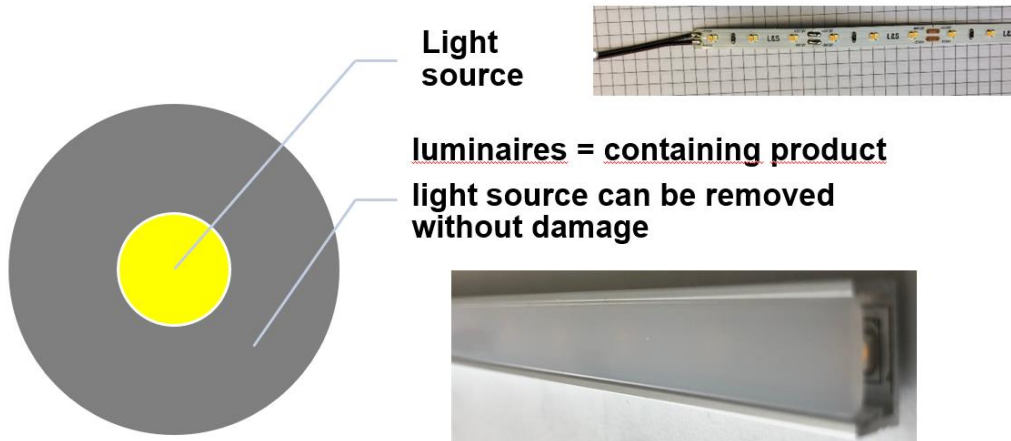


¹ <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12471-Energy-efficiency-updated-EU-rules-on-ecodesign-and-energy-labelling>

² <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12499-Energy-efficiency-updated-EU-rules-on-energy-labelling>

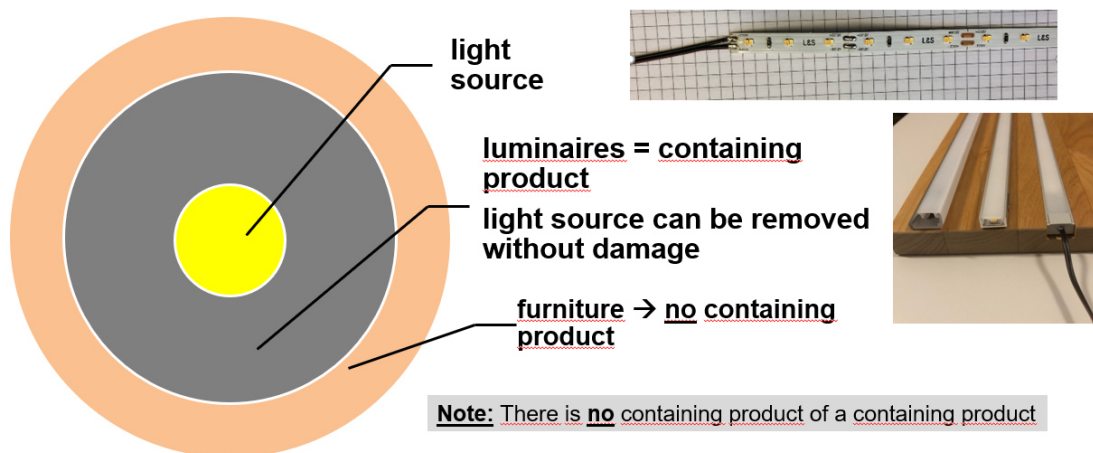
Luminaires are addressed in the same paragraph and under the above conditions, they may also be a "containing product".

System light source <> surrounding product luminaires = containing product



As a logical consequence, this would mean that furniture with a luminaire (= containing product) is not a "containing product".

System light source containing product



Proposal: For the purpose of clarity and thus legal certainty, an additional sentence in Article 4(1) would be helpful, which could read as follows: "There is no containing product of a containing product". This means for example: A piece of furniture with a luminaire is not to be regarded as a "containing product".

Article 4, paragraph 3: (editorial)

3) Annexes I to IV are amended as set out in Annex VI to this Regulation.

Proposal: Here Annex IV should be referred to.

Commission Regulation (EU) .../.... of XXX amending Regulation (EU) 2019/ 2015

General comments on the existing (EU) 2019/2015 text:

Article 4, paragraph (b)

(b) in the event of distance selling, the label and product information sheet are provided, in accordance with Annexes VII and VIII;

Comment & proposal: Since in all other paragraphs (a), (c), (d), (e) the term "light source" is explicitly mentioned, **this term should also be used in (b)** to be more precise.

Amendments to Delegated Regulation (EU) 2019/2015

Article 3, paragraph 1

(1) in Article 2, point (3) is replaced by the following:

'(3) 'containing product' means a product containing one or more light sources, or separate control gears, or both. Examples of containing products are luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s);'

Commentary: See commentary on Commission Regulation (EU) .../.... of XXX amending Regulation (EU) 2019/ 2020; Article 4, paragraph 1.

Article 3, paragraph 3

(3) Annexes I, III, IV, V, VI and IX are amended as set out in Annex III to this Regulation.

Annex V, point 2:

Information to be displayed in the documentation for a containing product

If a light source is placed on the market as a part in a containing product, the technical documentation for the containing product shall clearly identify the contained light source(s), including the energy efficiency class.

If a light source is placed on the market as a part in a containing product, the following text shall be displayed, clearly legible, in the user manual or booklet of instructions

This product contains a light source of energy efficiency class <X>'

where <X> shall be replaced by the energy efficiency class of the contained light source.

If the product contains more than one light source, the sentence can be in the plural, or repeated per light source, as suitable.

Understanding:

EFIC's understanding of this point 2 is as follows:

- A distinction is made between
 - "technical documentation".
 - "User Manual/ Operating Instructions".
- **Technical documentation:** is the responsibility of the manufacturer of the containing product and can be made available to the market surveillance authority on request within a reasonable period of time.
The technical documentation contains
 - Light sources - ID
 - Energy efficiency class
- **User manual/ user guide** is enclosed with the product and contains
 - Phrase "This product contains a light source of energy efficiency class <X>",
 - if several light sources of the same energy efficiency are included in the product this sentence is sufficient once it is included in the user manual or the instruction manual. Otherwise this sentence must be stated for each light source in the efficiency class of different light sources.

Commentary:

- Furniture is usually accompanied by assembly instructions and sometimes a warranty document --> but usually **no** user manual or instruction manual and certainly not a "customer commission based" instruction manual or user manual.
Another problem (which is not the responsibility of the manufacturer) is that assembly instructions/warranty documents enclosed with the furniture are very often not handed over to the customer and at the "point of sale (POS)" are usually not with the product assembled in the exhibition room.
- Since assembly instructions are never prepared on a "customer commission basis", but always include all possible assembly constellations (including light sources, unless they are already pre-assembled at the factory), the required details of the possible light source types could therefore only be listed on one page. This would make it difficult for the reader to assign the information to a particular type of lightsource and would then require checking again the documents provided at the point of sale.
- As such, the question arises as to where this information should be placed in a way that makes sense for the consumer.


Proposal:

- This information could usefully be included in documentation accompanying the product (e.c. list of types) at the point of sale (short: sales documentation). This is always available at the "Point of sale (POS)" and then also serves the purpose of informing the customer in advance of the purchase if necessary.

Suggestions:

- the energy efficiency class <X> (see illustration) is indicated directly with the sales type



- A "restriction" to the "letter" of the energy efficiency class based on Annex II, Figure 1 would be useful, as it is impractical for layout reasons to include the complete sentence "*This product contains a light source of energy efficiency class <X>*" with each type of sales unit.
- The meaning of this  could then be explained in the sales documentation in the context of the sentence "*This product contains a light source of energy efficiency class <X>*", and everyone (customer, market surveillance officers) would know immediately what it refers to.

Text – proposal: Therefore the text of the regulation would have to be supplemented as follows:

- "*If a light source is placed on the market as a part in a containing product, the following text shall be displayed, clearly legible, in the user manual or booklet of instructions **or sales documentation.***"

Suggested addition as last paragraph of point 2:

If the text cannot be used in the above-mentioned documents due to lack of space, it is permissible to leave it as it is when the efficiency class is stated by means of a letter in accordance with Annex III, Figure 1, provided that the context of the letter and the above-mentioned text are explained in the sales documentation.

For further information, please contact:

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