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CEN-CENELEC response to the European Commission's Public Consultation on Ecodesign and Energy Labelling on Refrigerators, Dishwashers, Washing Machines, Televisions, Computers and Lamps

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About CEN and CENELEC

CEN (European Committee for Standardization) and **CENELEC (European Committee for Electrotechnical Standardization)** are recognized by the European Union (EU) and by the European Free Trade Association (EFTA) as European Standardization Organizations responsible for developing and defining standards at European level. These standards set out specifications and procedures in relation to a wide range of products and services.

The members of CEN and CENELEC are the National Standards Bodies and National Electrotechnical Committees of 34 European countries including all of the EU member states plus Iceland, Norway, Switzerland, Turkey and the former Yugoslav Republic of Macedonia.

European Standards (ENs) are developed through a process of collaboration among technical experts nominated by business and industry, research institutes, consumer and environmental organizations and other societal stakeholders. Once adopted, these standards are implemented and published in all of the 34 countries covered by CEN and CENELEC.

CEN and CENELEC also work to promote the international harmonization of standards in the framework of technical cooperation agreements with ISO (International Organization for Standardization) and IEC (International Electrotechnical Commission).

For more information, please see: www.cencenelec.eu

Executive Summary

CEN and CENELEC welcome the opportunity to respond to the EC public consultation on Ecodesign and Energy Labelling on Refrigerators, Dishwashers, Washing Machines, Televisions, Computers and Lamps.

In the field of Ecodesign (2009/125/EC) and Energy Labelling (2010/30/EU), CEN and CENELEC produce European Standards that provide dedicated methods for measuring the energy performance of various energy-related products against the compulsory values and thresholds laid down in Ecodesign Regulations adopted by the European Commission.

In 2017, around 25 standards were published in support of Ecodesign Regulation on space and water heaters, air conditioners, domestic oven and hobs, vacuum cleaners, power transformers, computers and computer servers, electric motors, directional and LED lamps, and, fluorescent and professional lamps. The work on 65 additional standards started or continued under the different Mandates or standardization requests active to date in this area and so far, 30 CEN and CENELEC Technical Committees are actively involved in the development of ecodesign and energy labelling standards.

It is to be noted that the CEN and CENELEC Technical Boards set up the Ecodesign-Coordination Group (Eco-CG) in November 2012 to coordinate and advice on standardization activities in the fields of Ecodesign and Energy. The Eco-CG serves as a focal point concerning standardization issues relating to the Ecodesign standardization requests (SR, previously called 'mandates') issued under Directive 2009/125/EC on Ecodesign of energy-related products and under Directive 2010/30/EU on Energy labelling of energy-related products and their future versions.

Detail of responses to on-line questionnaire

See next page.

PART 4: Technical background information

This section asks more specific questions on the technical aspects of Ecodesign and Energy Labelling requirements for the product groups under consideration.

D. This section asks specific questions on electric lamps and luminaires

D.1 Should the ecodesign requirements be updated to take into account emerging high-efficient technologies, notably LEDs?

- **Yes**
- No
- Don't know or no opinion

D.2 Should the ecodesign requirements take into account visual effects such as flicker?

- Yes
- **No**
- Don't know or no opinion

D.3 Are you in favour of products containing a light source that cannot be removed or replaced (e.g. a sealed luminaire)?

- **Yes, I like them. In this way I can buy frequently a new luminaire and change the appearance in my room**
- Yes, but only when they are cheap
- No, I want to be able to change or replace the light source (e.g. the light bulb)
- Don't know or no opinion

D.4 The label on luminaires should:

- Be kept as it is today
- Be replaced by a label that concerns only the light source, which is contained in the luminaire
- **Be discontinued**
- Don't know or no opinion

D.5 What information would you like to have when you buy a lamp/light bulb:

	Yes	No	Don't know or no opinion
Quantity of light provided by the lamp (expressed in Lumen)?	x		
Energy efficiency expressed in terms of lumen per watt?	x		
Warm/cold effect of LEDs?		x	
Life-time?	x		
Watt equivalence with old bulbs (incandescents)?		x	
If it is tested for flickering?		x	
Other:			

Further comments. Are there further comments you would like to make on anything that is not covered above?

As regards the ecodesign and energy labelling requirements for electric lamps and luminaires, **CEN/TC 169 'Light and lighting'** highlighted that the terms and definitions used in the draft regulation, do not comply with the terms and definitions of the relevant standards (e.g. EN 12665 'Light and lighting - Basic terms and criteria for specifying lighting requirements'), which are according to the state of the art. Some terms used in the draft regulation are completely new and not unambiguously defined. In practice, this leads to high discrepancies between standards and regulations. Using terms and definitions based upon EN 12665 and adopted to the scope of the regulation could additionally enable a straightforward approach by not reinventing the wheel. Please see below some examples:

- Light source: definition not according EN 12665;
- Containing product: this term is completely new and opens a new category besides light source and luminaire.