

中国 WTO/TBT 国家通报咨询中心

China WTO/TBT National Notification & Enquiry Center

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Subject: Comments from P. R. China on United States Notification G/TBT/N/USA/1734 Energy Conservation Program: Backstop Requirement for General Service Lamps	

Comments from P. R. China on United States Notification

G/TBT/N/USA/1734

Energy Conservation Program: Backstop Requirement for General Service Lamps

Dear Sir or Madam,

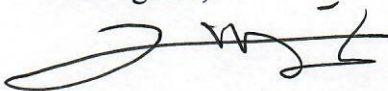
We appreciate the opportunity to submit comments on the notified draft proposed by United States of American.

Enclosed please find comments in English and Chinese.

Please acknowledge receipt of the comments by e-mail to tbt@customs.gov.cn and pengdy_tbt@163.com.

Thank you very much in advance for United States of American taking into account comments from P.R. China. Your formal reply will be appreciated.

Best regards,



Zhao Minggang

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G/TBT/N/USA/1734

Energy Conservation Program: Backstop Requirement for General Service Lamps

1. A transition period of at least three years should be given for GSIL provisions for minimum efficacy as 45 lm/W.
2. For museums, art galleries, art classrooms, etc. have high requirements for color rendering index ($RA \geq 90$ and $R9 \geq 60 \sim 80$), allowing the use of halogen tungsten lamps. That is, to add the mentioned application field of halogen tungsten lamps as the 23rd allowed case.
3. The statement "and any other lamps that the Secretary determines are used to satisfy lighting applications traditionally served by GSILs" gives the Secretary a very large discretion. It is recommended that the new product categories within the scope be clearly listed in the regulations, and a three-year transition period for the new product categories should be given.

Comments in Chinese are in below:

1. 针对白炽灯/卤钨灯 (GSIL) 的 45/lm/W 最低光效指标的规定, 应给予至少三年过渡期。
2. 对于博物馆、美术馆、美术教室等对显色指数有高要求 ($Ra \geq 90$ 且 $R9 \geq 60 \sim 80$), 允许使用卤钨灯, 即将该应用场景作为白炽灯/卤钨灯 (GSIL) 的第 23 种允许情况。
3. "and any other lamps that the Secretary determines are used to satisfy lighting applications traditionally served by GSILs." (以及能源部长确定的其它灯, 其用于传统上采用普通照明用白炽灯的照明应用场合。) 给了 the Secretary 非常大的自由裁量权, 建议法规中明确列出范围内新增产品种类, 并给予新增产品种类三年过渡期。