

Clarification of the status of LED replacement lamps (LEDr) in the UN ECE framework

UN ECE R128 does not cover LED replacement lamps (retrofits). It does cover LED substitute and XLS which are a solution for new vehicles. The LED products are specifically designed in (socket coding is different to existing sockets).

UN ECE R37 covers filament lamps like traditional halogen H7 lamps and LED replacement lamps (LEDr). **BUT** status today only C5W LEDr and H11 LEDr are defined in a category sheet. Therefore, only these two types (C5W, H11 LEDr) can get an ECE approval. OSRAM is now offering a fully ECE approved H11 LEDr bulb. H4 LED, H7 LED, W5W LED are not covered by UN ECE R37. It is planned to include further types in the ECE regulation in the future. The timeline for including new types is open.

UN ECE R10 does only cover the electromagnetic compatibility (EMC) testing. It does not cover the photometric and geometrical performance testing. ECE R10 approval does **NOT** mean approval as LED replacement lamp acc. ECE R37. The products with ECE R10 can be identified as they are always marked with "10R" e.g. E24*10R.

Status today, OSRAM has XLS approved acc. R128 and H11 LEDr acc. R37. OSRAM has no approved LED substitute acc. R128. In the market we are not aware of **ANY** manufacturer which has a substitute product acc. R128.

All **OSRAM products** marked street-legal/on-road and off-road are fulfilling the ECE R10 requirements. Any manufacturer claiming to be street-legal based on ECE R10 approval, is misleading as an ECE R10 approval is only one part of the legal requirements.

Because of this situation OSRAM has national approvals for H7-LED, H4-LED, W5W-LED and several other types in Europe.

With best regards
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