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

UN ECE R128 does not cover LED replacement lamps (retrofits). R128 does cover LED substitutes which are a solution for new vehicles designs. The LED substitutes need to be specifically designed-in (cap keying is different to "filament" cap keys).

UN ECE R37 covers filament lamps like traditional halogen H7 lamps and also LED replacement light sources (LEDr). **BUT** status today only C5W-LED and H11-LED are defined in a category sheet.

H4-LED, H7-LED, W5W-LED etc are not covered by R37 and therefore cannot be UN ECE approved.

UN ECE R10 does only cover the electromagnetic compatibility (EMC) testing. It does not cover the photometric and geometrical performance testing. If an LED replacement lamp has only an ECE R10 approval it does **NOT** mean it is approved for on-road use! Any claim to have "street legal" products based on only an R10 approval are simply false.

Status of today, OSRAM has no approved LED substitutes according R128 and not yet LED replacement lamps approved according to R37. In the market today we are not aware of **ANY** manufacturer who has a product approved according R128 substitute or R37 LED replacement lamps. So there are no UN ECE approved LED replacement lamps in the market according to our knowledge.


Because of this regulatory situation, OSRAM has national approvals for H7-LED, H4-LED and W5W-LED in several countries.

In addition, all **OSRAM LEDr products** for on-road and off-road use are filling the R10 EMC requirements.

With best regards



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