



Position on the Commission's proposals to revise the Ecodesign & Energy Labelling measures on lighting

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Scope & exemptions

We welcome the removal of the exemption for special purpose/decorative lamps, that has triggered a massive loophole and enabled manufacturers to leave many highly inefficient lamp models on the market.

The fact that some suppliers have played against the spirit of the EU policy means that they may continue exploiting any loophole they find in the future. We welcome all efforts made to close as many loopholes as possible, but we still see risks with the exemptions currently included in the Commission's proposal. Some manufacturers could use e.g. the limits to the chromaticity of the light sources covered by the Regulations, or the '*operating in low or high temperatures*' criteria to continue placing inefficient lamps on the market unduly, and creating an unlevel playing field as well as distortion of competition.

We propose that **the exemptions are tightened**, and that **the mandatory information requirements in Annex III point 3.5 apply to all exempted lamps and are made more explicit and precise**, to ensure consumers are discouraged from falling into a potential trap and purchasing such lamps, attracted by lower prices and not answering real technical needs.

The low temperature exemption is not justified as LEDs have no problem to perform at low temperature, and we suggest removing it completely. As for the other exemptions, the legal text could for instance specify that the indication that the light source is not intended for use in normal illumination applications shall be placed on the packaging front side (facing the consumer at the point of sale), in a font as large as the brand name and in a frame covering at least a fourth of the packaging side. If these specifications are not added, the situation will be the same as with special purpose lamps currently where most models have the indication '*not suitable for general illumination*' in a very small font and on the side or rear of the packaging.

Dynamism

The draft Ecodesign Regulation only foresees one tier in 2020. While we can sympathise with the argument that it is a fast-changing market, it would be way preferable to **set two tiers, to provide visibility to the market and sustain a dynamic policy principle**.

History has shown that reviewing requirements and setting new ones are very long and cumbersome processes. There is a risk that after 2020, a considerable time is taken to define and agree on new tiers, triggering a long period without requirements, with LED technologies continuing improving in the meantime. Precisely because technologies and efficiency are constantly improving, ambitious targets can and should be set.

We therefore propose to introduce a tier in 2023 that would remove products in the bottom efficiency class for each technology (i.e. phasing out class F for standard LED lamps and class G for other lamps).

Too large allowances in Ecodesign levels

The Ecodesign efficacy requirements for lamps include a base allowance called ‘end loss factor’ (“L”), **that we do not consider justified for standard LED lamps**. It distorts the equation, especially in the low lumen ranges. It leads to offering all lamps a 1.5 W base allowance to the power limits, and as a result, the minimum allowed efficacy levels for a non-directional mains LED lamp are:

- Only 63 lm/W for a 200-lumen model (whereas today best LEDs achieve 125 lm/W in this range)
- Only 87 lm/W for a 470-lumen model (whereas today best LEDs achieve 120 lm/W in this range)
- Only 98 lm/W for a 806-lumen model (whereas today best LEDs achieve 135 lm/W in this range)

Because of this end loss factor introduced in the equation, the requirements will have virtually no impact on a large proportion of the LED market in the medium and low lumen ranges, where many new products are developed. While we could understand a small loss factor allowance for e.g. connected lamps (to achieve connectivity), we do not see the need for providing one for standard models. **We propose to set the L factor to zero for standard LED lamps.**

Tighten standby allowances

The standby allowances foreseen in the Ecodesign draft still seem disproportionate compared to the low wattage LED products have these days. Especially with the upcoming trend of smart and connected lamps, tightened standby allowances are needed to reach the estimated energy savings. Given that lighting products spend on average 7760h per year in standby, versus a typical 1000h in on-mode, the impact on the annual energy consumption is substantial.

We support a 0.5W threshold for off, standby and networked standby, for light sources and separate control gear. We call on the Commission to take it one step further in a second tier by:

- Lowering the thresholds to 0.2W;
- Or encouraging manufacturers who reduce their levels below 0.5W by reflecting the standby levels on the Label, using an EEI instead of the current efficacy criterion.

Safeguard against misleading green claims

In the current Regulations, a provision specifies that terms such as ‘energy saving’ or ‘eco’ lamps may only be used for models that are in the top efficiency classes. We do not see any justification for removing this provision in the future. Manufacturers currently make many green/energy-saving claims about their LED products. After 2020, being a LED will not be a sufficiently discriminating

criteria to be in the top efficiency classes. But there is a risk that manufacturer claims continue, even for products that will actually be at the bottom of the market at that time. We urge the Commission to **reinstate the provision on restricting the use of green claims**. Only the best LED products in the top two classes at a given time should be allowed to be named energy savers.

Resource efficiency aspects

We strongly **support the efforts made by the Commission on the removability of light sources and control gears**. We think that the Commission should seize the opportunity and go even further by making the components of these luminaires replaceable, or at a minimum introducing a more concrete formulation than 'readily removable'. If such a requirement is deemed unfeasible by Tier 1, it should at least be stated as a Tier 2 requirement.

We agree with the proposal supported by several stakeholders to maintain the **minimum lifetime requirement for light sources**, which helps prevent the market to be flooded with low-quality lighting products.

Finally, we are concerned that no more information **requirements on the number of switching cycles** is foreseen, as opposed to today. We see a risk that manufacturers will continue providing this information, and could even make super-declarations, without this aspect being covered by the regulation anymore. What would then be the legal grounds to verify this information, or for market surveillance authorities to require additional justifications from manufacturers?

Declared lifetime and switching cycle values - even if not often controlled by MSAs – are indicators that help distinguish between low-quality products (that often suspiciously declare lifetime and switching cycles just at the minimum regulatory levels) and better-quality products that have more precisely declared values. This benefit would be lost if the information requirements are removed.

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