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The Consumer Voice in Europe

ANEC/BEUC COMMENTS ON THE PROPOSED ECODESIGN AND ENERGY LABELLING UNIFIED REGULATIONS ON LIGHTING

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Summary

The European Commission carried out a study on 'lighting products' (Lot 8/9/19) aiming to revise the existing Ecodesign and Energy Labelling requirements. Among other, the study aimed at assessing the feasibility of unifying all Ecodesign regulatory measures. Based on the conclusions of this study, the European Commission put forward two preliminary measures on lighting revising the existing Ecodesign and Energy Labelling measures.

We welcome the intention of the European Commission to provide a more coherent regulatory environment for lighting products. However, we believe that the level of ambition of future measures shall not be compromised for the sake of simplicity.

This paper outlines the main consumer relevant issues related to the proposed measures and recommends improvement options. It includes specific, technical recommendations to increase the energy efficiency and overall performance of these products as well as to ensure consumers can make an informed choice.

More specifically:

- ✓ The scope of the regulation shall be clear in order to ensure that products able to emit light in different colors do not escape the requirements;
- ✓ A color rendering scale suitable for LEDs shall be selected;
- ✓ The minimum energy efficiency requirements shall be tightened;
- ✓ Parasitic electricity shall not be accounted disproportionately in energy efficiency calculations;
- ✓ The regulation shall set limits on mercury content;
- ✓ A minimum lifetime requirement shall be set;
- ✓ Luminaires with non-replaceable lamps shall not be allowed;
- ✓ Simplicity and comparability of information shall be ensured;
- ✓ Display of color temperature and color rendering information on packaging shall be simple;
- ✓ Information requirements on high UV radiation, flickering and separate recycling shall be available on the product package;
- ✓ Information on free-access websites shall be available for as long as the declared product lifetime;
- ✓ Deviation from declared color temperature shall be limited;
- ✓ Verification procedures shall not allow unjustified variation within product batches;
- ✓ Energy Labelling requirements shall not be set too high deterring consumers from turning to more efficient products. On the other hand, Ecodesign requirement shall be tightened.

Ecodesign proposal

Scope must be further clarified

It remains unclear how the scope of the regulation addresses lamps that can emit light in different colours. Such products must be covered by the regulations as alternatively, a loophole could arise allowing on the market lightbulbs that emit light in different colours but are inefficient in their primary function of emitting white light. In addition, for certain types of applications where very high light quality is necessary, such as sewing or drawing, some exceptions to the halogen ban should be allowed. These exceptions shall be accompanied by a warning that the product is only intended for the specific use and not for general lighting purposes.

A more suitable scale for colour rendering of LEDs must be selected

Article 2 (4) states that 'colour rendering' is measured with the colour rendering index (CRI). CRI is not a suitable scale to indicate how accurate LEDs are at rendering colours. In addition LEDs can be designed to have a high CRI while they render colours poorly. As the efforts for a more suitable scale are ongoing, we would suggest that the regulation does not make a specific reference to the CRI scale. We would invite the Commission to support and follow closely international efforts for the development of an appropriate colour rendering scale for LEDs and come forward with a proposal.

The ambition level of minimum efficiency requirements shall be raised

We question the ambition level of the minimum energy efficiency requirements proposed. For example in the case of linear fluorescent lamps, the requirements currently in force would be replaced by less stringent ones until at least 2020. We would propose skipping stage 1 and moving directly to stage 2.

Energy efficiency calculations shall account for lower parasitic electricity

The energy efficiency calculation formulas of annex II take into account parasitic electricity of 2 watts. This value would allow very inefficient lighting products for consumer use on the market. For example, under stage 1 the target efficiency is 60 lumens/watt. Due to the 2 watts foreseen in the formula a 400 lumen LED, commonly used by consumers, can be as little efficient as 46 lumen/watt. A value of 0,5 watt for parasitic electricity would be more appropriate.

The regulation should set limits on mercury content

Mercury limits should not be deleted from the lighting requirements. We do not share the opinion that such limits are irrelevant due to the shift to LED technology. As discussed during the Consultation Forum meeting, certain jurisdictions might move to a complete shift to LED technology by 2020. This could result in CFLs with high levels of mercury being dumped on the European market.

A minimum requirement on lifetime is necessary

Annex IV of the proposal foresees accelerated endurance testing. However, the proposed measure does not set minimum lifetime requirements. We acknowledge the purposefulness of introducing such a test as the expected lifetime of LED products is by far longer than technologies that will be phased out. However, we fear that the absence of any minimum lifetime requirement could result in making available on the market products with a very short rated lifetime. To avoid that we would propose introducing a minimum rated lifetime for products allowed on the market.

Lamps in luminaires shall be replaceable

Luminaires with numerous non replaceable LED lightbulbs are available on the market. In case few of these LEDs fail, the service and aesthetics of the luminaire will be compromised. As a result consumers might be forced to replace the luminaire just because of a few defective lamps. It is currently unclear why certain luminaires include lamps that cannot be replaced. We advocate in favour of introducing a mandatory requirement making lamps in luminaires replaceable. This would be in line with Europe's goals to become more resource efficient. In case exemptions to the rule of replaceable lightbulbs in luminaires are granted these should come with a justification.

Clear and comparable information is necessary

The draft text states that the information on the packaging or on websites '*may be displayed in the form of graphs, drawings or symbols rather than text.*'

ANEC/BEUC request adding that functionality-related information should be provided in a standardized and comparable way.

Clear and comparable information is crucial for consumers' take-up of more sustainable products and for understanding their expected performance.

Information on high UV radiation and flicker to be available on the packaging

To protect consumers with vulnerable health when the UV radiation or the flicker of a lightbulbs is higher than average this information should not only be displayed on websites but also on the product packaging.

Separate recycling information shall be displayed on packaging

The need to recycle separately should be displayed on the packaging and where possible on the lamp foot.

Information on free-access websites shall be available for longer

Paragraph 3.3 of annex II states that information enlisted under section 3.3.1. should be available on free-access websites for at least 10 years. Since there are luminaires with built-in LEDs on the market with much longer nominal lifetime we consider the 10 year information requirement too short. Information on such products should be available for as long as the declared product lifetime.



Limits on deviation from colour temperature declarations must be set

According to the proposed legislation the packaging shall contain information on colour temperature. However, it sets no requirement on how close the measured colour temperature should be to the rated value. The regulation shall provide certainty about the consistency in colour temperature of a given product, as well as the proximity of the average value to the rated value on the package.

Verification test variance shall be limited

Currently, paragraph 2c of annex III sets the verification requirement on the arithmetical mean of the measured values of a 10 product batch. We could imagine a batch of 10 products where half of it would emit 30% less light than expected and the other half 30% more light. Such a batch would pass this verification procedure however not all products would provide the expected service. The variance between the 10 samples to be tested in the verification procedure by member states shall be limited.

Energy Labelling proposal

Based on the Energy Labelling revision proposal, most Ecodesign compliant lamps in 2020 would belong to red energy efficiency classes E or F. While it would be desirable for consumers to replace by then their old CFL's/LEDs with E or F class bulbs, we fear that with most products at E and F classes, consumers will not be encouraged to turn to these more efficient lamps. We would therefore propose less tight Energy Labelling requirements, ensuring that A class would be empty and at the same time raising the ambition level of Ecodesign requirements.

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