



LIGHTINGEUROPE
THE VOICE OF THE LIGHTING INDUSTRY

Position Paper

LIGHTINGEUROPE comments on the Proposal for a Regulation setting a framework for energy efficiency labelling & repealing Directive 2010/30/EU

October 2015

LightingEurope appreciates the efforts of the EU Commission to improve a Framework that underpins and reinforces the successes of the energy label. Nevertheless the lighting industry would like to highlight the need for a better design in several critical areas to preserve the success and credibility of the existing European Energy Labelling Framework for both end users and product manufacturers.

Rescaling

When rescaling from A to G, Commission should ensure some **flexibility** for each sectorial product group (e.g. an assessment product by product, linking the rescaling with the population of the classes). Labels should only be rescaled where the top classes are **saturated**; this will provide stability for investments and avoid unnecessary confusion for end users. In particular for the lighting industry the rescaling should be treated as a special issue, because lamps are a mass product, and the energy label is printed on the immediate packaging (e.g. boxes, blisters).

Database

The proposed database would be just a further cost and a burden for the industry, and would not solve the identified failures of market surveillance, including the lack of human resources and physical checks, nor the estimated loss of 10% of energy savings. Real improvements and better market surveillance results depend on car-

rying out physical tests and on applying adequate sanctions. Furthermore all reputable lighting manufacturers have already all information available on free access websites.

Moreover:

- The label should ensure **10 years of stability** to allow industry's investments in innovation and to avoid frequent changes that would confuse end users.
- The proposal for the supplier to deliver **two labels** for each product for a period of 6 months is **unfeasible**. For lamps (in comparison with e.g. "white good products") it would result in a **disproportionate financial impact**, while for luminaires it would create only double confusion. Providing the **electronic label only** (already widely used e.g. for luminaires) could be an optimal solution.
- The requirement for Lamps to have the label on packaging should be removed to avoid discrimination of the lighting products against all the other product groups:
 - The label will have fulfilled its purpose when the Mains Voltage halogen lamps will be phased out in September 2018; by then a label on the shelf/website will be sufficient in conjunction with the product fiche and technical files.
- Where lamps are typically products sold in very large volumes, some products have relatively long shelf times. Therefore a more realistic change over scenario and transition time should be taken into account for these products, avoiding any need for manufacturers/suppliers to take back lamps from the distribution chain.

About Lighting Europe

LightingEurope is an industry association of 31 European lighting manufacturers, national associations, and companies producing materials. LightingEurope members represent over 1,000 European companies, a majority of which are SMEs; a total workforce of over 100,000 people in Europe; and an annual turnover estimated to exceed 20 billion Euros. LightingEurope is dedicated to promoting efficient lighting practices for the benefit of the global environment, human comfort, and the health and safety of consumers. More information about LightingEurope is available on our website www.lightingeurope.org.

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