

Comments on Inception Impact Assessment on the review of energy labelling for lighting products

LightingEurope, representing the lighting industry in Europe, would like to thank the European Commission for the opportunity to contribute to the Impact Assessment on the energy labelling legislative review for light sources.

We understand that the Commission's proposals will introduce important changes compared to the current legislation.

It is our understanding that the Commission will propose to discontinue the energy labelling of luminaires, currently included in the definition of the term 'containing product.' LightingEurope welcomes the Commission's proposal as we believe that a luminaire label has no benefit for consumers, because it does not provide relevant information for evaluating a luminaire. LightingEurope shares the Commission's conclusion, reflected in the present proposals, it is not possible to design an energy label for luminaires due to the large amount of different applications in which luminaires are used. We also believe that such a label is not relevant when buying a different type of containing product (e.g. furniture or home appliance).

LightingEurope calls on the Commission to undertake a detailed Impact Assessment of two particular aspects of the draft proposal: the impact of labelling on containing products and the impact of EPREL for containing products.¹

Impact of labelling on containing products

Considering that the current legislation on labelling is applicable to:

- end-user replaceable light sources (lamps and LED modules); and
- luminaires for end-users (where the requirements are limited to only providing information on included end-user replaceable lamps and/or compatible light sources);

LightingEurope believes that the scope of the Delegated Act on Energy Labelling should be limited to end-user replaceable products. The scope should include lamps and LED modules that can be replaced directly by end-users, since they can be fairly compared and verified according to harmonised EN standards.

All luminaires/containing products should be consistently excluded from the proposed labelling and database requirements. If not, an Impact Assessment should evaluate the

¹ Ref. Ares(2018)476111 - 26/01/2018.

costs and administrative burden for the luminaire-making industry against the potential benefits for consumers, the environment, and society in the following scenarios:

- the value of having a containing product with the same appearance but different information requirements (user-replaceable vs non-user-replaceable light sources), as this may cause confusion to the consumers; and
- the value of any containing products having information about the energy classification of the light source on their packaging, in their technical documentation, and in the EPREL database. It is important to also take into consideration the specific scenario where many containing products are energy related products (ErPs) as well and are therefore subject to eco-design and labelling requirements of their own. For example, is information on the energy classification of the light source of a fridge relevant or valuable information to consumers when purchasing a new fridge?

The information requirements in the draft Delegated Act for the packaging of containing products, which are also required for EPREL, are similar to the ones required by current legislation on the energy label for luminaires. This implies that all the issues and complaints that have been voiced about the current labelling of luminaires will continue under the new draft. The situation could potentially become even more complicated under the new proposed system, because the new requirements will apply to even more products (including those not intended for the end-user).

Impact of EPREL for lighting products

Uploading product information for, in our most conservative estimation, one million lighting product models, including luminaires, lamps and modules sold between 1 August 2017 and 1 January 2019, is unfeasible for manufacturers with the current timeline and may result in involuntary non-compliance.

This situation becomes much more complicated now that containing products are being taken into consideration in the proposed Delegated Act. Containing products include several types of appliances with a light source, such as luminaires, furniture, household appliances, etc. Due to the wide scope of the term 'containing products' and the complexity of the variety of actors involved, the total amount of containing product models cannot be calculated.

The Impact Assessments on the Delegated Act on labelling and EPREL should evaluate the following:

- Impact of database requirements on Europe's lighting manufacturing industry, with hundreds of thousands of products placed on the market every 6 months (many individually adapted to a project). This requires the consideration of two scenarios:
 - introducing and maintaining all the information requirements currently proposed by the Commission; and
 - introducing a limited set of data requirements (only those needed to generate the label) as proposed by LightingEurope. Please note that Europe's luminaire manufacturing industry mainly consists of SMEs.
- Additional costs and benefits of including luminaires, which will probably go out of scope of the future Delegated Act on Energy Labelling in a period of 18 months. The Impact Assessment should evaluate if there is a clear value in uploading information concerning a category that will be out of scope with the next regulations.

Contact

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LightingEurope is the industry association that represents the lighting industry in Europe. We are the voice of more than 1,000 lighting companies that employ more than 100,000 Europeans and create an annual European turnover of over € 20 billion. Our daily mission is to advocate and defend the lighting industry in Brussels, while reconciling it with ongoing EU policy aims. In doing so, we are dedicated to promoting efficient lighting practices for the benefit of the global environment, human comfort, and the health and safety of consumers. More information is available on: www.lightingeurope.org.