

Feedback to the draft LED Quality and Performance Requirements Proposed by Governments Participating in the IEA 4E SSL Annex¹

LightingEurope has reviewed the proposed LED quality and performance requirements shared by the IEA 4E SSL Annex. We have identified a number of errors in the basic data, the understanding of lighting concepts and the resulting proposed methodology and do not support the overall multiple tier approach.

LightingEurope shares the objective of increasing the energy savings delivered by lighting.

LightingEurope believes that our members' efforts and the resources of governments across the world would be put to better use if, instead of working to correct the draft proposals for additional requirements, they were in fact invested in:

1. stimulating the renovation of old buildings;
2. accelerating the deployment of smart lighting systems;
3. collaboration between governments and with online platforms to enforce the strict energy performance requirements that are already in place.

LE believes that one minimum performance specification, as opposed to multiple tiers, is a more appropriate regulatory option, especially in emerging economies. We favour the setting of minimum performance requirements in line with the methodology adopted by the EU in the European Regulation 2019/2020 on ecodesign for lighting.

LightingEurope would be happy to engage in a dialogue on our recommendations with the governments of the IEA 4E SSL Annex, together with the members of the Global Lighting Association (GLA).

¹ Reference document: "Quality and Performance Requirements LED Lighting Products - DRAFT FOR STAKEHOLDER COMMENT 25 NOVEMBER 2020" available at [Task_6_LED_Lighting_Product_Quality___Performance_-_Nov_2020.pdf](https://www.iea-4e.org) (www.iea-4e.org)

Background to our feedback

Lighting's contribution to energy savings and the challenge ahead

In the last decade, the lighting industry has accomplished an unprecedented transition towards more and more energy efficient and sustainable lighting products and solutions. This transition has been consistently and successfully driven forward by the industry through technological progress and industry standards supported by international organisations such as the IEA. Regulatory initiatives such as the phase-out of less energy efficient light sources (e.g., incandescent and halogen lamps) in the EU and in other countries have supported the market-driven transition to more energy efficient lighting.

The success of this journey is illustrated by the significant share of LED products in today's lighting product sales and is confirmed by the IEA itself when it states that "lighting is on track" ([Lighting – Analysis - IEA, June 2020](#)).

The lighting industry supports the goals set by the IEA for its Sustainable Development Scenario (SDS) 2010-2030, in which the IEA states: "Current trends suggest the (lighting) market is on track to follow the SDS trajectory by 2030."

Today one of the main challenges towards achieving these savings in the market is the renovation of lighting applications in existing buildings and the transition to modern efficient LED technology and smart control systems. The conversion of installations will make a major contribution to environmental targets. The Renovation Wave Initiative launched in the EU has correctly prioritised the need to accelerate the uptake of existing innovative technologies and products in order to deliver on our ambitious energy savings targets.

Creating additional requirements, such as those proposed in the draft IEA paper, with no evidence that these can be applied in the market nor enforced by authorities, is in our view not the best way to invest our respective resources and achieve our common savings ambitions.

LightingEurope indicative comments on the IEA proposals

A first review by the LightingEurope experts of the IEA draft indicates that the proposals are based on a limited data set, contain mistakes and misconceptions of lighting concepts and result in an opaque methodology that misleads users in their choice of products.

LightingEurope does not see value in investing time and energy to correct the proposals – below an indicative list of only a few of the errors we have identified:

- inappropriate use of multiple tiers versus one minimum performance specification
- limited data and methodology used to define future (2023) performance levels of products
- misconception of color quality and temporal light artefacts specifications
- overly complex and superfluous quality and performance criteria
- no consideration given to additional resources that public authorities will need for market verification & enforcement of these proposals
- inappropriate support for a very specific commercial initiative for replaceable components.

Contact

For further information on this topic, please contact Elena Scaroni, Policy Director (elena.scaroni@lightingeurope.org).

LightingEurope is the voice of the lighting industry, based in Brussels and representing 30 companies and national associations. Together these members account for over 1,000 European companies, a majority of which are small or medium-sized. They represent a total European workforce of over 100,000 people and an annual turnover exceeding 20 billion euro.

LightingEurope is committed to promoting efficient lighting that benefits human comfort, safety and well-being, and the environment. LightingEurope advocates a positive business and regulatory environment to foster fair competition and growth for the European lighting industry. More information is available at www.lightingeurope.org.