LightingEurope Position Paper on the Roadmap on a Circular Economy Action Plan

Introduction

LightingEurope represents the lighting manufacturing supply chain. The membership consists of 34 members, both companies that manufacture and supply lamps, luminaires, control gear and other materials and components for lighting products, as well as national associations representing such companies. Together we represent over 1000 companies in Europe, over 100.000 jobs and 20 billion Euro annual turnover.

This position paper addresses the proposals included in the European Commission's Roadmap on a Circular Economy Action Plan.
LightingEurope views the Circular Economy as a key opportunity for delivering growth and more value of lighting to society; it is one of the 4 pillars listed in the LightingEurope Strategic Roadmap for 2025.
When applying the principles of the Circular Economy to lighting products, it is important to do it in the right way. As the industry transitions away from conventional technologies to LEDs, intelligent lighting systems and human centric lighting, LightingEurope members are working together to shape the framework for the circular economy for new lighting technologies, products, business models and supply chains.

General recommendations

1) Balance information requirements.

There are many labels or information requirements that already exist today, and additional requirements have just been adopted (e.g. Energy labelling regulations for several ERPs including lighting and are due for implementation between 2020 and 2021) or are in the policy pipeline.

The Commission should first carefully evaluate the impact of these new requirements and then decide whether additional databases and information requirements will help consumer choice and the access to information that is relevant and useful.

In the last three years, the EU has set up new databases (e.g. the ECHA Database for Article 33 REACH requirements – to be developed in 2020) and the Energy Labelling Database (EPREL created in 2017). The latter is still being developed, even though manufacturers' responsibility started on 1 January 2019 and despite the best efforts of the

Commission services and stakeholders involved to deliver a well-functioning website on time. There are some lessons we can learn from the first experiences. In particular, LightingEurope has serious concerns about the vast amount of information requirements for every single product and the limited resources (IT, expertise, finances) available to the EU to correctly develop and launch these new databases on time.

For more information, please see section below on lighting products.

2) EU product rules must be designed to consider product's diversity.

LightingEurope believes that the European Commission should not propose an EU Scoring system (or Index or Product Passport) on Sustainability that applies for all sectors or products in the same way.

Consultations and impact assessment on the parameters to be applied should instead take place at sectorial or product specific level. Different products will achieve the objectives of a circular economy in terms of longer lifetime in different ways, depending on their needs and characteristics.

The EU Circular Economy policies should maintain a case-by-case, product focused approach that takes these particular features into account.

For more information, please see section below on lighting products.

3) Simplify EU rules. Existing EU Policies need to be aligned better, to avoid conflicting policies over the same products.

LightingEurope has experienced the exact same products being evaluated for a possible phaseout at the same time, but under two separate EU laws, by two separate Commission DGs and two separate consultants (Ecodesign for lighting and RoHS mercury exemptions for lamps). There are useful lessons and good practices that can be applied in the future to ensure consistency in the EU legislation when similar requirements are being discuss for the same products:

- the Commission DGs and officers meet regularly and collaborate in their evaluation when discussing similar or the same requirements for the same products;
- stakeholder input from one process is also made available and evaluated by the other process;
- the Commission college speaks with a single voice and sends a single clear message on the requirements on these products.

4) Increase enforcement of existing EU rules by supporting Member State Authorities to prevent harmful products from being placed on the market.

The amount of non-compliant products that are placed on the market, also via online platforms, is a reason for concern for human health and the environment and for a fair and competitive market. The EU already has a significant number of rules and standards to ensure consumer safety and high levels of protection of human health and the environment.

The priority should therefore be to enforce the product legislation available, support national authorities and step-up market surveillance actions.

This is very relevant for online platforms, where responsibility for non-compliant products should clearly be allocated to an economic actor within the EU jurisdiction.

Every new EU rule shall include defined minimum market surveillance requirements for Member States, such as a requirement for a minimum number of products to be tested by Member State authorities, by a certain date, etc.

5) EU Policies must support the EU Industry as a Global Competitor.

LightingEurope fully supports the ambition of the new Commission to deliver a Green Deal that brings value to the planet, to people and to companies.

The European Union is in a position to help promote the EU industry and provide political guidance to foster European competitiveness. LightingEurope and other Industry4Europe co-signatories call on the next European Commission to swiftly present an ambitious long-term EU industrial strategy, which shall include clear indicators and governance.

LightingEurope is taking the lead in applying circular economy to lighting. Too strict requirements, unclear definitions in legislation and the proliferation of information requirements and databases may hamper innovation and tie-up resources that could be otherwise employed to deliver on the circular economy.

For more information, please see section below on lighting products.

Recommendations for lighting products

I. Our engagement to inform consumers: a pictogram for containing products

LightingEurope has published in [its Guidelines](#) on the recently adopted Ecodesign Regulation (Reg. 2020/2019) a pictogram that clearly provides the information required in article 4 of the Ecodesign rules to consumers and professional users **(see Annex)** and even goes further to indicate whether the replacement can be undertaken by an end-user or by a professional (among others due to safety reasons).

With this pictogram on Containing Products, we can provide quick and easy to understand information to consumers about the replaceability or non-replaceability of a light source and control gear. The pictogram also represents a lighting industry-wide consensus and facilitates the task of manufacturers to clearly inform customers.

We advise the Commission to give time to consumers and to the market to first get acquainted with this new information requirement and with the pictogram proposed by manufacturers of the lighting industry and then evaluate whether additional requirements may be needed.

II. What if a Sustainability Score is set for all products?

LightingEurope encourages the Commission to adopt a product-specific approach and to review existing/upcoming requirements before introducing any new information requirements for consumers.

In case a "Sustainability Score" is to be applied to all Energy Related Products (ERPs) or to all electronic products including lighting, this score should at least ensure consistency with the information requirements that are already set. These information requirements apply under the Ecodesign regulation (R. 2019/2020) and in the Energy Labelling Regulation (R. 2019/2015), considering that a pictogram on replaceability (as proposed by LightingEurope) will appear – from September 2021 - on the Containing Product packaging in which light sources and control gears are used (following the obligation requirements in art 4 of R. 2019/2020).

ANNEX – LightingEurope pictograms for containing products on replaceability

Placing the following pictograms on the packaging of containing products can cover the abovementioned information requirements on the replaceability of light sources and control gear by end-users or qualified persons (Art. 4 of the Reg. 2019/2020).

These symbols should not be used on containing products (luminaires) that are considered to be a light source.

These pictograms – displayed below - are available on the LightingEurope guidelines on Reg. 2019/2020.

Replaceable light source by a professional
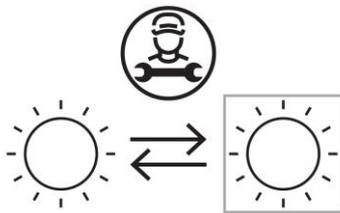
Replaceable (LED only) light source by a professional
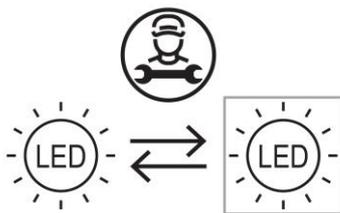
Replaceable control gear by a professional
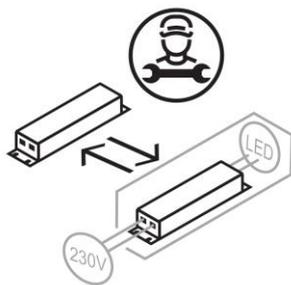
Replaceable light source by an end-user
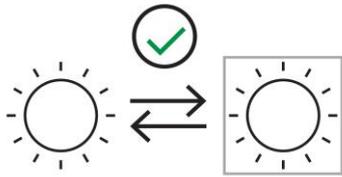
Replaceable (LED only) light source by an end-user
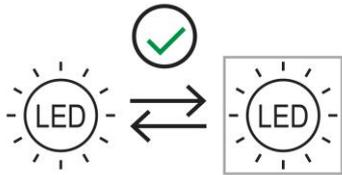
Replaceable control gear by an end-user
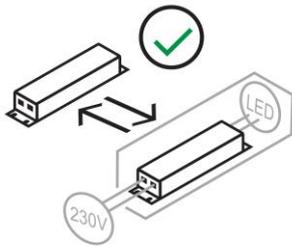
Non-replaceable light source
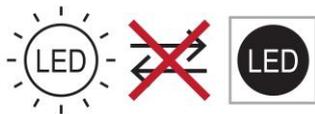
Non-replaceable control gear
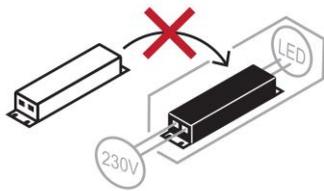
Contacts

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LightingEurope is the voice of the lighting industry, based in Brussels and representing 34 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