

# Better Regulation Consultation

## High-level messages on the October 2018 European Commission's proposal for revised eco-design requirements on lighting

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LightingEurope, representing the lighting industry in Europe, would like to thank the European Commission for the opportunity to comment on the eco-design legislative review for light sources, in which the Commission proposes important changes compared to the current legislation.

LightingEurope fully supports the Commission's Circular Economy proposals in Article 4 – the proposed rules provide clear requirements for manufacturers and for consumer choice. A mandatory removability requirement that applies to all lighting products and all lighting applications is not feasible and would have led to the unnecessary ban of lighting products that otherwise achieve the objectives of the circular economy in terms of durability, material efficiency, etc.

LightingEurope supports increased enforcement of the eco-design rules and therefore proposes shorter and cheaper testing methods. The current testing method of 21 weeks (which is 5 months) is too long, and we propose further simplifying and introducing a 500 h or 1,000 h early failure test.

Additionally, the proposed +/- 5% tolerances for luminous flux are industrially not feasible at all. Instead, LightingEurope proposes a one-side tolerance that is feasible for manufacturers and market surveillance authorities.

LightingEurope calls for a more pragmatic and realistic timetable for the transition to substitute technologies and products. A premature phase-out of some lighting technologies (e.g. T8) will have a negative economic, social, and environmental impact on industry and end-users, including insufficient capital to invest in substitute technologies and products. This will increase precautionary purchases of old technologies, significant amounts of unnecessary waste and job losses due to a reduction of industrial activities in Europe.

Another major concern has been brought forward by various other industries, which need specific lighting products for specialised industrial applications. Those irreplaceable light sources are at risk under the currently proposed eco-design requirements. Examples are standby requirements used in DMX/RDM applications for stage lighting, LED high luminance light sources in the entertainment industry, R7s halogen lamps for stage and studio lighting, and E27 halogen lamps for heating. Specialised applications have to be exempted under the list of special purpose lamps.

Related to abovementioned is the need to align with other legislative reviews, in particular the revision of RoHS requirements. LightingEurope calls for a pragmatic and consistent transition timetable between eco-design and RoHS legislation when requiring a phase-out of lighting products from the market.

Various editorial and technical corrections will be sent directly to the European Commission and the Member States in a separate file.

## Contact

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

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](http://www.lightingeurope.org).