

# Better Regulation Consultation

## High-level messages on the October 2018 European Commission's proposal for revised energy labelling 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 proposed review of energy labelling requirements for lighting products.

LightingEurope welcomes the discontinuation of the label for luminaires, as we believe that it does not provide any relevant information when evaluating a luminaire and has no other benefit for consumers. We fully support the proposal to limit the energy label to light sources.

LightingEurope proposes additional revisions in order to clarify the text and ensure the proposal is feasible and easy to enforce. The scope has to be reduced to end-user replaceable light sources that are not marketed as part of a containing product (except when they are offered for sale, hire, or hire purchase or displayed separately to the end-user, for example as spare parts).

LightingEurope urges the legislator to exempt in particular emergency lighting from energy labelling obligations, including EPREL, as emergency lighting is not intended for illumination but rather to ensure the safety of humans in case of emergencies.

We also recommend more flexibility when it comes to the labelling format. As the energy label has to be printed on the packaging and lighting products come in multiple shapes and sizes. LightingEurope recommends maintaining the option of a complete horizontal label and a greyscale complete label.

LightingEurope is very concerned with the proposals for EPREL. Uploading product information related to hundreds of thousands of light source models, including lamps and modules sold between 1 August 2017 and 1 January 2019, is unfeasible in light of the current timeline and state of preparedness of the database, and may result in involuntary non-compliance. The necessary guidelines and infrastructure does not yet exist for suppliers to start registering and uploading information. The current planning foresees that this will only be possible from 14 December 2018. Eight working days is too short for industry to upload all information before the deadline of 1 January 2019.

Additionally, in the second phase of EPREL starting from September 2021, the information requirements in their current format go far beyond the necessity of informing end-users and market surveillance authorities about the energy usage of lighting

products and the level of details is far too complex. We need a much more pragmatic approach for dealing with data requirement. We therefore propose to limit the information requirements to what is necessary for end-users to be informed about the energy usage of lighting products.

## 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).