



Position Paper on the evaluation of Low Voltage Directive 2014/35/EU¹

Introduction

Since its establishment, LightingEurope has always supported initiatives from the EU that benefit consumers, the environment, and the economy. LightingEurope therefore appreciates the opportunity offered by the European Commission to provide feedback on the evaluation of Directive 2014/35/EU on the placement on the market of electrical equipment designed for use within certain voltage limits (Low Voltage Directive).

LightingEurope does not see a need for operational changes in the Directive, especially concerning the scope, its fundamental principles, and the responsibilities set for the different actors.

Comments on the proposed evaluation

The Low Voltage Directive requirements were first established in 1973, and the principal elements of the safety objectives, as listed in Annex I of the Directive, have never been changed.

During the last few decades, the Directive provided an exhaustive list of essential requirements regarding safety and has always been considered a reference by experts involved in the development of standards. The requirements and principles of the Directive are still applicable and up-to-date, even though innovation and new technologies have continuously improved electrical products. LightingEurope is convinced that these elements will continue to be fully applicable to future products and new technologies.

Another key element of the success of this Directive is that over the last 45 years, it has provided stable rules and well-defined responsibilities for economic operators.

Presumption of conformity

The protection of EU citizens has been further strengthened by the presumption of conformity, provided by safety standards, with the essential requirements specified in the Low Voltage Directive. In addition to this, Annex I of the Low Voltage Directive specifies the essential requirements that must be met. The compliance with the standards

¹ Ref. Ares(2017)5291384 - 30/10/2017.

published in the Official Journal of the EU provides a presumption of conformity to these essential requirements.²

Moreover, products within the scope of the Directive are traceable to their source (i.e. manufacturer) throughout their lifetime. The Low Voltage Directive states that the products within its scope must be clearly identified with a reference to the manufacturer and the manufacturer's address.

The abovementioned points allow for a clear understanding by both the manufacturer (as regards product design and placing on the market) and the market surveillance authorities (for the evaluation of the products for market surveillance). Changing the Directive creates the risk that the corpus of safety standards created in order to comply with the Low Voltage Directive will no longer be appropriate and will also have to be changed. This means that revising the relevant requirements in the Low Voltage Directive might damage the competitiveness of the European industry.

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.

² This paragraph has been revised on 10 May 2019 and clarifies the statement from the first version of this position (2 March 2018).