

LightingEurope proposals

European Commission **eco-design** and **energy labelling** working documents on light **SOURCES** (November 2017 drafts)

#LightMeetsEU

20 March 2018, European policies impacting the lighting market, Light+Building

Main topics

1. Scope
2. Removability
3. Timing
4. Align RoHS and Ecodesign
5. Special purpose lamps
6. Call for a realistic timetable for transitioning to new lighting technologies
7. EPREL (Energy Labelling Database)

Key take-home messages

1. Welcome simplification from 3 Ecodesign Regulations* into one single Regulation
2. Keep requirements of existing Regulations for conventional products (non-LED), including product information requirements
3. Align on the evaluation and policy recommendations between RoHS and Ecodesign
4. Minimise the burden for companies in the labelling Regulation, especially in the EPREL database

For further savings, focus on LEDs instead of conventional technologies

* Reg. 244/2009, Reg. 245/2009 and Reg. 1194/2012

1 Scope of Eco-design rules and Energy Labelling

Two new terms are introduced - the definitions of 'light sources' and 'containing products' need to be clarified

LE proposal (summary):

- Light source to be considered is the smallest physical unit that can be readily removed from the containing product without permanent mechanical damage **of the light source** and that meets the definition for light source
- Light source **can be lamps, modules**, or the part of the containing product as identified by the manufacturer for the purpose of market surveillance

2. Removability- Replaceability

LightingEurope does not support a mandatory regulatory requirement on replaceability

LightingEurope recommends:

- Light sources and control gear can be removed without being permanently damaged for verification by **market surveillance**
- Light sources and control gear can be dismantled at **end of life** – instructions available upon request
- Manufacturers/importers provide **information** on whether light sources and control gear are **replaceable** (free access websites, pictogram on packaging for consumers)
- Commission to undertake **detailed impact assessment** before proposing new circular economy aspects, taking current regulatory requirements into account.

3. Timing

The market should be allowed to transition to new technologies and products at its natural pace to avoid unnecessary waste and costs.

1/ Proposed ban of T8 fluorescent lamps and small halogen lamps in 2020 is too early

Concerns raised by the users about the phase out of T8 and small halogen lamps

2/ Flicker requirements to be introduced at a possible stage 2 (2023)

Need experience of working with common test method

4. Align RoHS & Ecodesign

- The same products are being reviewed under 2 separate processes at the same time.

DG Environment is taking decisions on RoHS exemption renewal requests for most of the conventional lamps on the market today (e.g. CFL, LFL, HPS, HID and Special Purpose lamps)

- LightingEurope encourages the Commission to jointly review all stakeholder input to both processes and to align on the evaluation and policy recommendations.

Considerations on phase out of lamps made at the Consultation Forum (for ex. on T8 lamps) by Member States, other stakeholders and DG Energy itself, should also be taken into account in the RoHS process

5. Special purpose lamps

- Where no LED replacement is available, these technologies and products need to be exempted.
- To avoid loopholes in the exemptions and an unwanted early ban of technologies, LightingEurope proposes a combined approach.

LightingEurope proposes a definition of special purpose lamps as a replacement of Annex I, para. (3), together with a non-exhaustive detailed list of lamps ('Annex Z' in detailed comments) that will constitute a new Annex to the Ecodesign text.

6. Call for a realistic timetable for transitioning to new lighting technologies

- A Joint Industry Statement is being drafted and will be published in the next days. Main messages to regulators:
- to adopt a pragmatic and realistic transition timetable to substitute lighting technologies and products (ex. T8).
- where there are no substitute products and technologies, to continue to allow these special purpose products by exempting them from the ecodesign rules and from RoHS (ex. UV lamps for curing inks and varnishes)

7. EPREL

Do you know what EPREL is?

7. EPREL (Energy Labelling Database)

- Regulation (EU) 2017/1369* establishes a EU product database in which all new products covered by energy labelling, have to be registered before placement on the market in a database (EPREL)
- the European Product Registry for Energy Labelling (EPREL), has to be set-up and be completely functioning from 1 January 2019 onwards.

* Also called Energy Labelling Framework Regulation

7. EPREL (Energy Labelling Database)

- What does it practically mean for companies (LightingEurope estimations)

Products models to be registered in EPREL before June 2019

Luminaires

Lamps

Between 1 and 3 million

between 200,000 and 500,000

7. EPREL (Energy Labelling Database)

LightingEurope proposals:

- A fairer timeline (testing phase to start asap)
- Exempt luminaires (under 874/2012) completely from the EPREL
Ensure a minimal burden e.g.:
 - when rescaling from one label to the following
 - when small changes need to be made (for ex. due to a change in standard)
- Ensure user-friendly IT interface
- Ensure the highest level of data security & IP protection
- Input shall be limited to what essential for the generation of the label

We call on Member States to verify that all relevant operators are registered with their products in the database!

7. EPREL (Energy Labelling Database)

- LightingEurope is being consulted by the Commission as other sectorial associations
- Our members are actively contributing to minimise negative effects of EPREL, which is a mandatory requirement by law
- If you also would like to contribute, please get in touch with your Lighting National Association or with us!

Thank you! Keep in touch!



Ourania.Georgoutsakou@lightingeurope.org

Elena.Scaroni@lightingeurope.org



www.lightingeurope.org



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