

**The European Lighting Industry Position on
How to Maximise the Potential Benefits of European Policy
on Energy Efficiency in Lighting**

January 2008

Overview of our position

Highly aware of the importance to the EU of delivering rapid and cost-effective CO₂ emissions reductions, the European Lighting Industry, represented by ELC for the lamps (www.elcfed.org) and by CELMA for the luminaires and components for luminaires (www.celma.org), is keen to ensure that there is the quickest and most effective follow-up possible to the EU's public commitments in March 2007 on developing a low carbon economy, in particular through a 20% increase in energy efficiency by 2020.

For lighting, this means contributing via:

1. EU-wide Product Standards - under the EU's Eco-Design of Energy Using Products Directive (EuP)
2. National measures to encourage renovation of existing installations - notably under the EU's End-Use Energy Services Directive (NEEAPs, ESD)
3. EU-wide lighting installation design criteria – under new legislation that should be proposed

1. EU-Wide Product Standards

Our goal: the development of EU-wide Implementing Measures (IMs) that will set energy efficiency limits for the future use of lamps, ballasts, optical systems of luminaires and standby power of control systems under the ***Eco Design of Energy Using Products Directive (EuP)***.

Timing

The Lighting Industry sees this as the **first and quickest way to secure significant energy and CO₂ savings for new lighting products that are placed on the European single market.**

Scope

- For simplicity of communication and for market surveillance reasons these measures should be **formulated independently for each of the lighting EuP's which are lamps, ballasts, optical systems of luminaires and control systems (standby power).**
- We support the EUP approach for selected product technology-based categories and which are independent of the application (location of use) of those selected products.
- The approach on Implementing Measures has to date been triggered by application-focused studies on street, office, and domestic lighting. In order to harness the largest possible saving potential, the position of the lighting industry is that these IM's should contain generic energy efficiency criteria for the specific product categories listed in the Eco-profile tables provided by ELC and CELMA, independent of the application area. **The reason for this is that products identified by the Commission, now and in any future phase out plan, will not only be removed from one particular application area but from the total market.**

- **Luminaire optical part tables should not lead to additional requirements for lamp categories for which no Eco-profiles have been defined.** This is because adding additional lamp tables contributes negligible energy savings.

Labelling

- We urge that the CE marking is used as the sole means of identification for products on the market that comply with the requirements of Implementing Measures for energy efficiency.

2. National measures to encourage renovation of existing lighting installations

Our goal: The development of complementary national legislation and measures that encourage the renovation of existing low performing lighting installations (starting with street and office lighting) to energy efficient systems.

- Notably but not exclusively, this can be achieved within the framework of the **National Energy Efficiency Action Plans (NEEAPs)** required under the EU's End Use Energy Services Directive, based on Article 175.
- All NEEAPs should be developed or reviewed where already available to ensure that such measure for lighting are included and prioritised.

3. EU-Wide Lighting Design Legislation to improve light quality as well as the energy efficiency of the lighting installation

Our goal: the development of **harmonized EU-wide energy saving and performance criteria for lighting installations**, through authority certification of lighting designs, based on European Legislation, like EuP based on Article 95.

- Such rules would 'close the loop' by ensuring that light quality is improved whilst achieving energy savings in the most efficient manner through a system approach.
- Since lighting solutions and their energy saving criteria are in principle the same across EU Member States, such binding Lighting Design rules would avoid the risk of 27 divergent national criteria, which would be unnecessary, costly and time-consuming. Rather, they could form part of national **building codes and public procurement rules** or any specific national regulations.

Conclusion

Our commitment to policy-makers and regulators is:

- To assist the development of workable Implementing Measures under the Eco Design of Energy Using Products Directive by providing technical lighting expertise.
- To provide assistance to drive renovation through National Energy Efficiency Action plans (NEEAPs) through our Roll Out Member State (ROMS) network.
- To build awareness for the need of harmonised lighting design criteria to push for larger savings in installations.