



CELMA

C.E.L.M.A.
*Federation of National Manufacturers
Associations for Luminaires and
Electrotechnical Components for
Luminaires in the European Union*

CELMA POSITION ON THE COMMISSION'S WORKING DOCUMENT ON ECODESIGN REQUIREMENTS FOR EXTERNAL POWER SUPPLIES

Status 15 February 2008

CELMA, representing the European Luminaires and Ballasts manufacturers (www.celma.org), has the following comments and questions on the above mentioned Commission working document, for which it requests support and/or clarification in the view of the next EuP Consultation Forum meeting on 22nd of February 2008:

EXECUTIVE SUMMARY

CELMA expresses the following general comments:

- 1. We consider that halogen convertors (including magnetic transformers) should be excluded from the scope of this implementing measure and should be included in the lighting specific implementing measure (e.g. Lot 19, domestic lighting) for reasons below.**
- 2. The implementing measure should also include the built-in type halogen transformers and convertors (built inside the luminaire).**
- 3. The requirements for no load losses is applicable only to controllable convertors, where the lighting can be switched on or off / dimmed to desired lighting level by controlling signal through input control port (analog or digital, wired or wireless control network).**
- 4. In non-controllable halogen lighting applications the lamp load is typically always connected and the switch is on the primary side of the non-controllable convertor. No-load situation is an abnormal case appearing only when the lamp is defective or missing. The implementing measure should require that the circuits are so designed that the switch is on the primary side. The no-load requirements shall be deleted. Primary switched-on circuits represent more than 90% of the market.**



Further CELMA questions and comments on the working document:

Definitions, page 1, item 3. “Halogen lighting convertor”

The definition of external halogen lighting convertor is somewhat confusing. The word refers normally to **electronic** convertors, but in the working document the definition covers also magnetic transformers. There is no differentiation made in the working document between magnetic and electronic types of convertors. The scope includes only independent convertors. Built-in type convertors, which are built into a luminaire, are excluded, why?

Annex I, Ecodesign requirements, chapter 2, Halogen convertors

1. Differentiation between three operation modes (situations):

- **Energy saving mode** (like DALI = digital addressable lighting interface or other techniques for controlling the light output via interface protocol <http://www.dali-ag.org/>)
- **No load mode** (transformer or convertor connect to the voltage supply and lamps are switch off)
- **Normal operation mode** (lamps are connected to the transformer or convertor in normal operation)

2. Differentiation between magnetic transformer and electronic convertor for halogen lighting with separate requirements:

- **Electronic convertors:**

- Energy saving mode

- This mode in combination with daylight sensors, present detectors and/or other automatism is the real mode to save energy.

- No additional requirements indicated.

- No load mode

- The no load power consumption shall not exceed 1 Watt (EU (EN) measurement requirements shall be fixed). This requirement is valid only for controllable convertors with integrated input control port.

- Normal operation mode

- The active efficiency shall not be less than 0.925 (EU (EN) measurement requirements shall be fixed).

- **Magnetic transformer:**

- Energy saving mode

- Does not apply to magnetic transformer.

- No load mode

- The no load power consumption shall not exceed 15 % of the rated power of the magnetic transformer (EU (EN) measurement requirements shall be fixed).



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(Typical values for the open circuit wattage (no lamp connected to the transformer) are 10% of the nominal Wattage. In installations the transformers are typically switched via the mains, the “no load mode” is an abnormal situation, which happens in case of a defect of all connected lamps only. This requirement is not applicable, as the switch should be on the primary side.)

Normal operation mode

The active efficiency shall not be less than 0.7 for for rated output powers less than 250W and 0.85 for from 250W upwards. (EU (EN) measurement requirements shall be fixed).

Magnetic transformers are necessary for a lot of applications with special conditions where electronic convertors not feasible to use. Therefore different requirements on the product level for magnetic transformer advised.

Annex III: Measurement method for halogen lighting convertors

Electronic convertors: Measurements/classification of efficiency according to Australian standard (ref. Annex III) is acceptable, including the reference table 1 for load conditions.

All convertors: The tolerances of the measurement shall be defined.