



CELMA

C.E.L.M.A.

*Federation of National Manufacturers
Associations for Luminaires and
Electrotechnical Components for
Luminaires in the European Union*

**CELMA comments on the Commission's documents
on possible ecodesign requirements for general lighting equipment
("Domestic lighting part 1, including incandescent bulbs")**

For discussion at the EuP Consultation Forum meeting on 28th of March 2008

Final version - 20/03/2008

EXECUTIVE SUMMARY

CELMA, representing the European Luminaires and Ballasts industry (www.celma.org), welcomes the Commission's documents on "possible ecodesign requirements for general lighting equipment ("Domestic lighting part 1, including incandescent bulbs").

CELMA members work very hard to develop energy efficient lighting solutions since many years. We therefore fully support the efforts of the European Union to achieve the target of 20% CO2 reduction by 2020.

However, CELMA wants to highlight the following concerns raised by the above mentioned documents:

- 1) **On the proposed timing for the phase-out, CELMA fully supports the ambitious timing proposed by the European Lamps Companies Federation (ELC) – 5 stages and 9 years - for the following reasons:**
 - We do not believe there are enough quality CFLs available on the market to replace the GLS lamps that will be removed from the market. Our concern is not just volumes (production capacity) but also the quality of the lamps. We need to ensure quality lamps are used such that the final luminaire/lamp system quality is maintained. We do not want to take the risk of bad quality products. General experience of the past has shown that the European lamp manufacturers are the best guarantee that EU quality standards are respected. In contrast, imports from Far East have often shown safety issues or did not comply with environmental regulations and material requirements. They may also bear a higher risk of not meeting the key objective of higher energy efficiency.
 - The faster phase-out option (the one based on the preparatory study) – 3 stages and 5 years – will not allow enough time to the luminaire producers to change their production line. One consequence of the phasing out of the inefficient incandescent lamps will not only consist in changing a lamp in a luminaire, it will be about changing the whole design of luminaires. Hence why, luminaires producers will need time to develop these new technology of luminaires specifically designed for CFLs.
 - In some situations, no replacement lamps are available (e.g. low wattage clear candle lamps). These lamps will never be replaced by CFLs but by halogen lamps.
 - We need strong basic standards before the main wattages of incandescent lamps are phased out. E.g. CFL Quality Charter with amendment to the Charter to cover energy efficient halogen lighting sources.

- We accept that the majority of products will be coming from Far East countries. To ensure the imported lamps will be of high quality, complying with EuP quality requirements, we need a strong market surveillance in all Member States of the European Union.
- A possible consequence of low quality CFLs on the European market may be an increase in health issues due to, for example, poor electronic ballast design causing flicker. Further risk assessment studies should be undertaken to ensure that the different parts of the public who could have health problems find alternative solutions.
- In some countries there are specific needs (eg. sparkling in Poland and neighbouring countries in central Europe) and also sometimes problems to afford the high initial cost of CFLs.
- It's generally accepted that in 5 to 10 years, LEDs will be more and more prevalent in the market. Luminaires producers need time to develop LEDs luminaires.
- 2) In general, CELMA supports the banning of inefficient lamps with the condition that replacement types are available. (Options 2 or 3)
- 3) On requirements on luminaires for general lighting, CELMA is against the banning of luminaires with G9 sockets.
- 4) On Energy labelling, CELMA does not support a ban of lamps based on the energy label. We support the phase out proposed by the ELC which is based on lm/W criteria that underpin the EU Energy Label. *Note: the energy label concept is under discussion and not yet finalised.*

**CELMA detailed comments on the Commission’s Working Document
on possible ecodesign requirements for general lighting equipment
 (“Domestic lighting part 1, including incandescent bulbs”)
Annex 2**

CELMA comment number	Working Document page number	Extract of the Working Document	CELMA comment
1	2	On timing, the question is whether to implement quickly (such as 3 stages and 5 years, with total GLS phase out after 3 years) or more cautiously (5 stages and 9 years, with total GLS phase out after 7 years), as proposed by the lighting industry. The timing also raises the question of production capacity and closure of production lines in Europe.	As mentioned in details in our summary above, CELMA fully supports the ambitious timing proposed by the European Lamps Companies Federation (ELC) – 5 stages and 9 years.
2	5	Revision of the energy label for lamps	CELMA does not support a ban of lamps based on the energy label but supports the phase out proposed by the ELC is based on lm/W criteria that underpin the EU Energy Label. <i>Note: the energy label concept is under discussion and not yet finalised.</i>
3	9	Levels of ambition in timing	As mentioned in details in our summary above, CELMA fully supports the ambitious timing proposed by the European Lamps Companies Federation (ELC) – 5 stages and 9 years.
4	11	Main potential problems with the options “A higher proportion of sub-standard products entering the market with the risks and disadvantages associated with that.”	We do not want to take the risk of bad quality products. Hence why CELMA fully supports the ambitious timing proposed by the ELC.
5	11	“Third country producers would also be bound by the quality requirements under the planned implementing measure.”	We accept that the majority of products will be coming from Far East countries. To ensure the imported lamps will be of high quality, complying to EuP quality requirements, we need strong market surveillance in all Member States of the European Union.

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6	13	Health issues	A possible consequence of low quality CFLs on the European market could be an increase in health issues due to, for example, poor electronic design causing flicker. Hence why, further risk assessment studies should be undertaken to ensure that the different parts of the public who could have health problems find alternative solutions.

**CELMA detailed comments on the Commission’s document
on possible ecodesign requirements for general lighting equipment
(“Domestic lighting part 1, including incandescent bulbs”)
Annex 3**

CELMA comment number	Working Document page number	Extract of the Document	CELMA comment
7	12	<p>III.5. Requirements on luminaires for general lighting</p> <p>Luminaires for general lighting shall be compatible only with the lamp caps referred to in Annex I.3 unless they are luminaires with integrated lamp (e.g. LED luminaires). If options 1 or 2 of the main Working Document are selected, further luminaire requirements will be set:</p> <p>Luminaires for general lighting shall not be manufactured with the following sockets:</p> <ul style="list-style-type: none"> • G9 • R7s, (unless the luminaire has a built-in presence detector and minimum ingress protection IP54) • RX7s (unless the luminaire has an integrated HID lamp ballast) 	<p>CELMA position on requirements on luminaires for general lighting:</p> <ul style="list-style-type: none"> • We are against the banning luminaires with G9 sockets because <ul style="list-style-type: none"> ○ There are already energy saving G9 halogen lamps on the market ○ There are already energy saving G9 CFLi lamps on the market • CELMA accepts the proposal for luminaires with R7s sockets. • CELMA believes that the luminaires with RX7s sockets specific to certain applications should be tackled under the new EU wide lighting design legislation, proposed by the European lighting industry which will be application based.
8	12	<p>III.6. Requirements on wall-mounted lamp dimmers for general lighting</p> <p>From Stage 1, wall-mounted lamp dimmers for general lighting shall be able to dim fluorescent lamps with integrated ballast.</p>	<p>This requirement is not technically feasible because a CFL lamp with integral ballast, <u>unless specifically designed for dimming</u>, cannot be dimmed.</p>