

NL comments on the consultation of 5 July 2010 on possible measures targeting the energy efficiency of lighting in the tertiary sector

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Regarding **option A (lighting at component level)** we suggest the following changes/improvements to the ecodesign regulation:

- For both outdoor and indoor lighting requirements for the powerfactor (min) and THD (max) would be necessary as soon as possible. This to avoid harmonic distortion created by inferior (new) equipment (e.g. of poorly designed ballasts, led drivers and adaptors).
- Regarding light sources the time has come now to formulate minimum requirements for energy efficiency, life, lumen maintenance for LED lamps and systems. Since the preparatory study the LED market has developed very fast and in order to create a level playing field, also (information) requirements for LED lamps and systems for tertiary lighting are needed. In some cases we noticed that efficient FL-, CFL- and HID systems have been replaced by bad LED systems because of wrong or inadequate information. We suggest not to wait till the review in 2014, but start the process already in 2011. The Commission could in this case benefit from e.g. the work in the new 4E SSL Annex.
- Furthermore, we favour a faster phasing out of high pressure mercury lamps and an earlier date for stage 3 (2014 in stead of 2017) for ballasts (fluorescent and HID).
- Regarding luminaires it would be favourable to define (more) stringent requirements. As you indicate in the consultation document for indoor lighting the variety of applications makes this very difficult. However for new and in particular on installations for public lighting and outdoor lighting (including components to be used in those installations) additional requirements and labelling within the Ecodesign Legislation are acceptable when they sufficiently take the application into account. For a particular luminaire/lightsource combination this would mean that e.g 5 different label (energy efficiency) ratings, each related to a different application (street profile) would be applicable.

Regarding **option B (lighting at system level)** we suggest the following.

- For outdoor lighting, we think that the Dutch A-G public lighting energy (installation) label would be perfectly suitable and recommendable for upscaling on EU level. This label was developed and published in 2009 by the Dutch Illuminating Society (NSVV) and is also the basis for the Dutch governmental green procurement criteria for public lighting. In order to facilitate the implementation of this label a luminaire label which takes enough application profiles into account would be highly recommendable.

The description of the Dutch energy(installation)label for public lighting is based on the SLEEC method (Street Lighting Energy Efficiency Criterion) described in the EN13201-5 (Energy Efficiency Requirements) can be found in

http://www.agentschapnl.nl/openbareverlichting/publicaties/handleiding_energielabeling_openbare_verlichting.asp

- For indoor lighting, the CEN standard EN 15193 defined the LENI (lighting energy numerical indicator) would be a perfect indicator to be used to label installations and to define requirements at a legislative level. Contrary to requirements on component level this methodology facilitates the uptake of lighting control systems to adequately reduce the use of the systems.