

From: Eva Geilinger [mailto:eva.geilinger@topten.info]
Sent: Thursday, September 15, 2011 5:36 PM
To: TOTH Andras (ENER); LAMBEAU Colette (ENER)
Cc: eric.bush@topten.info
Subject: Comment to consultation on directional lighting / household luminaires

Dear Ms Lambeau, dear Mister Toth,

The consultation in July once again sparked the discussion about luminaire labelling. Topten's position is that a mandatory label is useful for both domestic and office luminaires. Voluntary labels can lead the way, but mandatory labelling should be established as a mid-term goal. Only then will the necessary research and development work begin seriously.

I formulated a position paper for Topten which I would like to hand in as comment to the current consultation on household luminaires. It will be spread via Topten Europe's website and newsletter.

To summarize it: We encourage the European Commission to take a stand for mandatory luminaire labelling in the mid-term, so research and development can begin: To minimize bureaucracy and costs for small and medium-sized enterprises, a straight-forward test standard and classification system for household luminaires should be developed. The energy efficiency index should consider essential differences between luminaires. A classification system with approximately 10 – 20 categories would be feasible. The process must be viable for industry. Strategies to streamline the process could include extending test results to like models in modular constructions, and excluding low wattage and limited production series.

Note: The proposed regulations on eco-design requirements and labelling for lamps are important, their adoption should be expedited as much as possible. Developing a genuine household luminaire label should be an independent project. A warning "not compatible with efficient lamps (class A)" could be a good interim solution.

Topten will of course continue to develop the test procedure for household luminaires currently applied in Switzerland. We are happy to support any research done on this topic.

I'm curious to hear how it all proceeds. Unfortunately, I cannot take part at the meeting on september 23rd.

I wish you a productive meeting next week!

Best regards
Eva Geilinger