



# Eco design requirements for general lighting equipment: ecee's comments

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ecee welcomes the proposed eco-design requirements for general lighting equipment, primarily intended for domestic use. ecee strongly supports the second option outlined by the Commission. Although the first option outlined by the Commission would theoretically bring about 10 % larger EU-wide savings than option 2, we believe that these savings may not be achieved due to problems of using CFLs in an optically optimal way in all situations. This may result in consumers using higher-wattage lamps to achieve their desired lighting effect. The mix of lamp types offered in option 2 will better suit the needs of consumers and is more practical.

We are also conscious that as lighting products are globally traded, then these issues need to be addressed within an international framework and we hope that the Commission's proposed International Partnership for Energy Efficiency Cooperation will address all lighting as a priority.

## **Time frame and end-goal of option 2**

Each option has two variables: one is the speed at which each stage is introduced and the products phased out at each stage, the second variable concerns the product that remain on the market after the last stage.

It seems as if the ELC proposal and Commission's option 2 in practice are rather close to each other regarding the end date. The EuP requirements would realistically not take effect until late 2009, which would give an end date of late 2014. This is only about 2 years earlier than the ELC proposed phase out (which has effectively started already). There is no four-year difference, which many seem to believe. We support the Commission's proposed timetable.

### *ecee believes that*

- Given the limitations of CFLs, it is important that only the most efficient halogens should remain on the market (infra-red reflective coating technology and with integrated transformers for mains-voltage lamps) after five years. Halogens of lower efficiency should not be allowed. However, it is important that the Implementing Measure is accompanied by consumer information campaigns to help people make the right choice between CFLs and the remaining halogens, as well as LEDs which

### ***About the European Council for an Energy Efficient Economy (ecee)***

ecee is a non-profit, membership-based European NGO. The goal of ecee is to stimulate energy efficiency through information exchange and co-operation. To facilitate this, ecee provides an information service through its website and e-mail newsletter, arranges workshops and conferences, and takes active part in the European Policy making process.

One of ecee's principal events is the Summer Study, held for five days every odd year in the early summer. The Summer Study attracts more than 350 participants from a wide range of backgrounds. ecee and its summer study offer governments, industry, research institutes and citizen organisations a unique resource of evidence-based knowledge and access to reliable information.

ecee promotes the understanding and application of energy efficiency in the energy research, policy and commercial organisations. It offers membership for both individuals and organisations.

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are on the verge of becoming viable options to these two technologies in several applications.

- Since IRC coating is a capital-intensive technology, manufacturers should be given a clear signal as to how long this technology may remain on the market. A phase out in parallel with the US 45 minimum lm/W requirement for 2020 may be an acceptable time frame. However, this time frame needs to be reviewed within an international framework and with respect to the development of LEDs.
- It is important to start the phase out of incandescent lamps as soon as possible. There are indications of consumers being willing to stockpile standard incandescent lamps (e.g. in Scandinavia), which would in practice prolong the phase-out and reduce peak demand for CFLs.
- Europe has an early-mover advantage if the incandescent phase-out starts quickly. Postponing the phase out may actually make our peak demand for CFLs coincide with that of other regions.

### **CFL quality**

Quality requirements for CFLs should be imposed and closely monitored for compliance to avoid consumer dissatisfaction. The existing European CFL Quality Charter represents a good starting point.

### **Scope of the proposal – lumen output**

ecee believes that the Commission should consider lowering the limit of lumen output for the lamps to be covered from 150 to 100 lm as soon as possible. This would make the proposal include smaller halogen lamps that are increasingly popular in the residential sector.

### **Avoid exemptions for coloured and modified spectrum lamps**

The current chromaticity scope of the proposal appears to cover even lightly coloured lamps, which is good, as well as incandescent so called “modified spectrum” or “enhanced spectrum” lamps.

The experiences from Californian standards show that it is crucial not to make exceptions for these “modified spectrum” or “enhanced spectrum” lamps. These lamps were not popular in the US before the standard was introduced, but due to the exemptions these incandescent, inefficient lamps have been marketed aggressively as replacements for incandescent GLS lamps.

### **Labelling**

It is questionable whether light sources so clearly not intended for domestic use should be included in the labelling system, e.g., low- and high-pressure sodium lamps.

### **Power factor**

There is a general misconception that low power factor of CFLs actually increase their energy consumption, and associated emissions, due to system losses. This is not true, but CFLs should still have a reasonable power quality for other reasons. ecee supports the Commission’s pragmatic approach of gradually tightening the power factor requirements.

ecee does recommend, however, that a few large scale field tests with high CFL saturation are set up and closely measured. This would help to settle the issue and allow us all to focus the debate on more important issues.

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