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Proposed eco-design requirements for fluorescent lighting products and office lighting: Comments from the European Council for an Energy Efficient Economy

General comment

We support the work to develop basic and generic criteria, which would eventually cover all lighting products (as presented at the Consultation Forum 18 December). This should also form the basis for revising the energy labels covering lighting products. In our view, criteria, definitions, test standards developed for the EuP Implementing Measures must be harmonised with criteria applied under the labelling Directive. We can only stress the urgency of seeing this work completed.

Classification of ballasts and other products for labelling purposes

We support the proposed revision of the ballast categories with two separate A and B classes for dimmable and non-dimmable products respectively. We think the current single class for dimmable ballasts has played out its role since all dimmable products are not equally efficient. We are also in favour of moving towards a harmonisation of the scale to the European A-G system (although there will be no E-G classes).

Elsewhere in the document, there is a reference to A+ and A++. We believe that any labelling classes should refer to the European A-G scale to avoid further consumer confusion. The A+ and A++ classes are the result of an unfortunate compromise.

Phase out of least efficient products

In item 1.6 the proposal states that ballasts should have an EEI Class of at least D one year after the IM has come into force. In the staged requirements, it appears that neither D nor C (both magnetic classes) are proposed to be phased out. We don't see the need for keeping magnetic ballasts after a phase-out period. Possible exceptions for magnetic ballasts must be very well defined and limited to those applications where HF ballasts are clearly not suitable (such as installations in very hot environments).

Yours sincerely

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The European Council for an Energy Efficient Economy (ecee) is a membership-based, non-profit association active in all of Europe and with primarily EU-based members. Members are both individuals and organisations.

ecee aims at making a contribution to initiatives and policies which promote European energy efficiency and associated environmental and sustainability benefits. It also aims to increase the interest for energy efficiency and strengthen the dialogue among different segments and categories of people in this field.

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