C.E.L.M.A.
Federation of National Manufacturers Associations for Luminaires and Electrotechnical Components for Luminaires in the European Union

CELMA POSITION ON THE COMMISSION'S WORKING DOCUMENT ON ECODESIGN REQUIREMENTS FOR STANDBY AND OFF MODE LOSSES

Status 12th of October 2007

CELMA, representing the European Luminaires and Ballasts manufacturers (www.celma.org), has the following comments and questions on the above mentioned Commission working document, for which it requests support and/or clarification in the view of the EuP Consultation Forum meeting on 19th of October 2007:

CELMA express the following comments:

1. **The scope of the Implementing Measure on standby and off-mode power shall exclude lighting equipment.**

2. **The reference to the WEEE Directive is not a suitable tool to define the scope if this Implementing Measure.**

3. **The proposed limits for standby power are not acceptable for lighting equipment. They may be acceptable for keeping the comfort level of equipment used in households but they are not acceptable for lighting equipment whose functionality has to be regarded in relation to safety and health issues in workplaces as stipulated by the Workplace directive.**

Further questions and clarification on the above points are given below.

1. Scope of the implementing measure

CELMA has studied the proposal and notes that the scope has been enlarged.

Considering the lighting sector, the preparatory study on standby losses covered transformers or electronic convertors for low voltage halogen lamps. The renewed scope gives the impression that "office equipment" refers to lighting equipment used in offices. The text referring to Annex 1B of the WEEE Directive (2002/96/EC) does not establish a clear borderline. Annex 1B tables 10 categories. It is our understanding that office equipment is covered by chapter 3: IT and telecommunication equipment, which are one of the main energy consuming products in the households. Moreover, chapter 5 for lighting equipment excludes equipment from households.

CELMA is aware that the energy used by the controlling equipment for lighting systems is regarded to be standby power. The controlling equipment is essential to bring down the total consumption of lighting systems to the minimum, as such the power used is functional. The power consumption of the lighting controls has to be at the level to guarantee the function. The standby power of IT and

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other household equipment cannot be regarded functional, it is merely a comfort feature, and hence it can be brought down to the minimum itself.

Question 1: Is the above interpretation correct and is the (fixed and portable) office lighting luminaires and other lighting equipment e.g lighting control equipment (controllers, occupancy sensors etc) intended to be in the scope?

CELMA considers that office lighting should not be included in the scope of this implementing measure due to the risk of loosing the functionality of lighting controls. Office lighting is to be considered as a system and it is better to consider the efficiency of the lighting as a whole. Therefore CELMA proposes that the requirements for the office lighting efficiency should be covered by the specific requirements for the lighting efficiency. For office lighting products there is already the EuP LOT 8, where energy efficiency requirements for office lighting are set including requirements for dimmable systems with the functional need of a standby mode for energy saving.

The energy efficiency of the lighting is however much more depending on the proper lighting design (proper selection of luminaires, light sources, control gears and intelligent control of the lighting using grouping of luminaires, daylight utilizing, occupancy detectors etc.) Therefore specific requirements covering the lighting design is required. Currently this kind of EU regulation is missing. CELMA is working on a proposal for such a regulation. The energy efficiency requirements for office lighting are also being considered in the European Standardization Committee CEN/TC169 “Light and Lighting”.

2. Reference to the WEEE directive

CELMA is also of the opinion that the reference to the scope of the WEEE Directive may cause further confusion. The WEEE Directive is based on the article 175 of the EU treaty stating only minimum requirements. Member states have transposed this Directive in their national legislation in different ways. Some countries have included the household luminaires in the scope and some others not. As the EuP Directive is based on the article 95, the implementing measures need to be harmonized in all the Member States. This may cause big confusion, if the scope of the implementing measure and the scope of the WEEE Directive would be different. According to the working document all the household luminaires are excluded as the scope shall be the same in all the Member States.

Question 2: Is the CELMA interpretation of the scope correct so that the national deviations from the scope of WEEE are not allowed? That is the household luminaires are exempted from the scope.

If not, then there would be a problem with the CE marking, which requires that the goods with CE-marking shall freely be marketed in all the member states. This would not be the case if the requirements would differ between member states.

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3. Proposed limits are not acceptable

In the last paragraph of page 1 in the working document there is mentioned the following exemptions:

> *Conditions of equipment providing the following functions are not considered as being standby:*
> - *preheating functions,*
> - *sensor-based safety functions,*
> - *network reactivation and network integrity functions.*

Modern office lighting is a system consisting of several luminaires (containing lamp(s), optics, control gear + optional daylight, occupancy sensors and switches) and lighting control devices.
Dimmable luminaires are normally connected to lighting controls with wired/wireless networks, which may be analog or digital. With proper lighting control the energy saving of up to 50% may be achieved compared to luminaires only controlled by manual on/off switches.
Dimmable luminaires need to have a standby status in order to be able to be switched on and dimmed to requested light output. The standby power depends on how many electronic control gears are in the luminaire and whether the sensors are contained within or outside the luminaire.
Currently one electronic control gear can meet the 1 W limit, but when a luminaire contains more then one electronic control gear and other control equipment, then this limit cannot be met.

However, the energy saving by intelligent lighting control is much higher than the energy used in standby mode.

Question 3: Are the luminaires connected to lighting control network exempted from the scope?

If the answer is no, CELMA proposes that the limits are set for each electronic control gear and sensor device (actor). So if the luminaire contains two or three electronic control gears the limits would be 2 or 3 watts.

Annex 1

CELMA will not support to include standby requirements for office lighting, but the total energy efficiency requirements.
The requirements given in the Annex 1 are not clear, when the definition of the EuP is not clarified in office lighting. If the electronic control gear is considered to be an EuP, CELMA sees that 1 W loss is reasonable limit. To achieve 0,5 W is challenging and today this can be achieved only by utilizing much more expensive technology, which would not encourage the use of the lighting control systems. Therefore CELMA opposes the proposed tightening of the requirement to 0,5 W after three years, as this would have counter effect on the huge energy saving potential in lighting.

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