



Brussels, Wednesday 29 March 2017

Position Paper on Commission Delegated Regulation (EU) supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the energy labelling framework

Introduction

LightingEurope is the association that represents the lighting industry in Europe. It is the voice of over 1,000 lighting companies that employ more than 100,000 people in Europe and have a total annual turnover of over € 20 billion. Since its establishment, LightingEurope has always supported initiatives from the EU that benefit consumers, the environment, and the economy. That is also the reason for why we would like to draw your attention to the following points.

Implementation time of energy labelling for lighting products after publication in the Official Journal of the EU

LightingEurope proposes to introduce the new labelling for lighting products at least 24 months after the publication on the OJEU, so that unnecessary costs and package waste streams can be avoided. This way, there will be enough time for the lighting industry to fully adapt itself to the new legislative requirements. In order not to have to go through the same procedure again, LightingEurope also proposes to introduce the new labelling requirements after or at the same time as the revised Single Lighting Regulation (expected eco-design regulation for lighting products), which will be interlinked with the new energy labelling framework.

The reason for this is that the new energy labelling framework Regulation will also set a structure for a Regulation on labelling of lighting products. For them the label is

printed on the packaging and incorporated in the total packaging design. Every year, more than one billion lamps are sold in the EU. Due to a too short timeframe, it becomes unfeasible to change the labelling for all these products and to set up as well a functioning database for the same amount of goods. Due to various local requirements and the small size of lighting product packages, implementing changes in such a short timeframe is a heavy burden for the industry.

Early revision

Revising the Regulation in 2017 means that lighting manufacturers will stay in a continuous cycle of changing their energy labels, as they already are in the process of updating the labels on the packaging, due to the combined effect of Regulations 874/2012 and 1428/2015. Such an early revision and rapid change of rules leads to a heavy administrative and financial burden for manufacturers in order to comply with the new Regulation. As the current proposals encompasses a new database and management system, this rapid change could result in high chances of error when implementing the new database and management system.

Furthermore, as new knowledge and skills are required by the broad scope of the proposed Regulation, additional training would be required for anyone working at relevant associations, industries, and national authorities. Additionally, all the continuous changes in the energy labelling create not only a burden for manufacturers, but also confusion for retailers and consumers. Therefore, LightingEurope recommends that the label ensures a very long-term stability, until at least the proposed review date of the Eco-Design legislation, in order to allow investments by the industry and to avoid confusion.

Purposes of the Regulation

Education and motivation

The purpose of the energy labelling system as introduced by the EU is to drive the market towards more energy efficient products. So far, the energy labelling legislation for lighting products was focussed on consumers. The objectives were 1) to educate consumers on the energy use of the available lamps and 2) to motivate them to choose for the most energy efficient lamp.

With regards to the education purpose, the draft proposal of the new label is counterproductive, as it will only confuse consumers. Lamps that consumers have bought with label A or A+ are now relabelled to G, while the efficiency of the lamp has not changed. Consumers might think “I always thought that I bought the best lamp, and now it is only G. Am I being fooled?”

This is directly related to the motivation of consumers. Since it will demote most lamps to lower energy efficiency classes, little choice will be left for consumers. This takes away the usefulness of the label for a consumer, so energy efficiency will not be considered anymore when buying a lighting product. As a result, the label will be disregarded. Such a situation is completely the opposite of what is actually envisaged

with the idea of an energy labelling system. Therefore, it is recommended to rescale the lm/W values in the proposal to clearer values, so that customers will not get confused or demotivated.

Consumers and professional market

Although the previous and current energy labels focussed on the consumer markets, the draft proposal aims at addressing the professional market as well. It is important to realise that the buyer's decision-making processes in that sector of the lighting market are based on total cost of ownership calculations, without necessarily seeing the products and their packaging on a shelf. This means that energy efficiency already is an important criterion in the professional lighting market, and that the packaging with label is not considered when buying the lighting product. Moreover, professional customers often order a make-to-order product, which means that it is specifically designed and produced according to the needs of the individual customer. Those products often do not have a standard packaging with any product information.

This is the reason for why LightingEurope questions the use of labels on lighting products for the professional market, and proposes to change the levels within the label to maintain the effectiveness for the consumer market. LightingEurope recommends making the label only mandatory for products up to 2,000 lumens. Above 2,000 lumens, the efficiency class has to be made available digitally, and not mandatory on the label.

Lamp limits and luminaires

Another worrying development in the draft proposal is that luminaires are being classified as lamps. As a consequence, lamp limits would have to be applied to luminaires. This is inappropriate, because it would make the scale and procedure of labelling unsuitable for the purpose of communicating the energy performance of the luminaires. This means that benchmarks representing the best products in a specific lighting application would be unfairly labelled. As an example, a high performance 120 lm/W street lighting luminaire would be classified in class E, while a bare lamp luminaire for street lighting would be placed in class D.

Oversimplification

In terms of administrative and financial burden for manufacturers, the approach proposed by the Regulation will not simplify the existing legislation but add more burdens, such as:

- 1) Photometry for all models (billions of luminaires models in few time), regardless their intended final use.
- 2) Colour-printed labels for all items falling in the scope of the Regulation even if a small percentage will be read by end-users when purchasing.
- 3) Difficulty in identifying suppliers and dealers' responsibility.
- 4) Registration of all products in a separate new database, which is duplicating the information already mandatory to be provided by the manufacturers.

Subject matter and scope

Regulation (EC) 244/2009 establishes (Art.1) eco-design requirements for the placing on the market of non-directional household lamps, including when they are marketed for non-household use or when they are integrated into other products. It also establishes product information requirements for special purpose lamps.

LightingEurope considers the abovementioned scope too vague and recommends that further details should be provided concerning, for example the inclusion of emergency lighting and rechargeable luminaires. In addition, LightingEurope expects that all lighting products becoming non-compliant in stage 6 of Regulation (EC) 244/2009 will not fall in the scope of the new labelling regulation.

LightingEurope proposals/recommendations

In light of the abovementioned comments, LightingEurope proposes the following:

- LightingEurope supports the European Commission's proposal to remove the label for luminaires.
- Introduce the new labelling for lighting products at least 24 months after the publication on the OJEU, so that unnecessary costs and package waste streams can be avoided.
- Exclude Emergency Lighting from the scope as the requirements established in the Regulation do not fit for Emergency Lighting.
- Make the label only on the packaging mandatory for lamps up to 2,000 lumens, as the professional market has to be clearly separated from the consumer market. For all lamps, including professional lamps, this information should be available online.
- LightingEurope recommends that the label ensures a very long-term stability, until at least the proposed review date of the Eco-Design legislation, to allow industry investments and to avoid confusion.
- LightingEurope will not support the relabelling of products that are already distributed in the supply chain.

As soon as the framework Directive has been finalised, LightingEurope will present a proposal on the rescaling of the energy label for lamps.

For further information, please contact: Elena Scaroni, Policy Director, elena.scaroni@lightingeurope.org or +32 474 730 446

More information is available on: www.lightingeurope.org