

Position Paper on third party certification and independent testing of batteries used with emergency lighting luminaires according to IEC/EN 60598-2-22 – Response to proposals from ETICS (OSM-LUM) and IECEE (CTL ETF5)

Introduction

Since its establishment, LightingEurope has always supported initiatives that benefit consumers, the environment, and the economy. This also means that a proper impact assessment needs to be performed before any proposal can be turned into a rule, whether it is legislation or standardised certificate requirements. LightingEurope therefore suggests that ETICS should first engage with battery manufacturers and jointly develop ENEC schemes that support the certification of emergency lighting batteries.

LightingEurope position on ETICS / IECEE certification and testing proposals

The IECEE and OSM test laboratories groups propose that only independent testing and certification from CB sources or ILAC accredited laboratories can be considered acceptable. With regards to this proposal, LightingEurope would like to make the following observations:

1. This is partly a commercial issue, with the battery industry currently not supporting third party approval of its products. ETICS does have a scheme for ENEC certification of batteries, although no certificates are issued against it at this moment. In addition, the battery standards covered by the current ETICS ENEC scheme are not those needed for the battery types used by emergency luminaires.
2. Available battery standards do not currently cover the complete scope of use needed by batteries used in emergency luminaires (e.g. operation at high temperatures; verification of four years design life). The process for introducing these changes into standards would take much longer than just two years.

3. Annex A of IEC/EN 60598-2-22 accepts battery manufacturers' conformity evidence, because of the abovementioned situation. Therefore, the proposed ETICS/CTL decision would be in direct conflict with conditions allowed by a published standard.

LightingEurope advises that the proposed timescale of two years to achieve an availability of a good supply of third party certified emergency luminaire batteries in the market is unrealistic, and that ETICS must first engage with battery manufacturers to jointly develop ENEC schemes that support the certification of these types of batteries.

Contact

For further information on this topic, please contact Dominik Flikweert, Policy Officer, through dominik.flikweert@lightingeurope.org.

LightingEurope is the industry association that represents the lighting industry in Europe. We are the voice of more than 1,000 lighting companies that employ more than 100,000 Europeans and create an annual European turnover of over € 20 billion. Our daily mission is to advocate and defend the lighting industry in Brussels, while reconciling it with ongoing EU policy aims. In doing so, we are dedicated to promoting efficient lighting practices for the benefit of the global environment, human comfort, and the health and safety of consumers. More information is available on: www.lightingeurope.org.