



Brussels/Paris/Tokyo, 20 April 2021

## **Joint position on the UNECE type-approval of automotive LED replacement light sources**

### **Introduction**

The undersigned associations urge the contracting parties at UNECE to reinforce market surveillance and to make use of the type-approval framework under the UNECE (WP.29, World Forum for Harmonisation of Vehicle Regulations) system for automotive LED replacement light sources.<sup>1, 2</sup> We believe that this will benefit traffic safety, the consumers, the environment, and the economy and will create a level playing field for light source suppliers (manufacturers, importers, as well as e-commerce).

We urge all contracting parties to support the proposals drafted by the GRE Task Force Substitutes and Retrofits that will be decided upon in the April 2021 meeting of the UNECE Working Party on Lighting and Light-Signalling (GRE).

### **Setting minimum safety standard**

Currently, there exists no legal framework for an international type-approval for automotive LED replacement light sources. However, because of the advantages offered by LED technology, there is a strong market demand and various retrofit light sources without type-approval are offered through e-commerce or wholesalers.

The combination of a strong market demand, the availability of non-type-approved light sources, and insufficient market surveillance leads to traffic safety risks (e.g., glare).

Today's situation, in which certain market players provide non-approved, unsafe products, needs to be stopped in order to safeguard road safety, to guarantee a level playing field among manufacturers. Policymakers have a responsibility to ensure all products on the market meet a minimum safety and quality standard: securing a compliant lighting performance will fulfil expectations in terms of energy savings and road safety.

The undersigned associations strongly urge the contracting parties at UNECE to strengthen road safety by ensuring that light source suppliers operate according to clear and enforceable rules that apply to all market actors. This can be achieved by an UNECE type-approval for LED replacement light sources that is compatible with the existing carpark.

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<sup>1</sup> Please note that a type-approval will cover neither off-road-applications nor interior applications, and that only on-road automotive applications for road illumination and light signalling are considered in this paper.

<sup>2</sup> LED replacement light source are designed to replace in a device (luminaire) a counterpart incandescent (filament) light source, by having the same cap and equivalent photometric performance. LED replacement light source are also often referred to as LED retrofits.



## Safety and comfort

At this moment, LED replacement light sources generating additional safety, comfort, and energy savings are not allowed on the market.

Setting the technical requirements of a type-approval for automotive LED replacement light sources will achieve the following benefits:

- Safe lighting performance
- Light colour closer to daylight for better road vision and driving comfort;
- Quicker response time (time to 100 % light);
- Longer lifetime;
- Higher robustness against vibration;
- Better lumen maintenance;
- Higher efficiency (lm/W), which leads to less CO<sub>2</sub> emissions.

In order to ensure that the supply chain and end-users obtain access to these innovative LED light sources with higher safety, comfort, and performance specifications, the undersigned associations urge the UNECE contracting parties to use the type-approval framework for automotive LED replacement light sources, as proposed by the TF SR and discussed by the GRE in April 2021.

## About the cosignatories

**The Fédération Internationale de l'Automobile (FIA) Region I**, based in Brussels, is a consumer body representing European Mobility Clubs and their 37 million members. The FIA represents the interests of these members as motorists, riders, pedestrians and passengers. FIA Region I is working to ensure safe, affordable, clean and efficient mobility for all. More information is available at <https://www.fiaregion1.com/about-us/>

**Japan Lighting Manufacturers Association (JLMA)** is a general incorporated association consisting of manufacturers and sellers of light sources, materials and parts for lighting, control-gears and luminaires, these members account for over 200, and related organizations, and its aim is to contribute to the development and promotion of the lighting industry, the securing of safety of people's lives, and the enhancement of culture of life. JLMA are working for popularizing the better lighting culture and more environment-friendly energy saving products. On April 1, 2019, the Japanese National Committee of CIE (JCIE) is merged into JLMA, and we also conduct research and study on illumination and light, thereby we aim at reinforcement of activities for "Improvement of Lighting Quality". For more information, visit [https://www.jlma.or.jp/about/pdf/JLMA\\_panf.pdf](https://www.jlma.or.jp/about/pdf/JLMA_panf.pdf).

**LightingEurope** is the voice of the lighting industry, based in Brussels and representing 30 companies and national associations. Together these members account for over 1,000 European companies, a majority of which are small or medium-sized. They represent a total



European workforce of over 100,000 people and an annual turnover exceeding 20 billion euro. LightingEurope is committed to promoting efficient lighting that benefits human comfort, safety and wellbeing, and the environment. LightingEurope advocates a positive business and regulatory environment to foster fair competition and growth for the European lighting industry. More information is available at [www.lightingeurope.org](http://www.lightingeurope.org).