

JOINT STATEMENT

Call for a realistic timetable for transitioning to new lighting technologies

Brussels, 27 March 2018



INTERNATIONAL ASSOCIATION OF LIGHTING DESIGNERS

IALD



Increasing the level set for energy efficiency requirements of products designed with LED technology is beneficial not only for the consumer, but also for the environment, for society and for the competitiveness of Europe's industry.

Three legislative initiatives impacting lighting products are currently underway (see Annex II for details), with major changes expected compared to current legislation:

- Eco-design requirements for light sources
- Energy labelling requirements for light sources
- RoHS exemption renewal requests

We, the undersigned associations, support the objectives of Eco-design, Energy labelling and RoHS.

We call on regulators to adopt a pragmatic and realistic transition timetable to substitute lighting technologies and products. This timetable needs to respect the established maintenance and repair cycles of the end-users of these lighting products.

Markets need sufficient time to understand and evaluate alternative lighting products and to then adjust their budgets and replacement cycles. A premature phase-out may lead to unnecessary waste and costs.

The transition period needs to allow affected companies to build new manufacturing facilities, to train workers and to help them make the transition from one professional environment to another (see Annex I).

Where there are no substitute products and technologies, we call on regulators to continue to allow special purpose products on the EU market by exempting them from the Eco-design rules and renewing the exemptions under RoHS.

In the interest of a robust and balanced impact assessment, we call on the European Commission to take into account the input received from all stakeholders across the value chain (from lighting manufacturers to installers and end users) and under both legislative processes (consultations under RoHS and Eco-Design).

ANNEX I

Why do we request a postponement of the phase-out of lighting technologies?

As recognized by the European Commission, several lighting technologies are already being phased out naturally, without further regulatory requirements being required, resulting in significant energy savings.

The transition to LED lighting is happening and cannot be reversed. This is clearly seen in the increase of LED sales and a strong decrease in the sales of conventional lamps¹.

The enforcement of an early ban of lighting technologies that cannot be undertaken within the framework of existing maintenance and repair cycles may have a number of adverse consequences on Europe's economy and society:

- **Insufficient capital available to cover the cost of purchasing and installing new LED technologies:** A changeover to LED lighting should be planned well in advance, to properly inform and educate customers. A changeover should also fit with the budgeting and replacement cycles of the owners and end users.
- **Increased precautionary purchases of old technologies:** some industries may turn to 'stockpiling' as a 'quick and easy' solution to address the unplanned ban of certain products and guarantee the proper and safe operation of their installations. This will completely neutralize the desired effect of energy and CO2 savings and reducing the amount of unwanted substances on the market and in the waste stream.
- **Negative impact on a number of industrial manufacturing activities in Europe:** As recognised by both the DG Energy and the DG Environment consultants, there are no full replacements for all mercury-containing discharge lamps. Some special purpose lamps are used in a number of industrial and commercial applications (e.g. micro lithography in semiconductor

¹ See for example, "The Model for European Light Sources Analyses, MELISA" developed by VHK and adapted after 2015 European Consultation Forum.

production, entertainment lighting, etc). The future of these industries would be seriously affected.

- **Significant amounts of unnecessary waste:** an early ban of technologies will result in a significant amount of unnecessary waste, as currently installed luminaires that still have a service life ahead of them, prematurely enter the waste stream.
- **Job losses:** within the lighting industry, a premature ban will result in significant job losses, as the industry will not have the time needed to transition some of the facilities and staff to new jobs and new products.

ANNEX II

Explanatory note on legislation at stake

The changes mentioned in above text are being prepared in several regulations currently under discussion in the European Commission:

- 1) **The review of the lighting products regulations (both Eco-design and Energy Labelling Regulations).** The current European Commission draft working document proposals contain important changes from current legislations (both in terms of energy efficiency performance and circular economy mandatory requirements on removability) that may result in a ban of lamps. This would affect Linear Fluorescent T8 lamps, the most common lamps used in office buildings and industrial sites in Europe, as well as CFL-i and some halogen lamps and luminaires already from **September 2020**.
- 2) **RoHS exemptions for mercury containing lamps.** In parallel with the Eco-design review led by DG Energy, DG Environment is evaluating whether to renew RoHS exemptions for most conventional lamps on the market today (e.g. CFL, LFL – including T8, HPS, HID and Special Purpose lamps). **The European Commission may decide to ban many of these products even before 2020.**

About the Signatories

About APPLiA: APPLiA - Home Appliance Europe represents home appliance manufacturers from across Europe. By promoting innovative, sustainable policies and solutions for EU homes, APPLiA has helped build the sector into an economic powerhouse, with an annual turnover of EUR 44 billion, investing over EUR 1.4 billion in R&D activities and creating nearly 1 million jobs.

About CER: The **Community of European Railway and Infrastructure Companies (CER)** brings together more than 70 railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 73% of the rail network length, 77% of the rail freight business and about 93% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policymakers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit www.cer.be or follow us on Twitter @CER_railways.

About DTHG: The German Theater Technicians Association, founded in 1907, counts to the oldest professional organisations in Germany. It belongs to her most important duties to bring together the producing industry and the experts as a user, to formulate professional demands for the education and to become active advisory and sometimes also reminding in many legislative questions.

About EIM: EIM, the association of European Rail Infrastructure Managers, was established in 2002 to promote the interests and views of independent infrastructure managers in Europe, following the liberalisation of the EU railway market. It also provides technical expertise to the appropriate European bodies such as the European Railway Agency. EIM's primary goal is promoting growth of rail traffic and the development of an open sustainable, efficient, customer orientated rail network in Europe. For more information, visit www.eimrail.org.

About EPTTOLA: The **European Passenger Train and Traction Operating Lessors' Association (EPTTOLA)** was founded on 13th August 2009. EPTTOLA's objectives are to be a representative body for European passenger train and traction operating lessors that: examines those activities of European authorities which impact on the interests of its Members and communicates those activities to its Members; and works with such European authorities so as to ensure that its Members' interests are represented in those activities. EPTTOLA is recognised by the European Commission as an official stakeholder representative body for train leasing companies. For more information, visit: www.epttola.eu

About ESIA: The European Semiconductor Industry Association (ESIA) is the voice of the Semiconductor Industry in Europe. Its mission is to represent and promote the common interests of the Europe-based semiconductor industry towards the European Institutions and stakeholders in order to ensure a sustainable business environment and foster its global competitiveness. As a provider of key enabling technologies the industry creates innovative solutions for industrial development, contributing to economic growth and responding to major societal challenges. Being ranked as the most R&D intensive sector by the European Commission, the European Semiconductor ecosystem supports approx. 200.000 jobs directly and up to 1.000.000 induced jobs in systems, applications and services in Europe. Overall, micro- and nano-electronics enable the generation of at least 10% of GDP in Europe and the world.

ESIA is an industry association under the EECA umbrella. EECA is registered in the EU Transparency Registry: 22092908193-23

About EuPIA: EuPIA, the European Printing Ink Association, represents the interests of the printing inks and varnishes industry in Europe. Operating under the umbrella of CEPE, it represents 75 companies generating about 90 % of ink sales in Europe (close to 1 billion tons in volume to a value of 3 billion Euros). 90% of EuPIA's members are SMEs. www.eupia.org

About EURATEX: EURATEX is the industry association representing the European textile and apparel industry. In the EU 28 the industry employs 1.7 Million people and accounts for 177.700 companies, 99% are SMEs (Small and Medium size Enterprises), which produces in Europe and are integrated in the global supply chains. Europe is the second largest world exporter of textile products, last year the sector generated €171Billion turnover and invests €4.8 Billion.

About FEDECRAIL: The **Federation of European Museum and Tourist Railways (FEDECRAIL)** is the European parent organisation for all friends of railways who are engaged in the maintenance, preservation and operation of historical railways. FEDECRAIL has currently 42 members from 27 countries comprising 650 heritage railways and railway museums. It was founded in April 1994 in Brussels. For more information, visit: www.fedecrail.org

About IALD: Founded in 1969, the International Association of Lighting Designers (IALD) is an internationally recognised organisation dedicated solely to the concerns of independent architectural lighting designers. The IALD strives to set the global standard for lighting design excellence by promoting lighting quality, the advancement and recognition of architectural lighting designers and the architectural lighting design profession. IALD members are located in 54 countries and practice globally. The IALD has a European office based in Brussels. More information about IALD is available at www.iald.org

About IPC: IPC – Association Connecting Electronics Industries is a global industry association representing more than 4,300 member companies, and is the definitive authority on industry standards as well as the leading source for training, market research, advocacy, and other programs to meet the needs of an estimated \$2 trillion global electronics industry.

About LightingEurope: 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.

About OETHG: The Austrian Association for Theatre Technique was founded in 1973 to promote national and international communication within the entertainment industry, including authorities, media and institutions. OETHG is member of OISTAT (Organisation Internationale des Scénographes, Techniciens et Architectes de Théâtre) and UNESCO's ITI (International Theatre Institution) Austrian branch. There are 400+ members and theatres all across the entertainment industry value chain: manufacturers, dealers, consultants, installation companies, opera houses, festivals, theatres congress centres, rental and event companies, individual technicians and broadcasting, such as ORF (public service broadcasting) and Wiener Staatsoper (300+ performances and 600.000 spectators each season).

About RadTech Europe: RadTech Europe is the European Association for the promotion of UV/EB curing technology for inks, coatings and adhesives.

About SEMI: SEMI is the global industry association that connects more than 2000 companies worldwide to advance the technology and business of electronics manufacturing. SEMI members are responsible for the innovations in materials, design, equipment, software, devices, and services that enable smarter, faster, more powerful, and more affordable electronic products. Since 1970, SEMI has built connections that have helped its members prosper, create new markets, and address common industry challenges together. SEMI maintains offices in Bangalore, Berlin, Brussels, Grenoble, Hsinchu, Seoul, Shanghai, Silicon Valley (Milpitas, Calif.), Singapore, Tokyo, and Washington, D.C. www.semi.org/eu

About UIP: Founded in 1950, the **UIP – International Union of Wagon Keepers**, with its seat in Brussels, is the umbrella association of national associations from fourteen European countries, thus representing more than 250 keepers with approximately 180.000 freight wagons, performing 50 % of the rail freight tonne-kilometres throughout Europe. UIP represents the members' concerns at international level. By means of research, lobbying and focused cooperation with all stakeholders and organisations interested in rail freight transportation, the UIP wants to secure on the long term the future of rail freight transport. www.uiprail.org

About UITP: In the European Union, **UITP** brings together more than 400 urban, suburban and regional public transport operators and authorities from all member states. It represents the perspectives of short distance passenger transport services by all modes: bus, regional and suburban rail, metro, light rail and tram and waterborne. These services are often organised in integrated public transport networks covering metropolitan areas and other specific territories. For more information, visit: www.uitp.org

About UNIFE: **UNIFE** represents the European Rail Industry in Brussels since 1992. The Association gathers more than 90 of Europe's leading large and medium-sized rail supply companies active in the design, manufacture, maintenance and refurbishment of rail transport systems, subsystems and related equipment. UNIFE also brings together 14 national rail industry associations of European countries. For more information, visit www.unife.org or follow @unife on Twitter.

Contact

For further information, please contact Elena Scaroni, Policy Director, through elena.scaroni@lightingeurope.org