



Working Document on an Implementing Measure on Public Street Lighting

under the

***Directive on the Ecodesign of Energy-
using Products***

(2005/32/EC)

First meeting of the Ecodesign Consultation Forum

Brussels, 22 June 2007

European Commission
DG Energy and Transport



<u>Ecodesign preparatory study</u>	<u>Lamp technology in focus</u>	Studies will be followed by impact assessment also for application areas outside study scope.
Street lighting	HID	
Office lighting	LFL	
Domestic lighting	GLS Halogen CFL LED	

The studies also examine the corresponding ballasts and luminaires.

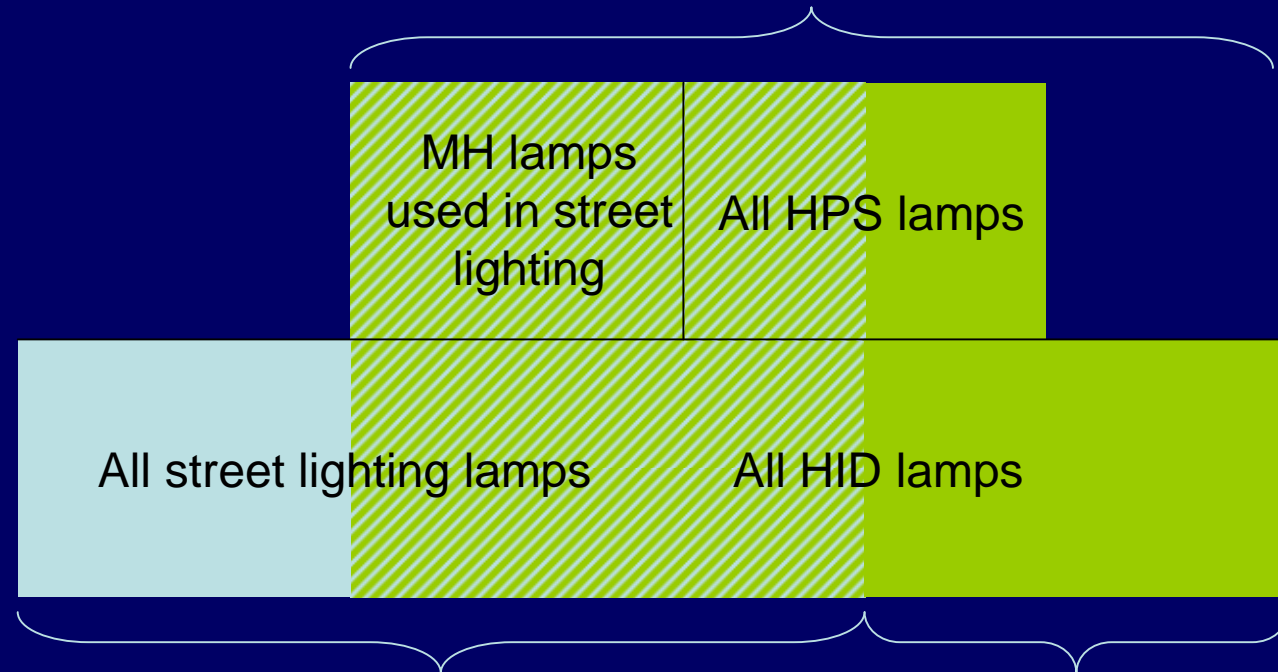


LAMPS

Mercury and Waste (Ga-3, Ga-4)

More ambitious limits
for specific HID
technologies (S3, S4)

Basic common limits
phasing out HPM and
equivalent efficacy (S1)



Indicated as suitable for street
lighting (Gi-1, Gi-2)

Indicated as
NOT suitable for
street
lighting (Gi-1)



BALLASTS

Waste (Ga-4)

Dimmability
requirements (S6)

HID ballasts for lamps
 $P > 100 \text{ W}$

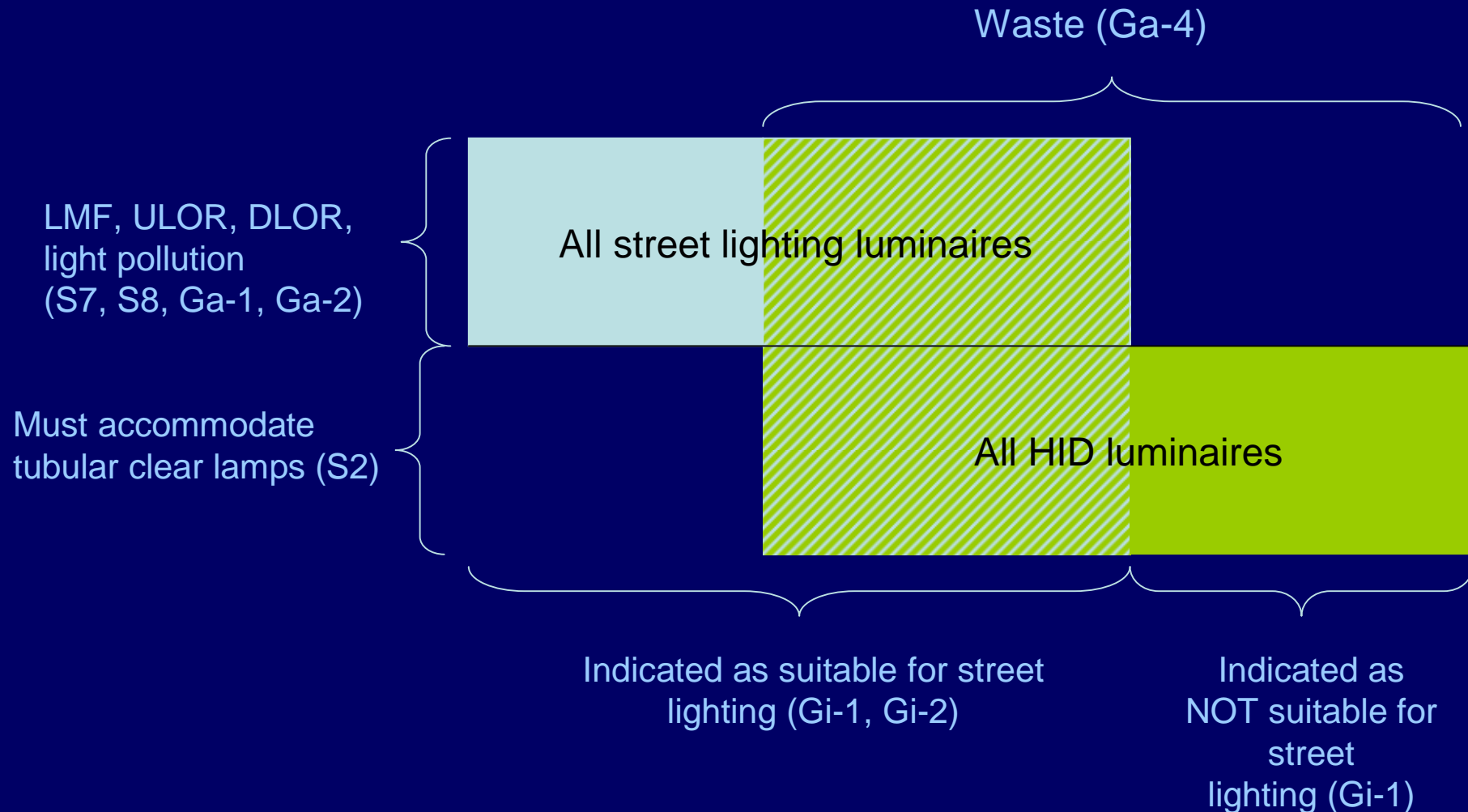
Limits on maximum
ballast losses (S5)

All HID ballasts

Information on ballast losses
(Gi-2) if installed in street
lighting luminaire



LUMINAIRES





Major issues raised by Members

Unless otherwise noted, comments come from the ELC/CELMA position paper

1. More time needed for proper input (*also ECOS*) – request for a revised Working Document
2. Is the luminaire an EuP? Are lamps and ballasts its components?
3. Harmonisation of abbreviations, terminology, numbering of requirements
4. Are labelling/marketing requirements possible, in addition to the CE marking?
5. ECOS: Dynamic requirements are missing from the measure – no push for innovation through phased introduction of requirements.
6. Further measures needed to accelerate replacement and for « putting into service criteria »



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7. Differentiating street lighting and other products is impossible, detailed product information to facilitate installation is difficult because manufacturer does not know where product will be installed
8. Weakness of market surveillance
9. Are all street lighting luminaires targeted, even TL-F?
10. The measure should be only on street lighting products.
11. Why does the measure exclude LFL and halogen lamps in public but not in private road lighting?
12. Fast phasing out of spare lamps will create critical situations – 5 years are needed



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13. Will this measure refer to additional environmental aspects not yet mentioned in the text?
14. The assessment of a product's energy efficiency should include the surface to be lit.
15. Existing HPS lamps are good enough, innovation would bring undue costs. <> ECOS: requirements on MHL and HPS too modest
16. No requirements on ballasts are possible, as there is no measurement standard for ballast efficiency and none will be proposed by industry in the near future. <> ECOS: COM should come forward with measurement method
17. Electronic ballasts cannot always replace magnetic ones and they do not bring enough benefits – bilevel or phase-cutting dimming should be enough, 5 levels and are too much. ECOS: 50% dimming not enough, 20 or 30% already used
18. Conservative values proposed for luminaire IP rating and for ULOR/DLOR <> ECOS: maintain ambition



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19. RoHS and WEEE directives should be used for mercury and waste, no requirements under this measure. <> ECOS: a maximum mercury content per unit should be defined + a mandatory take back system for used lamps would be appropriate (at least for Hg and other heavy metal containing lamps). Design for recycling needed.
20. Product documentation should be made available but not with individual products.
21. Requirements are necessary on component manufacturers.
22. ECOS: Requirements for (new) technologies not covered by the addressed lamp types may be either missing or inappropriate, which could result in a limited push towards the development and/or use of more efficient product alternatives available on the market.
23. ECOS: Requirements needed for S1 LLMF and LSF, the same should be harmonised across S3 and S4
24. ECOS: Ga-1 on light pollution - clear requirements supporting future upgrade possibilities of lamps (e.g. possibilities without change ballasts) are missing – *please clarify*.