



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR ENERGY AND TRANSPORT

DIRECTORATE D - New and Renewable Energy Sources, Energy Efficiency & Innovation
Energy efficiency of products & Intelligent Energy – Europe

MINUTES OF THE MEETING OF THE ECO-DESIGN CONSULTATION FORUM HELD ON 28 MARCH 2008

General Lighting products

Subject: Ecodesign of EuPs Consultation Forum
Place: CCAB building, Brussels
EC Participants: André BRISAER (Chairman), Elaine O'CONNELL, Andras TOTH (TREN/D3), Kerstin LICHTENVORT (ENTR/B1)

The Chairman opened the meeting and gave to floor to Mr Toth to present the working document.

Planned legislative framework for general lighting products

The Ecodesign requirements on lighting products are planned to be set in two separate implementing measures. One will contain basic requirements that apply to all lighting technologies used in general lighting (formerly "Domestic Lighting" Implementing measures), while the other will contain particular requirements on technologies used typically in professional general lighting applications ("tertiary sector lighting products", consolidation of the former 2 Implementing Measures on Industry & Office Lighting and on Street Lighting), namely high-intensity discharge and fluorescent lighting products.

Belgium queried if it would make more sense to have the two instruments ready so they can be voted on together. The Chairman clarified that it is not a problem to split the requirements into 2 separate instruments as it will not affect the overall consistency of the measures. Considering that it is often not possible to predict where a product will be installed/used (residential/commercial/industrial field), the measures will have to be technology focused (rather than application focused).

Clarifying Statements

Mr Toth made some clarifying statements (summarised in a slide) in relation to some details of the working documents sent to the Forum members.

The comment was made that the General Lighting Ecodesign Requirements would address white light, for a certain Lumen output, for all cap types except those specifically listed in Annex 3. Ballasts (transformers/converters) for Halogen lamps would be included into Part II of General Lighting IM.

Discussion on the level of ambition

All stakeholders agreed that the order in which the different lamp types are presented in the slide in terms of efficacy is correct:

Lamp technology	Efficacy
Average conventional GLS	1
Average halogen lamps	1,4
Very efficient halogen lamps (best available)	1,8
CFLs with bulb-shaped cover and low light output	2,7
CFLs with bare tubes or high light output	4,6

Belgium agreed that CFL was the best available technology (BAT) but wanted to note that the Commission's figures didn't take the power factor (ratio of the real power to the apparent power, due to non-linear load) into account. Vito, the Commission's technical consultants explained that power factor was taken into account in the overall study and that it made no significant difference to the figures.

Professional Lighting Designs Association agreed that CFL are the BAT on the Commission list but queried the figures and level of energy savings in the working document.

The Chairman invited all stakeholders to provide input on refining the figures if they have better data.

An observer from the European Parliament (Green Group) asked whether LED lamps have been considered. The Commission clarified that directional and non-directional light sources are going to be treated separately. Only directional LEDs are currently available on the market (although ECOS found some non-directional ones available through the internet¹) and will be looked at when the Commission looks at the second part of the study. LEDs higher efficiency will be shown by the future energy label as that is meant to apply to all lamps.

Best available technology will be benchmarked in the Implementing Measure for the significant environmental aspects.

Eurocommerce explained the two most important market forces are price and perceived quality.

On the issue of anti-dumping measures on CFLs, the chairman explained that excise duties are scheduled to end by the time the IM is in place, so anti-dumping will not be an issue for the availability of CFLs. As for the VAT option, if there are only efficient lamps available, it doesn't seem appropriate to ask MS to lower the VAT on it.

Italy said that it had tried to recreate the Commission's figures but with the uncertainties associated with Options 2 and 3, the range could be $\pm 30\%$. The Chairman clarified that

¹ ECOS gave the example of V-LumTech® <http://www.v-lumtech.com>

although there are uncertainties relating to respective market shares, they do not change the overall picture.

Presentation by ELC

ELC gave a presentation² describing their proposed planning for a phase out of incandescent lamps. The production capacity issue is critical and they are concerned about the peak demand in Vito's model. ELC propose a longer transition period where the lower classes are gradually phased out to alleviate this. Alternatives such as halogen lamps should be kept for quality of light and applications where no other alternatives are available.

Capacity Issue

The Chairman highlighted that the capacity issue was to be looked at also in a global market perspective – e.g. developments in India and China need to be taken into consideration. For instance, even if we delay the introduction of measures phasing out incandescent bulbs in order to tackle the capacity issue, major third countries could be adopting legislation at the same time which could again raise capacity problems of an equivalent order of magnitude.

ELC explained that all ELC members are global players and that there are ongoing discussions in Australia, China and the US on phasing out inefficient products. Even without the IM in the EU there was large growth in the use of CFLs. ELC stated that it is difficult to predict how a future ban in India and China would affect the industry. Any squeeze on future capacity by initiatives to phase out incandescent lamps in India and China would only make Option 2 in the EU tougher to respond to, especially by simultaneously fulfilling the quality requirements set for the European market. ELC believes that no plan is completely resistant to movements in other parts of the world but that their proposal took those potential risks into account and therefore is the most sustainable in terms of availability and avoidance of empty shelves.

Sweden added that out of 2.4 billion Chinese made lamps, 1 billion would meet current EU standards. If Australia, the US and EU all legislate together, then production will not meet demand.

ECOS believes that there is currently not enough data to determine production capacity and called for a transparent process for addressing the capacity issue in the Impact Assessment.

Greenpeace stated that they have spoken to a large number of CFL suppliers inside and outside of Europe who say that they will have no problem to meet peak demand if a phase out happens in 2011 and that, in light of the urgency of climate change, we need to act quickly and don't have the time to initiate studies to determine consumer behaviour patterns.

The "European Council for Energy Efficient Economy" asked if there was any estimate conducted on the stocks of lamps that people have at home as any projected savings will need to be delayed due to these stocks. The observer from the European Parliament

² The ELC presentation is available on CIRCA, alongside the other presentations made at the Forum.

commented that the ELC should have shown a scenario with LED as final technology and where CFL in EEL A&B would be a transition technology and not Halogen. He also asked for clarification on whether ELC had developed their own figures or if Vito provided the basis for the graph. ELC clarified that LED replacement lamps with adequate prices and performance are not widely available on the market at the moment.

The Professional Lighting Designers' Association commented that ELC has taken a holistic view of the process but that very little on the health issues and the quality of lighting was included. They are concerned that in 2020, lower quality lighting (CFL) will have the largest market share. They support the ambition but would like the figures on energy efficiency to be reviewed as their calculations are very different to those that Vito found. They think that the energy savings will be a lot less and would also like to see practical problems like health and recycling taken into consideration. The Chairman invited the parties who might have better data to send them to DG TREN to help refine the figures but commented that it is not possible to discuss the overall picture now as the preparatory study was launched several months ago with many opportunities for stakeholder submissions during the process.

Presentation by Vito

Vito gave a presentation on the figures and data used as a basis for the figures in the working document. They used a methodology that has been used and agreed before. It is difficult to find market data, there is an inevitable tendency to lag behind the facts because one needs to use often scarcely available or outdated data and nevertheless predict future trends, which logically includes a number of uncertainties. They strived to base their research on certainties like the Best Available Technology and the least life cycle cost from the consumers' perspective.

The Chairman again invited all stakeholders to send in any additional data they might have to refine the figures.

Quality Issues

At the outset of the discussion, the Chairman reminded the floor of Article 15 of the EUP Directive which states that “the measure should not have any significant negative impact from an end-consumer perspective”. The quality of the light and its perception by end-users is an important issue. Sweden commented that the colour-rendering index of technologies is critical here and that this issue is a critical one for specific groups such as countries with an aging population.

Consumer organisations feel that design is an issue for consumers and they support Option 2 which gives high energy savings but more options for consumers. They commented that it is very difficult to assess consumer behaviour and the choices we give them will impact this.

The Professional Lighting Designers' Association explained that CFLs have a diffuse light source and that cause problems for applications needing sparkling lights etc. The average consumer is always in favour of energy saving but doesn't always receive the correct information. An 11W CFL is not equal to a 60W incandescent lamp in terms of

output, dimming, toxics, etc. Consumers would need more information to make an informed decision.

Denmark commented that quality issues are very important and that they view the availability of alternatives to CFLs as crucial. They support LEDs in the long-term but in the short term, other alternatives to CFLs are needed. All CFLs should at least meet the EU CFL quality charter and need to have more burning hours than what is in the working document. They agree with Sweden that colour rendering is important and in this respect would like to reserve the term "excellent" to lamps whose colour rendering is close to the value of 100, and call the ones above 90 by a less positive name, e.g. "above average".

Belgium agreed that there must be an alternative choice to incandescent lamps for consumers in terms of light quality.

The Chairman asked the ELC and Vito if alternatives are currently available to GLS under Option 2. The ELC stated that for existing incandescent lamps, both halogens ES types (EEL B&C) are fully dimmable and fulfil light quality requirements. Option 2 does allow a product comparable to GLS (B level halogens) but that the product is not yet widely available on the market to fulfil consumer need. There is still a high demand for lamps with a sparkling effect.

CELMA commented that they supported the position of ELC.

The Commission asked about the use of halogen lamps and if this would solve the problem for luminaires. ELC replied that there would be a need to redesign many small domestic luminaires. However, 1 for 1 replacement is for certain types possible. There are indeed 2 types of halogen lamps with different sockets which are being used in general lighting. The first kind can be used for 1 to 1 replacement of incandescent lamps in existing sockets (Edison and Bayonett) and the second kind are the high and low voltage halogen lamps with various specific sockets and for LV, with a ballast. For those halogen lamps, there are almost no replacements as of today above EEL C and this would mean for the end-consumers that they have to change their luminaries at home. ELC is responsible for providing alternative lamps for the installed light sources and if the intention would be to phase-out this kind of light sources, one should start with phasing-out the luminaries using those sockets. The ELC also commented that for Option 3, in terms of market surveillance, many improvements are needed, especially in regard of the high volumes directly imported. Quality on the European market needs to be assured in order to maintain fair competition.

Czech Republic supported the Danish and Belgian positions that time for improving alternatives is important and that alternatives to CFLs are essential.

CELMA commented that in the shift from GLS to CFL lamps, it should be taken into account that different dimmers are needed and the dimmers will need to be replaced. The consequence would be that end-consumers will have to change their luminaries. Furthermore, this is a safety warranty issue and under the Product Safety Directive the entire product life needs to be considered. Finally many luminaries sold have been designed with the dimensions of GLS lamps and the replacement lamps need first to have the same size.

ELC explained that dimensions are not as much a problem as new CFL bulbs are compatible with GLS sockets. They added that only some CFL are fully dimmable today.

The CFL contains electronics as does the dimmer and they are not always compatible but more and more dimmable CFLs are coming onto the market. Both halogen options (with Edison and bayonet sockets) are fully dimmable and can be used in incandescent light fittings.

CELMA pointed out that it's important to review technical files of new products as testing is needed to ensure compliance with the Low Voltage Directive and Electromagnetic Compatibility Directive. Time is needed to put the right testing procedures in place and timing is the main reason why CELMA supports Option 3.

On quality issues, the European Environmental Bureau asked about mercury content. It will be discussed more fully but the assumption is made that if the switch is made to mercury containing lamps, the drop of mercury emissions stemming from electricity savings will at least offset the mercury content in CFLs.

Sweden commented that there is the assumption that alternatives can cover the transition period. It was also noted that from next year, Sweden will introduce automatic meter reading and they have noticed very high noise levels in the shift to CFLs when using the grid for communication. Thirdly, Sweden can experience very extreme temperatures and this is a serious issue when it comes to CFL lamps as they perform very badly or not at all at very low temperatures (-20 degrees).

ELC explained that the noise on the power grid is related to the power factor and that there is a way to eliminate this by enhancing the electromagnetic compatibility of these products and limiting electromagnetic interference. It is also a quality aspect of CFLs. The Chairman asked ELC to provide any further information they may have on this issue to the Commission.

Sweden commented that since there will be a quality requirement for CFLs and since there will be an obligation on Member States to monitor this, testing could prove very expensive for lamps of many different lumen values from many different producers. It should be possible to have a situation where, if a lamp is tested and meets the requirements (in accordance with agreed methods) in one Member State, it is good enough for the rest of Europe.

The Chairman agreed that on the issue of market surveillance, which is conducted at Member State level, information needs to circulate properly. He invited all stakeholders to look at the 2008 work programme for Intelligent Energy Europe where there is a slot for projects tackling the testing of products and ways to organise market surveillance more effectively.

Health Issues

A. Toth mentioned that several stakeholders had raised the issue of bad quality electronic components that cause lights to flicker. This can cause problems for people with conditions like epilepsy. Quality requirements and good market surveillance could address this issue.

However, some people also declare being light sensitive to CFL lamps. The Netherlands clarified that this is due to UV radiation and generally only affects people who are already affected by other symptoms. They will check if there is a Dutch report available on this.

The UK has also heard some concerns about this but believes that there are options apart from 2 or 3 to limit UV light (like ensuring alternative lighting sources for affected people) and that this issue need not affect the level of ambition. There is some work being done on this in the UK at the moment which they will share once it's completed.

Belgium added that a small percentage of the population are sensitive not to the light but to the electromagnetic fields from high voltage cables.

The Professional Lighting Designer's Association mentioned the effect of lighting on autistic children and that in a recent study, some of their negative symptoms decreased significantly with incandescent lighting.

The Commission services will continue to investigate this issue and invited all stakeholders to provide any information they have on it.

Sweden commented that they have received some documents from a group about a perception problem with fluorescent lighting (scotopic sensitivity syndrome) that makes it more difficult to read.

The UK Lighting Industry Federation stated that in the UK, with the phase-out of incandescent lamps, certain symptoms are becoming apparent. People with 6 types of symptoms had problems attributed to CFL lighting: people with lupus, skin disease, migraine sufferers, light sensitive people, deaf and partially sighted people (deaf people use incandescent lamps as sign posts).

ELC mentioned that a booklet containing the top 30 questions and answers they have received of this nature is available on their website. The ELC proposal (Option 3) would provide a solution to sufferers of the aforementioned health issues by allowing use of halogen lamps.

The Commission agreed that alternatives for CFLs will need to be considered if the health problems and symptoms are confirmed to be linked with the lighting technology used.

Delegate positions on the level of ambition and timing

The Chairman asked the delegates what position they would favour. He explained that if climate change and energy were the only considerations then option 1 would be the obvious option but other concerns also may need to be taken into account. Alternatives will need to be available at least in the beginning and new technologies like LEDs could solve these issues in the future.

The UK welcomed an ambitious timing and would support Option 1 or 2. Health and production capacity are issues but the UK also pointed out that, with regard to product capacity, a longer timeframe (9 years) might cause more problems than a shorter timeframe (5 years) because we don't know if China and India will move in this issue.

Portugal supports Option 3 (also the position of Spain) and would like to see a cautious transition.

Ireland supports the most ambitious option and would like the Commission to initiate the IA as soon as possible.

Belgium supports change but has some concerns about technical and consumer issues and for various reasons would not like to see Class C halogens phased out yet. Belgium is also very concerned about the mercury content and disposal and would not like to see new problems being created.

Czech Republic supports Option 3 which it believes is a more reasonable variant. It would leave class C on the market and give time to improve alternatives.

Germany supports ambitious goals in the long term but in the short term (5 years) would like to be more cautious and have class C products available so that consumers have alternatives with high colour rendering and other features discussed today.

Italy currently has a stakeholder consultation process underway. Italy is concerned about availability, quality, health and mercury content. If 1.3 billion lamps are substituted by CFLs it would equal to 9 tonnes of mercury. It is also concerned about the impact on SMEs (mostly regarding luminaires).

France has an ongoing consultation process where they are discussing which option to support. It has already been decided not to support Option 3 but Options 1 and 2 are still being discussed. They would welcome some more information on the impact of these options 1 and 2.

Poland agreed that consumers need to have alternatives and supported Option 3 but will analyse today's presentation. They would also welcome further information on various impacts that were outlined in the working document.

Netherlands supports Option 1 and see the big advantage as the fact that it doesn't leave too many loopholes. They are fully confident that manufacturers can solve the technical issues within the specifications of Option 1.

Austria supports a modified Option 2 based on the given information and would like to see more information on issues like the quality of Chinese lamps.

ECOS was concerned that the discussion only considers available products today but LEDs and CFLs will make quick progress. So an ambitious vision of "only A-rated products on the market" should be adopted, with potential transition products only tolerated for a short time period.

Mercury Content

Sweden mentioned that it produces no mercury in power generation. Also, electricity generation emits mercury in metallic form and in low concentration because dissipated over a large area. Metallic mercury doesn't easily become part of the food chain. However, when a CFL bulb breaks in a landfill, there is much less dissipation and bacteria convert metallic mercury into methyl-mercury which is 100 times more soluble in fat.

Environmental NGOs have been calling for reduced mercury levels over the entire European network. They are concerned that more mercury is used in power generation to switch on incandescents than in CFLs. Another issue for CFLs is recycling. Simple recycling systems are needed where consumers can return items to the point of sale. BEUC agreed with the position of Environmental NGOs and added that they do not share

the Commission's views that energy savings from CFLs will outweigh the increase in mercury. A solution to the waste issue is needed.

The Commission informed that there is an ongoing review of the RoHS exemptions including lamps for which the consultation period closes in April.

The European Environmental Bureau is involved in the RoHS exemption process. They have considered the whole life cycle of lamps and support a 2mg target for mercury content. The issue of waste is also critical and in relation to this, they are particularly concerned by a production process involving the dripping procedure with high mercury losses.

The Chairman explained that the Ecodesign legislation regulates product design. He would welcome any suggestions for a legally solid information requirement as to how the product was manufactured which would be enforceable also out of the EU. ELC commented that as mercury content and production processes are linked, limiting the mercury content below a certain limit could help to solve this. Nevertheless the requirement should be only "in so far as they relate to product design". The ELC confirmed that the 2 mg limit is related to production methods and is right now only available through European manufacturing. Several participants suggested that such a limit could probably prevent the use of the dripping method.

Germany commented that 1.4mg mercury is possible today.

Eurocommerce/IKEA explained that mercury leakage at end of life is a big issue. IKEA operates take back systems in store. However, most retailers are not selling own-brand products but branded products. Facilitating take back through product design is a manufacturer responsibility.

The Chairman considered that requirements on packaging/lamp information could help the recycling of CFLs at end of life. Consumers may not keep the original packaging until the end of life of the lamp, but information on the packaging of the replacement lamp could also call for proper recycling of the dead lamp.

Waste Issue

Mr Toth presented in a slide the idea of removing the separate waste requirement from the implementing measure, as according to the preparatory study, the requirement would represent minor additional improvement potential in the 15 environmental impact categories compared to requirements affecting other life cycle phases. The issue is also already tackled through the lifetime requirements in the proposed measure and through the existing particularly ambitious lamp recovery rate requirements in the WEEE directive. The end-of-life of luminaires will be tackled in the second general lighting implementing measure.

The Netherlands agreed that the approach of the Commission in this regard seems logical but was concerned about the confusion that could result from one lamp being treated as chemical waste and another that could simply be thrown away. It would be much easier for consumers to have one set of waste requirements for all lamps.

ELC supported this point and stated that they are committed to lowering mercury content and support the lower exemption levels in RoHS. They cautioned that careful consideration of timing is necessary if quality requirements are introduced.

Sweden commented that lamps need to be of a certain quality and that only a few countries are testing. There is no quality requirement on lamps on the market today and there is a need for easy recycling systems.

The European Environmental Bureau commented that the EcoDesign Directive should complement the other Directives and they agreed that the quality criteria on longer life span are important. They support dropping the vague requirement related to waste minimisation (as it would probably mean unproductive standardisation work) and encourage the link with WEEE.

Consumer Organisations would like to see recycling systems in place before the requirements come into force. The point of sale should be the point of take back.

Product Information

On the issue of product information, the location and quality of the information are essential.

Eurocommerce commented that the probability of having a large percentage of LEDs on the market is very likely in the future. They don't want to have to use more packaging simply due to information requirements and would like to see requirements focused on what is important for the average consumer (the energy label for example). There is also a problem with displaying information in several languages and there needs to be a way of communicating more information through other means.

The chairman asked the stakeholders what they see as essential information for packaging.

Sweden replied that energy efficiency, how much light it will produce, the colour of the light and the life expectancy of the lamp are the most important.

Germany believed that the most important information was the energy label, luminous flux (support reorientation from wattage), wattage, lifetime. Other information is also important but not necessary to access from packaging.

The UK agreed with Germany on the need to display luminous flux and lumens on the packaging and with Sweden on the life of lamp.

The Czech Republic commented that Wattage, colour, energy label, efficiency and input were the most important.

Germany raised the issue of luminous flux and the need to standardise the levels of luminous flux.

Belgium commented that the quality parameters, mercury content, health issues and information on what to do if a bulb breaks need to be on the packaging.

The Consumer Organisations believed that on the front of the packaging, a customer would need to see wattage, lumen, lifetime, energy efficiency, colour, temperature (warm, cool, intermediate) and the back of packaging could contain information on the colour rendering level, warm up time of the lamp/light output (take it up to 80% not 60%). It is also important to give information on take back, disposal and accidental breakage.

Netherlands added that the number of years a lamp burns is also important.

The ELC referred to the detailed comments sent already and reminded of the issues of space, languages and complexity for the end-consumers.

European Environmental Bureau has also provided comments already and supports the consumer organisation position. They would like to support only the most energy efficient products on the market.

It was agreed that information on how to deal with the end of life product is essential and the mercury content could possibly be mentioned in that context. There would be no need to give the exact figure because affixing the CE mark will demonstrate its compliance.

Germany outlined the need to standardise the level of light produced by lamps. The idea is to have a standardised level of how many lumens a lamp provides (rather than wattage). ELC fully supported standardised levels but it needs to be reviewed carefully. There will need to be more discussions on this and there will not be time in this IM to include this element.

Consumers will need to know the general equivalent to wattage. Lumen is a value already mentioned on the Energy Label and this will need to be discussed in the context of the revision.

The European Environmental Bureau would like to see a change in how mercury content is declared. At the moment, a producer declares compliance with requirements by affixing the CE mark and the quantities of mercury in a product are only disclosed by producers to market surveillance authorities on request. They would like to see mercury content information become publicly available on websites. Furthermore they would like to see the use of the wording “energy saving” limited to products of Energy Class A. The ELC don't agree with this statement since the classification takes care of the efficiency of the lamps and the wording has to do with a comparison with less efficient products as long as they are available. This will be further discussed in the labelling directive.

Eurocommerce commented on how best to show disposal information on lamps. In the WEEE directive, the crossed out wheelee bin symbol was used to avoid the need to translate directions for end of life disposal. Information on the correct disposal for halogens and incandescent lamps might cause problems if it had to be given in different languages.

Scope and Key Definitions

The Chairman raised the issue of how best to define the scope and key definitions.

Vito cautioned that we need to avoid as many loopholes as possible with a good definition of white light. This will need to be discussed with the manufacturers. Any exemption for coloured lamps could lead to aggressive marketing of coloured lamps to keep the incandescent market share as in California. If all colours are included in the definition (to close loopholes) it would be necessary to lower efficiency criteria for white light. ELC worked with Vito on the definition and is strongly in favour of leaving it as it is as it may be used in the future for standard definition of white light.

On the issue of coloured lamps, the Chairman was concerned that depending on the colour a consumer may need a 100W incandescent coloured lamp to have the same light

output as a 60-75W white incandescent. This could have the effect of promoting more energy consuming lamps. There are also issues around soft tone lamps which is a huge loophole. Even if the ELC self regulate, it would not affect importers.

ELC believes that consumers will not choose green or red over an energy efficient product. The soft tone bulbs all have A labels as they fall within the scope of the IM. ELC mentioned that their proposal (Option 3) was not limited to white light but included all colours of light. The Commission would like to discuss this further with the ELC.

Limits and Cap types. ELC: For some caps, there are no alternatives today (e.g. Halogen low voltage caps). CFL lamps replacing lighter lamps would fall out from some standard sockets installed vertically, this doesn't meet IEC standards. Fittings and luminaires are in households already, and the ELC only provides products for those installed sockets.

The ELC raised the issue of the double ended halogen lamps used in uplighters, which they propose to leave out of scope because there is no energy efficient replacement to those lamps that would fit into the existing sockets. The way to go is to first ban the luminaires using such lamps. Environmental NGOs added that they are actually proposing to ban such luminaires in their position paper.

The Chairman asked for feedback on the suggestion to lower the scope from 150 to 100 lumens and for opinions on how this would affect special purpose lamps. ELC replied that they would not be in favour of this because lowering the target would affect many special applications like in refrigerators or ovens, for which no alternatives are available today and which use very low wattages.

Performance Requirements

MR Toth presented a slide on performance requirements. These are the performance requirements set out in Annex III.6 of the possible EcoDesign requirements.

Mr Toth mentioned that there were questions on switching cycles, warm-up time, lumen maintenance and other issues relating to CFL quality. Sweden noted that if the number of CFLs increases in the home, then switching cycles gets shorter.

ANEC/BEUC mentioned that lumen maintenance for the entire life of the lamp is important and advocated that short switching cycles be taken as a base for the determination of the maximum switching cycles per lamp life as this isn't adequately addressed in the study or standard. Also, warm up time should be shorter – at least 80% in 60 seconds.

ELC would like to see a reference to the Eco Profile developed by the industry and proposed to the Commission rather than have specific quality requirements in the IM. The innovation rate is high in CFLs and industry would prefer to innovate faster which will be reflected in faster updates of the Eco Profile, rather than wait for a review of legislation every 5-10 years. Of course, the Eco Profile needs to become mandatory in this case.

The Chairman suggested looking at this in the IM and improving further, if necessary, in one and a half years at the same time as the second IM on domestic lighting.

The UK supports performance requirements in the IM.

Denmark commented that you cannot base EU legal initiatives on a reference to a voluntary charter but that it might be possible to incorporate some elements of the charter into the IM.

Poland cautioned that halogen performance needs to be discussed carefully in terms of heating, quality etc.

CELMA advocated including performance requirements for halogens as none exist yet although there is no need for CFL requirements due to the quality charter.

UK has recently implemented Version 6 of the Energy Saving Trust specification which includes halogen and maybe we can learn from that to write some basic halogen implementation measures.





ELC queried whether performance requirements for halogen needed to be in the IM. The Commission replied that some quality requirements that cover halogen lamps are already there and that it will be looked at in more detail.

Belgium asked about the power factor but Vito believes that there is no need to raise the bar on this as there is a good level on the market already.

The Commission concluded by recognising that proposed requirements on dimmers are controversial as dimmers able to operate any CFL can only dim the lamps to 40%.

List of written statements from members of the forum (as filed in CIRCA)

Comments received before the meeting

  <input type="checkbox"/>	080204 General comments Lot 19_GS1.pdf
  <input type="checkbox"/>	080311 Supporting Information on ELC DIM position_GS.pdf
  <input type="checkbox"/>	080324_ELC feedback Stakeholder CF_GS.xls
  <input type="checkbox"/>	2008.03.18 COMMENTS FROM SPAIN.doc
  <input type="checkbox"/>	20080320_CELMA Comments on the COM documents for general lighting equipment_FINAL.pdf
  <input type="checkbox"/>	28_March_2008_comments from_Hungary_02.doc
  <input type="checkbox"/>	EuP Environmental NGOs General Lighting 21-03-08.pdf
  <input type="checkbox"/>	EuroCommerce comments EuP Forum.doc
  <input type="checkbox"/>	Greenpeace UK - Capacity to meet CFL demand.doc
  <input type="checkbox"/>	NL comments to HH lighting proposal - 080320.pdf
  <input type="checkbox"/>	Preliminary remarks form DK on lighting_gen.doc
  <input type="checkbox"/>	Statement-Germany-EUP-Lot19a.pdf
  <input type="checkbox"/>	x018sma2008e ANEC-BEUC position domestic lighting.pdf

Comments received following the meeting

  <input type="checkbox"/>	ANEC-ML-2008-0079.pdf
  <input type="checkbox"/>	Comments_General_Lighting_Austria.pdf
  <input type="checkbox"/>	eceee General Lighting- comments 18 April.pdf
  <input type="checkbox"/>	Eco-design of general lighting - Belgium comments.doc
  <input type="checkbox"/>	EuP general lighting Swedish comments 080415.doc
  <input type="checkbox"/>	Italy ECODESIGN LOTTO 19_ENG.doc
  <input type="checkbox"/>	Italy ECODESIGN LOTTO 19_ITA.doc
  <input type="checkbox"/>	UK EuP Dom Lighting IM SM2.doc