



**Light Sources and Separate Control Gears:  
Recommendations on the final Ecodesign and Energy Labelling proposals**

November 2018

Ahead of the Member States' vote expected by the end of the year, we would like to support the draft Ecodesign and Energy Labelling regulations<sup>1</sup> proposed by the European Commission, and particularly the phasing out of T8 lamps, the important product information that will be made accessible in the EU product database, and the revised verification tolerance levels. We also have the following recommendations on how to further improve the proposals.

**Accelerate implementation of requirements**

We do not support the decision to delay the entry into force of the Regulations by a year, to 2021. The measures should take effect in 2020 as originally proposed in the 2017 draft. We particularly oppose the nine-month transition period offered for relabelling products in shops until June 2022. It is much longer than is necessary and conflicts with Energy Labelling Regulation 2017/1369 which states that new labels should be displayed in shops by the end of 2019.

**Expand the chromaticity boundaries defining "white light"**

We urge the Regulatory Committee to ensure that the light chromaticity boundaries defining the scope of coverage be expanded, so as not to create the risk of a loophole (i.e. products placed on the market which are just outside the white-light boundaries, that would still look like white light but would escape all requirements). We notably support the following revised scope proposed by CLASP, which will ensure a more robust coverage of all white light products on the market:

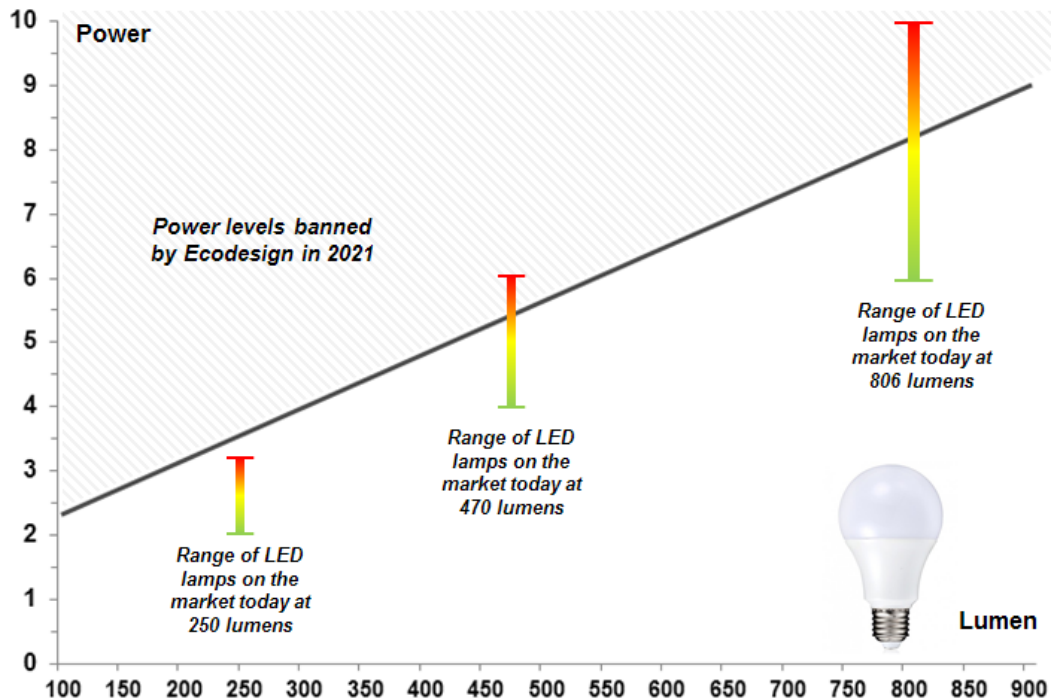
*x coordinates:  $0,250 < x < 0,570$*

*y coordinates:  $-2,3172 x^2 + 2,3653 x - 0,2400 < y < -2,3172 x^2 + 2,3653 x - 0,1400$*

**Set the L factor at 1.0 instead of 1.5**

We warn again about the too high "end-loss factor" L for LEDs in the formula for efficacy requirements. There will be hardly any impact on household products in the low and medium lumen ranges, where efficiency can be substantially improved. This is illustrated in the graph below for standard (non-directional) LED bulbs. We recommend setting the L factor at 1.0 instead of 1.5.

<sup>1</sup> [Ecodesign](#) & [Energy Label](#) draft regulations notified to the WTO on 8 October 2018



**Introduce a mid-term check in the new accelerated endurance testing proposal**

We welcome the new lifetime testing proposal, which combines endurance switching cycles with lumen maintenance. Since we believe that some of the poor-quality products may fail in the first few hundred hours of testing, and it is important that they can be quickly identified and subjected to timely sanctions, we suggest introducing a mid-term check during the test:

*After half of the test is complete (i.e., 600 switching cycles), a visual check is made on the sample under test. If at least one light source has already either failed, or a significant proportion (i.e. > 15%) of the LED chips constituting it has failed, then the test is discontinued and the model is considered non-compliant.*

**Ensure ease of product disassembly**

The provision on the possibility to remove the light sources and control gears without mechanical damage is too weak: only dismantling (not disassembly) is guaranteed, and only for market surveillance purposes, not by end-users and repairers. This is a big step backwards compared to the previous proposals, and we call on the reintroduction of the initial proposal which was supported by several Member States in December 2017.

Should this option not be considered feasible, it is essential, in our opinion, to opt for a combined approach and amend Article 4 of the Ecodesign proposal as follows:

- Allowing non-destructive disassembly by independent repairers:
  1. *Manufacturers and importers of containing products shall ensure that light sources and separate control gears can be removed without being permanently damaged for ~~verification~~ repair purposes by ~~market surveillance authorities~~ independent repairers and without permanent damage to the containing product. For containing products, instructions shall*

should be available on request on how light sources and separate control gears can be removed for repair for ~~verification~~ without these being permanently damaged and without permanent damage to the containing product.

2. Manufacturers and importers of containing products shall ensure that light sources and separate control gears can be ~~dismantled~~ disassembled from containing products ~~at end-of-life~~. Instructions shall be available on request.

- Making it extremely clear to consumers when the light source cannot be exchanged:  
3 Manufacturers and importers of containing products shall provide information about the replaceability or non-replaceability of light sources and control gears by end-users or qualified persons without permanent damage to the containing product. Such information shall be available on ~~free access websites~~ any visual advertisement for a specific model, including on the Internet. For products sold directly to end-users, this information shall be on the packaging, at least in the form of a pictogram with explanatory text, and in the user instructions.

#### Other proposed changes

- Introduce functional requirements on control gears. Limiting these to lighting sources is insufficient in our opinion.
- Remove the exemption for light sources in kitchen hoods. While we understand their lighting efficiency is already covered in a vertical regulation, these should not be exempted from the removability and dismantability requirements of lighting parts.
- Reinstate the provision (existing in the current Ecodesign Regulation) restricting green claims to the top-class models<sup>2</sup> (e.g. label classes A through C only). Terms such as *energy saver*, *eco-lamp*, etc. should not be permitted for advertising the lowest performing models.
- Broaden Article 5 of the Energy Labelling Regulation to any website, to avoid any gap:  
*Where a website allows the selling of light sources, the website owner shall enable the showing of the electronic label and electronic product fiche sheet provided by the dealer on the display mechanism in accordance with the provisions of Annex VIII and shall inform the dealer of the obligation to display them.*
- Refine Ecodesign Recital 15 and turn it into a regulatory article, as in Article 6 of the Energy Labelling Regulation:  
*Product parameters should be measured using reliable, accurate, reproducible and representative of real-life conditions and users' behaviour methods. Those methods should take into account recognised state-of-the-art measurement and calculation methods, including, where available, harmonised standards adopted by the European standardisation organisations (...).*

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<sup>2</sup> See Regulation 244/2009: The term 'energy saving lamp' or any similar product related promotional statement about lamp efficacy may only be used if the lamp complies with the efficacy requirements applicable to non-clear lamps in Stage 1 according to Tables 1, 2 and 3.