

Policy Recommendations for Lighting Products

Topten Comments and recommendations on the Commission's draft working documents in the frame of the review of the lighting regulations: [lamps and luminaires](#) (January 2018)

Summary

The Commission is currently revising all lighting regulations, with the aim of combining and facilitating them. This would align and greatly facilitate the ecodesign and labelling requirements for different lamp types, and treat luminaires with integrated LED lamps as lamps (same declaration, same labelling procedure, more transparency because all of a luminaire's lamps would be considered). However, Topten also sees important aspects that need to be improved in the proposal:

1. Higher ambition Ecodesign requirements needed:

In the last proposal, the requirements for 2018 and 2020 are for some lighting products below existing 2010 requirements. There is a more ambitious scenario in the preparatory study, which should be proposed and implemented.

2. Adjust Energy Label levels

The current proposal seems not to allow for sufficient level classes at the bottom end of the scale, but too many at the top end.

3. Close remaining loopholes and clarify definitions

Still many inefficient lamps are sold under the 'special purpose' loophole. This loophole needs to be closed. Further, the term 'energy-saving lamps' or similar should be restricted for use. Standby definitions and requirements should be clarified. Also for lighting products, the use of tolerances for declaration must be prohibited explicitly.

January, 2018