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INFORSE-EUROPE
International Network for Sustainable Energy - Europe

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Position of the environmental organisations working on Eco-design at European level

Climate Action Network-Europe – CAN-E

European Environmental Bureau – EEB

European Environmental Citizens' Organisation for Standardisation – ECOS

Greenpeace

International Network for Sustainable Energy (Inforse) - Europe

Worldwide Fund for Nature (WWF) - European Policy Office

On the Working document on possible Ecodesign requirements for Public Street Lighting, provided by EC DG TREN on 7 June 2007

In the context of directive 2005/32/EC establishing a framework for the setting of ecodesign requirements for energy-using products (Ecodesign Directive)

1. Introduction

The environmental organisations welcome the opportunity to provide an initial response to the Working document on possible Ecodesign requirements for Public Street Lighting (in the following: “working document”).

2. General remarks/questions

Systematic of defining the Scope of IM

From the working document on street lighting it seems that a kind of mixed scope is proposed (all lamps used for street lighting on the one hand, and HID lamps for all kinds of purpose) and the rationale for such a mixed approach is not clear.

An overall concept that ensures harmonised requirements for products/components used in different areas and that helps avoid a potential “loss of products” in the gap between two parallel IMs is missing instead.

Thus, we encourage the Commission to provide a clear plan explaining if and how all different types of lamps and kinds of uses will be covered. The plan should not be limited to street lighting but should consider the entire lighting sector.

General or technology specific minimum requirement

The working document presents a different level of ambition for several types of lamps. For instance the requirements for the HID S1 group do not meet the same level of ambition as those proposed for pressure sodium lamps (HPS)(S3) and metal halide lamps (MH) (S4).

From an engineering perspective this may be correct, but such differentiation may lead to the following shortcomings:

- Requirements for (new) technologies not covered by the addressed lamp types may be either missing or inappropriate.
- This could result in a limited push towards the development and/or use of more efficient product alternatives available on the market.

In this context it could be more appropriate to develop binding minimum efficiency criteria for all kinds of street lighting lamps.

Revision periods

Based on our observation of the process up to now we do not see how short revision periods of IMs can be guaranteed by the Commission.

To avoid missing drivers for further innovation a dynamic concept for an increase of the level of ambition should be included in the specific IM.

For example, when following the general minimum standard concept outlined above this minimum standard could start somewhere at the S1 level but with a clear timeline going up to the S3 level for all products in a 5- 10 year time period.

Such an approach would either give “older” lamp technologies the chance to increase efficiency or allow for a shift of lamp types for the users.

3. Remarks to specific aspects of the working document

Without anticipating the outcome of the general issue raised before (more general and dynamic requirements), we would like to make some first observations about selected requirements from the working document.

S1 – High-intensity discharge lamps (HID) and lamps for street lighting

S1 sets minimum efficiency requirements in lumen per Watt (lm/W). The suggested values might lead to a phasing out of high-pressure mercury lamps (HPM), but they are quite weak for all other types of HID lamps currently on the market (as well for those not used in street lighting!).

Requirements concerning a lamp lumen maintenance factor and a lamp survival factor are missing and should be included as a major aspect from an environmental perspective.

S3 – HPS lamps and S4 – MH lamps

S3 and S4 set clear minimum requirements which reflect the status quo in these technologies.

The requirements concerning a lamp lumen maintenance factor and a lamp survival factor should be harmonised for both types of lamps (towards the S3 requirements) and a clearly defined timeframe (< 5 years) for necessary improvements in the field of MH lamps might also be appropriate.

S5/S6 – Ballasts

Given the wide range of “quality” of existing ballasts regarding energy efficiency, upgrade possibilities and material properties ballasts is an important issue for an appropriate IM for street lighting. Values given in the working document are taken from industry self declarations (product information). We do not see the need for lowering the level of ambition here or to postpone the decision about this important issue until the corresponding standardisation procedure is finished.

To avoid a possible waste of time until ongoing standardisation work on this issue is finalised, the Commission should come forward with a proposal for a corresponding measurement method in the meantime.

The target for dim ability (50%) seems insufficient because up to date-street lighting management plans discuss values between 20 and 30% as target values.

S8 – Luminaires for public street lighting

S8 specifies requirements to increase optic efficiency by decreasing upward light flux and increasing downward light flux.

The “simple” criteria proposed doesn’t solve the difficulties of limiting the light pollution problem and grant proper illuminated public areas (light characteristics) at the same time. Considering that these requirements (DLO min and ULOR max) are key aspects in the chosen approach of regulating the overall efficiency of street lighting, we are in favour of maintaining them without weakening the level of ambition.

Ga-1* - Luminaires for public street lighting

Clear requirements supporting future upgrade possibilities of lamps (e.g. possibilities without change ballasts or vice versa) are missing.

Ga-3 – HID lamps

A maximum mercury content per unit should be defined accompanied by a clear phase out-strategy for all kinds of HID-lamps (within a defined time frame)

Ga-4 – All HID

The proposal is much too vague here. A mandatory take back system for used lamps would be appropriate (at least for Hg and other heavy metal containing lamps).

The same is true concerning design for recycling.

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