



Brussels, May 2009

**Comments from ECOS (on behalf of Environmental NGOs)  
on the draft EuP preparatory study for TREN Lot 19 part II**

Document reference: ECOS/EuP/2009-1

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This position has been elaborated with contribution from Norbert Reintjes (Ökopol).

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### ON LUMINAIRES

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*The preparatory study up to now is mostly focusing on lamps, and brought insufficient information on luminaires (especially in terms of environmental aspects and consumer issues). We expect the study to deliver more on these aspects. Moreover, the limited information is scattered in different chapters without a clear vision.*

- The proposed base cases for luminaires should be covered with more in-depth analysis, and be provided in the relevant task. **LCAs and impact assessments are missing.** Moreover, we consider that the number of base cases proposed is too limited and unable to give a picture of the range of luminaires on the market.
- We question the assumption in Task 4 p. 25: “*For luminaires it will be assumed that identified luminaire cases or improvement options have identical end of life behavior, hence there are no difference to be taken into account.*” **This approach fails to address the issue of toxic content, design for recycling and easy dismantling, thus will neglect policy options necessary to improve these environmental aspects.**
- We consider the improvement option for luminaires shortly reported in Task 6 p. 26, i.e. “*Avoid the lock-in effect into low efficient lamps class C*” as **a fundamental issue for this study and EuP implementing measure.** Therefore, we are not satisfied to see it reduced to two lines with the comment that “*this option does not need to be documented*”. On the contrary, we would like to read more data about it, especially a clear picture of the current catalogue and market trends towards more and more G9 and R7s luminaires (preventing consumer choice for efficient lamps), a list of all the caps leading to this lock-in effect, and a clear proposal to ban these caps for all new luminaires put on the market. **There is a necessity to raise awareness on how these caps and market trends in luminaires pose a very substantial threat to the overall EuP legislation on lighting.**
- We support in Task 6 p. 26 **a mandatory minimum value on LOR for luminaires** (and their components). The “decorative” aspect is a thing, but it should not lead to current astonishing trends of nearly black luminaires or shades blocking almost all of the light. A regulatory approach is necessary. We also question the complete disappearance of the LER concept, which was an interesting parameter toward a ‘lighting system’ approach.

### ON DIRECTIONAL LAMPS

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*We do not see why CFLi DLS and LEDs are only (partly) covered in Task 6, while they could be included in Task 5 as base case products. The reasons we read in the study are questionable (i.e. “not to complicate the calculation model” and because “the sales are low today”, see Task 5, p. 9). As the sales of these lamps are expected to increase rapidly, and they are in several ways not exactly similar or comparable to the other base case lamps considered, we suggest to have them fully covered in base cases. It is urgent to explore potential regulations and standards on the performance, quality and consumer information for these new products, in order to avoid consumer distrust at the earliest possible stage. **Therefore, full life-cycle and improvement potential analysis should be performed, and quality requirements explored.***

- We find the comments made on CFLi DLS on Task 6 page 19 excessively radical. It is said that “*most CFLi-R on the market can not be considered as a DLS*”. This argument is not convincing, since CFLi were not developed for directional applications in the first place, but now the situation is rapidly changing. **The study should cover all lamps that are marketed to consumers as DLS,**

**hence the DLS CFLi.** To our knowledge, smaller products fitting an increasing number of luminaires are regularly put on the market these days. Could you clarify on which ground you base this affirmation: “*for the normal dimensioned CFLi-R’s no improvement can be expected*”? This is contradictory to the technological trends observed for CFLs in recent years.

- We do not see why 4000°K LEDs are excluded from the study (Task 6 p. 17). Even if they do not constitute exact replacement options for halogens and GLS, **they are a DLS product on the market and should be covered and assessed.** The fact that halogens and incandescent lamps are limited to “warm white” light is not a reason to ignore other available products.
- We consider that the lot 19 part I study failed to properly assess the environmental impact of the production phase (especially regarding the leakage of mercury in CFL factories). Insufficient data and evaluation were clearly flagged-out. Therefore, **we do not find it relevant to quote the part I study as a reference on this aspect** (see Task 4 – p. 11: “*one can expect a very low total environmental impact for lighting by the ‘production phase’ according to part 1 of this study*”). The use of amalgam instead of liquid mercury was already suggested as a valid policy option, and we expect some assessment and discussion to be proposed in this study.
- The purchase price of LEDi in Task 7 p.10 (40 €) is somewhat problematic, as it is a fairly new technology (especially in the wattage range considered), and the price may rapidly change. This price should not be considered for granted in the next 5 years. We would prefer to see a price range there, instead of a precise figure. 3 W LED lightbulbs (comparable to 25 W GLS) are more widespread and are already available at a price range of 10-15 €. **We could then expect the price of 7 W LEDi to drop to a level that should be investigated in the study.**
- Finally, we have a fundamental concern with the general approach in chapter 7. Improvement potentials are only considered in a one-to-one replacement option, without taking a broader “luminaire system” approach. This is a clear limit in our opinion, which is not discussed in the study. Consumers want their illumination system to provide an appropriate amount of light. They do not necessarily want a specific lamp type or technology. In this respect, we do not support the way CFLi and LEDi were excluded from the start from improvement cases related to halogens: 7.1.2 (HL-MV-R) and 7.1.3 (HL-LV-R).

It is true that for a single-lamp directional luminaire, replacing a halogen by a LEDi would lead to a lower lumen output. However, there are several cases of multi-lamp luminaires where it is possible to play on the beam directions or number of lamps, in order to light a specific spot (which is the purpose of DLS): for instance, luminaires where lamps can be turned and cable-mounted spot luminaires where the user may choose the number of light fixtures to use. In all these cases (a significant part of the luminaire market and stock?), one halogen lamp could be replaced by two or more LEDi. The table 7.4 on page 14 gives an indication that replacing one traditional lamp by two LEDi would still lead to a lower life-cycle cost (in € / lumen / hour). Therefore, the LLCC option is a two-to-one replacement, which is achievable for some luminaire types.

This does not mean that a “simple” lamp regulation could be extracted from this statement, as it is not possible to know where lamps are fitted after they are put on the market. However, we would appreciate the study to perform a LCC comparison of a two-to-one replacement, to see how far this may improve the environmental performance and consumer benefits. The findings might help designing an additional requirement on luminaires, to facilitate these two-to-one replacements.