



Brussels, October 2009

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

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

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on the draft EuP preparatory study for TREN Lot 19 part II**

- ECOS is generally satisfied with the propositions made and the scenarios suggested in this study.
- Broadening the scope and assessment to directional lamps and luminaires used outside households (p.9) makes perfect sense and highlights the huge saving potential from the measure (nearly a half of the Lot 19 part I regulation)
- Leaving space for LED luminaires and modules to enter the market without tough requirements (p.9) makes sense. We support the condition that they should not claim equivalence to a standard lightbulb. At the moment in European shops, the packaging of LED products is not well harmonised and sometimes include claims of equivalence that are highly suspicious.
- We support quality requirements on LED retrofit lamps (p.15), but we are still waiting for feed-back from some technical contacts to assess them.
- We generally support the requirements on consumer information at the point of sale and a strict restriction of the use of the label "energy saver". However, for consistency with the Lot 19 part I regulation, we think that the mercury content of directional lamps should be displayed on the packaging. This is maybe also the opportunity to require a minimum font size. Otherwise the information will only be indicated in very small characters at the back and nobody will ever pay attention. (p.11)
- We wonder why the requirement on warm-up time is expressed to 80% of full light-output and not 60% as in Lot 19 part I.
- We support an aggressive policy on luminaires which are not designed to accept energy-saving lamps. Ban of G9/GU9 and R7s based luminaires is a must and should start as soon as possible in all the scenarios proposed. Decoupling the sale of the luminaire and lamps is also a good idea, to avoid sending a wrong signal to the consumer.
- We support a 0 W standby requirement if no intelligent controls are included (p.15).
- the proposal of a mandatory "design check-list" to be added to the technical fiche of luminaires (p.16), explaining potential deviation with good design practices to promote efficiency is a good idea in principle, but risks being heavily opposed by industry. And it would not necessarily have a huge impact on purchase decisions. Also the proposed voluntary ecolabel for luminaires (p.75) may be used to promote a few very good models but will hardly transform the bulk of the market and purchase habits among the majority of consumers. Therefore, we would rather favour a

mandatory energy labelling of luminaires based on an A-G scale. The rating would be based on a combination of the LOR value and possibility to operate with A and better lamps or not. As we understand it, luminaires can fall under the category of "energy-related products" which have an influence on energy consumption patterns. Therefore, they could be energy-labelled. Industry might complain that the LOR value does not reflect all the different luminaire types and specific applications. However, this is a good start and if it is feasible for a voluntary ecolabel, why not doing it on a binding basis (with potential exemptions for very extreme cases)?

➤ The 3 improvement scenarios proposed are a good basis for discussion, however they do not express very clearly their relation to the LLCC point. It would be useful to translate them into distance to the LLCC level.

➤ Unless we are mistaken, the study does not suggest which revision date would be adequate for the implementing measure. We understand that the quick development of LED-based products would require the measure to be revised earlier than the Lot 19 part I regulation (i.e. before 5 years). 4 years seems more adequate.