



Raising standards for consumers



The Consumer Voice in Europe

Consumer interests in the review of Stage 6 Requirements of Commission Regulation (EC) No 244/2009

Commission Staff Working Document:

“Report to the Ecodesign Consultation Forum on the
Review of the Stage 6 Requirements of Commission
Regulation (EC) No 244/2009”

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Summary

Regulation 244/2009 established Ecodesign requirements for non-directional household lamps. The last stage of the regulation, Stage 6, foresees that lamps must be of energy efficiency class B by 1 September 2016. Currently, B-class mains-voltage halogen lamps cannot be found at European market. Therefore, the European Commission launched a consultation process in order to investigate whether there is a need to adapt Stage 6 requirements. The Commission Staff Working Document "Report to the Ecodesign Consultation Forum on the Review of the Stage 6 Requirements of Commission Regulation (EC) No 244/2009," proposes postponing the entry into force of Stage 6 requirements by 2 years, including the –so far- exempted R7 and G9 lamps to the scope of Stage 6 and adopting requirements for luminaires.

Through this paper, and taking advantage of their experiences at European level as well as of the experiences of their members at national level, ANEC and BEUC highlight that:

- they would support a **restricted allowance** of two years before the entry into force of Stage 6 with the goal of resolving functionality issues associated to LEDs and ensuring quality products are offered widely to consumers;
- the inclusion of R7 and G9 lamps to the scope of Stage 6 should not leave consumers without options;
- requirements on luminaires are a good step forward as luminaires have a long product lifetime.

Background

European consumer organisations ANEC and BEUC welcome the Commission's decision to review "Stage 6" requirements on non-directional lighting before their implementation, as lighting is an iconic consumer product group under the Ecodesign framework and the associated requirements lead to the phase out of the wide spread and highly inefficient incandescent technology as well as to an immense market transformation thereafter. The European Commission recommends three regulatory measures in order to ensure a successful transition to Stage 6 requirements of Commission Regulation (EC) No 244/2009 on non-directional lighting:

- « 1. changing the entry into force of the Stage 6 requirements to 1 September 2018, allowing LED technology to mature further and reach an optimal time point in terms of monetary and energy savings;
- 2. removing the current loophole by extending the stage 6 requirements to halogen lamps with G9 and R7 socket;
- 3. introducing a provision that luminaires sold after 1 September 2015 should be compatible with LED technology to prevent future obstacles to efficient lighting... ».

European consumer organizations ANEC and BEUC provide comments on how to strengthen these recommendations and avoid possible loopholes that would endanger moving away successfully from halogen technology:

A potential change of the entry into force of the Stage 6 requirements to 1 September 2018

During the development of regulation 244/2009 with regard to Ecodesign requirements for non-directional household lamps, European consumer organisations ANEC/BEUC were very supportive of an ambitious measure which would provide legal certainty to manufactures and at the same time would urge them to continue investing on more innovative and energy efficient technologies. Over the last years, the market share and quality of LED products is rapidly improving while their price is becoming more accessible to consumers. Nevertheless, through our member organizations and the comparative tests they regularly conduct, we have come across shortcomings of available LED products. As a result, available products at the market do not always meet our expectations as expressed during the elaboration of the regulation. Therefore, we would support **a restricted allowance of another two years** before the entry into force of Stage 6. This would facilitate the production of LEDs that meet consumer expectations associated to **durability, light quality, compatibility with dimming mechanisms and cost-effectiveness**, in order for consumers to get a return on their investment, the latter being usually higher than for other lighting technologies.

Improving the functionality requirements for LED-lamps in addition to better market surveillance which will effectively remove non-compliant lamps is crucial to regain consumers' confidence in lighting policy that has maybe been lost in the first years of the implementation of Regulation 244/2009. The [EU's LED quality charter](#), which was published in 2011, refers to important functionality characteristics some of which are requirements of Regulation 1194/2012 on directional lighting, LEDs and related equipment and will enter into force in March 2014. Nevertheless, in order to ensure consumer trust to LED technology, the functionality requirements must be further elaborated in order to better address light quality, early failure, lifetime, flickering and compatibility with dimming mechanisms. For instance, recent tests have shown that certain LEDs with E14 socket could reach 70.000¹ switching circles, far more than the 15.000 that are currently referred to in the requirements. E14 together with E27 are the most commonly used light bulbs found at households.

With regards to colour quality two issues must be assessed before setting light quality requirements for LEDs. The first issue is linked to how accurate a "given" light source is at rendering colour when compared to a "reference" light source. CRI (Colour Rendering Index) has been developed taking into account a halogen lamp as a "reference" light source. Due to the different technology of LEDs, scepticism arises regarding the suitability of this scale in measuring light quality of LEDs. Therefore, we would support the use of a more suitable scale for these purposes. The second issue associates to consumer acceptance of LED light quality. Due to the rapid transformation of the LED market, there is a need for more consumer based research in order to define the correct level of consumer acceptance and satisfaction with regards to light quality.

A major issue for consumers when it comes to LED products is their compatibility with dimming mechanisms. The Stiftung Warentest test revealed also that only one manufacturer provided information on the fitting of its light bulb to the dimming technology. Hence, it is very burdensome for consumers to find out which lamps work with which dimming technology. The ability to dim is also crucial for people with sight loss. This group of vulnerable consumers must be taken into account as premature implementation of Stage 6 could make their purchasing choice difficult.

Inclusion of light bulbs with G9 and R7 sockets to the scope of Stage 6 requirements

We welcome the intention of the European Commission to set requirements for light bulbs with G9 and R7 sockets as they are commonly used in households and they are highly energy consuming. Nevertheless, as they are currently exempted from Stage 6 requirements, the review study did not focus on these types of lighting sources. We would agree with their inclusion to Stage 6, provided that solutions for G9 and R7 sockets are widely available at all countries covered by Ecodesign measures. Also, it must not be forgotten that floor luminaires with R7 sockets are widely used at households due to the fact that they allow the user to regulate the light strength. Therefore, in cases where LEDs with R7 sockets are used as alternatives, their compatibility with dimming features must be taken into account.

¹ Stiftung Warentest, Test 10/2013, pp. 70-75.

Compatibility of luminaires with LED technology

Luminaires usually have a long product lifetime and consumers should be able to get retrofitting lamps for a long time after the purchase of a new luminaire. Therefore, we support the proposal of the Commission to set requirements for luminaires.

It should be ensured that LED lamps are used and built into luminaires that allow for proper heat dissipation. Heat dissipation is instrumental in safeguarding LED lamps' lifetime (the chip of LEDs produces a lot of heat that needs to be dissipated; otherwise the chip will be damaged). This is a relevant aspect for LED lamps used as retrofits for non-directional lamps (besides being used as directional light sources).

END

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