

Comments for the future single lighting regulation,
received from Bram Soenen, Belgium, by e-mail on 28 August 2015:

1. It would be necessary that any **compatibility** issues between lighting components sold separately are resolved either by guaranteeing universal compatibility to a common standard or a simple information to the consumer allowing quick identification of compatible components. As a *minimum minimorum* a harmonized standard fixing 'electronic characteristics' of any dimmer to go to minimum (lowest possible with a fixed limit of the maximum) and maximum (output without a dimmer) stable lumen output of any lamp claimed to be dimmable should be implemented ASAP. Further requirements related to the quality of dimming shall be added.
2. **Abuse of tolerances** for verification should be clearly prohibited in the text.
3. **Market surveillance** should be **simplified**. Current **procedures** are very complicated. The possibility to do cheaper **testing** should be considered. It seems **life time** requirements are impractical to test due to long testing times. Premature failure requirements would seem more effective than very long life time requirements.
4. **Reparability** of more integrated, more expensive and longer lasting lighting products can become an issue. Ease of maintenance and repair by a consumer or technician and availability of compatible replacement parts should be considered as requirements in the proposal.
5. Due attention has to be paid to **system-related requirements**. It seems more energy savings are to be gained from better demand controls including presence detection and automatic dimming. However, smart lamps and control gear should get stringent **standby-requirements** to avoid stand-by consumption offsets gains from improved demand side controls.
6. A new **efficiency** requirement should be a function of lumen output (e.g. the current square root formula), beam angle and CRI (e.g. with CRI80 as an anchor point 'punishing' lower CRI and 'crediting' high CRI). It should take into account efficiency of electronic components for power conversion and control to ensure equal treatment / fair comparison. The current BAT-level of a CRI80 lamp of 4-600lm with 'bare' LED-modules seems a logical **pivot benchmark: 120lm/W**.
7. Unwarranted phasing out **Linear Fluorescent Lamps** and **tertiary lighting** should be avoided by taking into account required lumen output, light distribution patterns, glare and backward compatibility (such an 'exemption' should be limited in time as far as possible).

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