



LIGHTINGEUROPE

THE VOICE OF THE LIGHTING INDUSTRY

Ecodesign Preparatory Study

Lot 8/9/19 Light Sources

**1st Stakeholder Meeting
5 February 2015**

**LightingEurope
Comments**

Input from LightingEurope to VHK

LightingEurope welcomes the Ecodesign Preparatory Study Lot 8/9/19 Light Sources and thanks the study team light sources for organizing the 1st Stakeholder Meeting on 5 February 2015.

The following are LightingEurope comments on the Task 0-3 reports:

1. “Decorative” needs to be better defined: e.g. Gadgets which shine (light the way for someone) are no luminaires.
2. The misuse of incandescent lamps as shock proof lamps should be highlighted: estimated real shock proof lamps = 9.8 million (pieces sales/year). Estimated misused of incandescent lamps = 294.7 million (pieces sales/year).
3. Measurements (slides 33-39): a general review of the technical parameters should be done: they should be reduced to a minimum (quantity) in order to allow an effective market surveillance, avoiding long time consuming tests measurements.
4. Concerning Health issues (slide 100), please consult the LightingEurope Guide on photo biological safety.
5. Dimming (slides 104-118): as pointed out in the study, we have a legacy of many different dimmers. Nevertheless it is questionable whether LED lamps work with all of these dimmers.
6. The regulator should in future take into account much more than in the past current standards and standards in preparation. One of root causes of unclarity in the market today, including surveillance issues, is the big gap between existing regulations and regulatory definitions with available standards and formal standardized definitions. With as result the need for repair actions (mandates) which could to a large extend have been avoided.