

## WORKING DOCUMENT 3

### **on a possible Commission Regulation amending Commission Regulation (EC) No 245/2009 of 18 March 2009 with regard to ecodesign requirements for fluorescent lamps without integrated ballast, for high intensity discharge lamps, and for ballasts and luminaires able to operate such lamps**

#### **FURTHER AMENDMENTS PROPOSED BY ELC/CELMA**

The following requests for further amendments were made by ELC/CELMA. The members of the Consultation Forum are invited to provide their views on them.

#### **Use at Standard Room Temperatures**

##### Identified Problem

The wording “it shall be stated that the lamp is not suitable for indoor use at standard room temperatures “ is not at all technically correct – this is a misunderstanding between “room temperature” and “lamp ambient temperature”. If efficacy is measured at 25°C, than lamps are not measured under conditions, which most of them were designed for and are operating in reality. They are designed to reach their optimum performance in hot luminaires in recessed ceilings and often are used in normal office lighting.

Modern lamps such as T5 lamps or CFLpin lamps which do not have their optimum performance at 25°C are of course suitable for indoor use and can actually lead to energy savings as often the temperature in a modern small (and thus material saving) luminaire is above 25°C. In addition the modern energy saving T8 lamps (e.g. using only 51W instead of 58W without prior change to luminaires) are also optimized for higher ambient temperatures of the lamp. Such lamps do not reach 90% of the efficacy requirement at 25°C.

In effect such marking on the package of a lamp would cause consumers NOT to use the most efficient product for his application. If lamps are clearly designed for very cold or very hot temperatures (0°C or lower, 50°C or higher) such a note could be used.

Date of application of the requirements in question: April 2010

##### Suggested Solution

Change required that lamps which do not fulfil the requirements listed at 25°C should not be marked at all OR marked according to their optimum application

#### **Efficacy Requirements for Long Life Lamps**

##### Identified Problem

Such lamps target to reach more than double of the normal lifetime – official definition so far is > 25.000 hours for long-life lamps. Each manufacturer aiming to put long life lamps on the EU market will need to be in a position to provide appropriate technical

data upon request to prove that long life lamps meet their specification requirements. Banning these lamps would force more frequent maintenance cycles, as one long-life lamp replaces 2 or more regular lamps. The more frequent replacement will cause huge maintenance costs, as well as considerably increased mercury waste. In the last years industry has introduced long life lamps which reduce waste and allow the user to operate them for several years without exchange (of particular importance e.g. for lighting of tunnels, streets or in other applications where lamp exchanges are very expensive).

As no provision is made for the slightly lower efficacy of such lamps, they would be banned under this measure

Date of application of the requirements in question: April 2010

#### Suggested Solution

Change required "deduction of -10%" of efficacy requirements for lamps with > 25000 hours life-time