C.E.L.M.A.
*Federation of National Manufacturers Associations for Luminaires and Electrotechnical Components for Luminaires in the European Union*

# CELMA GENERAL COMMENTS ON LABELLING

**in the framework of the Consultation Document on the revision of the Energy Labelling Directive 92/75/EEC of 22 September 1992 on the indication by labelling and standard product information of the consumption of energy and other resources by household appliances**

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## EXECUTIVE SUMMARY

**CELMA, representing the European Luminaires and Ballasts industry (www.celma.org), is strongly against any additional labelling of luminaires and ballasts. The addition of information (e.g. EEI index, LOR value, ULOR value, IP rating), when appropriate, can be acceptable. CE marking, which is legally demanded in any case, is sufficient as the marking of compliance with environmental legislation.**

**Background information: lighting products can not be compared to a fridge! Tertiary sector lighting luminaires (all luminaires except the household ones) and ballasts are sold to the professional market and not to end users or consumers, like fridges. Hence why the "consumer energy label" applying to fridges which is intended for end users / consumers shall not become applicable to lighting products.**

## CELMA POSITION ON LABELLING OF LUMINAIRES

- The Lighting industry believes that the CE marking only (with the integration of incoming legislation regarding energy saving) can sufficiently cover all energy efficiency issues on the product side.
- It is not useful to provide energy efficiency labelling on the product. The characteristics are part of the product information available for the lighting stakeholders and the energy efficiency labelling cannot ensure the correct information to the user.
- Lighting solutions are pulled by the demand side, not pushed by the product side. Products are offered for selection by a professional knowing the environment in which luminaires have to find their place.
- With a possible new EU legislation on installation requirements (the lighting design legislation as proposed by CELMA), we will not need any marking on products at all, as it will be the task of the lighting designer to choose the lighting products according to the criteria set in the lighting design legislation on top of the common lighting performance criteria.
- The luminaire efficiency is related to its right use, so it is not possible on a single energy efficiency labelling to give all the needed information to the user

- For the domestic market, CELMA only wants a lamp energy label (as already in place) because assessing the efficiency of domestic lighting will have as a result that there will be no clear system to segment the differences in the designs of the optical part/ decorative parts.

- As an alternative to the consumer energy label for lamps, CELMA proposes for the tertiary sector lighting luminaires (with distinction, between indoor and outdoor luminaires) the following Energy Efficiency (EE) markings which are already used and published by most manufacturers in their catalogues and photometric data files.
    - LOR values for indoor luminaires
    - IP rating, ULOR and LOR values for outdoor luminaires
    - EEI index for FL lamp ballasts.

## CELMA POSITION ON LABELLING OF BALLASTS

- Ballasts are already marked with the CELMA EEI classification.

- Labelling on ballasts would be no use for the general public: ballasts are not consumer products, but components. They are sold to OEM luminaire manufacturers, who install them into the luminaires in their production. Ballasts are hidden (not visible) in a complete luminaire, so the labeling information could not be seen.

- As the size of the ballast is small, there is little area for markings and that is a problem already now. Energy labeling cannot be fitted in the small place.

- Consumers never buy ballasts, so the labeling would be no use for them. OEM manufacturers will get the energy efficiency information on the energy efficiency class (EEI) marked on the ballast and additionally on the ballast manufacturer's data sheet.