EUROPEAN LAMP COMPANIES FEDERATION

ELC Comments – WTO TBT Notifications

The ELC represents the leading lamp manufacturers in Europe and accounts for 95% of total European lamp production, with approximately 50,000 employees in Europe and a 5 billion EURO European turnover.

Below are comments from the ELC, on the following WTO TBT Notifications.

- **Philippines – PHL 61, PHL 62, PHL 66 and PHL 73;**
- **Taiwan – TPKM 40; and**
- **Hong Kong China – HKG 26.**

General Remarks

Currently China has developed an energy standard, which results in a rating that is higher than a European Energy Label 'A'. The Chinese Green Lights Project aim was to establish mandatory national energy efficiency standards focusing on six types of lighting products including double-capped fluorescent lamps, self-ballasted fluorescent lamps, high-pressure sodium lamps, ballasts for high-pressure sodium lamps, metal-halide lamps and ballasts for metal-halide lamps. The standards mainly consist of limited values for energy efficiency, evaluation values of energy saving, energy efficiency grades and target limited values of energy efficiency.

Analysis of the WTO TBT Notifications from the Philippines, Taiwan and Hong Kong China, highlight that the proposed energy efficiency standards are higher than those of the European Union and the standards agreed by the International Electrotechnical Commission (IEC).

In general the standards listed in the TBT Notifications from the Philippines, Taiwan and Hong Kong China are higher than that of the Chinese Green Light Standard and that of the IEC Standards.

Currently, there is a general trend to demand lm/W values, which "reputable" lamps cannot fulfil - but only those which start with a very high lumen output and usually loose substantial light over lifetime. This would result in the European manufacturers need to adopt the informal Asian strategy of "golden samples" and this would result in samples specially produced that would achieve the required efficacy in the testing period and then substantially deteriorate in quality thereafter. This results in adverse environmental and quality impact for these lamps, taking into account the total life cycle of the product; as a result of an increased lamp failure rate. ELC member companies have doubts if particular country-specific standards may result in restrictive impacts on free trade and thus may distort conditions of competitive market.

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The ELC Member Companies would like to express their concern of the lack of transparency provided by these countries, the lack of testing information and the lack of provision of the documents referred to in the Notifications.

The ***Appendix*** to these comments lists the industry and IEC accepted efficacy from lamp wattages.

The ELC Member Companies kindly requests the European Commission and the WTO Secretariat to respond to the following question.

- **What percentage of the fluorescent lamp market in the Philippines, Taiwan and Hong Kong China would comply with these standards?**

Philippines

PHL 61, PHL 62, PHL 66 - Fluorescent Lamps

- These standards would achieve greater environmental and quality results, by focusing on lumen maintenance minimum standards (after 2000 or 5000 hours).
- The general introductions to the testing requirements are not consistent with that of the text and the standards referred.
- CDPNS 2050-2: The requirement to test the lamps with 230V/60Hz causes issues. The test should be made with 50Hz. If this frequency is not changed, lamp manufacturers would be required to **produce lamps for the Philippines market only.**
- Efficacy values are too high and could result in the manufacture of 'golden samples'. Reputable lamp manufacturers can reach the values requested.
- CDPNS 2050-1-2: Testing at 230V/60Hz does not meet any international standards.
- 3.1: Internationally 827, 830, 840, 850, 860 etc are accepted, 8 for colour rendering, 27 for example for 2700K = Warm white. 827 for example is stamped on the lamp, warm white on the packaging, it is not deemed necessary to print this extra info on the lamp.
- 2.2 and 3.2: The testing guidelines unclear.
- 3.3: measure on the bulb diameter for CFLin makes no sense, maximum dimensions as in the IEC norm would be a better reference
- CDPNS 2050-1-1: Tables 1, 2 and 3 contradict each other and are unclear. Wattages 21 - 22W and 35 - 36W are missing. The lm/w are too high
- Table 3: Measuring temp is not given. ´This is critical for these lamps as the difference between 25 and 35 degrees is high!

PHL 73 – HID Lamps

- The ELC Member Companies do not agree with the requirement for energy labels on 'professional' products. Choice of the HID lamp is determined by professional end-users that are either engineers or electricians to meet the requirements of the application and the installed system. These professional end-users have the required knowledge about a lighting system, to ensure the an energy efficient installation.

- The scope and objectives of the requirement of an energy label for professional HID lamps is unclear.
- There are no requirements in the European Union to place energy labels on professional lamps. Therefore the European lamp manufacturers would be required to **produce lamps for the Philippines market only.**
- The ELC Member Companies request further information on the background, monitoring and reinforcement of this requirement for professional HID lamps.

Taiwan

TPKM 40 - Self-ballasted fluorescent lamps and compact fluorescent lamps.

- There is confusion in the documents TPKM 40.en and Table 1 in CDPNS 2050-2. The limits in TPKM 40.en are higher than in CDPNS 2050-2.
- In Table 1 in CDPNS 2050-2 the colour temp <4000K is missing.
- Point 3.3 - we do not know the "local regulations" and therefore we cannot comment.
- Point 3.4 - We do not approve of external testing, due to the expense and times involved, and encourage self-regulation.
- Point 3.4.2: Lumen efficiency should not be calculated with rated watt but actual watt.
- Point 3.4.3: Points b), e), g) and h) are not currently measured by manufacturers.
- Point d) it is not stated after how many hours the Maintenance should be tested.
- Annex 1: Label sample shows a 15W lamp with min. 50lm/Watt, this is wrong when compared to Table 1.

Hong Kong China

The ELC has no further comments.

APPENDIX

Efficacy Values for CFL-I – in accordance to IEC 6069

Wattages (W)	Light Output (lm)
5	250
7 or 8	400
11 or 12	600
15 or 16	900
20 or 21	1,200
23 or 24	1,500
30	1,900

Efficacy Values for CFL-nI – in accordance to IEC 60901

Wattages (W)	Light Output (lm)
5	250
7 or 8 change into 7-9-10	400-600
11 or 12 change into 11-13	900
15 or 16 change into 18-26	1200-1710
20 or 21 change into 32-36	2400-2900
23 or 24 change into 40-42	3300-2900
30 change into 55-57	4500-4300
70	5200
80	6000
120	9000

Efficacy Values for HIDs

Please refer to the attached spreadsheet.