

Global lighting industry opposed to performance tiers for lighting products

The Global Lighting Association considers the regulatory framework for lighting products should be such that:

- Unsafe and low quality products are kept from the market
- Interoperability of products is unhindered, so that customers have freedom to choose between individual brands
- A minimum level of quality is ensured, so that above that level individual vendors may choose to compete on various quality and performance parameters
- Adequate product surveillance should be in place to ensure that vendors' claims are truthful ('what is on the box is in the box')
- Brand or product differentiation and reputation prevails over quality labels and certificates
- Standards are internationally harmonized

Against this background the Global Lighting Association supports **one minimum level of performance** for lighting products.

The **multi-tier approach** on the other hand advocates, or prescribes through regulation or legislation, various levels of performance in a product range ('good, better, best'). The disadvantages of such an approach are:

1. Innovation is stifled

Brand differentiation is not possible, with all brands offering similar products with the same specifications according to the relevant performance tier. *This inevitably leads to loss of incentive for innovation and product development.*

In addition the introduction of multiple tiers is likely to lead to national regulators striving to adopt the highest tier. In such case products become too expensive, with slower acceptance by the market and further inhibiting innovation.

2. Consumer choice is denied

Brands should include differentiation in their portfolio and provide for consumer choice. Performance tiers eliminate consumer choice by forcing identical or near identical product offerings.

3. Certification leads to extra costs

Multiple performance tiers coupled to certification leads to extra costs in the supply chain and to increased cost for the consumer. Certification does not automatically translate to better quality in the market.

Summary of Global Lighting Association's position on performance regulation

- International Electrotechnical Commission (IEC) safety and performance standards should establish requirements for product safety, facilitate interoperability and ensure that product matches vendor claims.
- Performance levels are specified in National Regulations and should be regulated and enforced through national legislation and market surveillance.
- To facilitate innovation only a minimum level of product performance should be regulated, thereby enabling differentiation on price and quality in the marketplace.
- Minimum requirements should be set at such a level that good-quality products are widely available and at an affordable price. Making these requirements unnecessarily stringent will result in technically complex products that are only available to consumers at high prices, and thus hamper the transition to energy-efficient lighting.