

Global Lighting Association questions approach of IEA 4E SSL Annex initiative

Background

According to IEA, “the SSL Annex was established in 2010 under the framework of the International Energy Agency’s Energy Efficient End-use Equipment (4E) Implementing Agreement to provide advice to its member countries seeking to implement quality assurance programmes for SSL lighting.” Currently the IEA 4E SSL Annex consists of seven members: Australia, Canada, Denmark, France, Republic of Korea, Sweden and United Kingdom.

The Global Lighting Association’s comments that follow relate to the IEA 4E SSL Annex’s draft Solid State Lighting Annex: Quality and Performance Requirements dated 25 November 2020.

IEA 4E SSL Annex members and limitations of SSL initiative

Four of the seven member countries have actively contributed to the European Union debates and voted on the mandatory energy efficiency and labelling requirements for lighting. These new rules are binding in their countries. In the other three countries, it is questionable whether the evaluations and proposals of the IEA 4E SSL Annex will find their way into the legislative process.

- ➔ **Seven industrialised member countries of the IEA 4E SSL Annex have made a far-reaching proposal on lighting. The Global Lighting Association questions whether the governments of these countries have evaluated the proposal and its implications for adoption in their own jurisdictions.**

Complex approach based on limited data

While previous proposals of the IEA 4E SSL Annex haven’t been implemented in member countries, they were promoted in low- and medium-income countries without taking into account local market conditions such as differences in product portfolio or buying power. Much of the data was obtained from the U.S. Department of Energy Lighting Facts Label Database. Based on the limited data and the lack of technical expertise, many conclusions are wrong. IEA 4E SSL Annex recommends a multiple tier approach, which would lead to a higher complexity and costs in the market and be almost impossible to monitor.

- ➔ **The IEA 4E SSL Annex does not reflect realities of the market.**

Mutual goals

The Global Lighting Association and the International Energy Agency share the mutual goal of further strengthening and accelerating the transition to more efficient and energy saving lighting. Renovation and innovation are key elements in achieving this goal. The current publication with a three-tier approach does not support the goal.

- ➔ **The IEA 4E SSL Annex will not contribute to the goal of rapid energy transition.**

Conclusion and proposal for dialogue

The Global Lighting Association supports a harmonised approach which is realistic and not difficult to implement, and in which the countries concerned, together with technical experts, provide input.

The Global Lighting Association represents 27 national and regional lighting associations and 5,000 manufacturers. Since the present draft is not practicable, the Association is intending to develop a model regulation and invites members of the IEA 4E SSL Annex to commence a dialogue.