



To

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Dear Professor Fontoynt,

On behalf of the Global Lighting Forum (GLF) I have the privilege to cordially thank you for including the GLF in your consultation on Annex 4E.

GLF members have noted the documents circulated on 1 November and deliberated internally and within the GLF's LED Working Group. We would like to make it clear that the comments and positions expressed in this document relate exclusively to the consultation on Task 1 of Annex 4E.

As is pointed out in the accompanying letter to the consultation process, the main focus of Annex 4E is to build consensus between Member Governments and to provide guidance to interested stakeholders. It is explicitly pointed out that Annex 4E is not a standard-making association and the tiers proposed under Task 1 are not to be considered as proposed "performance standards". The Annex acknowledges the prerogative of international standardization bodies to create such "performance standards" and the prerogative of national Governments or regional lawmakers to regulate on minimum efficacy criteria and to develop voluntary energy efficiency programs. According to IEA-4E website, the Task 1 objective is even to "develop SSL Quality Assurance - work to clarify the SSL market worldwide, reduce the risks in using SSL and provide governments and consumers recommendations that they can trust when investing in SSL products." GLF is afraid that the direction taken by current work of the Annex is strictly following these guidelines.

The GLF fully subscribes to these observations and stresses that the system of complementary activities between internationally recognized standardization bodies and national or regional regulatory activity on performance requirements for lighting products - especially LEDs - has created a technical-



ly sound and economically viable environment which benefits both the global lighting industry and consumers.

In this context, the published findings of Task 1 of Annex 4E have to be measured against the self-definition of the Annex as outlined above. The GLF is concerned that the current findings go beyond the Annex's declared self-restraint to provide a tool for consensus building among the Governments involved. Rather they are likely to develop into performance standards and develop their own dynamics with unintended consequences.

A thorough evaluation of the proposed 4-Tier-Approach leads to the conclusion that a continuation of this particular effort in the Annex 4E project cannot find support from industry.

This position is based upon the following reasoning:

- Task 1 in its current outline is a redundant activity when measured against current efforts in international standardization bodies and national and regional jurisdictions.
- Most if not all of the participating Governments have either commenced or concluded legislative or voluntary programs on setting minimum performance requirements. Establishing additional performance criteria from quality assurance in SSL products is likely to result in more confusion for consumers and end users alike in the markets for which the signatory Governments are responsible.
- Beyond the jurisdiction of the Governments involved in the Annex 4E, the added value arising from a continuation and final adoption of Task 1 tier-based criteria is also questionable. Specific market transformation programs on a global basis are ongoing with the support of UNEP. On a regional basis such transformation programs have also commenced (eg Asia). The latter approach is to a certain extent different from the approach suggested in the Annex 4E and it requires clarification on how Governments can be suitably involved in both initiatives without overlap.
- Even the least ambitious "Tier 0" is five times more expensive than the least cost light source technology. Hence the lowest tier may not be appropriate for developing/emerging economies. The question must be asked why a project that relates to energy efficient structures in less developed countries is limiting itself to LED and does not integrate other technologies that may be more readily available in these markets.
- Moreover, the 4 tier approach needs to be questioned in the context of IEC standards. Is the applicable global IEC standard really too ambitious? Industry would have expected at least reasons why IEC standards are not to be applied in less developed countries.



- In case the project consortium nevertheless decides to further continue Task 1, we expect to limit the Task1's activity to necessary items to progress the Task2's and Task3's activities as follows:
  - 1) To restrict the measurements to the important items based on the view point of the consumers and manufacturers.
  - 2) To restrict the covered product to a few items that is spreading in the market or will be accelerated the progress in near future.

Based on the above, the global lighting industry sees no immediate added value from the findings communicated in Task 1 for consultation, and thus refrains from any further evaluation of the different tiers. From a more general point of view it has to be added, however, that if implemented the 4-tier-approach outlined in the Annex is likely to lead to segmentation of markets. There are a number of countries whose grid situation would make applicable both "Tier 0" and "Tier 1". It is also unclear in this context how the segregation of tier levels could be accommodated in exercises on grid improvements in specific countries. As for "Tier 3" and "Tier 4", the tier definitions already refer to these tiers being "similar or equal" to the performance required for established programs and giving respective examples. This reference speaks for itself and underlines the redundancy of task 1.

Given all this, the global lighting industry as represented in the Global Lighting Forum calls upon the Governments aligned in Annex 4E to put Task 1 on hold and to concentrate on Task 2 and Task 3 in order to make a positive contribution to the future development of SSL on a global scale.

Yours sincerely



Jan Denneman  
President

