Consultation Response from Philips Lighting

on

"E3 Lighting Update Policy Position of September 2017"

October 11, 2017

This consultation response of Philips Lighting includes the requested feedback on the "E3 Lighting Update Policy Position of September 2017" proposal and is submitted to <u>EERLighting@environment.gov.au</u> for Australia and to <u>regs@eeca.govt.nz</u> for New Zealand.

Content:

- 1. Answers on the 3 broad questions, which are raised in the introduction (page 6) of the E3 proposal.
- 2. Review results of Attachment J of the E3 proposal.

Note: The anwers and review results of Philips Lighting are red marked.

1. Answers on the 3 broad questions, which are raised in the introduction (page 6) of the E3 proposal.

A. Are there any implementation barriers or possible unintended consequences of any of the policy positions or proposals under consideration? Yes, the policy positions and proposals under consideration have significant implementation barriers and would, if implemented without sincere consideration of the many detailed comments provided in Chapter 2 of this consultation response, have unintended, negative consequences not only for the lighting industry, but also for consumers and the environment.

The proposal is based on several wrong assumptions, it is ambiguous and it lacks proper terms and definitions. It references wrong metrics and measurement methods. It proposes to impose too strict levels that are impossible to meet by state-of-the-art technologies in commercially viable fashion. Detailed examples of this are given in Chapter 2 of this consultation response and should be seen as an illustration of the flaws of the proposal, and not as an endorsement of the overall framework presented in this draft proposal.

The consequence of the proposed measure would be that state-of-the-art LED products cannot meet the proposed requirements. Prices of LED products would increase dramatically for consumers and the strictest forms of surveillance and corrective action would be required to enforce the new regulation, otherwise it would stimulate unfair competition, trade barriers, and a rogue channel of uncompliant products.

Moreover, proposed lifetime testing requirements are incompatible with ever faster product development cycles of innovative companies driving increased energy efficiency, and the proposed measures would continuously deprive Australian consumers of the latest innovations in lighting products, including more energy efficient products.

B. Is the analysis of the policy proposals considered reasonable, including data and assumptions used?

No, the analysis is not at all considered reasonable. The proposal seems to be largely based on the International Energy Agency (IEA) 4E Solid State Lighting Annex, a document that contains numerous flaws similar to those reported in Chapter 2, and that also was established without proper incorporation of industry insights on modern-day processes of sustainable, innovative product design and on market realities.

Moreover, the current document does not reflect adequate consideration of industry comments submitted in response to earlier drafts of the document. Most of the March 2017 comments that were submitted through Lighting Council Australia and the Lighting Council New Zealand, seem to have been ignored without any motivation or explanation, and without any attempt at dialogue or discussion.

The adverse effect of overly complex, overambitious and widely scoped regulations – which time and time again prove to be impossible to adequately enforce - on global sustainability goals is more and more recognized, not only by government representatives and the industry, but also by several NGO's that share our environmental goals. Setting the framework for effective regulation is not an academic exercise on "nominal CCTs consistent with the 7-step chromaticity quadrangles and Duv tolerances".

We would like to recall that previously submitted comments propose a more balanced, more correct and more sustainable framework for effective legislation that benefits consumers, that more effectively achieves environmental goals and that also ensures a fair, level playing field for innovative companies that share sustainability goals.

Such an enhanced framework should include the following attributes that are standardized in the international ISO, IEC and CIE standards:

- energy efficiency and functional performance requirements, and;
- product information requirements, and;
- means of confirming compliance with these requirements.

For further details, we refer to previously submitted comments and Chapter 2 of this consultation response, and we are offering to clarify these further as needed.

- C. Will the proposals have any adverse effects that have not been considered? Indeed, the proposal will lead to
 - (i) over-specified and too costly products for the end-users
 - (ii) reduction of product choice and variety for Australian consumers
 - (iii) delay of bringing innovative, energy saving products to the Australian market
 - (iv) very costly time-consuming qualification efforts for the industry
 - (v) unintended trade barriers
 - (vi) unfair competition due to ambiguous and erroneous content
 - (vii) unaffordable efforts for market surveillance and enforcement

2. Review results of Attachment J

Note: Because of the unclear scope and exemptions, and the incomplete terms and definitions, it was impossible to submit an integral response to the proposal at this stage. However, the major comments can be found below and should be seen as an illustration of the flaws of the proposal, and not as an endorsement of the overall framework presented in this draft proposal.

Draft Minimum Energy Performance Standards (MEPS) for LED Lighting

The draft MEPS has been developed in consultation with a technical working group of stakeholders from lighting and control supply, government programs and test laboratories, and was issued for stakeholder comment in July 2016 and November 2016 (as part of <u>Consultation Regulation Impact Statement</u> (<u>CRIS</u>)). Further revisions have been made after consideration of comments on the CRIS. The <u>Supplementary consultation document - Lighting: Updated</u> <u>policy positions</u> should be read in conjunction with this document.

Scope

The scope (e.g. what about LED packages, LED modules, drivers, etc.) and exemptions (e.g. 200 pcs. sales volume) are unclear. The terms and definitions are incomplete (e.g. what is the definition of LED lamp, Directional lamp, etc.). Proposal: Clarify the scope and exemptions, and include unambiguous definitions for all terms that are used in the document.

Furthermore, it's strongly recommended to add a "Subject Matter" to the document / attachment.

Proposal: Add the following subject matter;

This attachment deals with:

- energy efficiency and functional performance requirements, and;
- product information requirements, and;
- means of confirming compliance with these requirements.

This attachment does not deal with requirements on safety, electromagnetic compatibility (EMC), hazardous substances, lifetime and warranty since these requirements are not primary related to energy efficiency and functional performance, and are therefore typically incorporated in other regulations.

Proposed to apply to the sale and commercial use of:

• <u>LED Lamps</u>: target to publish March 2018 to come into effect March 2019.

The proposed MEPS detailed in this document will form the basis of the Decision RIS for approval by governments (expected to be considered by Energy Ministers in November 2017). The E3 program requests stakeholders to consider the LED MEPS on lamps detailed below and provide specific feedback on

any amendments required including rationale for change and alterative approach, with supporting evidence. The exposure draft of the LED MEPS determination will be released following approval of the DRIS.

 <u>LED luminaires</u>: As referred in the Supplementary consultation document, the GEMS Act will be reviewed to facilitate MEPS on LED luminaires. A separate CRIS (and subsequent Decision RIS) will be released prior to implementation.

Because of the staged approach, this version of the draft MEPS focuses on LED Lamps. The table providing details on the parameters and requirements for integrated luminaires has been moved to the end of the document to allow the reader to focus on the more immediate proposal for lamps.

The MEPS is intended to specify minimum performance levels for lighting efficacy and a number of other performance parameters important in ensuring LED lighting products provide an effective and efficient alternative to other less efficient lighting technologies (tables 1&5). Table 3 lists proposed package marking requirements. Where possible, the test requirements reference relevant international standards by the International Commission on Illumination (CIE), International Electrotechnical Commission (IEC), and regional standards such as the Illuminating Engineering Society of North America. The MEPS levels were originally derived from the International Energy

Agency 4E Solid State Lighting Annex Product Quality and Performance Tiers (<u>http://ssl.iea-4e.org/</u>) but have been updated with more recent market data. Note that while product test data will be required for product registration, it is proposed that third party accredited testing will not be required. Where the use of module, LED package or driver test data is allowed, this must be from an accredited (but not necessarily third party) laboratory.

All LED Product Categories

As well as the specific scope below, this MEPS applies to lamps and luminaires capable of being tuned to within the specified white region in any mode of operation. This includes fixed white light sources as well as tuneable sources which are capable of being tuned to within the white region specified by the chromaticity coordinates (x and y) range:

• 0,2 < x < 0,6; and



• $-2,3172 x^{2} + 2,3653 x - 0,28 < y < -2,3172 x^{2} + 2,3653 x - 0,1.^{1}$

This is a too wide white region specification which includes lamps that do not have a general lighting function (IR (e.g. red or gold), UV (blue), grow light (purple), collagen (pink), or coloured lamps in general). Consequently, these lamps shall be explicitly exempted from the regulation. Proposal: Change the above wide white region specification into following narrower specification:

- 0,270 < x < 0,530 and
- -2,3172 x2 + 2,3653 x 0,2199 < y < -2,3172 x2 + 2,3653 x 0,1595;

In the case of tuneable lamps and luminaires, compliance for photometric parameters will be based on testing at maximum light output (in case the lamps are also dimmable). Testing of tuneable products (for luminous flux, power, CRI and CCT) will be done with the product's CCT adjusted through operation with software provided with products as sold and updated with latest available software versions. The testing shall include (A) the nominal CCT of 2700 K or the minimum CCT (whichever is higher) and (B) the nominal CCT of 4000K or the maximum CCT (whichever is lower) and for dimmable lamps, be conducted at maximum light output.

The proposed testing of tuneable lamps is a very complex and timely test procedure which requires test houses to seek for the lowest and highest CCT and max light output.

Proposal: Limit the testing of tuneable lamps to one setting. (e.g. the initial, out-of-the-box, or the most power consumption setting).

Non-directional LED lamps (table 1)

Lamps with LED light sources of all shapes with lamp caps B15, B22, E14, E27, E39, E40, GU5.3, GU10, GX10, GU24, GX53, G9 and ELV lamp bi-pin caps G4, that emit ≥ 100 lm.

Directional LED lamps (table 1)

Lamps with LED light sources of all shapes with lamp caps B15, B22, E14, E27, E39, E40, GU10, G9 and R7, and ELV lamp bi-pin caps GU5.3, GX5.3, G6.35, GX53, that emit ≥ 100 lm.

¹ Note: referenced from EU Regulation No244 (2009)

Linear LED lamps (table 1)

Linear LED lamps double-capped LED lamps including G5 and G13 caps, intended for replacing fluorescent lamps (as defined in IEC 60081) with the same caps (as defined in IEC 60081) or caps specific for double-capped linear LED lamps (related to IEC 60838-2-3) with a nominal length of 550 mm to 1500 mm.

For LED lamp models otherwise within scope which have low volume sales of up to (200) annual units, a simplified registration may be submitted, including supply of manufacturer's datasheet, without demonstration of full compliance with MEPS. Import/production volumes to be provided annually for duration of registration. Where this upper sales limit is exceeded, the supplier may either withdraw the product from sale; or alternately both complete product testing and complete a full product registration (demonstrating compliance with MEPS).

Low (200) sales volume exemptions create loopholes. Proposal: Limit sales volume to 10 pieces.

Integrated LED Luminaires (table 5)

Luminaire requirements should be set for the light source (LED module) rather than for the luminaire. Consequently, no definition and requirements are needed for decorative LED luminaires.

The scope for luminaires is yet to be finalised but is likely to include:

- Integrated LED luminaires with a luminous flux of ≥ 250 lm and < 1,500 lm. Note integrated includes a luminaire with remote control gear.
- Planar Luminaires, integrated battens & Troffers
- Large Luminaires (including High / Low Bay integrated Luminaires)

Where an integrated LED luminaire within scope is supplied with either an:

- integrated driver; or
- separate driver provided in the same package; or
- driver supplied in a separate package that is specifically marked to be used with the luminaire;

The integrated LED luminaire will be tested with the specific driver for the purpose of demonstrating compliance.

Where an integrated LED luminaire within scope is not supplied with a driver in one of the configurations specified in the paragraph above, the luminaire will be tested with a nominated driver that is representative of intended drivers for use in Australia with the LED luminaire. (One of the intended drivers for use in Australia and/or New Zealand will also be nominated for compliance testing purposes).

Decorative style integrated LED luminaires otherwise within scope (see definition below) which have low volume sales of up to {250} annual units, or other limited production run luminaires which have low volume sales of up to 75 annual units are not within scope. Where this upper sales limit is exceeded, the supplier may either withdraw the product from sale; or complete product testing and be able to demonstrate compliance with MEPS). Note - where decorative luminaires are designed with lamp holders rather than an integrated light source, any supplied lamp will be subject to MEPS (in a standard registration process) rather than the entire luminaire.

Low (250) sales volume and decorative luminaires exemptions create loopholes. Proposal: Limit sales volume to 10 pieces and delete the decorative luminaire exemption.

Scope Exclusions for LED Lamps and Integrated LED luminaires

Exemptions are unclear and create loopholes (e.g. the exemption for outdoor, road and public space, wall luminaires with up/down lighting and integrated luminaires in furniture's).

Proposal: Clarify the exemptions and avoid / delete possible loopholes.

- Theatrical luminaires as defined in AS/NZS 60598.2.17:2006
- Lamps and luminaires compliant with cyanosis observation index and colour temperature requirements of AS/NZS 1680.2.5:1997 Interior lighting Part 2.5: Hospital and Medical tasks, with package marked 'For Medical Use Only'.
- Light source products that are battery operated in their fundamental operating state including:
- Portable luminaires for garden use: AS/NZS 60598.2.7:2005 (R2016)
- Hand lamps as defined in AS/NZS 60598.2.8:2005
- Portable (non-fixed) luminaires (e.g. desk lamps, standard lamps, Portable general purpose luminaires as defined in AS/NZS 60598.2.4:2005, and portable luminaires for children defined in AS/NZS 60598-2-10)
- Rope lights and string lights (as defined in AS/NZS 60598.2.20:2002) or chain lights defined in IEC 60598-2-21 Rope lights as defined in DR AS/NZS 60598.2.21: (2017?)6 and lighting chains as defined in DR AS/NZS 60598.2.20: (2017?)6
- Non-maintained emergency escape lighting luminaires and illuminated emergency exit signs (as defined in AS/NZS 60598.2.22)
- Outdoor luminaires as defined in IEC 60598-2-5 with an ingress protection rating of IP65 and above
- Road and public space lighting luminaires (as defined in AS/NZS 1158.0).
- Wall luminaires with up/down lighting of beam angles less than 30 degrees and less than 500lm in either direction (i.e. up or down)
- Integrated luminaires incorporated into furniture as defined in IEC 60364-7-713 ED. 2.0 Low-voltage electrical installations Part 7-713: Requirements for special installations or locations Furniture (but not exclude lamps imported with furniture)

Definition

The terms and definitions are incomplete (e.g. what is the definition of LED lamp, Directional lamp, etc., etc.). Proposal: Include unambiguous definitions for all terms that are used in the document.

Light Emitting Diode (LED): a PN junction semiconductor device that, by spontaneous emission, emits incoherent optical radiation by injecting electrons and/or holes across the PN junction.

Integrated LED Luminaire

Luminaire that:

- satisfies Type A or Type B LED luminaires specified in the scope of IEC 62722.2.1; or
- uses individual LED packages in place of a LED module
- and does not include IEC standardised lamp holders

Decorative style integrated LED luminaire

Integrated LED luminaires which are primarily designed for their lighted as well as their unlighted appearance and aesthetic contribution to the space. Such luminaires are typically intended for use where a decorative accent or an aesthetic appearance, not a specified amount of luminaire light output, is desired. The light output of decorative luminaires is typically not intended to independently illuminate a space or a task. (Based on NEMA Lighting Systems Division & American Lighting Association Joint Document: LSD 51-2009)²

Note: a photometric quantification of this definition is under investigation for small (residential) decorative luminaires and large (non-residential) decorative luminaires.

Product Families for Registration

The proposed family definition deviates from the one used in current IEC standards. Consequently, lighting industry will face new 'families of models' to be tested before registration. This will lead to additional testing and extra cost.

Proposal: Refer to international accepted IEC performance standards for family model definition.

² A picture-book guide may be produced to assist with scope determination

LED Lamps

(1) Two or more models (up to 75) from a single product class may be registered in the same family of models, when the models:

(a) Are of a single brand;

(b) Rely on the one test report (or the test report of the least efficient family member where (e) applies) that sets out the results of testing conducted in accordance with the Determination;

(c) Have the same physical characteristics that are relevant to complying with the Determination, including, but not limited to, the following: overall size, geometric form factor; and any other dimensions, components or component arrangements that may affect performance. However models within the same family may have different minor physical characteristics (that do not affect energy performance), for example:

- different lamp caps/ cap sizes (lamp size variations attributable to lamp cap variation permitted)
- shape of the outer glass or plastic lamp cover.
- colour or other surface variations to casing areas other than changes to the reflectivity or diffusers of the light emitting components of the product
- an application may include either clear lamps/diffusers and frosted/pearl;

(d) Have the same performance characteristics that are relevant to complying with minimum performance specifications set out in the Determination, including, but not limited to, the following:

- (i) efficacy; and
- (ii) wattage.
- (iii) voltage

(e) Despite paragraph (d), models in the same family may have different luminous flux or efficacy where the difference arises as a result of different colour temperatures, colour rendering index, beam angles or ability to dim. In such cases:

- (i) test results for registration purposes will only be required for the model with the lowest energy efficiency in the proposed family; and
- (ii) all models in the family must have the same performance characteristics relevant to complying with the specified minimum performance requirements other than efficacy, colour temperature, colour rendering index, diffuser, and beam angle.
- (iii) Wattage variations are permitted within 50% variation from nominated least efficient model

(2) For subsection (1), a model cannot be a member of a family if its inclusion in that family would lead to the family consisting of more than 75 lamp models.

(a) Within this limit, additional models may be later added to families at a reduced cost. Where additional models are updates of previous models with updated module or drivers, provided the physical characteristics are the same (as required by paragraph (1)(c)) these models may consume less power (due to more efficient components).

Performance requirements

*) It's strongly recommended that the test methods (last column in the below table) refer only to the applicable and globally accepted standards of the International Electrotechnical Commission (IEC) and / or the International Commission on Illumination (CIE). A reference to other alternative standards will create a lot of confusion at industry, test houses and surveillance authorities.

Table 1: Lamps (note preferred test standards are highlighted)³

				Requirement	_		Compliance	Test method
Ref	Attribute	Non-directional la	amps Dii	rectional lamps	Linear LED (tube)	Sample size	criteria	*)
	Energy Efficienc	y & Photometric						
1	Efficacy Improve	≥ 80 ≥ 90 ≥ 100	lm/W (2019) lm/W (2021)) lm/W (2023)		≥ 100 lm/W (2019) ≥ 110 lm/W (2021) ≥ 120 lm/W (2023)	10	Average ≥ value specified	CIE SO25 or
		These efficacy require lumen lamps. Proposal: Implement E.g:	ements are too strict an efficacy = f(lumir	t, especially for low- nous flux) relation.	These efficacy requirements are too strict, especially for low-lumen lamps. Proposal: Implement an			LM79 accepted until July
		Rated	Luminous Eff	icacy in lm/W	efficacy = f(luminous flux)			2021
		Luminous Flux Ø in Im	Non-Directional	Directional	Pop't regulate beyond 5			or
		150 ≤ Φ < 600	60	50	years from now.			

³ Colour codes – Purple: mandatory test for all products in scope. Green: Tests expected to be available already for most products.

	Test method
^{Ref} Attribute	*)
	EN 13032- 4:2015 Where a lamp model is provided with interchangea ble/adjustabl e reflectors or lenses, the test will use the configuration that delivers the narrowest beam angle Power to be tested as supplied for sale (additional functionality may be supplied not activated).

			Requirement			Compliance	Test method
Ref	Attribute	Non-directional lamps	Directional lamps	Linear LED (tube)	Sample size	criteria	*)
4	Light distribution Delete These are not requirements but definitions. Proposal: Delete these requirements and apply proper definitions instead.	ONLY IF CLAIMING to be an 'omnidirectional' lamp or replacement for a General Lighting Service (GLS) lamp. Omnidirectional equivalence No less than 5% of total flux (zonal lumens) shall be emitted in the 130° to 180° zone. No less than 35% of total flux (zonal lumens) shall be emitted in the 90° to 180° zone.	Beam angle is ± 25% of declared beam angle and 50% of flux shall be in declared beam angle	Beam angle is ± 25% of declared beam angle and 50% of flux shall be in declared beam angle	10 3 (Linear LED)	No less than 8 lamps (or 3 for linear LED lamps) meet the specified requirements	CIE S025 or LM79 accepted until July 2021 or EN 13032- 4: 2015
3	Centre beam luminous intensity Delete	N/A	For MR or PAR lamps with a beam angle <65°, centre beam intensity should meet equivalent levels using the online tool: <u>http://www.energystar.gov/i</u> <u>a/products/lighting/iledl/IntL</u> <u>ampCenterBeamTool.zip</u> There are no other equivalency requirements. Proposal: Change this requirement into an optional	N/A	10	For MR or PAR lamps: Average ≥ equivalent level For other lamps: Average ≥ declared value	CIE S025 or LM79 accepted until July 2021 or EN 13032- 4:2015

			Requirement	1	_	Compliance	Test method
Ref	Attribute	Non-directional lamps	Directional lamps	Linear LED (tube)	Sample size	criteria	*)
			voluntary information requirement. For others lamps: ONLY IF CLAIMING Centre beam luminous intensity ≥ declared value				
20	Maximum high angle Luminance Delete	N/A		When the gamma (γ) angle exceeds 60 degrees, the light source luminance is no more than 10,000 candela/m ² in C ₀ , C ₄₅ and C ₉₀ planes This is one of the many technical design specifications. It does not belong to a regulation. Delete this requirement.	3	All lamps satisfy requirements	CIE S025 or LM79 accepted until July 2021 or EN 13032- 4:2015
	Colour			•			
	Colour Rendering Agreed		Ra ≥ 80		10	Average ≥ value specified	CIE S025 (refers to CIE 13.3) or
							accepted

			Requirement					Compliance	Test method
Ref	Attribute	Non-directional lamps	Direc	tional lamps	Linear LED (tube)	Sample size	criteria	*)
									until July 2021 or EN 13032- 4:2015
8	Colour Appearance	Lamp must have one of the quadrangles and Duv toler	e following nomin ances below. ⁴	al CCTs consist	ent with the 7-step chro	maticity	10	All samples shall have Chromaticity values that fall	<mark>CIE S025</mark> (refers to CIE S015)
	prove	(K)	Tolerance (K)	Target Duv	Duv Tolerance Range			into the rated	or
		2200	2238 ± 102	0.0000	T _x : CCT of the source			nominal CCT	
		2500	2460 ± 120	0.0000	For T < 2970K			quadrangle	LM79
		2700	2725 ± 145	0.0000	0.000 ± 0.0060				accepted
		3000	3045 ± 175	0.0001	For <i>T_x</i> ≥ 2870K				2021
		3500	3465 ± 245	0.0005	$D_{-}(T_{-}) + 0.0060$				
		4000	3985 ± 275	0.0010	$D_{\rm uv}(T_{\rm x}) \pm 0.0000$ where				or
		4500	4503 ± 243	0.0015	$D_{\rm err}(T_{\rm x}) = 57700 \times (1/T_{\rm x})^2$				EN 13032-
		5000	5029 ± 283	0.0020	$-44.6 \times (1/T_x)$				4:2015
		5700	5667 ± 355	0.0025	+0.00854				
		6500	6532 ± 510	0.0031					
		CCT is an information requ	irement. It must r	not be accompa	anied with limits.				

⁴ As per ANSI C78.377: 2015 Specifications for the Chromaticity of Solid State Lighting Products

			Requirement			Compliance	Test method
Ref	Attribute	Non-directional lamps	Directional lamps	Linear LED (tube)	Sample size	criteria	*)
		Proposal: Change this requirem	ent into an information requiren	nent and delete the levels.			
	Life						
10	Endurance Improve	Must survive one switching cycl Must survive temperature cyclin Must survive accelerated opera Endurance tests are related to I regulation on EE and Functional Proposal: Replace these tests by	e for every 2 hours of rated life ng test for 1,000 hours tional life test for 1,000 hours ifetime and warranty. This does performance. y a simple 500h duration test to	not belong in the scope of a detect premature failures.	10	Satisfy conditions of the test method.	IEC 62612: 2013 Section 11.3.2-4
11	Lumen maintenance Delete	Lumen maintenance @ L _{x,6k} ≥ 86.7% (based on L ₇₀ B ₅₀ ≥ 15,00 LED Module or LED package tes may be used, combined with IS of lamp to be registered. ⁵ Lumen maintenance tests are re warranty. This does not belong EE and Functional performance Proposal: Delete this requireme	6000 hrs 00h) t data (from an accredited lab) TMT junction temperature test elated to lifetime and in the scope of a regulation on	Lumen maintenance @ 6,000h $L_{x,6k} \ge 91.8\%$ (based on $L_{70}B_{50} \ge 25,000h$) Lumen maintenance tests are related to lifetime and warranty. This does not belong in the scope of a regulation on EE and Functional performance.	10	Average L _{x,6k} ≥ value specified Compliance testing may be an ISTMT junction temperature test relating to module/packa ge test report or a full product test.	IESNA LM80/TM21 & ISTMT (IEC 60598.1 Section 12.4.1 or UL 1598 Clause 14) or IESNA LM84/TM28 Note these test methods relate to luminaires. A

⁵ Refer to Lumen Maintenance Testing Explained paper.

	Requirement								Compliance	Test method
Ref	Attribute	Non-direction	nal lamps	Direction	nal lamps	Linear	LED (tube)	Sample size	criteria	*)
						Proposal: De requirement	lete this			test "housing" (i.e. representativ e luminaire) for lamps may be required. Consider allowing use of thermal imaging camera for determining the hotspot for thermocoupl e attachment points.
	Electrical							1		1
14	Fundamental Power Factor	Ta	ble F.1 – Recomr	nended values for	[,] displacement fact	or	٦	10 3 (Linear	Average power factor ≥	IEC 61000-3- 2 (2014)
		Metric	P ≤ 2 W	2 W < P≤ 5 W	5 W < P ≤ 25 W	P > 25 W	_	LED)	value specified	
	Improve	$\kappa_{\text{displacement}}$ (COS ϕ_1)	NO limit	≥ 0,4	≥ 0 ,7	≥ 0,9	_			Test data
		PF > 0.90 Power factor- should not be specified at lamp level. IEC 61000-3-2 is not the right standard to refer to for power factor. For Power Factor please refer to IEC 62612 LED lamps > 50V performance requirements Annex D. This also specifies limiting values.				may be sourced from control gear manufacture r if available				

				Requirement		Compliance	Test method		
Ref	Attribute	Non-directi	onal lamps	Directional lamps	Linear LE	ED (tube)	Sample size	criteria	*)
		For LED lamps < is currently no p Factor. Also for TLED th Power factor. I seen at luminai	The previous standard available that specifies how to measure the Power or. for TLED there is no performance standard available that specifies how to measure the er factor. In case of retrofit TLED (used in existing luminaires) the power factor has to be at luminaire level with the combination of TLED and control gear.						
		It is best to dele to judge the lan Use unambiguo Proposal: Use: Fundamen	ete the PF requirem np impact on powe ous terms: Either dis otal power factor (w	ent as the displacement r grid splacement factor or fun rhich is also known as dis	factor is already a go damental power facto	od parameter or Cosφ1)			
15	Harmonics	For products 5V	N < P ≤ 25W: <i>{text</i> wing three requiren	<i>here is pending final app</i> nents:	proval of amendment	to 61000-3-2}	1	Comply with the	<mark>IEC 61000-4-</mark> 7
	Delete	1. the har	monic currents shal Table	l not exceed the power-r 3 – Limits for Class D eq	elated limits of Table 3 ulpment	3, column 2,		of IEC61000-3- 2	Test data may be
			Harmonic order	Maximum permissible harmonic current per watt	Maximum permissible harmonic current				sourced from control gear
			п	mA/W	A				r if available
			3	3,4	2,30				
			5	1,9	1,14				
			7	1,0	0,77				
			11	0.35	0,33				
			$13 \le n \le 39$ (odd harmonics only)	<u>3,85</u> n	See Table 1				
		2. the third	d harmonic current,	expressed as a percenta	age of the fundamenta	or: al current, shall			
		not exc	eed 86 % and the f	fth harmonic current sha	ll not exceed 61 %. Al	lso, the			

			Requirement			Compliance	Test method
Ref	Attribute	Non-directional lamps	Sample size	criteria	*)		
		 waveform of the input c before or at 60°, has its current threshold before voltage. The current thr the measurement windo that includes this absolu frequencies above 9 kH 3. the THD shall not excee the fundamental current seventh order shall not and the second order sl If the lighting equipment include drive multiple loads, then the malamps that gives the maximum at NOTE The preceding requirement control other than phase control For lighting equipment containing a the control module to the harmonic equipment with control module fed 	urrent shall be such that it reache peak value before or at 65° and a 90°, referenced to any zero cross eshold is 5 % of the highest abso bw, and the phase angle measure ute peak value (see Figure 2). Co Iz shall not influence this evaluati ed 70%. The third order harmonic t, shall not exceed 35%, the fifth exceed 30%, the ninth and eleve hall not exceed 5%. es means for control (e.g. dimmin easurement is made only at the c active input power. ent is based on the assumption th I, the THC decreases when the in a control module with an active input current of the lighting equipment is o by a separate mains supply.	es the 5 % current threshold does not fall below the 5 % ssing of the fundamental supply olute peak value that occurs in ements are made on the cycle imponents of current with on. or: c, expressed as a percentage of order shall not exceed 25%, the nth order shall not exceed 20% g, colour), or is specified to control setting and the load of hat, for lighting equipment using iput power is reduced. power ≤ 2 W, the contribution of lisregarded e.g. by testing the			

⁶ IEC 61000-3-2, Table 2, Limits for Class C equipment

Ref Attribute Non-directional lamps Directional lamps Linear LED (tube) Sample size Compliance criteria Test if criteria Harmonic Order expressed as a percentage of the input current the fundamental requency in (%) Image: Compliance of the input current the fundamental requency is 0 - 0PF * Image: Compliance of the input current the fundamental requency is 0 - 0PF * Image: Compliance of the input current the fundamental requency is 0 - 0PF * Image: Compliance of the input current the fundamental requency is 0 - 0PF * Image: Compliance of the input current the fundamental requency is 0 - 0PF * Image: Compliance of the input current the input power factor Image: Compliance of the input compliance of the input compliance of the input compliance of the input current values for the maximum active input power condition derived from the percentage limits given in Table 2 shall not be exceeded; Image: Compliance of the input conditions apply: Image: Compliance of the input conditions apply: Image: Compliance of the input condition the harmonic current values for the maximum active input power condition derived from the percentage limits given in Table 2 shall not be exceeded; Image: Compliance of the input condition the harmonic current values for the maximum active input power; Image: Compliance of the input condition the harmonic current values for the maximum active input power; Image: Compliance of the input condition the harmonic current values for the maximum active input power; Image: Compliance of the input power; Image: Compliance of the input power; Image: Compliance of the input power;					Requirement				Complianco	Tast mathed
Mainum permissible harmonic current Harmonic Order expressed as a percentage of the input current at the fundamental frequency n (%) 2 2 3 30 - CPF * 5 10 7 7 9 5 11 ≤ n ≤ 39 3 iodel samonic entry) 3 i. the harmonic current values for the maximum active input power condition derived from the percentage limits given in Table 2 shall not be exceeded; i. at control settings leading to an active input power less than the maximum active input power condition, the harmonic currents shall not exceed the limits based on the maximum active input power; <	Ref	Attribute	Non-directional lamps	Di	rectional lamps		Linear LED (tube)	Sample size	criteria	*)
Proposal: Delete this requirement		Health	{text below is pending final For the other types of lightin the following conditions app 1. the harmonic current the percentage limit 2. at control settings le condition, the harmonic active input power of o below 50W o 50 W - 250 o above 250 The Mains harmonic current reconstruction Proposal: Delete this require	Harmonic Order n 2 3 5 7 9 11 \leq n \leq 39 odd harmonics only) * CPF approval of a ng equipment by: nt values for the ts given in Talle adding to an a onic currents of: : no limits below W: no limits below W: no limits below W: no limits below w: no limits below the comparison of the comparison of the comparison is a comparison of the comparison	Maximum permissible harmon expressed as a percentage of current at the fundamental fr (%) 2 30 - <i>CPF</i> * 10 7 5 3 is the circuit power factor <i>mendment to 61000-3</i> - that includes means for that includes means for the maximum active inpu- pole 2 shall not be exceed citive input power less t shall not exceed the lim bw 5 W; below 10% of maximum elow 25 W. re related to EMC regula- tional performance.	ic current the input equency 2 -2} control ut powe eded; han the hits base active i ations.	(e.g. dimming, colour), r condition derived from maximum input power ed on the maximum nput power; This does not belong in			

			Requirement			Compliance	Test method
Ref	Attribute	Non-directional lamps	Directional lamps	Linear LED (tube)	Sample size	criteria	*)
18	Photo- biological Safety Delete	Blue Light & UV hazards shall be (UV hazard test not required if the Photo-biological safety required belong in the scope of a regulat in safety regulations. Proposal: Delete this requirement	V hazard test not required if the light source does not contain a UV LED chip) oto-biological safety requirements are related to product safety regulations. This does not long in the scope of a regulation on EE and Functional performance. And is already covered safety regulations.				IEC 62471 / CIE S009
19	Dominant light modulation frequency (f) Modulation percent at this frequency (Mod%) ⁹	Maximum flicker modulation at Maximum flicker modulation is Proposal: Change the requirem measured according IEC TR 615	the dominant modulation freque not recognized as the correct mo ent as follows: P _{st} ^{LM} ≤ 1,0 at maxi 47-1.	ency ¹⁰ < 30% etric for the attribute "Flicker" mum (full) light output, and	1	Satisfy conditions of the test method.	IEEE 1789 or other if specified in Determinatio n.

⁷ Based on IEC 62471/CIE S009. Guidance is provided in IEC/TR 62778:2014: Application of IEC 62471 for the assessment of blue light hazard to light sources and luminaires

⁸ Feedback during stakeholder consultation indicated a preference for this requirement to be retained for all lamps subject to MEPS

⁹ The requirements are based on IEEE 1789-2015. The priority here is on restricting the visible modulation of light (including flicker) at frequencies ≤ 90 Hz, as more research is required on the effects of light modulation frequencies beyond 90 Hz (i.e. non-visible effects). NOTE1: In some particular instances, there is a strong sub-harmonic or inter-harmonic frequency in the luminance modulation waveform. In this case, the dominant light modulation frequency may not be clearly defined. The requirements should then be met for both the Fourier fundamental frequency and the sub/inter harmonic frequency. NOTE2: Due to the lack of a standard for the photometric measurement of modulated light, the SSL Annex are continuing to work on this issue, consult with stakeholders including CIE TC 1-83 (authors of CIE TN 006:2016), and will issue an update when new guidance becomes available.

¹⁰ Based on IEEE 1789:2015 test method part only – and not the threshold values as concerns about stringency noted and may require adjustments to thresholds. See flicker discussion paper.

			Requirement			Compliance	Test method
Ref	Attribute	Non-directional lamps	Directional lamps	Linear LED (tube)	Sample size	criteria	*)
	(Includes Flicker effects) Improve Change Attribute in "Elicker"						
	Smart Lamps Of	NLY - Energy conservation			1		
5	Standby Power (For lamps with Standby mode only) Improve	(When the standby losses are hardly make it difficult to create low we further energy saving. These readers with Standby Power. These requirements are not feat Power. Proposal: Keep the requirement	$P_{STANDBY}/P_{ON} \le 5\%$ Capped at: < 0.5W < 0.3W (2023) rested with the latest firmware u effected by lamp wattage, it me rattage lamps with standby funct quirements are not feasible furth sible furthermore it's unclear what	pdates) ans that this requirement will cionality, potentially hampering nermore it's unclear what is nat is meant with Standby eant with Standby Power.	5 3 (Linear LED)	Average ≥ value specified To be tested as supplied for sale (additional functionality may be supplied not activated). See also smart lamp criteria.	AS/NZS IEC 62301 (or IEA 4E SSL Task 7 2016 publication http://ssl.iea - 4e.org/news /stand-by-of- smart- lamps) ¹¹
6	Smart Lighting: on-demand power	Device to provide energy consu Further revisions may follow ou groups.	mption reporting that is accessib tcomes of investigations by the	ble by owner. IEA 4E SSL and G20 working	1	Require device to provide energy consumption reporting that	Energy Star Lamps v2 Section 12.9

¹¹ Modified test method to be developed.

			Requirement			Complianco	Tast mathod
Ref	Attribute	Non-directional lamps	Directional lamps	Linear LED (tube)	Sample size	criteria	*)
	consumption feature (smart lamps only)	This is not yet a mature require Proposal: Delete this requireme	ment. ent.			is accessible by owner	
	Delete						
	Declaration			1		1	1
12	Rated Life Declaration (relates to packaging requirement) Delete	Packaging declaration of a mini Rated life declarations are relat This does not belong in the sco Functional performance. Furthe consumer products with these requirements and MVE is not p Proposal: Delete this requirement	mum lifetime of 15,000 hours red to lifetime and warranty. pe of a regulation on EE and ermore, there are no other kind of (20 years) warranty ossible.	Packaging declaration of a minimum lifetime of 25,000 hours Rated life declarations are related to lifetime and warranty. This does not belong in the scope of a regulation on EE and Functional performance. Furthermore, there are no other consumer products with these kind of (20 years) warranty requirements and MVE is not possible. Proposal: Delete this	N/A	Declaration Only	N/A

			Requirement	-		Compliance	Test method
Ref	Attribute	Non-directional lamps	Directional lamps	Linear LED (tube)	Sample size	criteria	*)
17	ELV converter compatibility (For ELV Lamps only) Improve	In combination with ELV conver manner without observable flic Suppliers do not need to submi Also the manufacturer shall: (a) declare which ELV cond minimum/maximum nu ELVC) under which the (b) provide a webpage add converter makes and m in the local market. Upcoming test method should m IEEE 1789	ter shall operate in a stable ker or light fluctuation. t tests for registration. ¹² litions (e.g. imber of lamps connected to lamp will operate ress that lists compatible ELV iodels including ELVCs available	N/A	3 lamps 3 ELVCs	All lamp/ELVC combinations where compatibility claimed satisfy conditions of the test method.	To be developed To include tests for flicker (IEEE 1789 or other). Suppliers do not need to submit tests for registration ¹³ Compliance may test.

¹² In the absence of an agreed test method, at the moment we would not require up-front test reports – this is currently designed to ensure that adequate information on transformer compatibility claims is provided.

¹³ Audible noise is from excessive peak current during supply cycle. Can a limit be set which would stop noise from being generated? (Similar to the new phase cut dimmer compatibility tech Report 63037)

			Requirement			Compliance	Test method
Ref	Attribute	Non-directional lamps	Directional lamps	Linear LED (tube)	Sample size	criteria	*)
16	Dimmer compatibility (Phase cut dimmers only) ¹⁴ Improve	Lamp dims smoothly to 30% of observable flicker. When dimm 90% of lamp without dimmer. F lamp manufacturer shall: (a) declare the conditions (b) declare which condition number of lamps conne- the lamp will operate; (c) provide a webpage add dimmer makes and mo compatible makes and the local market; and (d) for each compatible dir that can be dimmed an levels a given dimmer-I (e) The webpage may also been tested and meets 63037 Ed. 1.0 Note. Condition applies to Lam Upcoming test method should of IEEE 1789	light output with no er is set to 100%, light output ≥ For dimmable products, the under which the lamp will dim ns (e.g. minimum/maximum ected to dimmer) under which lress that lists compatible dels including (for ELV lamps) models of ELVCs available in mmer, the number of lamps d the range of luminous flux amp combination can achieve. specify where the Lamp has the requirements of IEC/TR p refer to IEC TR 61547-1 not	N/A	3 lamps 2 dimmers (1 ELVC model if required)	All lamp/dimmer/ (ELVC, if required) combinations where compatibility claimed satisfy conditions of the test method.	To be developed ¹⁵ To include tests for inrush current ¹⁶ , maximum cycle current, 30% dim and flicker (IEEE 1789 or other). Suppliers do not need to submit tests for registration. Compliance may test.
	Claims						

on in-rush current may provide reference

¹⁶ Limits on in-rush current could prevent audible noise and negate concern for trying to test the audible noise directly.

¹⁴ In the absence of an agreed test method, at the moment we would not require up-front test reports – this is more designed to ensure that adequate information on dimming claims is provided.

¹⁵ IEC Joint Working Committee TC 34 & 23B on the interoperability of dimmers and LED products 34/305/DTR may provide reference Also IEC TC document 34C/1187/DC

		Requirement									Compliance	Tost mothod
Ref	Attribute	Non-d	Non-directional lamps			Directional lamps		Linear LED (tube)	Sample size	criteria	*)	
Ref 2	Attribute Replacement Lamp Equivalence Improve	Non-d ONLY IF C (1) Minim required v equivalen GLS Tungs halogen la Replace GLS Tungsten Filament 10 W 15 W 25 W 30 W 40 W 60 W 75 W 100 W 125 W 100 W 125 W	Irectional LAIMING um Lumer when claim ce to a spe- sten Filame mp ¹⁷ Replace GLS Halogen 7 W 10 W 18 W 21 W 28 W 21 W 28 W 42 W 52 W 70 W 88 W 105 W 123 W 140 W	lamps n output ning ecified ent or Required GLS LED in lumens 100 lm 150 lm 250 lm 350 lm 500 lm 1500 lm 2500 lm 2500 lm 3000 lm 3500 lm	ONI (1) (as a equ wat equ filar shaj	Directional Jirectional A IF CLAIMING Minimum lum a percentage of ivalences of sa tage) required ivalent wattag ment lamps of pes ¹⁸ MR11 MR16 AR-111 R PAR R7 (forward lumens)	lamps en output of GLS lam ame for claime reflecto stated lan 80% 80% 70% 45% 60% 55%	p ≘d np	Linear LED (tube) ONLY IF CLAIMING (1) Minimum lumen output required for claimed equivalence to linear fluorescent lamp. Bare lamp ¹⁹ L \leq 600mm: 800 lm *600 < L \leq 900mm: 1200 lm 900 < L \leq 1200mm:1600 lm *1200 < L \leq 1500mm:2000 lm [Based on Design Lights Consortium DLC requirements with * extension] (2) Dimensions of the lamp must comply with equivalent	Sample size 10 3 (Linear LED)	Compliance criteria (1) Average Luminous flux ≥ the specified minimum light output (Im) of the claimed Equivalent wattage (2) Dimensions comply with Clause 6 of: IEC 60630 Ed. 2.5 b:2005 "Maximum lamp outlines for incandescent lamps" Dimensions comply with	Test method *) CIE S025 or LM79 accepted until July 2021 or EN 13032- 4: 2015
		(2) Dimen must com lamp's rec	sions of th ply with equirement	ie lamp quivalent s in the					lamp's requirements in the relevant IEC lamp		Clause 1.5.3 of: IEC 60081 Ed. 5.1 b:2002	

¹⁷ GLS halogen replacement wattages are indicative. All lumen values (except >125W) align with IEC62612 and 1:2015 section 9.1 preferred rated luminous flux values

¹⁸ Based on IEA 4 E SSL averaged values for directional lamps

¹⁹ Based on Design Lights Consortium DLC requirements with * extension

				Compliance	Test method		
Ref	Attribute	Non-directional lamps	Directional lamps	Linear LED (tube)	Sample size	criteria	*)
		relevant IEC lamp performance specification Standard Apply the Im-levels of the relevant Incandescent and Halogen IEC performance standards	 (use linear interpolation between GLS wattage values listed) (2) Dimensions of the lamp must comply with equivalent lamp's requirements in the relevant IEC lamp performance specification Standard Apply the Im-levels of the relevant Incandescent and Halogen IEC performance standards 	performance specification Standard		"Double- capped fluorescent lamps - Performance specifications	
4	Light distribution Delete These are not requirements but definitions. Proposal: Delete these requirements and apply proper definitions instead.	ONLY IF CLAIMING to be an 'omnidirectional' lamp or replacement for a General Lighting Service (GLS) lamp. Omnidirectional equivalence No less than 5% of total flux (zonal lumens) shall be emitted in the 130° to 180° zone. No less than 35% of total flux (zonal lumens) shall be emitted in the 90° to 180° zone.	N/A	N/A	10 3 (Linear LED)	No less than 8 lamps (or 3 for linear LED lamps) meet the specified requirements	CIE S025 or LM79 accepted until July 2021 or EN 13032- 4: 2015

Ref	Test method	Attribute
1	CIE S025	Luminous flux
		• Power
	LM79 accepted until July 2021	Efficacy
	or	• Colour Appearance (CCT, x, y)
	EN 13032-4:2015)	Colour Rendering (CRI)
	(All refer to CIE S015 & CIE 13.3 for colour measurements)	Centre beam luminous intensity (directional lamps only)
		Beam Angle (directional lamps only)
2	A. IEC 62612: 2013, Section 11.3: Lamps	Endurance
	P IEC 62717: 2014 Section 10.2: Modules	Switching cycles test
	B. IEC 62717: 2014, Section 10.3: Middules	Temperature cycling test
	C. IEC 62722.2.1: 2011, Section 10.3.2-4: Luminaires	Accelerated operational life test
3	IESNA LM80/TM21	Lumen maintenance
	&	•
	ISTMT (to IEC 60598.1 Section 12.4.1 or UL 1598 Clause 14)	
	(or IESNA LM84/TM28)	
4	IEC 61000-3-2 (2014)	Power Factor
5	IEC 61000-4-7	Harmonics
6	IEC 62471/CIE S009	Photo biological Safety
7		
-		
8	AS/NZS IEC 62301	Standby Power (smart lamps only)
	(or IEA 4E SSL Task 7 2016 publication)	

Table 2: Proposed test methods and nominated parameters

Ref	Test method	Attribute
9	Energy Star Lamps v2, Section 12.9	 Smart Lighting – controlled variations in power consumption (smart lamps only)
10	To be developed	Dimmer compatibility
11	To be developed	ELV converter compatibility

Table 3: Proposed product package marking requirements²⁰²¹

Ref	Attribute	Product	Package	Spec Sheet /website	Marked Value Criterion
1	Lumens Improve	x	x	x	<u>Non-directional LED lamps:</u> The rated luminous flux should preferably ²² be one of the following values: 100 lm, 150 lm, 250 lm, 350 lm, 500 lm, 800 lm, 1000 lm, 1500 lm, 2000 lm, 3000 lm. ²³

Table 3 is not reviewed in detail. In principal, the earlier generic and specific table 1 comments apply as well.

²⁰ Note that the allowed variations between tested and rated values specified below do not apply to compliance with minimum performance requirements.

²¹ Noting feedback that many types of professional and wholesale luminaires are supplied in plain packaging, the proposed package marking requirements for luminaires will be reviewed. We will examine options to allow package marking requirements to instead be shown on website and/or product data sheet where luminaires are not sold in retail outlets.

²² Stakeholder input sought on whether these values should be mandatory or only encouraged.

²³ Note these lumen values (except for the 150W which doesn't exist) align with the IEC62612 and 1:2015 section 9.1 preferred rated luminous flux values

Consultation Response from Philips Lighting

Ref	Attribute	Product	Package	Spec Sheet /website	Marked Value Criterion
					The initial luminous flux of each individual LED lamp in the measured sample shall not be less than the rated luminous flux by more than 10 %, and not be ²⁴ more than the rated luminous flux by more than 10% unless, if the rated value is one of the preferred values listed above, then 20%.
					The average initial luminous flux of the LED lamps in the measured sample shall not be less than the rated luminous flux by more than 7.5 %.
					Directional lamps: The initial luminous flux of each individual LED lamp/luminaire in the measured sample shall not be less than the rated luminous flux by more than 10 % and not be more than the rated luminous flux by more than 10%. The average initial luminous flux of the LED lamps in the measured sample shall not be less than the rated luminous flux by more than 7.5 %.
					Apply IEC 62612 (performance requirement for LED lamp): The initial luminous flux of each individual LED lamp in the measured sample shall not be less than the rated luminous flux by more than 10 %. The average initial luminous flux of the LED lamps in the measured sample shall not be less than the rated luminous flux by more than 7,5 %.
					Luminaires:

²⁴ We understand that a variation of the rated value below the tested value would not be allowed in EU. To discuss with TWG

Ref	Attribute	Product	Package	Spec Sheet /website	Marked Value Criterion
					The initial luminous flux of each individual LED luminaire sample shall not be less than the rated luminous flux by more than 10 % and not be more than the rated luminous flux by more than 10%. Do not determine bins but allow all flux values. Allow more room than 10-20% the bound or delete them.
2	Efficacy (lumens per Watt) Improve		x	х	The initial efficacy of each individual LED lamp or luminaire in the measured sample shall be no less than the rated efficacy by more than 10 %. The average efficacy of the LED lamps in the measured sample shall be no less than the rated efficacy by more than 7.5 %. Apply IEC 62612. For all tested units in a sample, the LED lamp efficacy shall not be less than 80 % of the rated LED lamp efficacy as declared by the manufacturer or responsible vendor.
3	Watts (must be in a smaller font than lumens on package)	х	х	х	The initial power consumed by each individual LED lamp in the measured sample shall not exceed the rated power by more than 10 %.
4	Replacement Lamp Equivalence (directional and non-directional lamps)		х	х	Statement of equivalence to a filament lamp (if claim made). Minimum lumen output required when claiming as specified in Table 1 above.
5	Rated Lifetime		Х	х	Must be equal or above the specified minimum rated life. May include a qualification for lifetime if used in enclosed luminaires.
6	Correlated colour temperature	х	х	Х	
7	CRI			х	Must be greater than rated CRI - 3.

Ref	Attribute	Product	Package	Spec Sheet /website	Marked Value Criterion
8	Beam Angle (for directional lamps & small luminaires)	х	Х	х	
9	Dimmable	х	Х	Х	
10	Dimmer compatibility information and web link		Х	Х	If claim made that product is dimmable
11	ELVC converter compatibility information and web link		Х	х	For ELV products only
12	Ballast compatibility information and web link (for Linear LED lamps)		х	х	
13	Website link for disposal information		Х	х	
14	Standby energy use		Х	х	Only for products with a standby mode
15	Photo biological Safety			х	Blue light and UV risk categories. Spec sheet/website only required if above RG0.
16	Product identification number/code as used for product registration		х	х	

Table 4: Proposed test conditions

Table 4 is not reviewed in detail. In principal, the earlier generic and specific table 1 comments apply as well.

Ref	Attribute	Test method
1	Efficacy	CIE S025 or LM79 accepted until July 2021 or EN 13032-4: 2015
2	Replacement Lamp Equivalence	CIE S025 or LM79 accepted until July 2021 or EN 13032-4:2015
3	Standby Power (smart lamps only)	AS/NZS IEC 62301 (or IEA 4E SSL Task 7 2016 publication)
4	Smart Lighting – controlled variations in power consumption (smart lamps only)	Energy Star Lamps v2 Section 12.9
5	Colour Appearance	CIE S025 or LM79 accepted until July 2021 or EN 13032-4:2015 (All refer to CIE S015)
6	Colour Rendering	CIE S025 or LM79 accepted until July 2021 or EN 13032-4: 2015 (All refer to CIE 13.3)

Ref	Attribute	Test method
7	Lumen maintenance	IESNA LM80/TM21
		&
		ISTMT (IEC 60598.1 Section 12.4.1 or UL 1598 Clause 14)
8	Power Easter	IESINA LIVI84/ TIVI28
0		1000-3-2 (2014)
9	Harmonics	IEC 61000-4-7
10	Dimmer compatibility	To be developed
11	ELV converter compatibility	To be developed
12	Photo biological Safety	IEC 62471/CIE S009
13	Endurance	
	Lamps	IEC 62612: 2013
		or
	Modules/packages	IEC 62717: 2014
		or
	Luminaires	IEC 62722.2.1: 2011
14	Flicker	IEEE 1789
15	Centre beam luminous intensity (directional lamps only)	CIE \$025
		or
		LM79 accepted until July 2021
		or
		EN 13032-4:2015
16	Beam Angle	CIE S025
		or

Ref	Attribute	Test method
		LM79 accepted until July 2021 or EN 13032-4:2015

Table 5: Integrated LED luminaires²⁵²⁶

	Attribute		Requirement		Sample	Compliance	Test method
Ref		Small	Large	Planar, Battens & Troffers (P/B/T)	size	criteria	
	Energy Efficiency	& Photometric					
1	Efficacy ²⁷	& Photometric Directional $\geq 85 \text{ Im/W} (2020)$ $\geq 100 \text{ Im/W} (2023)$ Non-Directional $\geq 85 \text{ Im/W} (2021)$ $\geq 100 \text{ Im/W} (2023)$ Reductions for (a) 90 \leq CRI $<$ 100 (10%) (b) CCT \leq 3000K (10%) (c) Beam angles \leq 30° (10%) (d) Glare control (Antiglare) 20%	 ≥ 110 lm/W (2020) ≥ 120 lm/W (2023) Increase for (a) 70 ≤ CRI < 80 (10%) 	≥ 110 lm/W (2021) ≥ 120 lm/W (2023)	128	≥ value specified	CIE S025 or LM79 accepted until July 2021 or EN 13032- 4:2015 Where a small luminaire model
		Note: Antiglare is where the luminous intensity 60 degrees and above in gamma					is provided with interchangeable /adjustable reflectors or

Table 5 is not reviewed in detail. In principal, the earlier generic and specific table 1 comments apply as well.

²⁵ Note that for maintained emergency lighting luminaires compliance with the performance requirements shall be met when the emergency components are disconnected.

²⁶ Colour codes – Purple: mandatory test for all products in scope. Green: Tests expected to be available already for most products

²⁷ Efficacy levels subject to market review closer to date

²⁸ Sample size for small luminaires to be discussed with TWG

Consultation Response from Philips Lighting

	Attribute		Requirement		Sample	Compliance	Test method
Ref		Small	Large	Planar, Battens & Troffers (P/B/T)	size	criteria	
		angle is less than 5% of the peak intensity of the luminaire The reductions will be cumulative.					lenses, the test will use the configuration that delivers the narrowest beam angle. Tool-less removable shrouds will not be included in test Power to be tested as supplied for sale (additional functionality may be supplied not activated).
4	Light distribution	ONLY for Directional luminaires: Beam angle is: ± 25% of declared beam angle and 50% of flux shall be in declared beam angle	None p	rovided	1	All samples meet the specified requirements	CIE S025 or LM79 accepted until July 2021 or EN 13032- 4:2015

	Attribute		Requirement		Sample	Compliance	Test method
Ref		Small	Large	Planar, Battens & Troffers (P/B/T)	size	criteria	
	Colour						
7	Colour Rendering	Ra ≥80	Ra ≥70	Ra ≥80	1	≥ value specified	<mark>CIE S025</mark> (refers to CIE 13.3)
8	Colour Appearance	Lamp must have one of the foll quadrangles and Duv tolerance	lowing nominal CCTs consistent v es below. ²⁹	vith the 7-step chromaticity	1	Chromaticity co- ordinates fall into the rated nominal CCT quadrangle	CIE S025 (refers to CIE S015)

²⁹ As per ANSI C78.377: 2015 Specifications for the Chromaticity of Solid State Lighting Products

	Attribute			Rec	quirement			Sample	Compliance	Test method
Ref		Small		Large		Planar, Battens & (P/B/T)	Troffers	size	criteria	
		No	ominal CCT (K)	Target CCT and Tolerance (K)	Target Duv	Duv Tolerance Range]			
			2200	2238 ± 102	0.0000	T.: CCT of the source				
			2500	2460 ± 120	0.0000					
			2700	2725 ± 145	0.0000	$1 \text{ For } T_x < 2870 \text{ K}$ 0.000 ± 0.0060				
			3000	3045 ± 175	0.0001	For <i>T_v</i> ≥ 2870K				
			3500	3465 ± 245	0.0005					
			4000	3985 ± 275	0.0010	$D_{uv}(T_x) \pm 0.0060$				
			4500	4503 ± 243	0.0015	where $(T_{1}) = 57700 \cdot (1/T_{1})^{2}$				
			5000	5029 ± 283	0.0020	$\frac{D_{\rm gv}(T_{\rm x}) = 57700 \times (1/T_{\rm x})}{-44.6 \times (1/T_{\rm x})}$				
			5700	5667 ± 355	0.0025	+ 0.00854				
			6500	6532 ± 510	0.0031					
	Life						-			
10	Endurance		Must survive Must su Must surviv	e one switching c urvive temperatu ve accelerated o	cycle for every ure cycling test perational life	1 hours of rated life ³⁰ t for 1,000 hours test for 1,000 hours		3 (Small) 1 (Large & P/B/T)	Satisfy conditions of the test method.	IEC 62722.2.1: 2011 Section 10.3.2-4 Test data from module and driver accepted (IEC 62717 Section 10.3)

³⁰ Note: twice requirement of IEC 62722.2.1

	Attribute			Requirement			Sample	Compliance	Test method
Ref		Small	La	irge	Planar, Bat	ttens & Troffers	size	criteria	
					(P/B/T)				
11	Lumen maintenance	Lumen maintenance 6,000h $L_{x,6k} \ge 93.1\%$ (based on $L_{70}B_{50} \ge 30,000h$) Module or LED pack data (from an accrea may be used, combi ISTMT junction temp test of lamp to be re	e @ Lu ≥ 9 (b (b (b (b) aned test dited lab) ined with perature egistered.	umen maintenance @ 6 95.4% of initial based on L ₇₀ B ₅₀ ≥ 45,000 lodule or LED package e used, combined with mp to be registered.	5,000h (L _{x,6k}) Dh) test data (from an a ISTMT junction ter	accredited lab) may nperature test of	3 (small) 1 (Large & P/B/T)	Average L _{x,6k} ≥ value specified Compliance testing may be an ISTMT junction temperature test and relevant module/package test report or a full product test.	IESNA LM80/TM21 & ISTMT (IEC 60598.1 Section 12.4.1 or UL 1598 Clause 14) or IESNA LM84/TM28 Note testing of small luminaires may require consideration of insulation requirement. Consider allowing use of thermal imaging camera to ascertain hottest point.
	Electrical		·				• •	•	
14	Fundamental Power Factor	Ta	ble F.1 – Reco	Recommended values for displacement factor			1	≥ value specified	<mark>IEC 61000-3-2</mark> (2014)
		wetric	P S Z W	2 W < PS 5 W	5 W < P ≤ 25 W	P > 25 W			Test data may
		κ _{displacement} (cosφ ₁)	No limit	≥ 0,4	≥ 0,7	≥ 0,9			be sourced from control gear manufacturer

	Attribute			Requirement			Sample	Compliance	Test method
Ref		Small	La	rge	Planar, Battens	& Troffers	size	criteria	
					(P/B/T)				
15	Harmonics	For products 5\	<i>N</i> < P ≤ 25W:				1	Comply with the	<mark>IEC 61000-4-7</mark>
					_			requirements of	
		{text here is per	nding final approva	l of amendment to 6100	0-3-2}			IEC61000-3-2	Test data may
		One of the follo	wing three requiren	nents:					control gear
		1. the har	monic currents sha	I not exceed the power-r	elated limits of Table	3, column 2,			manufacturer
			Table	3 – Limits for Class D eq	luipment				
			Harmonic order	Maximum permissible harmonic current per watt	Maximum permissible harmonic current				
			п	mA/W	Α				
			3	3,4	2,30	1			
			5	1,9	1,14				
			7	1,0	0,77				
			9	0,5	0,40				
			11	0,35	0,33				
			$13 \le n \le 39$ (odd harmonics only)	3,85	See Table 1				
				п		J or:			
		2. the third	d harmonic current,	expressed as a percent	age of the fundamenta	al current, shall			
		not exc	eed 86 % and the f	inth narmonic current sha	all not exceed 61 %. A	ISO, THE			
		before	or at 60° has its pe	ak value before or at 65 ⁰	and does not fall belo	the 5 %			
		current	threshold before 9	⁰ referenced to any zer	o crossing of the fund	amental supply			
		voltage	. The current thresh	hold is 5 % of the highest	t absolute peak value	that occurs in			
		the mea	asurement window,	and the phase angle me	easurements are made	e on the cycle			
		that inc	ludes this absolute	peak value (see Figure 2	rent with				
		frequer	frequencies above 9 kHz shall not influence this evaluation. or:						
		•	.						
		3. the THI	D shall not exceed	70%. The third order har	monic, expressed as a	a percentage			
			unuamentai current enth order shall no	, Shall not exceed 35%, 1	and eleventh order shall NO	all not exceed			
		20% an	id the second order	shall not exceed 5%.					

	Attribute	Requirement Sa				Compliance	Test method
Ref		Small	Large	Planar, Battens & Troffers (P/B/T)	size	criteria	
		• If the lighting equipment includ drive multiple loads, then the lamps that gives the maximum NOTE The preceding requirer control other than phase contri- For lighting equipment containing the control module to the harmon equipment with control module fer For products >25W ³¹ :	des means for control (e.g. dimmi measurement is made only at the n active input power.ment is based on the assumption rol, the THC decreases when the g a control module with an active inpu tic current of the lighting equipment is ed by a separate mains supply.monic OrderMaximum permissible harmon expressed as a percentage current at the fundamental nn(%)22330 - CPF *51077951 < n < 39 harmonics only)3* CPF is the circuit power factor	(P/D/1) ng, colour), or is specified to control setting and the load of that, for lighting equipment using input power is reduced. t power ≤ 2 W, the contribution of disregarded e.g. by testing the nic current of the input frequency			
		{text below is pending final ap	pproval of amendment to 61000-3	3-2}			

³¹ IEC 61000-3-2, Table 2, Limits for Class C equipment

	Attribute		Requirement		Sample	Compliance	Test method
Ref		Small	Large	Planar, Battens & Troffers	size	criteria	
				(P/B/T)			
		 For the other types of lighting equipment that includes means for control (e.g. dimming, colour), he following conditions apply: the harmonic current values for the maximum active input power condition derived from the percentage limits given in Table 2 shall not be exceeded; at control settings leading to an active input power less than the maximum input power condition, the harmonic currents shall not exceed the limits based on the maximum active input power of: below 50W: no limits below 5 W; 50 W - 250 W: no limits below 10% of maximum active input power; above 250 W: no limits below 25 W. 					
	Health				L		
17	Photo biological Safety	Blue Light & UV hazards shall b (UV hazard test not required if	e either RG0 or RG1 unlimited the light source does not contai	n a UV LED chip)	1	Satisfy conditions of the test method.	IEC 62471 / CIE S009
18	Dominant light modulation frequency (f) Modulation percent at this	Maximum flicker modulation a	t the dominant modulation freq	uency ³³ < 30%	1	Satisfy conditions of the test method.	IEEE 1789 (or other specified in Determination)

³³ Based on IEEE 1789:2015 test method part only – and not the threshold values as concerns about stringency noted and may require adjustments to thresholds

	Attribute		Requirement		Sample	Compliance	Test method
Ref		Small	Large	Planar, Battens & Troffers (P/B/T)	size	criteria	
	frequency (Mod%) ³²						
	(Includes Flicker						
	effects)						
	Smart Luminaires	ONLY - Energy conservation					1
5							
	Standby Power	P _{STANDBY} /P _{ON} ≤ 5% capped at: < 0.5W	< 0.1.1 < 0.0.5	W W (2023)	1	≤ value specified	AS/NZS IEC 62301
	(For luminaires with Standby mode only)	< 0.3W (2023)	Note: Where only 1 standby pre-	oduct/parameter is applicable, ontrol gear/module may be		To be tested as supplied for sale (additional	(or IEA 4E SSL
			used. Where a luminaire incorp product/parameter, e.g. DALI a measured.	porates more than standby and sensor, luminaire is to be		functionality may be supplied not activated) with	Task 7 2016 publication) ³⁴
						latest firmware updates. See also	
						smart lamp criteria.	

³⁴ Modified test method to be prepared.

³² The requirements are based on IEEE 1789-2015. The priority here is on restricting the visible modulation of light (including flicker) at frequencies \leq 90 Hz, as more research is required on the effects of light modulation frequencies beyond 90 Hz (i.e. non-visible effects). NOTE1: In some particular instances, there is a strong sub-harmonic or interharmonic frequency in the luminance modulation waveform. In this case, the dominant light modulation frequency may not be clearly defined. The requirements should then be met for both the Fourier fundamental frequency and the sub/inter harmonic frequency. NOTE2: Due to the lack of a standard for the photometric measurement of modulated light , the SSL Annex are continuing to work on this issue, consult with stakeholders including CIE TC 1-83 (authors of CIE TN 006:2016), and will issue an update when new guidance becomes available.

	Attribute		Requirement		Sample	Compliance	Test method
Ref		Small	Large	Planar, Battens & Troffers	size	criteria	
6	Smart Lighting – controlled variations in power consumption (smart luminaires only)	Device to provide energy consumption reporting that is accessible by owner. To be considered following the outcomes of investigations by the IEA 4E SSL and G20 working groups			1	Require device to provide energy consumption reporting that is accessible by owner	Energy Star Lamps v2 Section 12.9
	Declarations						
12	Rated Life Declaration (relates to packaging requirement)	Packaging declaration of a minimum of 30,000 hours	Packaging declaration of a mini	imum of 45,000 hours	N/A	Declaration Only	N/A
16	Dimmer compatibility (Phase cut dimmers only) ³⁵	Luminaire Dims smoothly to 30% of light output with no observable flicker. When dimmer is set to 100%, light output ≥ 90% of luminaire without dimmer. For	N	/Α	1 luminaire 1 dimmer	Satisfy conditions of the test method.	To be developed ³⁶ To include tests for inrush current, maximum cycle

³⁵ In the absence of an agreed test method, at the moment we would not require up-front test reports – this is more designed to ensure that adequate information on dimming claims is provided.

³⁶ IEC Joint Working Committee TC 34 & 23B on the interoperability of dimmers and LED products 34/305/DTR may provide reference Also IEC TC document 34C/1187/DC on in-rush current may provide reference

	Attribute		Requirement		Sample	Compliance	Test method
Ref		Small	Large	Planar, Battens & Troffers	size	criteria	
				(P/B/T)			
		dimmable products, the					current, 30%
		manufacturer shall:					dim and flicker
							(IEEE 1789 or
		(a) declare the					other).
		conditions under					Suppliare da nat
		which the luminaire					suppliers do not
		(b) declare which					tests for
		(b) decidie which					registration
		minimum/maximum					Compliance may
		number of luminaires					test.
		connected to					
		dimmer) under which					
		the luminaire will					
		operate					
		(c) provide a webpage					
		(c) provide a webpage					
		compatible dimmer					
		makes and models:					
		and					
		(d) for each compatible					
		dimmer, the number					
		of luminaires that					
		can be dimmed and					
		the range of					
		luminous flux levels a					
		given dimmer-					
		luminaire					
		combination can					
		achieve.					

	Attribute	Requirement			Sample	Compliance	Test method
Ref		Small	Large	Planar, Battens & Troffers	size	criteria	
				(P/B/T)			
	Claims						
2	Replacement Lamp Equivalence	ONLY IF CLAIMING. Where claiming replacement equivalence to a specific lamp based fixture, the luminaire must meet minimum lumen output provided for lamps in table 1. (e.g. for halogen downlights replacements, use equivalence of MR16 directional lamp)	None provided	ONLY IF CLAIMING. Luminaire lumens (per lamp) for claimed number of tubular fluorescent lamp equivalents must meet minimum lumen output provided in the lamp table 1.	1	Luminous flux ≥ Claimed Equivalent wattage specified minimum light output (Im)	CIE S025 or LM79 accepted until July 2021 or EN 13032- 4:2015
3	Centre beam luminous intensity	ONLY IF CLAIMING. For luminaires claiming equivalence to MR or PAR lamps with a beam angle <65°, centre beam intensity should meet equivalent levels using the online tool: <u>http://www.energystar.gov/i</u> a/products/lighting/iledl/IntL ampCenterBeamTool.zip ONLY IF CLAIMING Centre beam luminous intensity ≥ declared value	ONLY IF CLAIMING Centre beam luminous intensity ≥ declared value	N/A	1	For MR or PAR lamp claimed equivalence: ≥ of equivalent level For other lamp type claimed equivalence: ≥ of declared value	CIE S025 or LM79 accepted until July 2021 or EN 13032- 4:2015



Lighting: updated policy positions

www.energyrating.gov.au

A joint initiative of Australian, State and Territory and New Zealand Governments