

LIF Consultation Response_Contents of Email

From: Nic Mallinson [mailto:NMallinson@lif.co.uk]
Sent: 10 August 2009 14:40
To: Emily Batchelor
Subject: Consultation response

Dear Emily,

The following is the submission from The Lighting Industry Federation based on our discussions.

1. Evidence to support the need to either amend scores for look-a-like CFLs or provide a range mix to support the uptake of these products.

2008 saw the introduction of energy efficient halogen lamps which are a viable replacement for GLS, candle and globe incandescent. In this short period we have already seen a significant increase in sales of these new products, despite the relatively low availability, and therefore reductions in energy use and carbon.

With the impending EuP phase out in September followed by the UK voluntary phase out of the common 60W GLS lamp in January 2010 we expect to see a continuing and considerable increase in this growth in these energy saving halogen products.

The LA survey shows that there are currently 338 million incandescent lamps (GLS, candle and globes) in UK homes. LIF market trend information indicate that approximately 200 million of these are (should this be "were") replaced last year while approximately 130 million CFLs were sold (but of those we estimate only 9% were look-a-like CFLs).

Of the 200 million incandescents we expect the phase outs to account for approximately half which? will be replaced by alternatives.

The target will be to encourage the uptake of more CFLs (80% saving) rather than the less efficient halogens (30% saving).

If we do nothing we expect the energy saving halogens to account for at least half of these replacement sales owing to their greater suitability for decorative use.

As we see it the target is to convert this 50 million into look-a-like CFLs by putting in place a mechanism to encourage their uptake.

Peter and I ran some calculations and we estimate the savings if we do nothing will be .59 billion kilowatts, if we convert these sales to look-a-like CFLs the savings will be 1.69 billion kilowatts. The net saving by encouraging this uptake is 1.1 billion kilowatts.

If the score for sticks were reduced to balance the increase in look-a-like scores we believe this is the most effective method of encouraging suppliers to provide the broader range which is one of the objectives of the new rules.

2. We also discussed the possibility of reviewing the score for dimmable CFLs. It is generally accepted that installations with dimmers save around 30% of the energy of undimmed ones.

Our figures show that there are 24 million dimmers in UK homes 90% of which are installed in living rooms which are among the high burn areas of the home and usually on circuits with multiple lamps. Use of these lamps can be regarded as saving more energy in high use areas and therefore deserve consideration for an improved score. It ought to be possible to put some numbers to this assumption if you would like us to do that.

3. Another topic we discussed was that of small independent retailers having no access to subsidies given the trend towards large retail schemes through major grocery and DIY retailers. Among independent lighting retailers and hardware stores there are many thousands who have discontinued the sale of energy efficient lamps because they are unable to offer products at a reasonable price in comparison to the majors. This comes at a time when the two phase out programs take effect and consumers are faced with the need to buy efficient lamps. It is these very retailers who are best positioned to give advice of the correct energy efficient lamps to the consumer. If there were some way of allocating a value to this advice this might be one way to redress the balance. Major retailers are not able to offer this level of service.
4. The issue of dedicated energy efficient luminaires. While halogens remain on the market, and they will certainly do so until at least 2016 and most probably well beyond that date, there is always the option to replace a CFLi with a less efficient lamp. Given that the average life of a luminaire in the UK is over 20 years, the installation of dedicated products will ensure the carbon savings for their lifetime. In addition to this the separate ballast route is the most efficient way to deliver light from a lamp and the life cycle energy consumption is also reduced as the ballast is not replaced at the end of life of the lamp. As it stands there is no CERT delivery route for these products which manufacturers have been encouraged to invest in. We would urge you to re-visit the scores for these products which guarantee to provide long term savings.
5. Finally the issue regarding lead times needs to be clarified. The Lighting season runs from September through until April and Lampmakers and Retailers have planned their Fixtures and promotions based around that timescale. To make the proposed changes on Jan 1st will cause issues for both Retailers and Manufacturers, the date of change should be moved to the end of April in line with the season.

If there is any more information we can supply you with to help you in achieving the aims of the new CERT rules, please let us know.

Regards

Nic