



Mr. Per M. Bakken
Head of Chemicals Branch
UNEP DTIE
11-13, chemin des Anémones
CH-1219 Châtelaine, Geneva, Switzerland

Re: request for becoming partner in the UNEP Global Partnership

14th March 2011

Dear Mr Bakken,

I am writing to you in order to apply for partner status in the UNEP Global Mercury Partnership, Mercury Containing Products Partnership Area.

The European Lamp Companies Federation (ELC) is an international non-profit association under Belgian law with a secretariat in Brussels. Currently, it has eight members: Philips Lighting, Osram GmbH, GE Lighting, Havells Sylvania, Aura Light, BLV Licht- und Vakuumtechnik GmbH, NARVA Lichtenquellen GmbH + Co. KG and Toshiba. These companies account for 95% of total European lamp production, employing over 50,000 people in Europe.

ELC is convinced that the goal of UNEP and ELC regarding mercury is the same, more precisely reducing mercury emission to environment. ELC believes that the best measures to achieve this goal are energy efficiency and reduction of mercury content of products. All ELC member companies are engaged to provide reliable and aesthetic lighting solutions to the global market, which also put less pressure on the environment. ELC members continuously improving the energy efficiency of lamps and lighting systems, and search ways to reduce or even to eliminate mercury in lamps. Finally, ELC is working towards better collection and recycling of compact fluorescent lamps.

In summary, ELC is engaged to promote the idea of creating a global, legally binding instrument on mercury for lamps using the synergy provided by the UNEP Global Mercury Partnership.

I am looking forward to receiving a positive answer to our application.

Yours sincerely,

Jürgen Sturm
secretary general

UNEP GLOBAL MERCURY PARTNERSHIP REGISTRATION FORM*

PARTNERSHIP AREA

Please check partnership areas that your organization intends to contribute to:

- artisanal and small scale gold mining
- mercury cell chlor alkali production
- mercury air transport and fate research
- mercury in products
- mercury releases from coal combustion
- mercury waste management
- mercury supply and storage

Please indicate in your support letter how your organization intends to contribute to each of the indicated partnership areas.

ORGANIZATION NAME

EUROPEAN LAMP COMPANIES FEDERATION

NAME, FUNCTIONAL TITLE OF REPRESENTATIVE

JURGEN STURM, SECRETARY GENERAL

ADDRESS OF ORGANIZATION

1030 BRUSSELS, Bd. A. LEYERS 80.

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FAX No.

+32 2 708 609

WEBSITE/URL

WWW.ELCFED.ORG

TYPE OF ORGANIZATION

- Government
- Regional economic integration organization
- Non-government Organization
- Industry
- Scientific community
- Other, please specify:

Industry Organisation,
Federation

*UNEP Global Mercury Partnership Registration Forms are to be accompanied by a letter to UNEP signifying support for the UNEP Global Mercury Partnership and commitment to achieving the partnership goal.

The support letter should specify how the organization intends to contribute to meeting the goal of the UNEP Global Mercury Partnership.

Please submit the support letter and registration form to:

Head, UNEP Chemicals Branch, DTIE
11-13, chemin des Anémones
CH-1219 Châtelaine - Geneva, Switzerland
Fax: (+41 22) 797 3460
E-mail: mercury@chemicals.unep.ch

Application for becoming partner in the UNEP Global Mercury Partnership

About ELC

The European Lamp Companies Federation (ELC) is an international non-profit association under Belgian law with a secretariat in Brussels. Currently, it has eight members: Philips Lighting, Osram GmbH, GE Lighting, Havells Sylvania, Aura Light, BLV Licht- und Vakuumtechnik GmbH, NARVA Lichtquellen GmbH + Co. KG and Toshiba. These companies account for 95% of total European lamp production, employing over 50,000 people in Europe.

The ELC Board is the executive of the Federation and consists of a Chairman and six Members. Multi disciplinary issues of importance are discussed at Working Group level and conclusions are submitted to the Board for action.

Objectives

Objectives of ELC are

- to promote efficient lighting practice for the benefit of the global environment, human comfort and the health and safety of consumers
- to monitor, advise and co-operate with legislative bodies in developing European Directives and Regulations of relevance to the European lamp industry
- to act as the key discussion partner for the European Union (EU), as well as for European Industry federations, such as CELMA (luminaires and ballast), ORGALIME (metalworking, electrical and electronics industry) and UNICE (employers) on all topics concerning light sources

Efforts towards mercury emission reduction

The ELC and its members are engaged to provide reliable and aesthetic lighting solutions to the global market that, at the same time, reduce the pressure on the environment. With regard to reducing the mercury emission the lighting industry has three ways to go. Firstly, we are continuously improving the energy efficiency¹ of lamps and lighting systems, secondly we are researching ways to reduce or even to eliminate mercury in lamps, finally we are working towards better collection and recycling of CFLs.

¹ Research has shown that when comparing the full life cycle of incandescent and compact fluorescent lamps (CFL), mercury is mainly emitted during the use phase due to electricity production in coal power plants. Significantly less is emitted because of improper recycling. Considering the fact that in the current EU energy mix 28% of electricity is produced from coal, the overall mercury emission accounted to CFLs is lower than that attributed to incandescent lamps.

Energy efficiency

The ELC strategy regarding energy efficiency is to increase awareness of energy efficient lighting, to help compliance with obligations set out in the directives via sharing information, and to provide positions under all legislative initiatives.

In 2006, the lighting industry approached the EU to have a collective look at ways to accelerate the switch to energy efficient lighting solutions in the domestic sector. The idea was taken-up, and in December 2008 the EU Member States endorsed the **Directive on Eco-Design of Energy-using Products (EuP)**, making it possible to gradually phase-out inefficient incandescent lamps in the domestic and in the tertiary sector.

ELC participated in various projects in order to raise awareness, share experiences, and to increase the market up-take of efficient lighting systems. One of them was the EU-funded project '**Bottom up to Kyoto**' (**BUtK**)². Via this project, we developed country specific ESCO schemes, to help municipalities to 'make the switch' to efficient street lighting systems.

Besides this, ELC participated in a communication program for EU households: the **BUY BRIGHT project**³. The main objective was to present best practice case studies to show local level actors, how to achieve substantial energy savings through energy efficient lighting. Also, we gave them a 360-degree view of the key challenges of purchasing energy efficient lighting technology via public procurement.

Recently ELC participates in the Energy Saving Outdoor Lighting⁴ (ESOLI) project. The background of the project is that new technology in street lighting is already available, which allows that lighting level can be adapted dynamically to the particular situation. The refurbishment of infrastructure and requirements of ECO design directive provides a good opportunity for the implementation of this next generation technology, resulting in significant energy savings and CO2 reduction. The main objectives are to

- promote the extended use of adaptive lighting in outdoor areas using intelligent systems
- remove barriers for large scale technology roll-out
- establish a comprehensive network of key actors on national and European level
- knowledge transfer from countries experienced in intelligent street lighting to countries with very little intelligent outdoor light points
- implementation of a significant number of intelligent light points on particularly by ESCOs with focus on new member states

² see more in the Annex and on the website <http://butk.elcfed.org/>

³ see more on the website: <http://buybright.elcfed.org/index.php?page=21>

⁴ <http://www.esoli.org/>

Mercury reduction in lamps

The ELC member companies expressed their commitment to reducing quantities of mercury in energy efficient lamps below the limits required by the **RoHS Directive**⁵. The ELC attended and presented its commitment and views on various conferences, such as the “Mercury containing lamps under the spotlight” organized by the European Environmental Bureau (EEB) on 27 June 2008 in Brussels. By now, the best available technology lamps contain significantly less mercury than what the RoHS directive allowed before the revision. For CFLs for example the limit was 5 mg per lamp. According to the new⁶, revised exemptions, the maximum limit is gradually decreased to half (2.5 mg per lamp) for CFLs below 30 W by the end of 2012. The ELC member companies fully support this new limit.

Another important tool for increasing the awareness on mercury is the requirement of the **Ecodesign regulation**⁷ for labeling the mercury content on packaging. Industry will have to develop harmonized and clear pictograms for the entire EU market in 2010. In the course of the adoption of the regulation, the ELC -jointly with CELMA- has been active in providing guidance to the European Commission when requested, in defining a common industry position, in providing information support to national authorities via their joint communication network (RoMS) and in developing dedicated communication materials (see, for instance, Questions & Answers on draft EU decision to phase out incandescent and less energy efficient lamps on the ELC website).

Development of mercury free lighting solutions

ELC and its members are promoting **LEDs** as energy efficient lighting solutions wherever appropriate and in a way that satisfies end user needs. Therefore ELC coordinates the working group SSL (Solid State Lighting) which is working on:

- formulating a glossary of standard terms/definitions for LEDs;
- finding straightforward, logical arguments to effectively establish the business case leading to the increased uptake of LED Technology;
- establishing a clear communications package to effectively position LEDs;
- lobbying and any other appropriate action to safeguard ELC interests on technical aspects of energy efficient products.

Global activities for mercury reduction

The ELC together with other eight lighting associations established in 2007 the **Global Lighting Forum**⁸ (**GLF**), which represents the majority of global lamp production, in the seven regions of the world. ELC provides the secretariat and as such the contact point for the GLF.

GLF is an informal affiliation of lamp manufacturer trade associations (see Annex). The GLF members are aware that the lamp manufacturing industry can contribute substantially to improving the environment

⁵ RoHS directive (2002/95/EC)

⁶ Commission Decision (2010/571/EU) Annex to the Directive 2002/95/EC

⁷ Ecodesign regulation (EC no. 245/2009)

⁸ <http://globallightingforum.org/>

and to decreasing greenhouse gas emissions by producing more energy efficient lamps and lighting systems. Therefore the Global Lighting Forum:

- shares knowledge of legislative developments in lighting
- shares information on the activities of individual associations
- determines common areas of interest and seek opportunities for communicating with government authorities and other stakeholders
- provides governments with relevant product and market information for various global initiatives

In the context of mercury, GLF established an Environmental Working Group (EWG) chaired by the Lighting Council Australia. The EWG has embarked on a number of activities, with a focus on accompanying the process to minimize the mercury content in CFLi energy saving lamps and to take a proactive and scientifically founded stand on behalf of the industry.

Annex

Annual reports

Annual report of ELC from 2003 to 2009 can be found here:

http://www.elcfed.org/2_about_annual.html

Fact sheets

„Did you know...“ ...the potential energy savings of an energy efficient lamp?⁹

„Did you know...“ ...the glowing environmental progress record of the European lamp industry?¹⁰

Press releases

- *Lamp Manufacturers encourage the switch to Energy Efficient Lighting in Europe*
- *Energy Efficiency: the solution to high energy prices*
- *Lamp Manufacturers are working towards reducing the amount of mercury needed in energy saving lamps*
- *Lamp manufacturers around the world join forces to support the G8 in the promotion of energy efficient lighting*
- *European Lighting Manufacturers welcome draft EU decision to phase out traditional incandescent lamps in European homes*

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<http://www.elcfed.org/documents/050301%20DYK%20the%20potential%20of%20energy%20savings%20of%20an%20energy%20efficient%20lamp.pdf>

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<http://www.elcfed.org/documents/050301%20DYK%20the%20glowing%20environmental%20progress%20record%20of%20the%20European%20lamp%20industry.pdf>

Events¹¹

- **Energy Efficient Lighting at the European Union Sustainable Energy Week 2009**
- **ELC Conference on Energy Efficient Lighting during EUSEW 2009**

Projects

EU-funded project: 'Bottom up to Kyoto' (BUtK)

Our Federation is coordinating 'Bottom up to Kyoto', or BUtK, a 3-year EU-funded project started in 2007 whose main aim is to help municipalities 'make the switch' to efficient street & office lighting systems – freeing up funds that would normally be spent on energy to operate inefficient lighting systems. The project is partly financed by the partners and the Executive Agency for Competitiveness and Innovation (EACI) of the European Commission, under the Intelligent Energy Europe Program. The project runs until December 2009. Our Federation, together with the Electrical Wholesalers (EUEW) and the Electrical Installers (AIE), and led by Berliner Energieagentur, assists the municipalities involved to overcome these barriers and to achieve significant energy savings at a local level. The partner municipalities are Raciechowice in Poland, Slovenska-Bistrica in Slovenia, and Võru in Estonia. In 2008, the BUtK Project Management Committee (made up of all project partners) and the BUtK Lighting Taskforce (a body that provides technical input to the Committee) met in Berlin in January and met again later, in May, in Slovenska-Bistrica. In 2008 the following project steps were achieved:

- Feasibility report for all partner municipalities, including calculation of CO₂ emissions and potential savings;
- Contract template, in local language and adapted to the national law of each municipality;
- Workshop in five municipalities (Cluj-Napoca, Riga, Võru, Slovenska-Bistrica and Raciechowice) with participants representing local authorities, ESCOs (Energy Service Companies), lamp manufacturers, installers, representatives of national energy agencies and producers;
- Announcement of tender preparation by three municipalities (Slovenska-Bistrica, Rachiechowice and Võru);
- Call for tender for the replacement of street lighting with energy efficient installations in one municipality (Slovenska Bistrica).

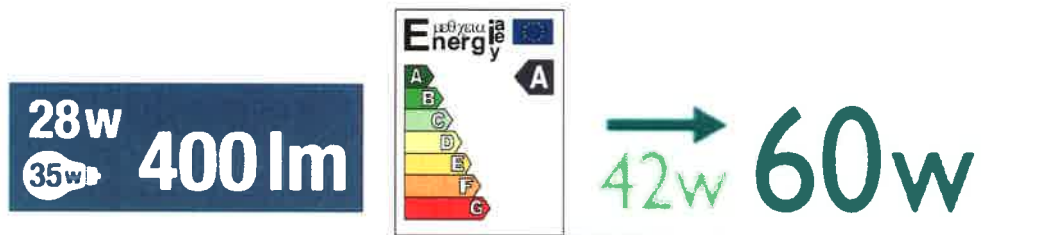
Members of the Global Lighting Forum

- Lighting Council Australia
- Brazilian Lighting Industry Association
- China Association of Lighting Industry
- European Lamp Companies Federation

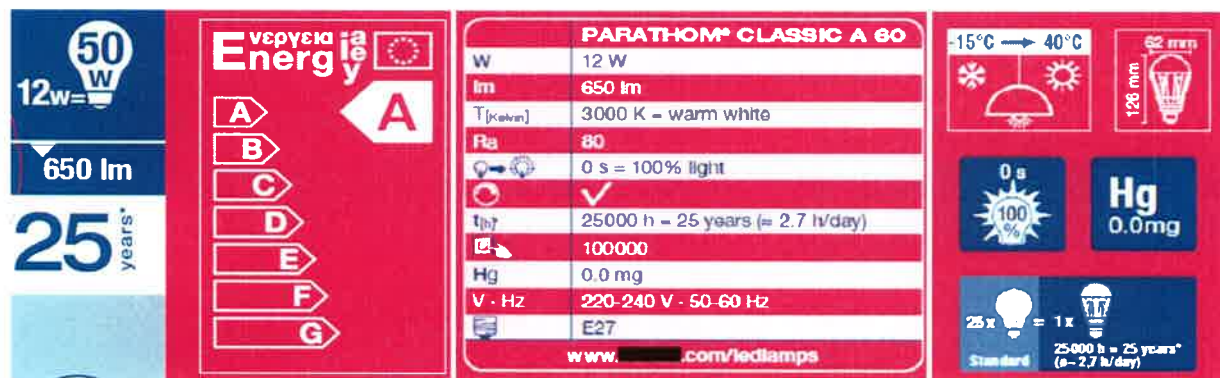
¹¹ http://www.elcfed.org/2_resource_events.html

- Electric Lamp and Components Manufacturers' Association of India
- Japan Luminares Association
- Japan Electric Lamp Manufacturers' Association
- National Electric Manufacturers Association
- Taiwan Lighting Fixture Export Association

Labeling



- Energy Labelling of non-directional household lamps: Consequences for LED lamps from 1 September 2010, Ecodesign requirements at stage 2 of Commission Regulation (EC) 244/2009¹²



¹² http://www.elcfd.org/documents/Position_Labeling_Retrofit%20lamps_Reg%20244-2009_1Sep2010_20100831.pdf