Compiled	<b>Document:</b> DCRS 58 – Energy efficiency labelling of CFLs and LEDs - Specification, labelling and conformity
	Date: March 12 to May 11, 2018

1	2	(3)	4	5	(6)	(7)
MB1	Clause No./ Subclause No./ Annex / Figure / Table	Line Number	Type of com- ment 2	Comment (justification for change) by the MB	Proposed change by the MB	RTC observations on each comment submitted
BBSQ	scope		TE	This IEC 60061-1 standard is most probably in conflict with the equivalent North American standards; and in particular the Canadian Electrical Code, the current wiring standard in The Bahamas. To be compatible with The Bahamas' wiring standards, all such devices covered by this IEC standard must be either CSA Approved, UL Listed or have similar listing or approval.		Remove reference to IEC 60061-1.
	scope		TE	This IEC 62560 standard on safety may conflict with the current equivalent North American safet specifications as defined in the Canadian Electrical Code or other accepted codes and standards covering lamps.		Remove reference to IEC 60061-1.
	D.1 Voltage		TE	For The Bahamas voltages applied on test including three- phase power shall be in accordance with US and Canadian standards.		The standard specifies the rated voltages.
	1		Ge	The scope. of the standard appears to be adequate		
	3.1		Ed	Typographical errors appear to have been made in this section Line 1 " it is provide with a screw" Line 2 "as well the complementary"	Hit is <u>provided</u> witha screw" "As wellii thecomplementary	Agree. A new definition of CFL has been proposed. See TT comments.

2 **Type of comment: ge** = general **te** = technical **ed** = editorial

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	4.2.6		Ge	The label should specify that the bulb is Mercury (Hg) free if possible		Member State to take a decision on banning CFLs. Not appropriate for an EE labelling standard. Leave the mercury content to another standard or appropriate regulation. Not relevant to Energy Efficiency.
Grena da	Pg 1, item 1 a	Line 1	te	>50 V does not cover the lamps that are under 50. The lowest on the market is 12.	Change >50 V to > 12 V	Based on the IEC standard, stick with >50 V. 12 V lamps are d.c. and therefore outside of the scope of this standard.
	Pg 1, item 1 a			Should there be a maximum wattage rating for compact CFLs?		No maximum wattage specified in the IEC Standard for CFLS.
	Pg 1, item 1, b) 1		te	They go up to 150 W – there is need for maximum rating based on industry.	Change 60 W to 150 W	The IEC Standard go up to 60 W. ST Lucia – no objection to 60 W.

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	Pg 1, item 1, b	Line 1	te	What is considered under 'similar general lighting' – does it include commercial and industrial?		It is important to consider the ratings of the CFLs and LEDs. They can be used in commercial and industrial establishments. This does not denote that the product is a commercial or industrial type. It means that the product can be used for general lighting purposes regardless of type of establishment.
	Pg 1, item 1, b)2		te	Rated voltage of > 50 V up to 250 V should be change to include under 50 and above 250 as reflected in the market.	Change > 50 V a.c. up to 250 V a.c. to > 12 V to 270 V	Based on the IEC standard, stick with >50 V. 12 V lamps are d.c. and therefore outside of the scope of this standard.
	Pg 1, item 3.0		te	There is no definition for LEDs, types of LEDs and the integrated LEDs – noting that LED is actually a fixture.	Definition of LEDs, and the types of LEDS, integrated LEDs	Agree. To find a definition of LED lamp.
	Pg 1, item 3.2	Line 1	te	' it is provided with a screw' is confusing. There should be no mechanism to secure. The unit should not be opened. once it is opened it is damaged and becomes useless. '	Provided with a screw' should be removed. There is need for clarity on the definition- generally – it does not read properly.	Agree. New definition of CFL proposed.

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	Pg 1, item 3.3		te	The note to the standard only refers to tubes and light bulbs and not fixture.	Fixtures should be included	Standard cover CFL and LED lamps/. Fixtures are outside the Scope.
	Pg 1, item 3.0		te	Definition for fixture is needed.		Standard cover CFL and LED lamps/. Fixtures are outside the Scope.
Grena da	Pg 3, item 4, table 1		te		Characteristics – efficacy, safety, colour rending index (CRI), power factor (PF), Harmonic distortion, lumen maintenance, start time, run-up time, switching cycles, premature failure rate and flicker – should be defined. Also LEDi should be defined.	Agree. See TT comments.
	Pg 4, item 4.2.3.3			The labels come on the packages example light bulb. Are we supposed to put the CARICOM label over them?		Yes. There is supposed to be one standardized regional label on the item. CROSQ will provide further details regarding administrative requirements and conformity assessment requirements for the EE labelling scheme.

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	Pg 4, item 4.2.3.4		te	Where the label cannot be placed on the package – the label may also not be able to fit on the lamp eg G4, G9. It may be useful to add , <b>'place on the shelf'</b> For small units CFLS and LEDs both the package and item are small.	it may be useful to add , <b>'place on the</b> shelf'	Disagree. We cannot control placement re labelling information on shelf. Certain labelling requirements have to be placed on the item itself. Additional labelling would have to be placed on the packaging.
				Should there be a disclaimer on 'expected life' of the product		Disclaimers on expected life are normally covered in the product warranty. The warranty is not covered as part of the technical requirements of the standard.
	Pg 4, item 4.2.6		te	Under optional items, the estimated yearly energy use is impossible when you have different usage.		Leave out estimated yearly energy use.
					Ratings for CFLs and LEDs should be included on the labels.	We agree. Hence the development of this standard. Need to determine what items should be on the product and what items should be on the packaging.

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Jca	4.2.3.2		Ge	Dimensions: When none of the sides of the packaging is large enough to contain the label and blank border, or when would represent more than 50% of the area of the largest side, the label and border may be reduced, but only enough to meet these two requirements.	Uncertain what this section is saying	Dimensions and font size removed from standard as this will be part of the conformity assessment document. Further guidance from CROSQ secretariat needed.
	4.2.3.3		Ge	The external size of the label must be at least 18,5 mm per 26 mm , keeping the proportions indicated in Figure 1.	This is not clear.	Dimensions and font size removed from standard as this will be part of the conformity assessment document. Further guidance from CROSQ secretariat needed.
	4.2.3.4		Ge	When the packaging is too small to accommodate the reduced label, it must be attached to the lamp.	Was the heat from the lamp possibly affecting the glue of the label considered?	Dimensions and font size removed from standard as this will be part of the conformity assessment document. Further guidance from CROSQ secretariat needed.

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	4.2.5		Ge	Content of Label: The label shall have the information required in (Table 1) .	The only thing from Table 1 that is on the proposed label below is efficacy. Suggestion: Create a clause that outlines the information required for the label.	Disagree. Addressed in 4.2.6 Table 1 specifies the test method and performance level (MEP).

MB = Member body (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by \*\*)
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	4.2.6		Ge	Proposed Energy label design – Energy label Wattage Efficacy (lumens/watts) Light output Expected life Other required information Mark of manufacturer Power Voltage Optional items: Estimated yearly energy use Life span	Suggestions for consideration: 1. A means of rating the efficiency, 2. Operating cost for the year, logo, standard to which it was tested, validity period	Based on working group discussion the following elements were agreed upon: Energy label: -Rated wattage -Efficacy -Light output -Rated life Other required information: -Mark of manufacturer -Country of origin -Rated Voltage -Light colour -Colour temperature -CRI (Colour Rendering Index) -Cap type -Frequency Optional items: -Estimated yearly energy use -Beam angle (for LED)

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TT 1	1 b)	1	ge	Light-emitting Diode not stated only abbreviations.	Light-emitting Diode (LED) Light-emitting Diode with integral (LEDi)	Agree.
2	Contents4.2 .4;4.2.4	1 1	Ed ed	In the region Queen's English spelling applies	Colours	Agree
3	1 a)	1	ed	Compact duplicated		Agree
4	1 a)	2	ed	Camps should be caps	caps	Agree
5	1 Scope		te	Add the following: It specifies the relevant test methods and a proposed energy efficiency label design.		Agreed
6	2	all	ed	References identified are to be placed.	IEC 60061-1, IEC 62560, : IEC 62612, IEC 60969, IEC 62560, IEC 61000-3-2	Agreed
7	3.1	2	ge	The explicit name and abbreviation should be accommodated here.	Compact fluorescent lamps (CFLs)	Agreed
8	3.1	3	te	The lamp does not have or come with lampholders as it can be placed in any lampholder/socket whether as infrastructure or a lampstand. This may be lamp cap. Change to definition used in IEC 60968	a fluorescent lamp which cannot be dismantled without permanently damaged, provided with a lamp cap and incorporating a light source and additional elements necessary for starting and stable operation of the light source	
9	3.2	3	te	Delete 3.1	Proposed definition given in 3.1.	Agreed
10	3.3	3	te	Delete 3.3	New proposed definition for CFL given in 3.1.	Agreed

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11	3.5, 3.6	3	Te/ge /ed	Clauses Should be combined. Replace with rated wattage for consistency with IEC 60968.	rated wattage wattage marked by the manufacturer on the CFL or LED lamp	Agreed
12	3.5, 3.6	3	Te/ge	Power values should not be determined by the importer.	Addressed in the proposed definition for rated wattage	Agreed
13	Clause 3	3	Te/ge /ed	Add definitions for: Rated voltage Rated frequency	Add: Rated voltage Voltage or voltage range marked on the CFL or LED lamp Rated frequency Frequency marked on the CFL or LED lamp	Agreed
14	3.X		te	Add definition for colour rendering index (CRI) as per IEC 60969	CRI Measure of the degree to which the psychophysical colour of an object illuminated by the test illuminant conforms to that of the same object illuminated by the reference illuminant, suitable allowance having been made for the state of chromatic adaptation	Agreed

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15			te	Add a definition for efficacy	Add: Efficacy Quotient of the lamp luminous flux by the lamp power consumption NOTE Efficacy shall be calculated from the measured luminous flux of the individual lamp divided by the measured initial input power of the same lamp.	Agreed
16			te	Add a definition for power factor	Add: Power factor Ratio of the absolute value of the active power to the apparent power	Agreed
17			te	Add a definition for distortion factor	Add: Distortion factor Factor indicating the level of harmonic current distortion	Agreed
18			te	Add definition for lumen maintenance	Add: Lumen maintenance Luminous flux at a given time in the life of a lamp, divided by the initial luminous flux of the lamp NOTE Lumen maintenance is expressed as a percentage of the initial luminous flux	Agreed
19				Add definition of starting time	Add starting time Time required for a lamp to develop an electrically stable arc discharge, the time being measured from the moment the lamp circuit is discharged.	Agreed

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20				Add definition of run-up time	Add run-up time Time required for a lamp to reach a specified percentage of its stable luminous flux, the time being measured from the moment the lamp circuit is energized	Agreed
21	4.2.1	3	Ed	Re-wording and clarity of this sentence is needed.	"of each packaging of the lamp shall prevent or reduce the visibility of the initial information and the label".	Agreed
22	4.2.3	all	Ed	Recommend deletion since the label design requirements could be too restrictive.		Deleted. Based on discussions with CROSQ secretariat it was indicated that dimensions, colours and the general label design will be included in the CA document.
23	4.2.4	2	te	Delete this clause		Deleted. Based on discussions with CROSQ secretariat it was indicated that dimensions, colours and the general label design will be included in the CA document.

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24	4.2.6		te	Change Wattage to rated wattage Light output to initial luminous flux Lamp life Other required information Name of manufacturer, importer or distributor Rated voltage Optional item Estimated yearly energy use		Based on working group discussion the following elements were agreed upon: Energy label: -Rated wattage -Efficacy -Light output -Rated life Other required information: -Mark of manufacturer -Country of origin -Rated Voltage -Light colour -Colour temperature -CRI (Colour Rendering Index) -Cap type -Frequency Optional items: -Estimated yearly energy use -Beam angle (for LED)

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25	4.2.5, 4.2.6	2	Ge	Specifics should be placed here as in the other EE label documents. "Expected life" and "Life span" should not both be placed on a label.	CARICOM Energy label logo Wattage Efficacy (lumens/watts) Light output Expected life Colour-coded rating	Based on working group discussion the following elements were agreed upon: Energy label: -Rated wattage -Efficacy -Light output -Rated life
					Other required information Mark of manufacturer Brand Model Power Voltage Frequency at which it was tested Additional Optional items: Estimated yearly energy use Estimated yearly operating cost Life span Standards to which the lamp was tested Cautionary statement NOTICE: LABEL NOT TO BE REMOVED BEFORE PURCHASE.	Other required information: -Mark of manufacturer -Country of origin -Rated Voltage -Light colour -Colour Temperature -CRI (Colour Rendering Index) -Cap type -Frequency Optional items: -Estimated yearly energy use -Beam angle (for LED)
26			te	Include definitions for life span and expected life.	Use rated life.	
27			te	There is no clause stating the language in which the label shall be written.	Include statement that states "Labelling requirements shall be expressed in the national language of the Member State."	Agreed

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28			te	<ul> <li>Include definitions for:</li> <li>Rated life:</li> <li>1. CFL - the length of time during which a complete lamp operates to burn-out</li> <li>2. LED - the length of time during which an LED lamp provides at least claimed percentage of the initial luminous flux, under standard conditions.</li> </ul>		Agreed
LC	Scope 1a	2	ed	The word "Camps" should be "caps" based on referenced document	Replace the word "Camps" the word "Caps"	Already addressed above.
LC	3.2	1-2	ed	Definition is poorly structured.	A proper definition for Compact fluorescent lamps with integrated ballast	Already addressed above.
LC	4.2.3.1	1	ed	This clause refers to a "Figure 1": "The dimensions of the label shall keep the proportions shown in Figure 1". Figure 1 cannot be identified anywhere in the document.	Figure one should be included, or the clause should be removed.	CROSQ is proposing the development of a label design. This Figure will be included pending approval
LC	4.2.3.2	1-3	ed	The clause and sentences are poorly structured.	<ul> <li>The clause may be structured as follows:</li> <li>"The label and border size may be reduced under the following conditions</li> <li>1. The label would represent 50% of the area of the largest size of the package.</li> <li>2. When the package does not contain sides large enough to contain the label. "</li> </ul>	CROSQ is proposing the development of a label design. This Figure will be included pending approval All references to Figure 1 have been removed.

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LC	4.2.3.3	1-2	ed	This clause refers to a "Figure 1": "The dimensions of the label shall keep the proportions shown in Figure 1". Figure 1 cannot be identified anywhere in the document.	Figure one should be included, or the clause should be removed.	CROSQ is proposing the development of a label design. This Figure will be included pending approval. All references to Figure 1 have been removed.
LC	4.2.6		te	The lack of a colour scheme makes this energy efficiency label less desirable in terms of its appeal to consumers. The thrust of an energy efficiency label is to allow consumers to make a choice based on established benchmarks or comparative products in the market. This label fails to do just that.	A colour scheme should be included in standard.	Based on a previous decision made at the Guyana meeting in 2017, it was agreed that no comparative label would be used. To reconfirm this decision with the entire RPT
Guyana	4.2.6				Proposed energy label design: Energy label Information on the light appearance or color temperature should be included. Optional items The average lifetime is important and should be included under the energy label.	CRI added to label. Requirement for rated life added.

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				Include definition for LED	Def from IEC 62504: LED – LED light source provided with (a) cap(s) incorporating one or more LED module(s) and possibly including one or more of the following; electrical, optical, mechanical and thermal components, interfaces and controlgear Note 1 A LED lamp may be integrated (LEDi) or semi-integrated (LEDsi lamp) or non-integrated (LEDni lamp) This standard only applies to integrated types (LEDi) (addressed in scope)	

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