



The Importance of Compliance

- If Regulations (and Standards) are not complied with the following consequences arise:
 - The aims of the Regulation(s) are frustrated:
 - Energy-efficiency performance e.g. CO2 savings not made, Users do not make the savings they expect
 - Safety of people could be compromised
 - Waste improvement not achieved
 - Users/Designers do not achieve the results they expect
 - More draconian Regulations to correct the situation
 - Un-level playing field between those that do comply and those that don't.
 - Prosecutions/fines for non-compliance

Strengthening of Market Surveillance (enforcement)

- Both the EU and National Government accept that there is a need to strengthen “Market Surveillance” = enforcement, regarding products
- Traditionally checking products was a Trading Standards responsibility and a low priority unless safety is involved.
- UK Gov’t:
 - has introduced a centralised function for testing, run by the National Measurement Office.
 - Is in process of strengthening civil sanctions e.g. power to force corrective action, raise unlimited fines (to at least neutralise financial gains from non-compliance).
- Criminal prosecutions continue to be available

Other Enforcement arrangements

- Building Regulations, emergency lighting etc
 - Building Inspectors
- WEEE and Batteries = Environment Agencies
- RoHS = National Measurement Office (NMO)

User/Client expectations

Non-compliance is bad for Users/Clients e.g

- Safety of people e.g. unsafe electrical products, emergency lighting installations that don't work effectively etc.

Safety in lighting products is paramount

- Lighting performance expectations are not met e.g. light output, light effect, life-time etc
- Cost savings are not achieved
- Through-life cost savings and performance are frustrated
- In the less likely situations of counterfeit products, Users expectations of the brand are frustrated

An old adage: if it looks too good to be true (price-wise) it probably is!

Manufacturers perspective

Reputable businesses, including manufacturers, are committed to full compliance. Non-compliant products therefore are a problem:

- Undermines confidence of Users/Clients and that affects the whole market (particularly if safety issues are involved)
- Creates an un-level playing field:
 - Compliance increases costs
 - Non-compliance can avoid costs and give a competitive edge
- Can lead to short term decisions to save capital investment rather than investment in longer term through-life savings
- Can reduce the confidence of Governments to provide incentives
- In less likely cases of counterfeit it can lead to damage to reputable brands.

Summary

- LIF on behalf of its members promotes the importance of full compliance to Regulations/Standards:
 - Fully support strengthening of Market Surveillance inc:
 - Whistle-blowing to the authorities
 - Progressively increasing communications to raise awareness of risks of non-compliance and the importance of asking the right questions
 - Guidance/checklists on the right questions
 - Support & corrective action for unintentional non-compliance (e.g. complexity of Regulation) or uncertain definitions.
- LIF also supports full compliance to lighting design specifications

Thank you