ANDRIS PIEBALGS
MEMBER OF THE EUROPEAN COMMISSION

Brussels,
AP/SS/sw 2009D0197

20 FEV. 2009

Dear Ms Lucas,

Thank you for your letter on the health concerns of light sensitive patients related to the alternatives to incandescent bulbs.

As you quote in your letter, during the preparation of the household lamps regulation, the Commission paid utmost attention to the health concerns of the light sensitive citizens.

Whilst the conclusions of the Scientific Committee for Emerging and Newly Identified Health Risks (SCENIHR) acknowledge that the ultraviolet and blue light emissions of compact fluorescent lamps can aggravate the symptoms for a number of patients, they clearly pointed to the use of alternatives that will remain on the market that avoid these consequences.

Firstly, double envelope CFLs or other similar technologies (such as transparent or translucid light bulbs fully enclosing CFLs) are one possible means to mitigate such effects. Furthermore, according to technical data available (see attached), the light spectrum of halogen bulbs (conventional or with improved efficiency) is almost identical to that of incandescent bulbs (contrarily to CFLs, which have a very different spectrum). Halogen bulbs can be used in the same lamp fittings as "traditional" bulbs and can be dimmed the same way as incandescent bulbs. Therefore we have neither a reason nor any evidence to suspect that the impact of these lamps on light sensitive people would be different from that of incandescent bulbs.

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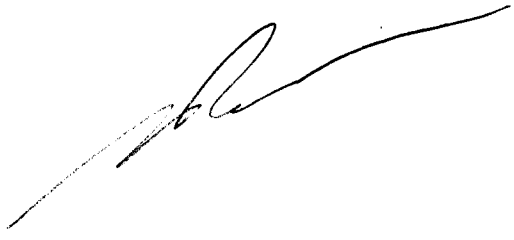
The evidence we have received so far concerning the aggravation of light sensitivity symptoms in the presence of improved halogen bulbs is anecdotal. A representative of a patient's association informed us that four of their members experienced an aggravation of their symptoms when exposed to these bulbs, while a letter from a light sensitive individual claimed that they did not trigger any negative effect in her. All in all, however, we have therefore no scientific evidence proving that the light sensitivity symptoms of some patients are aggravated by improved halogen bulbs. I should emphasise that this view was shared by all Member States representatives in the Committee who voted on the measure proposed by the Commission.

It is however clear that during the introduction of these measures careful regard will need to be had regarding its effects in practice, including on how existing and emerging products meet the needs of light sensitive EU citizens. At present, as mentioned, there is no scientific evidence that double envelope CFLs or other technologies (such as transparent double envelope halogen bulbs) do not meet the need of these citizens. I am committed, however, to keeping this under close review over the next three years, during which incandescent bulbs are to be phased out and , on the basis of further scientific evidence, to propose the additional or exceptional measures that are necessary.

I hope this is helpful. I have sent a similar letter to MEP Hassi.

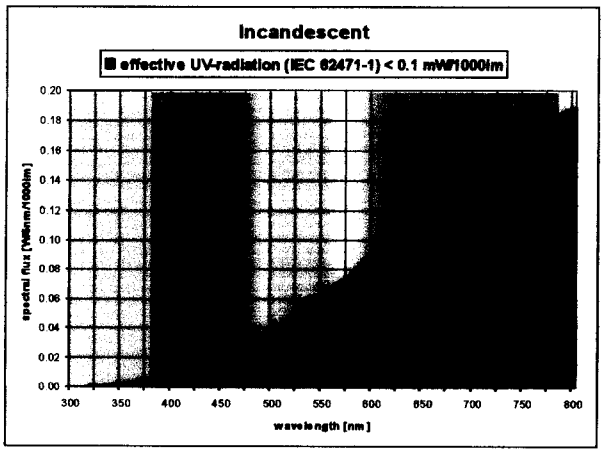
Yours sincerely,

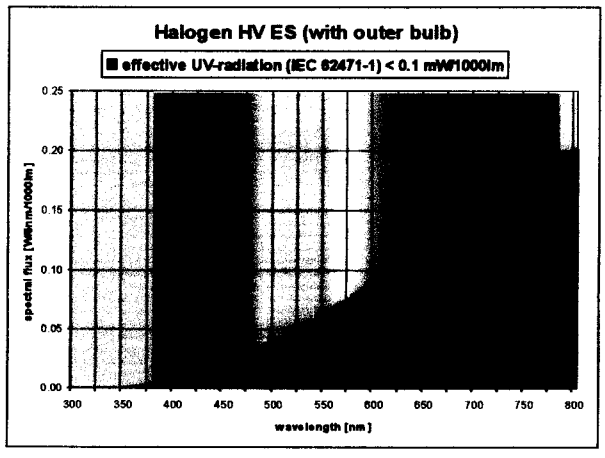


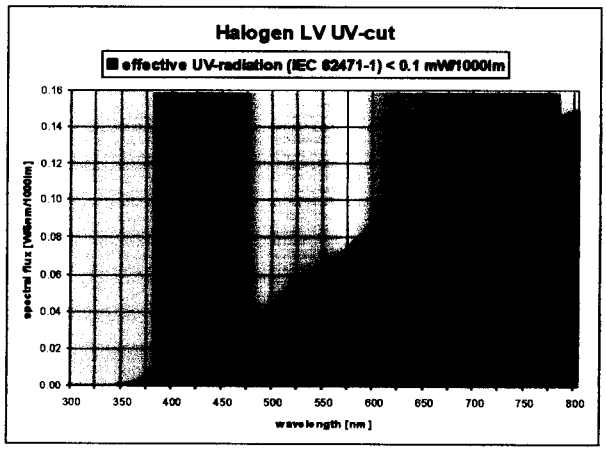
Encl.

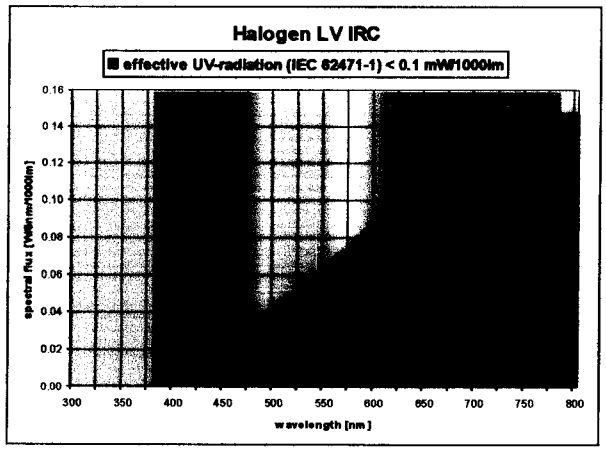
Effective UV Data of Light Sources

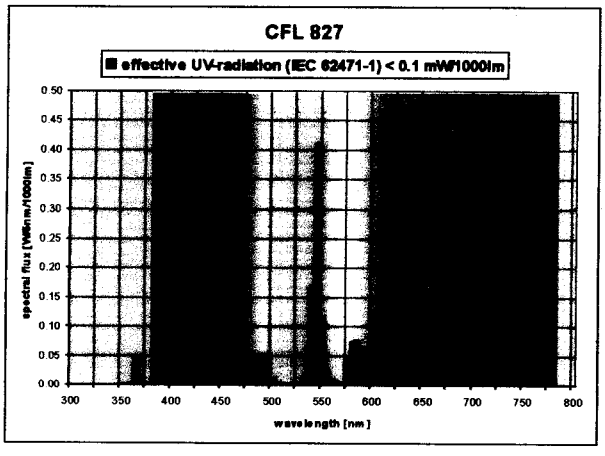
Typical effective UV-radiation of different light sources according to IEC 62471-1 (UV-Hazard):
Max. permissible dose: 30 J/m²
A threshold limit of 2 mW/klm (effective UV-radiation of a lamp) means, that the max. permissible dose is reached after 8h (working day) with an illuminance level of 500lx
Wavelength of UV light: below 400 nanometers

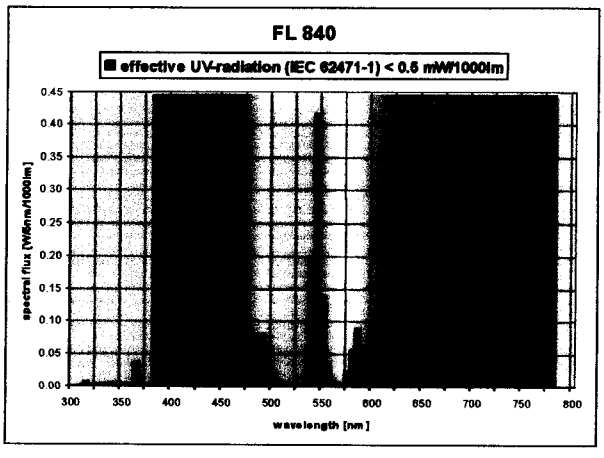












The halogen lamps presented comply with the efficiency requirements of the regulation.
Halogen HV ES = improved mains voltage halogen bulb with outer glass envelope (energy label class C)
Halogen LV UV-cut = conventional low-voltage halogen bulb with UV filter (energy label class C)
Halogen LV IRC = improved low-voltage halogen bulb with infrared coating (energy label class B)
CFL 827 = compact fluorescent lamp with colour temperature 2700K, equivalent to incandescent bulbs
FL 840 = linear fluorescent lamp with colour temperature of 4000K (cool white)