

**Call for Comments:
Proposal to submit the Quality Standards to the IEC
Lighting Global Stakeholder Outreach Memo**

May 2017

Since 2010, Lighting Global has maintained quality standards for off-grid solar products with modules smaller than approximately 10 peak watts (pico-solar products). These standards set a baseline level of quality, durability, and truth in advertising to protect consumers. We are now considering whether to submit these quality standards for adoption by the International Electrotechnical Commission (IEC). Making such a transition could provide benefits to the sector, but it also involves some drawbacks and risks. This memo outlines the pros and cons of making such a transition. **We request that you review the analysis below and provide your input and recommendations no later than Friday, June 30, 2017. Comments may be submitted to the Lighting Global Quality Assurance team through an online form at: <https://www.lightingglobal.org/work-with-us/source-the-products/>.**

Background:

Quality standards and test methods are two key components of the Lighting Global Quality Assurance (QA) framework. Note that while Lighting Global now maintains quality standards for pico-solar products and solar home system (SHS) kits, this memo focuses solely on the quality standards for pico-solar products. We are not proposing submitting the quality standards for SHS kits to the IEC at this time.

Test methods describe the process for evaluating quality, durability, and truth in advertising for pico-solar products. The test methods were adopted by the International Electrotechnical Commission (IEC) through Technical Specification IEC/TS 62257-9-5 in 2013 and revised most recently in 2016.

Quality standards describe the pass/fail thresholds for pico-solar products tested according to the test methods. The quality standards are maintained separately by Lighting Global and are publicly available here: www.lightingglobal.org/resource/lighting-global-quality-standards/.

Meeting the quality standards is a requirement for participation in Lighting Global support programs. All products that meet the quality standards are issued a Standardized Specifications Sheet and Verification Letter, and posted on the Lighting Global website. Additional programs, distributors, and governments also reference or harmonize with the Lighting Global quality standards to ensure product quality for their stakeholders or consumers.

Motivation for submitting quality standards to the IEC:

In cases where governments have expressed an interest to regulate the market for off-grid solar lighting products, Lighting Global has worked with Lighting Africa and Lighting Asia program staff to engage with governments to help ensure that they adopt test methods and standards that are harmonized with IEC/TS 62257-9-5 and the Lighting Global quality standards.

Lighting Global staff have often noted that while governments are accustomed to commonly referencing quality standards and test methods published by international standards bodies such as the IEC, they are hesitant to accept quality standards published by a program such as Lighting Global. We have had success in convincing governments in a few key markets to adopt standards for pico-solar products that are harmonized with the Lighting Global quality standards. However, we have also recently begun to see an increasing number of governments that are proposing their own modified version of these standards. IEC incorporation of the Lighting Global quality standards is therefore expected to simplify and accelerate widespread government adoption of harmonized quality standards.

The IEC is an appropriate organization to maintain the quality standards. The IEC specializes in electrical product standardisation and is one of the first places national standards bodies look for reference standards. Additionally, nearly every country in the world is affiliated with the IEC, and representatives from these countries – including stakeholders from industry, government, and other organizations - can provide input in the development of the standards provided that they join IEC through national standards organizations and participate in periodic meetings. In short, submitting the Lighting Global quality standards to the IEC is expected to:

- Increase the stature of the Lighting Global quality standards and thereby reduce risk of countries adopting divergent standards.
- Provide a formal process for obtaining input from national governments.

Concerns with submitting quality standards to the IEC:

Though submitting the quality standards to the IEC promises to improve the government adoption process, the transition comes with several concerns as outlined below:

- **Less flexible standards.** The quality standards would be slower to respond to the needs of a rapidly changing market. Whenever a needed change to the quality standards is identified, the change would need to go through the IEC review process. It generally takes at least a year to update IEC standards, and the process can be longer if the changes are significant or controversial. In general, it is reasonable to assume that the standards would be updated at most every 2-3 years under the IEC framework. For reference, we have historically made substantial updates to the Lighting Global quality standards approximately a yearly basis, with smaller revisions for clarity as needed.

- **Less flexible policies.** Lighting Global has often developed policies, such as the Family of Products policy, the Similar Products policy and the Co-branding policy that respond to needs in the market. If the standards are adopted by IEC, these policies would need to be included in the quality standards, making adjustments to these policies less malleable.
- **Unequal stakeholder influence.** Some stakeholders, such as governments, organizations, and companies that can afford to send representatives to the IEC meetings, could have a more direct voice in the development and revision of the quality standards. In contrast, those who do not have the resources to send representatives would have more limited influence. The Lighting Global QA team could play a mitigating role by continuing to gather stakeholder perspectives from a wide audience and feeding that input into the IEC process, but those privileged to be “in the room” at the IEC meetings would have a stronger voice.
- **National standards may still fall out of harmonization.** Over time a country may fall out of harmonization. This could happen either because the government decides to make changes that diverge from the IEC adopted standards (e.g. they may make changes to adapt the standards to local conditions or because suggestions that they proposed through the IEC process were not accepted). It could also happen simply because they do not take measures to update their national standards when changes are made through the IEC process. In either case, the result is that some countries may have standards that diverge from the latest version of the IEC adopted standards. This outcome has been observed for many IEC standards for mainstream appliances and lighting technologies, and it could also happen in the off-grid sector.
- **Governments that are not prepared to enforce the standards may adopt.** If submitting the quality standards to the IEC makes the national standards adoption process more straightforward, countries that had not previously considered adopting quality standards may be compelled to do so. Many of these countries may not be in a position to enforce these standards effectively or in a transparent manner. Poorly enforced national standards could undermine markets for quality products and reduce the perceived value of the QA program (if market participants look to the national standards as a guarantee that products in that market are of high quality).

Lighting Global’s goals are to encourage governments to adopt an internationally harmonized QA approach, accept product test results from qualified and accredited laboratories around the world, and to adopt measures to prevent sales of counterfeit products. Results would likely be more easily obtained if the quality standards were published by the IEC alongside the reference test methods, but this likely comes at a cost of less flexibility and a slower pace of changes to be responsive to the needs of the market, along with the other concerns described above.

We welcome your comments on whether the quality standards should be submitted to the IEC. Please provide evidence and examples to support your views where possible. Please provide feedback no later than June 30, 2017, through the online form at <https://www.lightingglobal.org/work-with-us/source-the-products/>.