LIGHTINGEUROPE
THE VOICE OF THE LIGHTING INDUSTRY

LightingEurope Questions & Answers on the Commission Regulation (EU) No. 874/2012 with regard to Energy Labelling of electrical lamps and luminaires

Version 2

8 August 2013

Questions & Answers

Lamp label

1) Does the label have to be in the exact format shown in the regulation
   Yes – the format must be as shown.

2) Does the lamp label need to be in colour?
   No – there is a monochrome option allowed in the Regulation.

3) For the Energy Label there is no white light boarder mentioned in the Regulation – this means that coloured LED, halogen, fluorescent will need to be labelled? If so the luminaires using these will also need labelling… Xmas lighting chains etc?!
   It is correct that the colour of a light is not a reason for exemption in regulation 874/2012, neither for the lamp nor the label for luminaires.

4) The monochrome label is shown in black colour, but no description or clear definition is given for the colour as it is done for the coloured label. The background colour is defined in Annex I, 1. (4) (b) *"the background shall be white for both the multicoloured and the monochrome versions of the label".* LightingEurope's understanding of the text is that the colour of the monochrome label could be also brown, red, green, etc.

LightingEurope recommends choosing black on white for best contrasts. If you decide to take any colour instead of black it is recommended to take one that provides sufficient contrast.

Label for luminaires

5) Is this a luminaire energy label?
   No – it only shows which energy class lamps are compatible with the luminaire and/or are delivered with the Luminaire. Furthermore it provides information to the end-user if the luminaire contains non replaceable LED lamps or modules.

6) From which date must the label for luminaires be used?
   The label must be used for products placed on the market from 1st March 2014 on. Luminaires already placed on the market before 1st of March 2014 are not mandatorily requested to bear the "label for luminaires" on compatibility with lamps.
   Luminaires placed on the market in-between 1st September 2013 and 1st March 2014, having in their packaging lamps already placed on the market before 1st September 2013 and having no Energy Label under 98/11/EC, are excluded from the obligation related to the label for luminaires and can be marketed as they are.
   Anyhow lamps in stocks, placed on the market before 1st September 2013 and having no Energy Label under 98/11/EC can be re-sold via luminaire manufacturer (as distributor); they can be marketed after 1st March 2014 together with the luminaire with no further obligation on lamp information and luminaire compatibility.

   Lamps produced in Europe before September 1st, 2013, exported outside EU27 and brought back to Europe prior March 1st,2014, as part of the luminaire box, can have the old label, provided the product is placed on the market in EU before export to China (underpinned by documents).

   Lamps produced in China and brought to Europe between 1st of September 2013 and 1st of March 2014 are placed on the market in EU for the first time in that period, and thus need to have the new EEL label.

7) According Article 9, 1., the provisions for the label for luminaires "shall not apply ... before 1 March 2014".Is the usage of the EEL allowed already now?
   Yes.

8) My luminaires are not sold to end users – do I need the label for luminaires?

No – if luminaires are not intended to be sold to end users they do not need the label for luminaires. Anyhow the label for luminaires can be provided with the label on the luminaire manufacturer web site (made available for the dealer/retailer); this to close any doubts in case of the luminaire is sold to the end-user even if it is not intended for. So the label can be printed and placed in the shop according to the requirements specified in the Regulation.

9) Does the label for luminaires need to be printed on the luminaire box?
No – the intent of the Commission was for the label (either as paper or as a downloadable file) to be supplied to the "dealer" (retailer) for display with the luminaire. For some luminaires e.g. own brand, where only one language is needed etc, then printing the label on the luminaire box is an option.

10) Does the label for luminaires need the supplier's name/trademark and model number if it is on the luminaire box?
Strictly according to the Regulation, yes – but where this information is presented elsewhere on the box this is considered sufficient. However an electronic complete version should also be available via website in case dealers wish to display this version.

11) Does the label for luminaires need to be in colour?
Yes – there is no monochrome option for the label for luminaires.

12) Can the luminaire logo on the label for luminaires be different from the printed example in the Regulation?
Yes – suppliers can use their own product picture, logo etc. relevant to the specific product.

13) Concerning the dimension of the label for luminaires, there is a minimum size indicated in the legislation, but if this label does not fit on our packaging: can it be minimized further?
No, there is no reduction allowed.
This is because the European Commission did not really want it on the luminaire box but to be supplied to the dealer as a label or on the website to be displayed at the point of sale in such dimension.

14) If you use a curly bracket in the label for luminaires and you do this for a luminaire with a standard lamp holder, can you then just indicate all possibilities?
You can only indicate the existing possibilities at the time of the placing on the market of the luminaire; you cannot foresee the future developments.

15) If an update will be provided of the energy classes and e.g. a class A+++ is added (and/or the class E disappears), must all labels be updated?

Yes. Same situation as lamps, but we expect there will be a transitional period defined within the relevant legislation.

16) There seems a contradiction in EU 874/2012 regarding rounding of energy consumption figures: in Annex I, the value is rounded up to nearest integer in accordance with Annex VII. However in Annex VII, the requirement is rounded to two decimal places! Which one shall we follow?
Both - The first is for the information on packaging (nearest digit).
The two decimal places for the technical documentation file (TDF).

17) Catalogues: must the manufacturers (which print the catalogues for their dealers who themselves use these catalogues in communication/ advertisement to the end-users) print an individual label close to each luminaire? Or can they refer to e.g. one catalogue page with a table displaying all required details?
Yes, they can. For supplier, the label information is mandatory only at supplier's WEB site. BECAUSE there is no minimum mandatory information required for catalogue, the information can be in textual form, as a table, or nothing at all.
This is also valid for product brochures, flyers, etc.

18) If labels have to be printed in the catalogues: only in colour or is also black+grey+white allowed?

Not Applicable. See the above reply. Please note that there is no black and white label for luminaires in the regulation because only the colour version is required.

19) Can actual catalogues, which expire after 01.03.2014, be used also after 01.03.2014?
Yes, they can be used after 1 March 2014.

20) A minimum size for the "label for luminaires" presented at the point of sale of "at least" 50 mm x 100 mm is required; is there also a requirement for the maximum size?
No.

21) May the EEL at the point of sale be part of the product label which we show beside the luminiare, provided that the minimum size of the EEL is given?
Yes.