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Electrical Safety First

The UK's electrical safety experts

British Retail Consortium

The Lighting Industry Association

Electrical Safety First

Retailer guidance on the Ecodesign for Energy-Related Products and Energy Information (Lighting Products) Regulations 2021

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Note: *This guidance is provided in good faith to help retailers in their compliance obligations under the EcoDesign regulations. Neither the BRC, ESF or LIA can be held liable for any enforcement action or penalties resulting from this guidance. If you have any questions around compliance of the regulations please contact your Primary Authority.*

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BRC on Ecodesign for Lighting for Retailers

Territorial Scope – This guidance applies to retailers in Great Britain (England, Wales and Scotland). References have been made to EU and NI as many retailers are selling in GB and Northern Ireland.

This is a guide for retailers. Separate rules apply for manufacturers.

Who do the regulations apply to?

Any retailers selling:

- (a) light sources; and
- (b) separate control gears.

And containing products (luminaire / light fixture) which includes light sources or separate control gears

Where can I read the regulations?

For Great Britain - [Ecodesign for Energy-Related Products and Energy Information \(Lighting Products\) Regulations 2021](#)

For Northern Ireland and the European Union –

For Energy Labelling - [Commission Delegated Regulation \(EU\) 2019/2015 of 11 March 2019 supplementing Regulation \(EU\) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of light sources and repealing Commission Delegated Regulation \(EU\) No 874/2012 \(Text with EEA relevance.\)](#)

For Ecodesign - [Commission Regulation \(EU\) 2019/2020 of 1 October 2019 laying down ecodesign requirements for light sources and separate control gears pursuant to Directive 2009/125/EC of the European Parliament and of the Council and repealing Commission Regulations \(EC\) No 244/2009, \(EC\) No 245/2009 and \(EU\) No 1194/2012 \(Text with EEA relevance.\)](#)

What is a light source?

- 1) an electrically operated product intended to emit light;
- 2) a non-incandescent light source, intended to be possibly tuned to emit light;
- 3) or both of the above

What is a ‘separate control gear’?

“Separate control gear” means a control gear that is not physically integrated with a light source and is placed on the market as a **separate product** or as a part of a **containing product**.

Is Integrated LED lighting as a 'light source' or a 'containing product'?

If the LED light source can be removed for verification as a light source, then the LED would count as a light source, and the whole unit as a containing product. If the LED light source cannot be removed for verification, then the whole unit would be considered as a light source

What about labelling for light sources placed on the market as independent products (i.e., not in a containing product)?

The regulation is quite clear in that only light sources placed on the market as independent products (i.e., not in a containing product) need an energy label.

Light sources placed on the market in containing products need to comply to the other information requirements (product info sheet etc) but do not need the energy label.

What is a containing product?

- (a) one or more light sources; or
- (b) separate control gears; or
- (c) both;

It can be a luminaire (light fixture), domestic appliance (e.g. freezer, cooker) etc that contains one or more light sources, separate control gears or both.

When do the regulations come in Great Britain?

1st October 2021

What are the timelines for Great Britain?

1st October 2021 - Ecodesign and Energy Labelling Regulations (Lighting Products) 2021 come into force

Each light source that is then **placed on the market** will require the energy label provided by the manufacturer at the point of sale in-store. The point of sale is the physical location where the product is displayed or offered for sale. This doesn't apply to containing products which are 'one or more light sources', separate control gears or a mix of both

1st March 2022 – From this date suppliers of containing products must:

(a) provide information on the contained light source, in accordance with paragraph 3 of Schedule 8;

(b) ensure that the technical documentation clearly identifies the contained light source, including the energy efficiency class

1st April 2023 – Existing stock (i.e. products placed on the market before 1/10/21) will need new energy labels.

What are the roles in the GB supply chain?

Suppliers¹ means a **manufacturer** established in the United Kingdom, the **authorised representative** of a manufacturer who is not established in the United Kingdom, or an **importer**, who places a product on the United Kingdom market.

Dealers² are a **retailer** or other natural or legal person who offers for sale, hire, or hire purchase, or displays products to customers or installers in the course of a commercial activity, whether or not in return for payment

In summary, as a GB retailer what must I do?

From **1st October 2021**, products placed on the market:

- 1) Each light source will require the energy label provided by the manufacturer at the point of sale instore. The point of sale is the physical location where the product is displayed or offered for sale. This **doesn't apply** to containing products which are 'one or more light sources', separate control gears or a mix of both.

From **1st March 2022**:

- 2) (a) provide information on the contained light source, in accordance with paragraph 3 of Schedule 8:

“If a light source is placed on the market as a part in a containing product, the following statement must be displayed, clearly legible, in the user manual or booklet of instructions—

“This product contains a light source of energy efficiency class <X>”,

where <X> is to be replaced by the energy efficiency class of the contained light source.

¹ Regulation 6 3 (7) https://www.legislation.gov.uk/uksi/2019/539/pdfs/ukxi_20190539_en.pdf

² Article 2 (13) <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R1369&from=EN>

(2) If the product contains more than one light source, the statement referred to in sub-paragraph (1) may be in the plural, or repeated for each light source, as appropriate”

- 3) Ensure that the technical documentation clearly identifies the contained light source, including the energy efficiency class”

- 4) If advertising the product online, you will need to display:
 - (i) the energy efficiency class;
 - (ii) and the range of energy efficiency classes available on the label

- 5) For any technical promotional material concerning a specific model of light source which describes its specific technical parameters, including material available on the internet, includes—
 - (i) the energy efficiency class of that model; and
 - (ii) the range of energy efficiency classes available

What about products that are currently on sale in Great Britain?

From April 2023 labels that comply with the ‘new’ labelling requirements will need to be on all applicable products. This means products placed on the market **before October 2021** will need ‘new’ labels from **April 2023**.

Once a product has been relabelled, it must comply with the new energy labelling requirements i.e., Updated product information sheet and technical documentation in line with the new regulations

Will any products be banned?

The following lamps cannot be placed on the market after 1st October 2021:

- Self-ballasted Compact Fluorescent retrofit lamps (caps B22, E27 etc)
- Linear Halogen R7s lamps over 2,700 lumens
- 12V Halogen reflectors lamps (MR11/GU4, MR16/GU5.3 etc)
- Lower performing LED lamps

The following lamps cannot be placed on the market after 1st September 2023:

- Linear fluorescent lamps T8 2 foot, 4 foot, 5 foot
- Mains voltage Halogen capsules with G9 cap
- 12V Halogen capsules with G4 or GY6.35 cap

What are the labelling requirements and when do they come in?

Light sources placed on the GB market from 1st October 2021 (or 1st September in Northern Ireland) must have the new energy label printed on their packaging.

Light sources placed on the market before the new Regulations come into force on 1st October 2021 may still use the old energy label (or 1st September in Northern Ireland). All old energy labels on products placed on the market (see definition below) before this date must be replaced with the new energy label in the form of a sticker within 18 months of the Regulations coming into force (April 2023)

What does 'placing on the market' mean?

Under the framework regulations, placing on the market means **the first making available of a product on the UK market.**

Guidance suggests that:

In **Great Britain**³ - When a product is placed on the market when there is an offer or an agreement, verbal or written for the transfer of the ownership, possession or any other kind of right, excluding intellectual property rights, concerning the product. It does not therefore require the physical transfer of the product.

- The product is made available for the first time on the market, for distribution, consumption or use during a commercial activity.
- The proof of placing on the market can be contained in contracts of sale, invoice, shipping documents or similar commercial documents.

In the **European Union** product is placed on the market when it is made available for the first time on the Union market⁴. The operation is reserved either for a manufacturer or an importer, i.e. the manufacturer and the importer are the only economic operators who place products on the market. When a manufacturer or an importer supplies a product to a distributor or an end-user for the first time, the operation is always labelled in legal terms as 'placing on the market'. Any subsequent operation, for instance, from a distributor to distributor or from a distributor to an end-user is defined as making available.

I sell lighting in GB and EU/NI what must I do?

The UK energy label must be supplied with products placed on the GB market and the EU energy label must be supplied with products placed on the Northern Ireland market. For these markets, the correct label must be supplied as a minimum.

³ <https://www.gov.uk/guidance/placing-manufactured-goods-on-the-market-in-great-britain>

⁴ https://ec.europa.eu/growth/content/%E2%80%98blue-guide%E2%80%99-implementation-eu-product-rules_en

Across the UK, dual labels may be supplied if manufacturers choose to do so where UK and EU energy labels contain exactly the same information in terms of grading, energy usage and testing, with the only difference being the design so as to prevent potential confusion to customers

What are the Labelling Requirements for EU and Northern Ireland?

In the EU a dual label *may* not be recognised. Retailers have reported that enforcement bodies have told them that **“The presence of the UK energy label alongside the EU label would violate the mimicking prohibition”**

Legally, the EU energy label must be supplied with products placed on the NI market, and the UK label must be supplied with products placed on the GB market. For these markets, the correct label must be supplied as a minimum.

Across the UK, dual labels may be supplied, if manufacturers choose to do so, where UK and EU labels contain exactly the same information in terms of grading, energy usage and testing with the only differences being the design so as to prevent potential confusion to customers. We recommend that manufacturers take steps to ensure the labels provided are relevant to the market in which the product will be sold and that dealers are aware of which label is relevant to their territory.

If selling in the EU and you wish to use a dual UK/EU label you should contact the relevant enforcement authority within the member state to understand their approach to enforcement.

For units of a product in shops or for online sales before and after 1 September 2021⁵:

The supplier "re-registers" the product in EPREL from 1 May 2021 according to the new regulation, namely by entering the values of the parameters included in the product information sheet into the public part of EPREL. Other relevant obligations such as supplying a label printed on the packaging and entering the content of the technical documentation will enter into application from 1 September 2021.

The dealer shall replace within 18 months after 1 September 2021, i.e. by 28 February 2023, the existing label with a sticker with the rescaled label of the same size on the packaging or attached to the package;

The supplier shall provide on request from the dealer, stickers with the rescaled label of the same size as the one which exists on the packaging or attached to the package and the related product information sheet (NB: the latter can be requested in a printed form).

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https://ec.europa.eu/info/sites/default/files/energy_climate_change_environment/standards_tools_and_labels/documents/rescaled_eu_energy_labels_and_transition_period.pdf

the dealer shall not display the rescaled labels before 1 September 2021;

the dealer shall replace the existing labels for products for online sales, with the rescaled labels within 14 working days after 1 September 2021.

For units of a product in shops or for online sales from 1 September 2021:

- the supplier registers the product in EPREL according to the new regulation;
- the supplier shall provide each light source in individual packaging with the rescaled label printed in colour or monochrome (the latter if the information on the packaging is printed in monochrome) and the related electronic product information sheet to the dealer; on request from the dealer, the supplier shall provide the printed product information sheet.
- the dealer shall in shops and for online sales display units of a model in such a way that the rescaled label or the arrow with the energy efficiency class is clearly visible on the packaging for the consumer. For online sales, the rescaled label and related product information sheet can be requested to the supplier by the dealer.

NB: The supplier may choose to supply only the rescaled label for units of models to be placed on the market from 1 July 2021 to 31 August 2021. In that case, the dealer shall not offer those units for sale before 1 September 2021. The supplier shall notify the dealer concerned of that consequence as soon as possible, including when it includes such units in its offers to dealers.

What is EPREL and will GB have an equivalent?

The European Product Database for Energy Labelling (EPREL) provides energy efficiency information to consumers and market surveillance authorities. It is a legal requirement for suppliers (manufacturers, importers or authorised representatives) of products covered by the EU Energy Labelling Regulations to upload information about their products into the database before placing these products on the **market in the EU**.

There will be no equivalent to the EPREL database for products placed on the GB market. Products placed on the NI market must continue to follow EU Energy Labelling rules, and therefore must meet EU EPREL requirements and deadlines.

Lighting products placed on the GB market from 1st October must make the relevant information (i.e., the information relevant to the EPREL database in NI and the EU) accessible to the public without charge on the supplier's website.

The QR codes should link to the specific fiche of the product. Leading to a directory/list would not meet the requirements laid out in the legislation.

What information should be supplied on the supplier's website?

For selling in GB from 1st October must make the relevant information (i.e., the information relevant to the EPREL database in NI and the EU) accessible to the public without charge on the supplier's website.

NB: GB does not have plans to provide a GB equivalent of EPREL

As above this is the information required to be on the supplier's website:

- the name or trademark, address, contact details and other legal identification of the supplier
- the model identifier
- the label in electronic format
- the energy efficiency class and other details from the label
- details from the product information sheet in electronic format.

The additional information to be made available by the supplier is as follows:

- the model identifier of all equivalent models already placed on the market
- the technical documentation: - a general description of the model, enough for it to be clearly and easily identified - references to the harmonised standards applied or other measurement standards used - specific precautions that shall be taken when the model is assembled, installed, maintained or tested - the measured technical parameters of the model - the calculations performed with the measured parameters - testing conditions as applicable

For selling in the EU. The information to be entered into the public part of the European Product Database by the supplier is as follows:

- the name or trademark, address, contact details and other legal identification of the supplier
- the model identifier
- the label in electronic format
- the energy efficiency class and other details from the label
- details from the product information sheet in electronic format.

The additional information to be entered by the supplier (for market surveillance authorities) is as follows:

- the model identifier of all equivalent models already placed on the market
- the technical documentation: - a general description of the model, enough for it to be clearly and easily identified - references to the harmonised standards applied or other measurement standards used - specific precautions that shall be taken when the model is assembled, installed, maintained or tested - the measured technical parameters of the model - the calculations performed with the measured parameters - testing conditions as applicable

What needs to be in the product information sheet?

For Great Britain : The supplier must enter the information set out in Appendix One (below) on a publicly accessible website. The information must be available free of charge and on a page of the website that does not contain any other information.

Telemarketing based distance selling must specifically inform the customer of the energy efficiency class of the product and of the range of energy efficiency classes available on the label, and that the customer can access the full label and the product information sheet by requesting a printed copy or accessing a website that is publicly available free of charge.

The size of the information sheet must be such that the sheet is clearly visible and legible.

If the product information sheet is displayed using a nested display or by referring to a publicly available website, in which case the link used for accessing the product information sheet must clearly and legibly indicate “Product information sheet”.

If a nested display is used, the product information sheet must appear on the first mouse click, mouse roll-over or tactile screen expansion on the link.

For Great Britain see Appendix 1

For European Union and Northern Ireland See Appendix 2

Can I dual label a Product Information Sheet PIS for GB and the EU/NI?

To avoid any potential enforcement challenges, you should ensure that the PIS is correctly headed for the market in which you intend to sell.

What about the size of the label?

All packaging must be least 20mm x 54mm, to accommodate the smallest version of the label, which is 20mm x 54mm. To ensure that these QR codes are readable and can be scanned, manufacturers should aim to use a lower level of error correction and make the length of the URL around 100 characters.

Where should the QR codes link to?

The QR code on the GB energy label should link directly to a publicly accessible, free website that contains the requisite information. As there is no UK equivalent for EPREL, a link to the public-facing side of EPREL, or a manufacturers' website meeting the requirements laid out in the legislation would be sufficient.

The QR codes should link to the specific fiche of the product. Leading to a directory/list would not meet the requirements laid out in the legislation.

Does the ‘right to repair’ (i.e. making spare parts and repair information available) applying to lighting products?

No.

Are Christmas Lights within the scope of the Ecodesign Lighting Requirements?

Whether or not Christmas lights are in scope is really dependent on the specific product. If the lights in question meet the technical parameters in the definition of a light source, they would be in scope. Manufacturers should check whether their product falls within the definition of a light source.

Is a 'special purpose' defined in the legislation?

'Special purpose' is not mentioned in the regulations.

Appendix One – GB Product Information Sheet

Supplier's name or trade mark

Supplier's address

Model identifier

Type of light source:			
Lighting technology used:	[HL/LFL T5 HE/LFL T5 HO/CFLni/other FL/HPS/MH/other HID/LED/OLED/mixed/other]	Non-directional or directional:	[NDLS/DLS]
Light source cap-type (or other electric interface)	[Free text]		
Mains or non-mains:	[MLS/NMLS]	Connected light source (CLS):	[yes/no]
Colour-tuneable light source:	[yes/no]	Envelope:	[no/second/non-clear]
High luminance light source:	[yes/no]		
Anti-glare shield:	[yes/no]	Dimmable:	[yes/only with specific dimmers/no]

Product parameters			
Parameter	Value	Parameter	Value
General product parameters			
Energy consumption in on-mode (kWh/1,000 h) rounded up to the nearest integer	x	Energy efficiency class	[A/B/C/D/E/F/G]
Useful luminous flux (Φ_{use}), indicating if it refers to the flux in a sphere (360°), in a wide cone (120°) or in a narrow cone (90°)	x in [sphere/wide cone/narrow cone]	Correlated colour temperature, rounded to the nearest 100K, or the range of correlated colour temperatures, rounded to the nearest 100K, that can be set	[x/x...x/x or x (or x...)]
On-mode power (P_{on}), expressed in W	x.x	Standby power (P_{sb}), expressed in W and rounded to the second decimal point	x.xx
Networked standby power (P_{net}) for CLS, expressed in W and rounded to the second decimal point	x.xx	Colour rendering index, rounded to the nearest integer, or the range of CRI-values that can be set	[x/x...x]
Outer dimensions without separate control gear, lighting control parts and non-lighting control parts, if any (millimetre)	Height	x	Spectral power distribution in the range 250 nm to 800 nm, at full-load
	Width	x	
	Depth	x	
Claim of equivalent power (see paragraph [2(1) and (2)])	[yes/-]	If yes, equivalent power (W)	x
		Chromaticity coordinates (x and y)	0.xxx 0.xxx

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Parameters for directional light sources:			
Peak luminous intensity (cd)	x	Beam angle in degrees, or the range of beam angles that can be set	[x/x...x]
Parameters for LED and OLED light sources:			
R9 colour rendering index value	x	Survival factor	x.xx
The lumen maintenance factor	x.xx		
Parameters for LED and OLED mains light sources:			
Displacement factor (cos ϕ 1)	x.xx	Colour consistency in McAdam ellipses	x
Claims that an LED light source replaces a fluorescent light source without integrated ballast of a particular wattage (see paragraph [2(3)]).	[yes/-]	If yes then replacement claim (W)	x
Flicker metric (Pst LM)	x.x	Stroboscopic effect metric (SVM)	x.x

Appendix Two – EU / NI Product Information sheet

1. Product information sheet

- 1.1. Pursuant to point 1(b) of Article 3, the supplier shall enter into the product database the information as set out in Table 3, including when the light source is a part in a containing product.

Table 3

Product information sheet

Supplier's name or trade mark:

Supplier's address ^(a):

Model identifier:

Type of light source:

Lighting technology used:	[HL/LFL T5 HE/LFL T5 HO/CFLni/other FL/HPS/MH/other HID/LED/OLED/mixed/other]	Non-directional or directional:	[NDLS/DLS]
Mains or non-mains:	[MLS/NMLS]	Connected light source (CLS):	[yes/no]
Colour-tuneable light source:	[yes/no]	Envelope:	[no/second/non-clear]
High luminance light source:	[yes/no]		
Anti-glare shield:	[yes/no]	Dimmable:	[yes/only with specific dimmers/no]

Product parameters

Parameter	Value	Parameter	Value
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General product parameters:

Energy consumption in on-mode (kWh/1 000 h)	x	Energy efficiency class	[A/B/C/D/E/F/G] ^(b)
Useful luminous flux (Φ_{use}), indicating if it refers to the flux in a sphere (360°), in a wide cone (120°) or in a narrow cone (90°)	x in [sphere/wide cone/narrow cone]	Correlated colour temperature, rounded to the nearest 100 K, or the range of correlated colour temperatures, rounded to the nearest 100 K, that can be set	[x/x...x]

On-mode power (P_{on}), expressed in W		x,x	Standby power (P_{sb}), expressed in W and rounded to the second decimal	x,xx
Networked standby power (P_{net}) for CLS, expressed in W and rounded to the second decimal		x,xx	Colour rendering index, rounded to the nearest integer, or the range of CRI-values that can be set	[x/x...x]
Outer dimensions without separate control gear, lighting control parts and non-lighting control parts, if any (millimetre)	Height	x	Spectral power distribution in the range 250 nm to 800 nm, at full-load	[graphic]
	Width	x		
	Depth	x		
Claim of equivalent power (%)		[yes/-]	If yes, equivalent power (W)	x
			Chromaticity coordinates (x and y)	0,xxx 0,xxx

Parameters for directional light sources:

Peak luminous intensity (cd)	x	Beam angle in degrees, or the range of beam angles that can be set	[x/x...x]
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Parameters for LED and OLED light sources:

R9 colour rendering index value	x	Survival factor	x,xx
the lumen maintenance factor	x,xx		

Parameters for LED and OLED mains light sources:

displacement factor ($\cos \varphi_1$)	x,xx	Colour consistency in McAdam ellipses	x
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Claims that an LED light source replaces a fluorescent light source without integrated ballast of a particular wattage.	[yes/-] ^(b)	If yes then replacement claim (W)	x
Flicker metric (Pst LM)	x,x	Stroboscopic effect metric (SVM)	x,x

^(a) changes to these items shall not be considered relevant for the purposes of point 4 of Article 4 of Regulation (EU) 2017/1369.

^(b) if the product database automatically generates the definitive content of this cell the supplier shall not enter these data.

^(c) '-': not applicable;

'yes': An equivalence claim involving the power of a replaced light source type may be given only:

- for directional light sources, if the light source type is listed in Table 4 and if the luminous flux of the light source in a 90 ° cone (Φ_{90°) is not lower than the corresponding reference luminous flux in Table 4. The reference luminous flux shall be multiplied by the correction factor in Table 5. For LED light sources, it shall be in addition multiplied by the correction factor in Table 6;
- for non-directional light sources, the claimed equivalent incandescent light source power (rounded to 1 W) shall be that corresponding in Table 7 to the luminous flux of the light source.

The intermediate values of both the luminous flux and the claimed equivalent light source power (rounded to the nearest 1 W) shall be calculated by linear interpolation between the two adjacent values.

^(d) '-': not applicable;

'yes': Claim that a LED light source replaces a fluorescent light source without integrated ballast of a particular wattage. This claim may be made only if:

- the luminous intensity in any direction around the tube axis does not deviate by more than 25 % from the average luminous intensity around the tube; and
- the luminous flux of the LED light source is not lower than the luminous flux of the fluorescent light source of the claimed wattage. The luminous flux of the fluorescent light source shall be obtained by multiplying the claimed wattage with the minimum luminous efficacy value corresponding to the fluorescent light source in Table 8; and
- the wattage of the LED light source is not higher than the wattage of the fluorescent light source it is claimed to replace. The technical documentation file shall provide the data to support such claims.