
Guide [Version 1.2] **for the furniture industry on the implementation of the EU regulations:**

- ✓ **(EU) 2019/ 2015: Energy labelling of light sources**
- ✓ **(EU) 2019/ 2020: Ecodesign requirements for light sources and separate control gears**
- ✓ **(EU) 2021/ 340: Amendment to Delegated Regulation (EU) 2019/2015**
- ✓ **(EU) 2021/ 341: Amendment to Regulation (EU) 2019/2020**

Disclaimer

EFIC is the European Furniture Industries Confederation. The EFIC Guide is our contribution to helping all EFIC members (and their company members) to understand and apply the complex afore-mentioned Regulations and to achieve uniform implementation in the market.

This guide has been prepared to the best of our knowledge and belief. However, we cannot accept liability for the relevance, accuracy or completeness of the information and material offered in this guide unless the mistake occurred intentionally or through gross negligence.

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The contents of this document constitute a recommendation only and are not binding on any party.

Brussels, July 2021

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Colour - Legend in this guide

Blue:

**Contents of the Ecodesign Regulation for light sources and separate control gears
(EU) 2019/2020/ & (EU) 2021/341**

Pink:

**Contents of the Energy Labelling Regulation for Light Sources
(EU) 2019/2015 & (EU) 2021/340**

Grey:

Content from various EU regulations and EU directives/sources according to source information.

Petrol:

EFIC - Comments/ Recommendations (see also notes in disclaimer)

Table of contents

- Definitions
- Regulation (EU) 2019/ 2020 & Art. 4 (EU) 2021/341
- Regulation (EU) 2019/ 2015 & Art.3 (EU) 2021/340
- Conclusion I Requirements for manufacturers
- Conclusion II Requirements for products
- Implementation timeline
- FAQ's Detail regulations

Eco-design and energy labelling

Regulatory areas/contents

Ecodesign - Regulation

- EU-wide rules to improve the energy efficiency of products, such as household appliances, information and communication technologies, or engineering and lighting.
 - Sets binding minimum energy efficiency requirements, through product-specific regulations proposed by the European Commission
- this has been a driving force in the transition to LEDs in recent years

Energy labelling - Regulation

- The energy labelling requirements are created within the EU framework regulation on energy labelling in a process coordinated by the European Commission.
- for 16 product groups there is a regulation for energy consumption labelling, including light sources.

Eco-design & Energy Labelling - Regulation

History/ Context

Eco-design revision

- (EU) VO 244/ 2009
- (EU) VO 245/2009
- (EU) VO 1194/2012
- incl. the respective annexes



Revision and consolidation of
of the above-mentioned EU Regulation on the basis of the
2009/125/EC "Ecodesign Directive" (Framework Directive)



(EU) 2019/ 2020 Regulation

"Ecodesign requirements for light sources and separate control gears".



(EU) 2021/ 341, Article 4

"Omnibus" - Amendment Regulation

Energy labelling Revision

- (EU) VO 874/ 2012 Regulation
- incl. the annexes



Revision and consolidation on the basis of
(EU) 2017/ 1369
(Framework Regulation for all Energy Labelling Regulations)



(EU) 2019/ 2015 Regulation

"Energy consumption labelling of light sources".



(EU) 2021/ 340, Article 3

"Omnibus" - Amendment Regulation

New! European Product Registry for Energy Labelling - database
(EPREL database) based on (EU) 2017/1369 and (EU) 2019/2015

Eco-design & energy labelling - Regulation **Main changes**

- Both regulations were published on 05 December 2019.
- Both regulations were supplemented by so-called "omnibus" amending regulations in February 2021
- Both regulations incl. the amending regulations have significant effects for industry & trade

Ecodesign - Regulation (EU) 2019/2020 & 2021/341

- **Requirements** for, among other things, **energy efficiency of light sources** -> also in "containing products".
- **Phasing out** some conventional lighting technologies due to increased energy efficiency requirements
- **Requirements** for **damage-free removal and interchangeability of light sources and separate control gears** from containing products

Entry into force:

Start of validity: from 1 September 2021

Date of application Article 7 („Circumvention"): from 25.12.2019

Energy labelling - Regulation (EU) 2019/2015 & 2021/340

- All light sources fall within the scope of Regulation (EU) 2019/2015
- **Abolition of energy labels according to (EU) 874/2012** (Article 9, (EU) 2019/2015)
- Obligation to maintain light source product data in the EPREL database (Article 3.1(b))
-> Light source label for light source suppliers

Entry into force:

Start of validity: from 1 September 2021

Date of application Article 3, 1(b): from 1 May 2021

Definitions

'Manufacturer' means the natural or legal person who manufactures products covered by this Directive and is responsible for their conformity with this Directive in view of their being placed on the market and/or put into service under the manufacturer's own name or trademark or for the manufacturer's own use. In the absence of a manufacturer as defined in the first sentence of this point or of an importer as defined in point 8, any natural or legal person who places on the market and/or puts into service products covered by this Directive shall be considered a manufacturer;

Article 2 (6) 2009/125/EC, Ecodesign Directive

From the EU Blue Guide Chapter 3.1 2016/C272/01:

- *The manufacturer is any natural or legal person who manufactures a product or has a product designed or manufactured, and places it on the market under his own name or trademark.*
- *The manufacturer is responsible for the conformity assessment of the product and is subject to a series of obligations including traceability requirements.*
- *When placing a product on the Union market, the responsibilities of a manufacturer are the same whether he is established outside the European Union or in a Member State.*
- *The manufacturer must cooperate with the competent national authorities in charge of market surveillance in case of a product presenting a risk or being non-compliant.*

Definitions

"importer" means any natural or legal person established in the Community who places a product from a third country on the Community market in the course of his business;

Article 2 (8), 2009/125/EC, Ecodesign Directive

Responsibilities of the importer

*Where the manufacturer is not established within the Community and in the absence of an authorised representative, the **importer shall have the** following obligations:*

- (a) to ensure that the product placed on the market and/or put into service complies with this Directive and the applicable implementing measures; and*
- (b) to keep and make available the EC declaration of conformity and the technical documentation.*

Article 4, 2009/125/EC, Ecodesign Directive

From the EU Blue Guide Chapter 3.3 2016/C272/01:

- *An importer is a natural or legal person established in the Union who places a product from a third country on the Union market.*
- *His obligations build on the obligations of the manufacturer.*

Definitions

'authorised representative' means any natural or legal person established in the Community who has received a written mandate from the manufacturer to perform on his behalf all or part of the obligations and formalities connected with this Directive

Article 2 (7), 2009/125/EC, Ecodesign Directive

From the EU Blue Guide Chapter 3.2 2016/C272/01:

- *Irrespective of whether he is established in the EU or not, the manufacturer may appoint an authorised representative in the Union to act on his behalf in carrying out certain tasks.*

'supplier' means a manufacturer established in the Union, the authorised representative of a manufacturer who is not established in the Union, or an importer who places a product on the Union market;

Article 2 (14); (EU) 2017/ 1369 (= Regulation on energy labelling)

Definitions

"placing on the market' means *making a product available for the first time on the Community market, with a view to its distribution or use within the Community, whether for reward or free of charge and irrespective of the selling technique;*

Article 2 (4), 2009/125/EC, Ecodesign Directive

From the EU Blue Guide Chapter 2.2 & 2.3 2016/C272/01:

- *A product is made available on the market when supplied for distribution, consumption or use on the Union market in the course of a commercial activity, whether in return for payment or free of charge.*
- *The concept of making available refers to each individual product.*
- *Such supply includes any offer for distribution, consumption or use on the Union market which could result in actual supply (e.g. an invitation to purchase, advertising campaigns).*
- *A product is placed on the market when it is made available for the first time on the Union market.*
- *Products made available on the market must comply with the applicable Union harmonisation legislation at the moment of placing on the market.*

Definitions

'energy-related product' ('product') means any good that has an impact on energy consumption during use which is placed on the market and/or put into service, and includes parts intended to be incorporated into energy-related products covered by this Directive which are placed on the market and/or put into service as individual parts for end-users and of which the environmental performance can be assessed independently;

Article 2 (1), 2009/125/EC, Ecodesign Directive

Definitions

"product information sheet" means a standard document containing information relating to a product in printed or electronic form;

Article 2 (22) (EU) 2017/ 1369 (= Regulation on energy labelling)

"technical documentation" means documentation sufficient to enable market surveillance authorities to assess the accuracy of the label and the product information sheet of a product, including test reports or similar technical evidence;

Article 2 (23) (EU) 2017/ 1369 (= Regulation on energy labelling)

Definitions

"Light source" means an electrically operated product intended to emit, or, in the case of a non-incandescent light source, intended to be possibly tuned to emit, light , *or both... [a list of technical requirements including chromaticity coordinates, luminous flux, colour rendering index follows]*.

Article 2, No.1 (EU) 2019/2015 & 2019/2020

Technical requirements:

a) *Chromaticity coordinates x and y in the range*

$$0.270 < x < 0.530 \text{ and}$$

$$2.3172 x^2 + 2.3653 x - 0.2199 < y < - 2.3172 x^2 + 2.3653 x - 0.1595;$$

(b) *a luminous flux < 500 lumen per mm² of projected light emitting surface as defined in Annex I;*

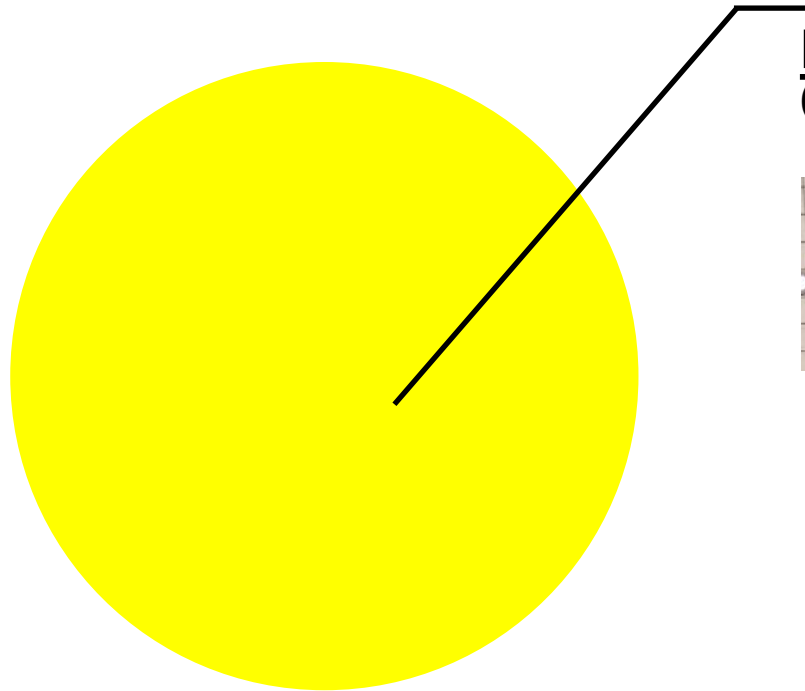
(c) *a luminous flux between 60 and 82 000 lumen;*

d) *a Colour rendering index (CRI) > 0;*

"using.... inorganic light-emitting diodes (LED) or organic light-emitting diodes (OLED)...as lighting technology."

Systematics Light source - containing product

Light source



Light source
(i.e. LED module/stripe)



Light source is **not**:

- LED dies/ chips
- LED packages

[Art.2 (EU) 2019/2015]

Note: The light sources and luminaires shown are only examples to illustrate the system and are therefore not exhaustive.

Definitions

Note: the following definition of the term "containing product" is the current definition from the two amending regulations (EU) 2021/ 340 & (EU) 2021/ 341.

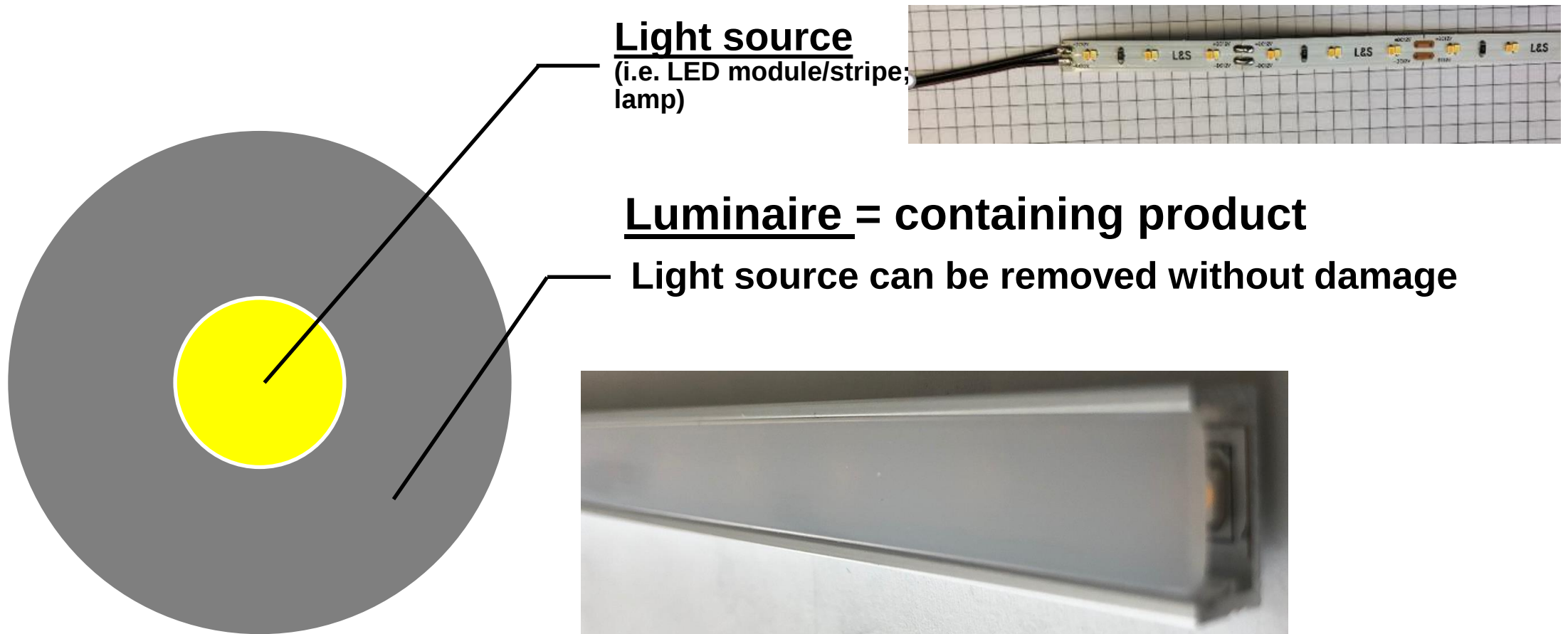
This replaced the original definition from Article 2 No.3 (EU) 2019/2015 & Article 2 No.4 (EU) 2019/2020.

"containing product" means a product containing one or more light sources, or separate control gears, or both, including, but not limited to, luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s).

Article 3 No.1 (EU) 2019/ 340 & Article 4 No.1 (EU) 2021/ 341

Systematics Light source - containing product

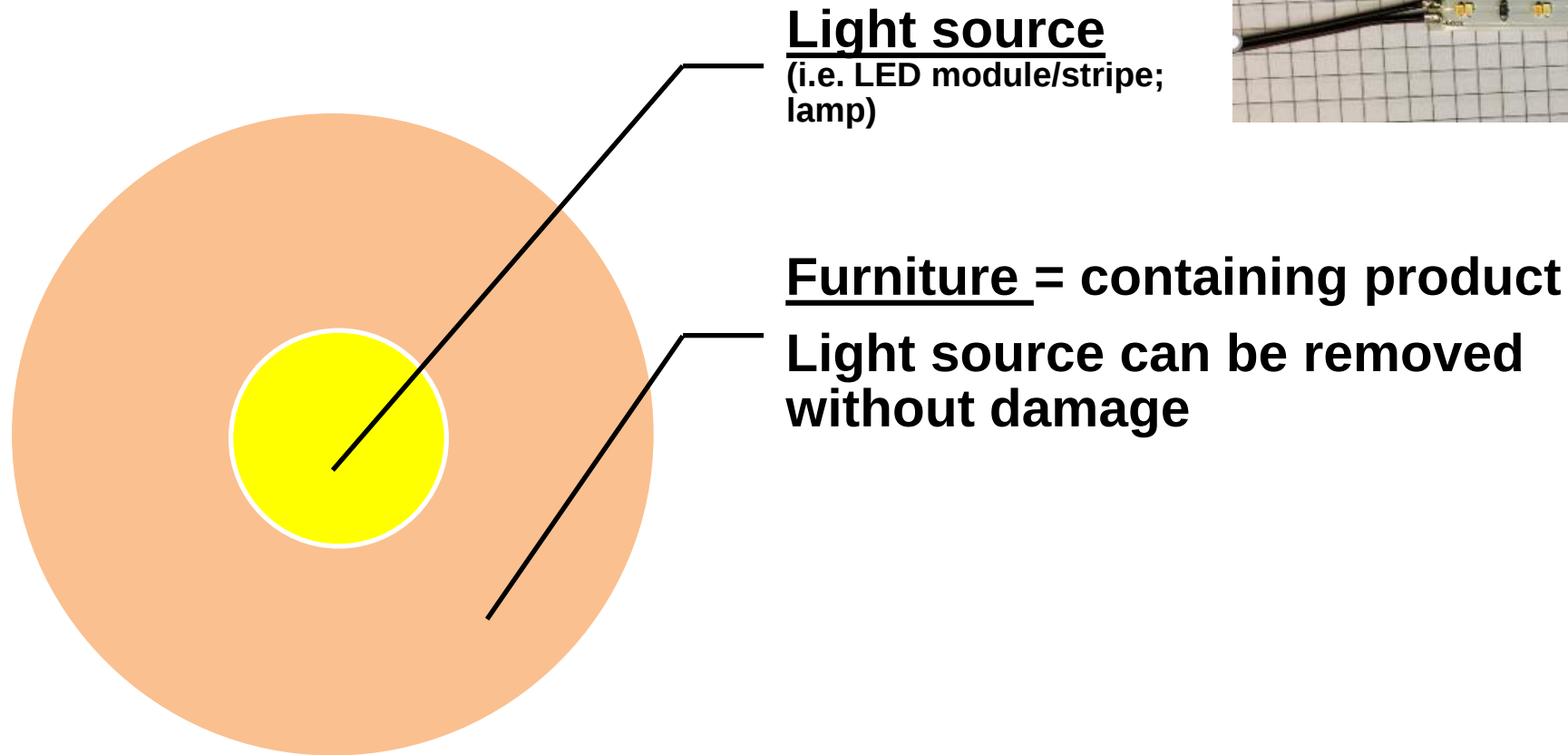
Luminaire = containing product



Note: the light sources and luminaires shown are only examples to illustrate the system and are therefore not exhaustive.

Systematics Light source - containing product

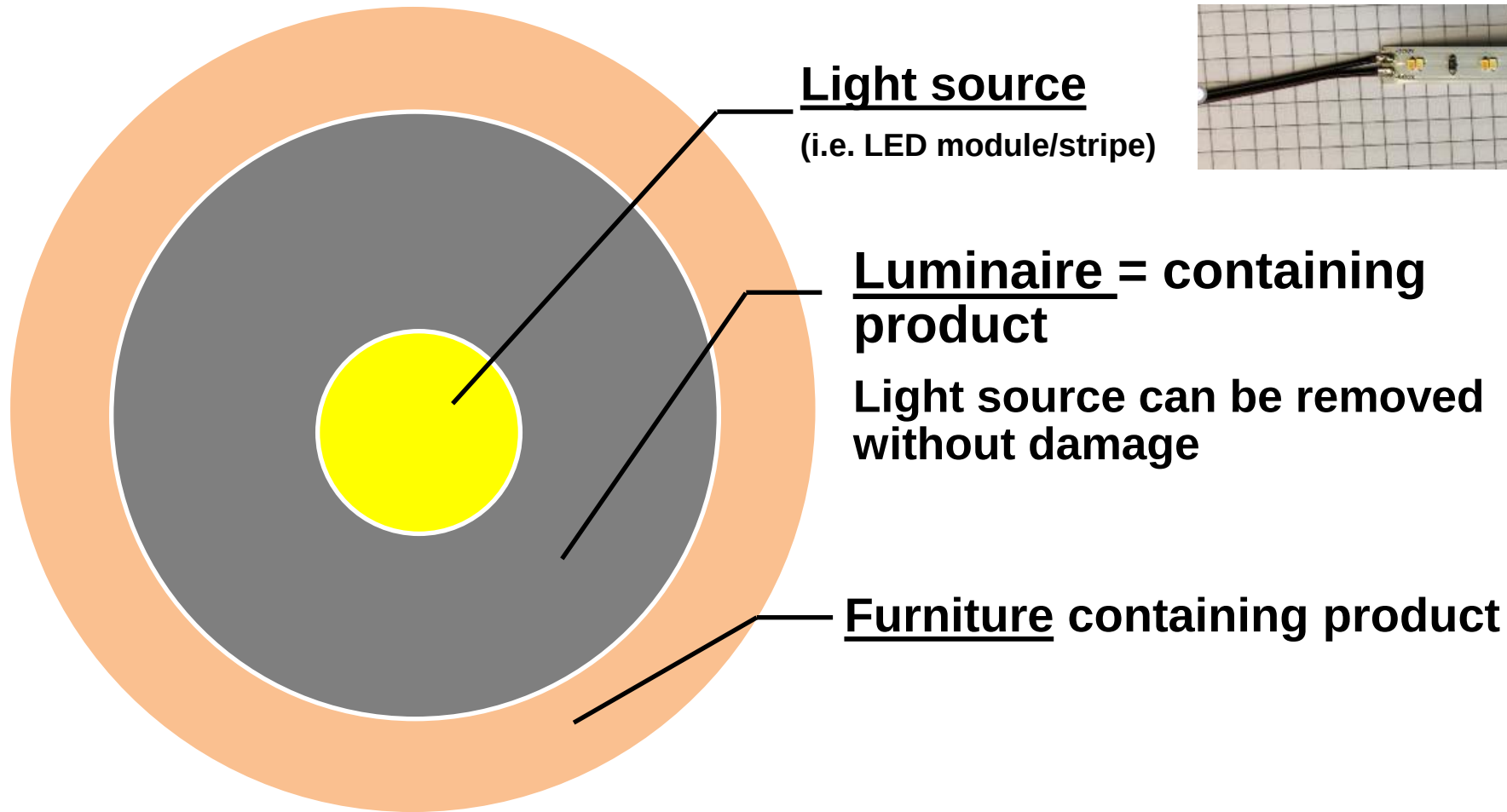
Furniture = containing product



Note: the light sources and luminaires shown are only examples to illustrate the system and are therefore not exhaustive.

Systematics Light source - containing product

containing products luminaire & furniture



Note: the light sources and luminaires shown are only examples to illustrate the system and are therefore not exhaustive.

**Regulation (EU) 2019/ 2020
& Art. 4 (EU) 2021/341 Amendment Regulation
Ecodesign requirements
for
Light sources and separate control gears**

EcoDesign Regulation (EU) 2019/ 2020

Article 1: **Subject matter and scope**

1. This Regulation establishes ecodesign requirements for the placing on the market of

a) **light sources**;

b) **separate control gears**.

The **requirements also apply to light sources and separate control gears placed on the market in a containing product**.

[Article 1 (1) (EU) 2019/2020]

Consequences of Article 1 (1)

- the **supplier of a light source** and also the supplier of a "**containing product**" (e.g. luminaire) must ensure that the light source and/or the **separate control gear** used in the product complies with all relevant EU legislation, including (EU) 2019/2020.

Note: See also **supplier** definition [Article 2 (14); (EU) 2017/1369] and **producer definition** [Article 2 (6) 2009/125/EC].

- **Ensure means:**

Case: Procurement of a **light source or a luminaire** through a manufacturer/supplier established in the EU.

- that the necessary technical documentation can be made available to the Market Surveillance upon request.
 - Ideally the light source-ID → EPREL database (→ product information sheet)

EcoDesign Regulation (EU) 2019/ 2020

Article 1: **Subject matter and scope**

1. This Regulation establishes ecodesign requirements for the placing on the market of

*a) **light sources**;*

*b) **separate control gears**.*

*The **requirements** also apply to **light sources** and **separate control gears** placed on the market **in a containing product**.*

[Article 1 (1) (EU) 2019/2020]

Consequences of Article 1 (1)

➤ **Ensure means:**

Case: **Procurement by furniture manufacturer directly from a third country (outside EU)**

- product information sheet and compliance proof of corresponding test documents from accredited testing institutes are available and can be made available to the market surveillance authority upon request
 - by supplier = (first-) distributor in the EU internal market
 - Data maintenance and labelling obligations (including maintenance of the EPREL database --> results from (EU) 2019/2015 Article 1 (1))

EcoDesign Regulation (EU) 2019/ 2020

Article 1: Subject matter and scope

Article 1: Subject matter and scope

- ✓ **Light sources:**
 - LED and OLED lamps and modules
 - Halogen - Lamps
 - LFL = (Linear fluorescent lamps); T2; T5; T8; T9; T12
 - CLFi (Compact fluorescent integral); CFLni lamps
- ✓ separate control gear
- ✓ **The requirements also apply to light sources and separate control gear placed on the market in a "containing product"!**

Exemptions according to Annex III



Exemptions according to Annex III:

Exemptions relevant for the furniture sector regarding the requirements of the Regulation

- ✓ 2-sided capped T5 fluorescent light sources with $P \leq 13W$ (Annex III, No.2 a)
- ✓ Light sources and separate control gears in battery-powered products (Annex III, No. 2c)
- ✓ RGB light sources with defined wavelengths (Annex III, No.3 n)
 - Information requirements according to Annex II No.3 e) = indication of the L70B50 lifetime is required

Colour	Wavelength	Minimum colour content
Red	610nm - 670nm	95%
Green	520nm - 570nm	65%
Blue	440nm - 490nm	90%

Eco-design & Energy Labelling Regulation

Definition "containing product"

"containing product":

*... means a product containing one or more light sources, or separate control gears, or both, including, but not limited to, luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), **furniture (shelves, mirrors, display cabinets) containing light source(s).***

(EU) 2021/ 341, Art.4 No.1 and (EU) 2021/340 Art.3 No.1 **!Amendment!** of (EU) 2019/2020, Article 2 (4) and (EU) 2019/2015, Article 2 (3)

EFIC - Commentary:

Consequences of this definition:

- a piece of furniture/ part of furniture is always a "containing product" if it contains a light source
 - Defined obligations for a supplier of a "containing product"
 - ✓ Article 4, (EU) 2019/2020 & Article 4 No.2 (EU) 2021/341: Information on the replacement and removal of light sources and separate control gears without permanent damage to light source & "containing product" in technical documentation
 - ✓ Article 3 (2), (EU) 2019/2015: Information on the contained light sources according to Annex V point 2
 - + Dismantling information for market surveillance in technical documentation on how light sources can be removed for inspection without permanent damage

Eco-Design Regulation (EU) 2019/2020

Requirements for replacement/removal of light sources/ separate control gears

Note: Consolidated version from Article 4(1) (EU) 2019/2020 & Article 4 (2) (EU) 2021/341.

*Manufacturers, importers or authorised representatives of containing products shall **ensure** that light sources and separate control gears can be **replaced with the use of common available tools and without permanent damage to the containing product, unless a technical justification related to the functionality of the containing product is provided in the technical documentation explaining why the replacement of light sources and separate control gears is not appropriate.***
[Article 4 (1) [(EU) 2019/2020]

*Manufacturers, importers or authorised representatives of manufacturers of containing products shall ensure that **light sources** and separate control gears can be removed **without permanently damage for verification purposes** by market surveillance authorities. The technical documentation shall provide instructions on how to do this.* [Article 4 (2) (EU) 2021/341]

EFIC - Commentary:

○ Requirement:

1. Replaceability of the **light source** or the separate **control gear** without permanent **damage to the containing product.**
2. **Removability** of the light source and the separate control gear for the purpose of inspection by market surveillance without permanent **damage to the light source.**

Recommendation: The **damage-free interchangeability of light sources and luminaires** in furniture **should or must** be a focus of product development for various reasons.

>> Ecodesign regulation (EU) 2019/2020 mandatory !

>> Customer viewpoint → currently „should“ → but be in preparation "EU legislation Right to repair" is expected to become compulsory

>> Circular Economy upcoming/ existing requirements (reparability, replaceability)

>> From the point of view of the WEEE-directive, easy separability is a prerequisite for furniture not to become E-appliances.

Eco-design: Circular-Economy

Requirements for information on the removal/replaceability of light sources/ separate control gears

EFIC - Commentary: Consequences of (EU) 2019/ 2020 Article 4 & Article 4(2) 2021/341

Supporting standards / information
[Source: LightingEurope]

Article 4 (1): requires that all "containing products" must allow the **removal of light sources and separate control gear** without permanent damage. Information on the removal of light sources/ separate control gears without their permanent damage to both the light source and the containing product must be available in the **technical documentation**

Article 4 (2): prescribes

that **information** on the **interchangeability** or **non-interchangeability** of the **light source** and the **separate control gears**

- must be available on a **free accessible website**
- must be indicated on the packaging of the "containing product" (only for products sold directly to end consumers) in the form of **pictograms**. Source pictograms [.jpg/.eps]:

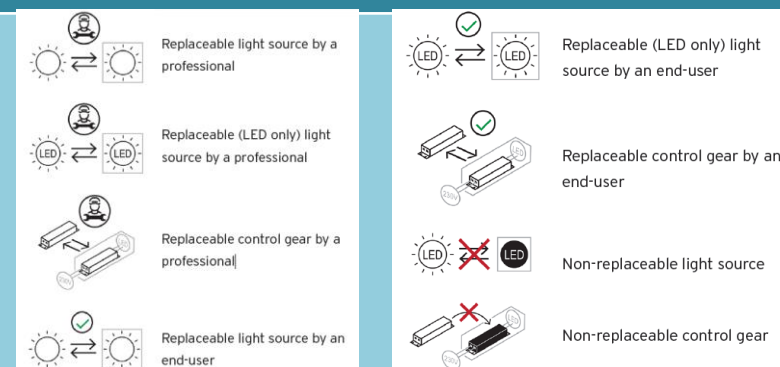
<https://www.lightingeurope.org/guidelines>

Article 4 (3): prescribes

- that a separability (removability) of the light sources and separate control gear from the "containing product" at the "end of life" must be ensured
- the **instructions for disassembling the light source** from the containing product must be available on a **free accessible website**

See decision diagram

Page 28

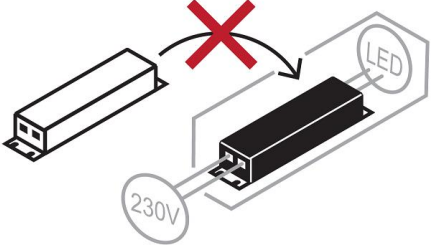
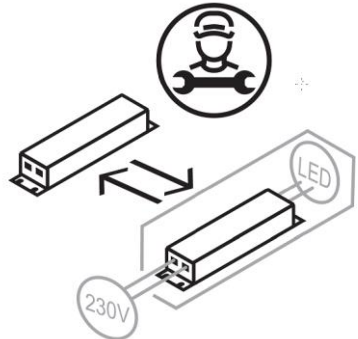
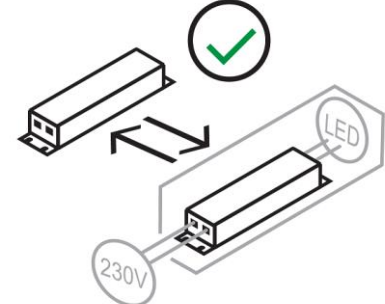
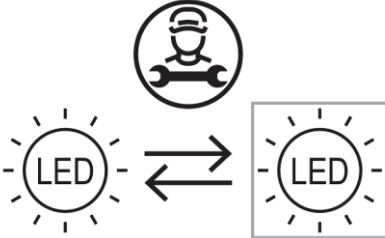
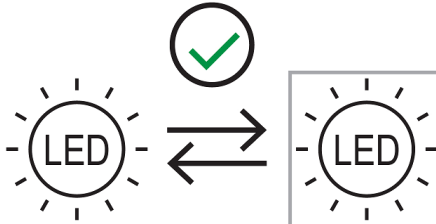


See decision diagram

Page 28

Eco-design: Circular-Economy

Pictograms - Meaning

	Replaceability: NO	Replaceability: YES „Qualified personnel“	Replaceability: YES "End customer"
Separate Control gear			
Light source Note: also available for non-LED-based light sources.			

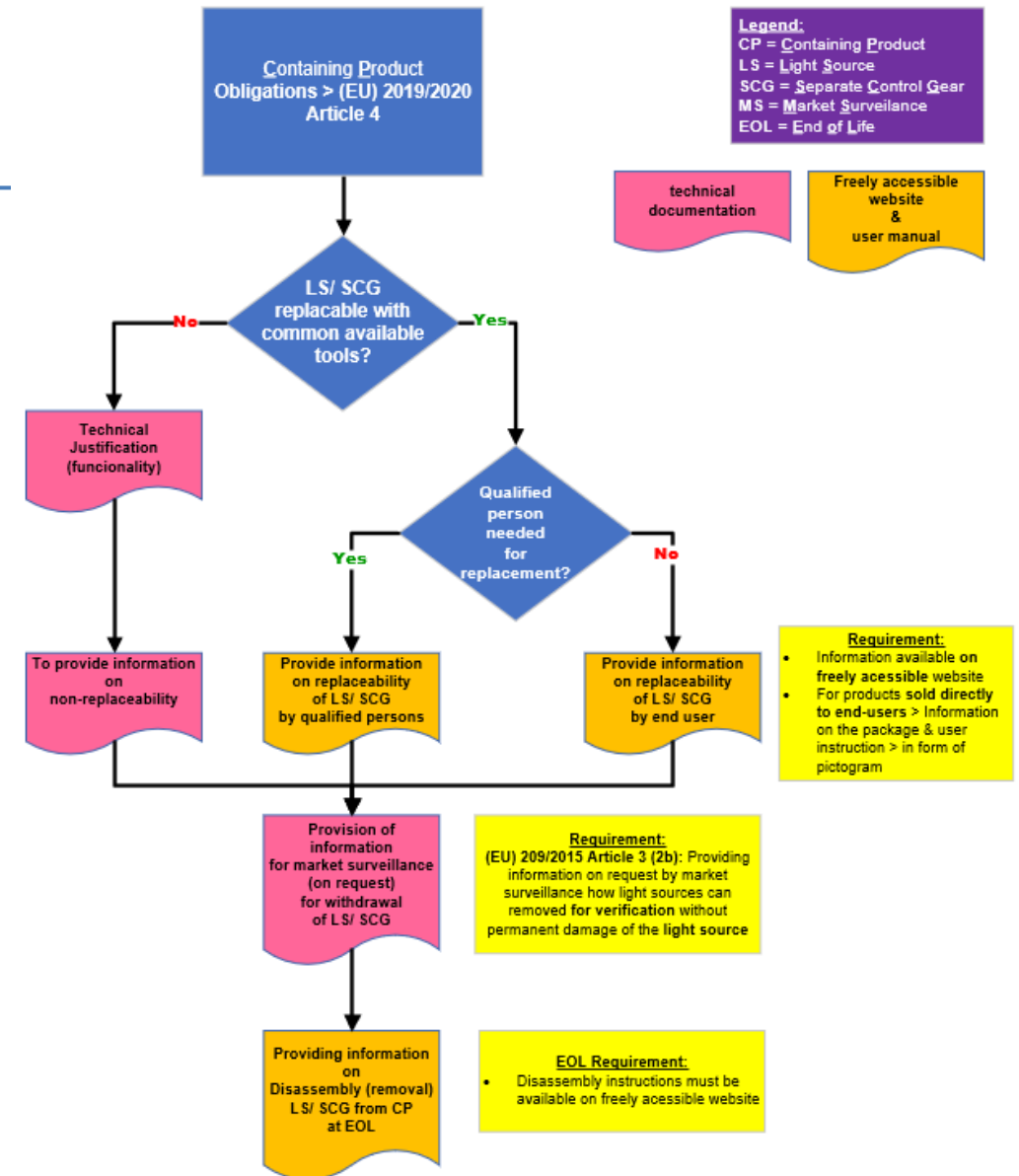
Source pictograms [. jpg/. eps]: <https://www.lightingeurope.org/guidelines>

Eco-Design Regulation:

Requirements for the removal of light sources/ separate control gears

Information - Obligations based on Article 4 (EU) 2019/2020 & Art. 4 No.2 (EU) 2021/ 341

- manufacturer of a containing product (e.g. luminaire or furniture) defines:
 - whether replaceability is given if no technical justification (only functional reasons admitted!)
 - If so, it must also be defined whether the replacement is to be carried out "by qualified personnel only" or also "by end users".
- Appropriate information in the disassembly instructions
- **Note:** "Disassembly instructions" must describe the steps of disassembly (removal) of the light source or luminaire in corresponding work steps. As a rule, it is not sufficient to read "assembly instructions" only "backwards"!



Eco-Design Regulation (EU) 2019/2020

Expiry dates for products (Annex II, Table 1)

EFIC - Commentary:

The new efficiency requirements of the EcoDesign requirements mean in practice that certain products are gradually withdrawn from the market

Product - Type	Expiry date
CFLi (fluorescent compact fluorescent lamps) with integrated control gear ("i")	1 September 2021
Halogen R7s > 2,700 lm	1 September 2021
Fluorescent lamps T2 and T12	1 September 2021
Halogen low voltage MR11, MR16, AR111	1 September 2021
Fluorescent lamps T8 61cm, 122cm, 152 cm	1 September 2023
Halogen lamps with G9, G4 and GY6.35	1 September 2023

Eco-Design Regulation (EU) 2019/2020

Annex II: Efficiency/functionality requirements for light sources and separate control gears

- **for all light sources:**
 - Colour rendering index CRI
- **for (O)LED:**
 - Displacement factor
 - Lumen maintenance factor
 - Survival factor
 - Colour consistency
 - "Flicker" IEC TR 61547-1
 - Stroboscopic effect;
 - Testing according to IEC TR 61358
- **for separate control gears** [Annex II, No.1 a)].
 - **i.e.** Power consumption in the
 - Idle mode P_{no}
 - Standby mode P_{sb}
 - networked standby mode of a networked light source P_{net}

$\leq 0,5W$

EFIC - Commentary:

Procurement of LED light sources/ luminaires and control gear

- Focus on technical requirements in procurement
- Requirements also apply to light sources/ separate control gears in containing products [Article 1, (2) (EU) 2019/2020].

Ecodesign Regulation (EU) 2019/2020

Annex II: Ecodesign - Requirements for light sources

➤ Obligations Light source supplier

- **Energy efficiency requirements** [Annex II, point 1]
- **Functional requirements** [Annex II, point 2]
- **Information requirements** [Annex II, point 3]
 - a) *Information to be displayed on the light source itself. For all light sources except CTLS, LFL, CFLni, other FL and HID, the value and physical unit of the **useful luminous flux (lm)** and correlated **colour temperature (K)** shall be displayed in a legible font on the surface if, after the inclusion of safety-related information, there is sufficient space available for it without unduly obstructing the light emission.*
*For directional light sources **the beam angle (°)** shall also be indicated.*
If there is room for only two values, the useful luminous flux and the correlated colour temperature shall be displayed. If there is room for only one value, the useful luminous flux must be displayed.

EFIC - Commentary:

In certain cases (see flowchart page 35) furniture manufacturers may have duties of a light source supplier. In this case, the above-mentioned "information requirements" must be observed in particular with regard to the **information to be affixed directly to the light source**.

This shall be without prejudice to the other obligations set out in Annex II.

**Delegated Regulation (EU) 2019/ 2015
& Art.3 (EU) 2021/340 Amendment Regulation
Energy consumption labelling
for
Light sources**

Energy labelling (EU) 2019/ 2015

Article 1: **Subject matter and scope**

*(1) This Regulation establishes requirements for the labelling of, and the provision of supplementary product information on, light sources with or without integrated control gear. The **requirements also apply to light sources placed on the market in a containing product***

[Article 1 (1), (EU) 2019/2015]

Consequences of Article 1 (1) sentence 2

- *If the light source or the luminaire (containing product) is procured **in the EU**:*
 - *the supplier of the light source has obligations according to **Article 3 (1)***
 - *e.g. maintenance of the EPREL database (product information sheet, label)*
 - *Paragraphs a) - i)*
 - *the supplier of the containing product (luminaire, furniture) has obligations according to **Article 3 (2)***
 - *technical documentation with indication of the included light source + energy efficiency class*
 - *Text: "This product contains a light source of energy efficiency class <X>" ["X" = respective energy efficiency class A-G].*
- *If the light source or the luminaire (containing product) is procured **from a third country** (outside the EU):*
 - *Supplier of the light source and also of the containing product have the obligations according to Art. 3 (1) & (2) > see above.*
 - *Among other things, also maintenance of the EPREL database for the light source contained in the "containing product" (**no label !**)*

Energy labelling (EU) 2019/2015

Article 2: Definitions

"containing product":

*... means a product containing one or more light sources, or separate control gears, or both, including, but not limited to, luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), **furniture (shelves, mirrors, display cabinets) containing light source(s).***

(EU) 2021/ 341, Art.4 No.1 and (EU) 2021/340 Art.3 No.1 !Amendment! of (EU) 2019/2020, Article 2 (4) and (EU) 2019/2015, Article 2 (3)

➤ as furniture can always be seen as a "containing product" the following no longer apply:

- the **maintenance of the EPREL database** and other obligations under Article 3 (1) (EU) 2019/2015
- the **labelling obligation for furniture with lighting**
 - Omit labels according to (EU) 874/2012! (since 25.Dec. 2019)

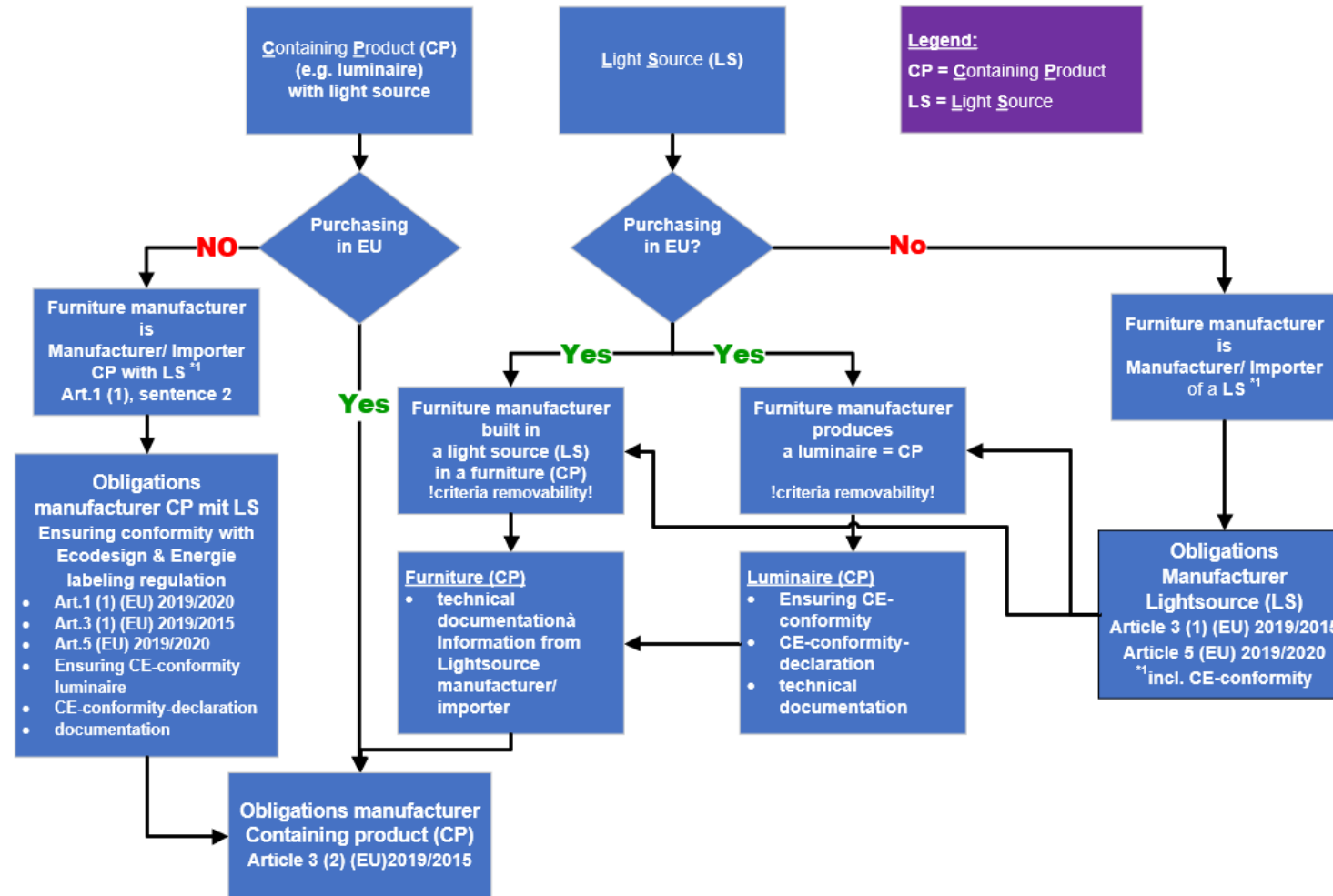
unless:

- the **furniture manufacturer** imports the "actual" **light sources** (e.g. LED strip) or a **luminaire (containing product)** from a third country is thus "importer" and "manufacturer".

s. Flow chart page 35

(EU) 2019/2020 & (EU) 2019/ 2015

Obligations of furniture manufacturers > Possible constellations



Energy consumption labelling

Obligations of the suppliers

Article 3 (2) (EU) 2019/ 2015

Suppliers of containing products shall:

- a) *provide information on the contained light source(s), as specified in **point 2 of Annex V**;*
- b) *Upon request by **market surveillance authorities**, provide information on **how light sources can be removed** for verification without permanent damage to the light source.*

(EU) 2019/ 2015, Annex V, point 2

Information to be displayed in the documentation of a containing product:

*„If a light source is placed on the market as a part in a containing product, the technical documentation for the containing product shall clearly identify **the contained light source(s)**, including the **energy efficiency class**.*

*If a light source is placed on the market as a part in a containing product, the following text shall be clearly legible, in the **user manual** or **booklet of instructions**:*

"This product contains a light source of energy efficiency class <X>".

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

If the product contains more than one light source, the sentence can be in the plural, or repeated per light source".

Obligations of furniture manufacturers:

1. Text **"..energy efficiency class <X>"** as specified ! in **operating/assembly instructions**
2. **Light sources - identification** by depositing the "model identifier" + **energy efficiency class <X>** in **technical documentation**
3. Information on **"Removability of light sources"** for market surveillance in user manual/ assembly instructions

→ Recommendation:

1. Text **"..energy efficiency class <X>" additionally in type list/product description (> because there it makes sense for the end customer and market surveillance and is also required from the point of view of competition law, as the customer must be able to compare!)**

→ see also Article 3 (2) (EU)2019/2015

Energy consumption labelling

Obligations of light sources - suppliers (only for information)

Article 3 (1) (EU) 2019/ 2015, Obligations of suppliers

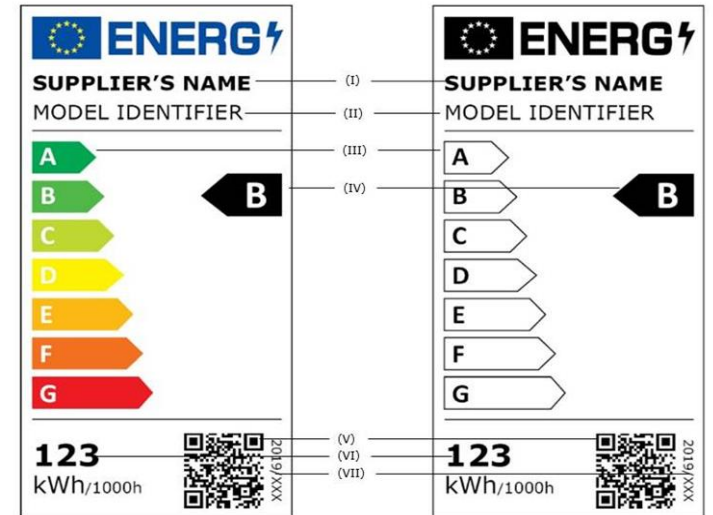
Suppliers of light sources shall ensure that

- a) each light source which is placed on the market as an independent product (i.e. not in a containing product) and in packaging, is supplied with a label, printed on the packaging, in the format as set out in Annex III*
- b) the **parameters of the product information sheet**, as set out in Annex V, are entered into the **product database**;*
- c) If **specifically requested** by the dealer, the product information sheet shall be made available in printed form*
- d) the **content of the technical documentation**, as set out in Annex VI, is entered into the **product database**;*
- e) **any visually advertisement** for a specific model of light source model contains the **energy efficiency class of that model** and the range of energy efficiency classes available on the label, in accordance with Annex VII and Annex VIII;*
- f) any **technical promotional material** concerning a specific model of light source, including technical promotional material on the internet, which describes its specific technical parameters, includes the energy efficiency class of that model and the range of energy efficiency classes available on the label, in accordance with Annex VII;*
- g) an **electronic label** in the format and containing the information, as set out in Annex III, is made available to dealers for **each light source model***
- h) an **electronic product information sheet**, as set out in Annex V, is made available to dealers for **each light source model**;*
- i) **upon request from dealers and in accordance with Article 4(e) printed labels** to rescale products are provided as a sticker, of the same size as the one which already exists*

Energy consumption labelling

Novelties labels light sources (only for information)

- **Main innovation:** a new label from **A to G** instead of the previous A++ to D classes
 - New label with new dimension (72 x 36mm) compared to the "old label" (75x36mm)
- **all light sources according to the Ecodesign Regulation** fall within the scope of energy labelling **as of 1 September 2021**
- Exceptions (only exceptions that may be relevant to furniture):
 - Light sources in battery-powered products
 - Displays, marine equipment
- The transition period to replace the old label with the new one is up to 18 months for stationary retailers (until 1 March 2023) but **not for suppliers!**
- There are **no "transition periods"** in "online trade"



Link to the webinar "EPREL-DB" by LightingEurope & EU Commission:
<https://lightingeurope.us10.list-manage.com/track/click?u=a6aa30c3ceb8d1dec2ea0ac0c&id=12bbd48808&e=53ccf44a03>

Conclusion I

Obligations of manufacturers > Labelling - Information

➤ Furniture with lighting is always a containing product

❖ **No more labels for furniture with lighting!** [Article 9 (EU)2019/2015]

❖ **In user manuals/ assembly instructions:**

1. the following **text must be printed legibly in the exact wording:**

"This product contains a light source of energy efficiency class < X>".

(with < X> = energy efficiency class of the respective light source)

ii. If the furniture contains several light sources, the sentence can be used in the plural.

iii. **Recommendation:** In addition to the user manual/ assembly instructions, this text should also be included in the sales documentation.

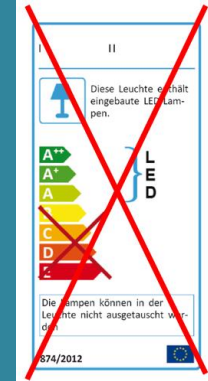
→ this is where this information is of most use to customers and market surveillance and is also required from a competition law perspective! The positioning of this text should -if possible- ideally take place in the vicinity of the corresponding luminaires.

2. **Information on „replaceability of light source YES/ NO" Recommendation: via pictograms!**

i. for products sold directly to end customers on packaging and in user manual/ assembly instructions in the form of pictograms! [Article 4(2) 2019/2020]

ii. Recommendation: Note regarding replaceability by "qualified personnel" and/or "end user"
Note: Can be covered by proposed pictograms.

3. **Information on point 2 on free accessible website** [Article 4 (2) (EU)2019/2020] Note: This does not mean the EPREL-DB!



Conclusion I

Obligations of the manufacturer > Documentation

❖ in technical documentation Light sources - identification by

1. Deposit of the "model identifier" + energy efficiency class <X> in technical documentation (e.g. master data of the article)
 - a. alternative to model identifier: light source type (e.g. LED; T5,..); energy efficiency class,
2. Information on damage-free "removal possibility of the light source" for market surveillance
3. Information on point 2 on free accessible website [Article 4 (2) (EU) 2019/2020].

❖ on a free accessible website [Article 4 (2) (EU) 2019/2020].

1. Instructions for disassembly/ removal or replacement (if possible)
& pictograms replaceability "YES/ NO" (by qualified personnel or end customer)

I. **Note:** There must be disassembly instructions in which the steps for disassembly are described

Recommendation: Link via QR code in the user manual/ assembly instructions.

Note: The free accessible website does not mean the EPREL-DB!

Conclusion I

Obligations of the manufacturer > Documentation

→ ATTENTION:

I. For import of light sources from third countries by furniture manufacturers

Obligations of light source manufacturers

1. **Conformity of the light sources with the requirements of the "Ecodesign Regulation"** Articles 1 & 5 (EU)2019/2020
2. **Obligations under Article 3 (1) a) to i)**
 - i. **i.e. documentation of the technical data of the light source** Article 3 (1) b) (EU) 2019/2015
 - ii. **maintenance of the EPREL database, among others** Article 3 (1) d) (EU) 2019/2015
 - [Link to a webinar by "LightingEurope/ EU Commission" on the EPREL database](#)
3. **labelling of the light source (affixed to the product) according to Annex II (3) a) > useful luminous flux [lm], colour temperature [K], half-value angle [°].**
4. **CE conformity assessment (EMC; RoHS) + CE marking** 2014/35/EU; 2014/30/EU

II. When importing luminaires from third countries by furniture manufacturers **Obligations**

1. **see obligations under I.**
2. **Luminaire/ light source: CE conformity assessment (EMC; RoHS) + CE marking** 2014/35/EU; 2014/30/EU

The previously mentioned obligations as a manufacturer of a "containing product" with regard to information and documentation also apply.

Note: further necessary markings according to relevant legal requirements/ standards are obligatory

Conclusion II

Requirements for products > Product development!

➤ Requirement for the products:

1. Replaceability of the **light source** or the separate **control gear** without permanent damage to the containing product.
2. **Removability** of the light source and the separate control gear for the purpose of inspection without permanent damage to the light source.

❖ The damage-free replaceability of light sources^{*1} & luminaires^{*3,4} and separate control gears in furniture **should or must be** a focus of product development for various reasons:

1. Ecodesign Directive for light sources and separate control gears (EU) 2019/2020 → Obligation!
2. Customer viewpoint → currently „Should“ → but in preparation "EU legislation Right to repair" is expected to become obligatory.
3. Circular Economy existing & upcoming requirements (e.g. reparability, replaceability; "Right to Repair" as an ongoing legislative initiative at EU level)
4. From the point of view of the WEEE-directive, easy separability is a prerequisite for furniture not to become E-appliances → cost-relevant point

Implementation timeline according to the Ecodesign Regulation for light sources and separate control gears (EU) 2019/2020 & (EU) 2021/ 341 Energy Labelling Regulation for Light Sources (EU) 2019/2015 & (EU) 2021/340

- since 25 December 2019, the energy consumption labels according to (EU) 874/2012 are no longer required.
- from 01 May 2021 until 01 September 2021, the information and parameters of the product information sheet shall be entered into the EPREL database by the manufacturer/ importer of light sources [Article 10 (EU) 2019/2015].
 - from 01 September 2021, light sources may only be placed on the market by the manufacturer/ importer with the new energy consumption label [Article 3 No. 2 c) (EU) 2021/340].
- **From 01 September 2021, the** requirements of the above-mentioned Energy Consumption Labelling Regulation [Article 10 (EU) 2019/2015] shall apply.
- **From 01 September 2021, the** requirements of the above-mentioned Ecodesign Regulation apply [Article 11 (EU) 2019/2020].
- From 01 September 2021 until 01 March 2023, stationary retailers have time to sell or relabel light sources with "old" energy consumption labels according to (EU) 874/2012. After 1 March 2023, only the new energy consumption labels will be permitted. Online trade without transition period > i.e. already from 01.09.2021
- From **01 March 2022, all manufacturers/ importers of luminaires** must provide information on the light sources contained in the luminaires [Article 3, No.4 (EU) 2021/340].
- From 1 September 2023, linear T8 fluorescent lamps and most types of halogen lamps that are currently still permitted may no longer be placed on the market. [(EU) 2019/2020 Annex II, Table 1].

FAQ's

Detail - Regulations

1) Refrigerators with (interior) lighting

- **Question:** For the lighting in the refrigerator, does the sentence "This product contains a light source of energy efficiency class <X>" have to be included in the operating instructions of the refrigerator?
energy efficiency class <X>" in the operating instructions of the refrigerator?
- **Answer from BAM** (Federal Institute for Materials Research and Testing > commissioned body for Germany): **Yes**

2) Import of "containing products" from a third country (outside EU)

- **Status:** Import of finished furniture (incl. lighting) furniture = "containing product".
- **Questions:**
 1. Does the importer have to maintain the EPREL database instead of the light source manufacturer in the EU country in order to be able to generate a product information sheet?
 2. Does the product need to be labelled ?
 3. Does the product information sheet have to be available?
- **Answers:**
 1. **Yes**, also all obligations under Article 3 (1) (EU) 2019/2015
 2. **No**, because the furniture is a "containing product". However, the information (given text) about the energy efficiency class <X> of the contained light sources must be given
 3. **Yes**, at the request of the market surveillance authority
Furthermore, the importer is responsible for compliance with the requirements according to GPSD (> ProdSG: manufacturer; identification marking, CE declaration of conformity; CE marking, necessary test certificates) and according to the Ecodesign Regulation (EU) 2019/2020 & (EU) 2021/341 see also flowchart page 35.

FAQ's

Detail - Regulations

3) Offering "optional lighting" separate item/ packaging

- **State of affairs:** (Furniture) products for which the lighting can be ordered **optionally from** the retailer. Lighting is not offered individually, but is always supplied in combination with furniture via retailers. Assumption: Procurement in EU
- **Questions:**
 1. Does the packaging that optionally accompanies the product on delivery have to be labelled?
 2. Would the energy label for such a product have to be made available on the furniture supplier's website
 3. Does the product information sheet have to be available?
- **Answers:**
 1. First of all, it depends on the content of the box. Is it a light source within the meaning of the regulation (e.g. LED strip) or is it a containing product within the meaning of the regulation (e.g. LED strip in a profile with diffusing lens ideally light source removable without damage)?
 - i. **Light source inside:** The packaging must contain an energy consumption label, ideally attached to the outside. This would be required in any case if the lighting were offered for sale over the counter (which is not the case here).
 - ii. **"containing product"** (e.g. light source in a profile with diffusing lens) no energy consumption label
 2. **No**, because in the present case (B2B); **Yes**, in the case of a direct sale to end customers (B2C)
 3. on request of the market surveillance, only information about the light source (ideally light source ID and energy efficiency class) must be available at the supplier of the "containing product". Everything else (product information sheet) must be available from the light source supplier or then in the EPREL database.

FAQ's

Detail - Regulations

4) Regulations for "existing programmes/products

- **State of affairs:**
 - A furniture programme/product has been on the market for a long time and contains light sources
- **Question:**
 1. Do the obligations under the Ecodesign Ordinance and the Energy Consumption Labelling Ordinance have to be implemented after 01.09.2021?
- **Response:**
 1. Yes, existing furniture programmes/products must also comply with the requirements after 01.09.2021. The requirements apply to every product that is placed on the market.
Note: see also definition "Placing on the market".

FAQ's

Detail - Regulations

5) Light sources in battery-powered products?

- **State of affairs:**
 - Light source in a battery-powered product
- **Question:**
 1. Do the obligations under the Ecodesign Ordinance and the Energy Consumption Labelling Ordinance have to be implemented?
- **Response:**
 1. NO, both the Ecodesign Regulation [Annex III No.2 c)] and the Energy Labelling Regulation [Annex IV No. 2 c)] exclude light sources in battery-powered products.

FAQ's

Detail - Regulations

6) CE marking and EU declaration of conformity

- **State of affairs:**

- CE-marking and EU declaration of conformity is required on the basis of
 - for light sources (nominal voltage: < 50V AC; < 75V DC): EMC-directive [2014/30/EU]; RoHS [2011/65/EU].
 - for luminaires (rated voltage: < 50V AC; < 75V DC): EMC-directive [2014/30/EU]; RoHS [2011/65/EU].
 - for separate control gears (nominal voltage primary: 230V AC): LVD [2014/35/EU]; EMC-RL [2014/30/EU]; RoHS [2011/65/EU].
 - for radio control: + RED-directive [2014/35/EU]

- **Question:**

1. Is a CE marking and EU declaration of conformity mandatory when using a system with LEDs?

- **Response:**

1. Yes, see above under state of affairs

Case 1: Procurement of light source and separate control gear in the EU

Obligation of the supplier of the light source and control gear

in case of changes to the product (e.g. soldering on power supply line) Obligation of the company soldering on)

Case 2: Procurement by furniture manufacturer directly from third country

Obligation of the furniture manufacturer

FAQ's

Detail - Regulations

7) Question: Does the new energy label have to be shown and explained in the operating instructions?

- Answer: No, your furniture is a "containing product"! therefore only the mandatory sentence "This product containsthe energy efficiency class <X>".

8) Question: What exactly do we have to document in the operating instructions?

- Light source type e.g. LED? **No**, (but in the technical documentation)
- Energy efficiency class (with the named text)? **Yes, mandatory!** (also in the technical documentation)
- Light source identifier (of the EPREL database)? **No** (but in the technical documentation)

FAQ's

Detail - Regulations

9) What must be included in the user manual/ assembly instructions:

- the product information sheet of the light source? No
- the EU conformity assessment/declaration?
 - If the question was aimed at compliance with the ecodesign requirements? No
 - also an EU declaration of conformity with regard to compliance with EMC, RoHS of a light source or luminaire or LVD, EMC; RoHS of the separate control gear does not have to be enclosed, but must be part of the "technical documentation" (which must be available in the company).
 - however, CE marking of the above-mentioned components must be carried out!

FAQ's

Detail - Regulations

10) Lumen/ Kelvin/ beam angle marking on the light source

▪ Question:

1. We are building a mirror cabinet (containing product) with 8 light sources, 2x4 different light sources each. Then each light source must be marked separately with the lumen/ Kelvin/ angle?
2. Does this mean that each length must have its own article no. or can these be grouped together, if so, what spacing is permitted?

▪ Response:

1. **Yes**, but depending on the space available, the useful luminous flux [lm] and colour temperature [K], or at least useful luminous flux [lm], are also sufficient.
2. **Yes, there is** currently no regulation in the ordinance that makes it possible to combine this required information in "clusters". The question of permitted distances is therefore obsolete.
Whether a separate article number is required for this is not regulated in the ordinance and is therefore a topic of internal control.

Relevant sources > Link list

➤ EU regulations

- [\(EU\) 2019/2015](#): Energy labelling of light sources
- [\(EU\) 2021/340](#): Omnibus Amendment Regulation > inter alia to (EU) 2019/2015
- [\(EU\) 2019/2020](#): Ecodesign requirements for light sources and separate control gears
- [\(EU\) 2021/341](#): Omnibus Amendment Regulation > inter alia to (EU) 2019/2020

➤ Guides

- [2016/C272/01](#): Guide for the implementation of the EU product legislation 2016
("Blue Guide")
- [Pictograms "LightingEurope"](#)
- [Webinar "EPREL-DB" LightingEurope & EU Commission](#)

Queries/ Information



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