

Supporting Online Marketplaces in complying with energy labelling for lighting products and the implementation of Regulation EU 2019/2015

Key messages

The variety of lighting applications and a complex regulatory framework make it difficult for non-experts to understand which lighting products must bear an energy label, and which products are not permitted to. LightingEurope has prepared this simple handout to clarify the issue. More specifically:

Light sources, which include LED modules and **lamps** (commonly known as bulbs), **per regulation EU 2019/2015 must be registered in EPREL and must have an energy label as part of the online sale information** (apart from a very small percentage of light sources exempted for specific applications or not capable of generating enough white light). This label **must be displayed** by the manufacturer/importer, distributor/dealer/trader/seller and online marketplaces must enable that.

Luminaires provided with a light source, which are referred in the regulation as containing products, **do not have**, on the other hand, **an energy label**, (with the exception of a very small percentage of those for which the light source is not removable for verification purposes). Displaying a label for them is misleading and illegal. Thus, **displaying a luminaire energy label should be conditional and is dependent on the manufacturer's decision** and the field should be populated only if the trader/manufacturer supplies the information.

Issue

LightingEurope members have reported difficulties when interacting with online marketplaces and online retailers when placing luminaires for sale on online platforms.

The most common issues are related to:

1. Manufacturer/importer obligations: applicability of Regulation (EU) 2019/2015 to luminaires, i.e. whether a manufacturer or importer offering a luminaire for online sales can provide an energy label as part of their online marketplace offer.

2. The duty of distributors and online marketplaces to display an energy label for luminaires as part of online marketplace offer.

Below we explain the correct way to deal with luminaires and energy labelling.

Regulation (EU) 2019/2015

The regulation does not provide any definition of luminaire. The products in the scope of the regulation are **light sources** and **containing products**. They are defined as follows in Article 2:

- (1) '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, with all of the following optical characteristics:
 - (a) chromaticity coordinates x and y in the range: $0,270 < x < 0,530$; 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 mm^2 of projected light-emitting surface area as defined in Annex I;
 - (c) a luminous flux between 60 and 82 000 lumen;
 - (d) a colour rendering index (CRI) > 0 ;

Light sources do not include:

- (c) products containing light source(s) from which these light source(s) can be removed for verification;
- (3) "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);

The typical form factors of a light source are light bulbs and (seldomly sold to consumers) LED modules.

Requirement for manufacturers and importers (suppliers) of light sources¹

- (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 of (EU) 2019/2015;
- (b) The values of the parameters included in the product information sheet, as set out in Annex V of (EU) 2019/2015, are entered into the public part of the product database; [[EPREL - European Product Registry for Energy Labelling](#)]

Requirement for distributors/dealers/traders of light sources²

- (a) At the point of sale, each light source which is not in a containing product bears the label provided by suppliers, with the label or the energy class being displayed

¹ Art. 3(1) of (EU)2019/2015

² Art. 4 of (EU)2019/2015

in such a way as to be clearly visible, in accordance with Annex III of (EU) 2019/2015;
(b) in the event of distance selling, the label and product information sheet are provided, in accordance with Annexes VII and VIII of (EU) 2019/2015.

Requirement for online marketplaces enabling sale of light sources³

Where a hosting service provider as referred to in Article 14 of Directive 2000/31/EC allows the selling of light sources through its internet site, the service provider shall enable the showing of the electronic label and electronic product information sheet provided by the dealer on the display mechanism in accordance with the provisions of Annex VIII of (EU) 2019/2015 and shall inform the dealer of the obligation to display them.

Annex VIII of (EU) 2019/2015 provides the details on where and how the label and product information sheet shall be displayed.

No energy label for luminaires/products containing light sources⁴

The luminaire energy label that existed before 2019 was deprecated by (EU) 2019/2015 and shall not be used. Regulation (EU) 2019/2015 does not define any energy labels for containing products, including luminaires. Therefore, providing an energy label for a luminaire (package or online offer) is forbidden as per the energy labelling framework regulation (EU) 2017/1369, article 6(d).

For products not covered by delegated acts, the supplier and the dealer shall not supply or display labels which mimic the labels provided for under this Regulation and the relevant delegated acts;

The above thus prevents both inventing an energy label for the containing product and placing the energy label of the contained light source on the (online offer for the) containing product.

As per Regulation (EU) 2019/2015 there is only a valid case, depending on the luminaire's construction and under the manufacturer's sole responsibility, where a luminaire may display an energy label. The case relates to a luminaire from which the light source cannot be removed for verification purposes (whereby removal for verification purposes allows for damaging the luminaire in the process as long as the light source stays intact; removal for verification purposes is thus not to be confused with light source replaceability by consumer).

Such a product does not fulfil the definition of a containing product and is treated as a light source for the purpose of ecodesign compliance. It must then be registered in EPREL, indicating the performance parameters and meeting the performance requirements of EU 2019/2020 as measured for the entire luminaire (and not the light source inside), and display the resulting energy label.

Displaying a luminaire energy label should be conditional and is dependent on the manufacturer's decision and the field should be populated only if the trader/manufacturer supplies the information.

³ Art. 5 of (EU)2019/2015

⁴ Art. 6(d) of (EU) 2017/1369

Summary

Light sources, which include LED modules and **lamps** (commonly known as bulbs), **per regulation EU 2019/2015 must be registered in EPREL and must have an energy label as part of the online sale information** (apart from a very small percentage of light sources exempted for specific applications or not capable of generating enough white light). This label **must be displayed** by the manufacturer/importer, distributor/dealer/trader/seller and online marketplaces must enable that.

Luminaires provided with a light source, which are referred in the regulation as containing products, **do not have**, on the other hand, **an energy label**, (with the exception of a very small percentage of those for which the light source is not removable for verification purposes). Displaying a label for them is misleading and illegal. Thus, **displaying a luminaire energy label should be conditional and is dependent on the manufacturer's decision** and the field should be populated only if the trader/manufacturer supplies the information.

Contact

For further information on this topic, please contact Elena Scaroni, Secretary General, through elena.scaroni@lightingeurope.org, or Alfredo Menghini, Policy Officer, through alfredo.menghini@lightingeurope.org

LightingEurope is the voice of the lighting industry, based in Brussels and representing 32 companies and national associations. Together these members account for over 1,000 European companies, a majority of which are small or medium-sized. They represent a total European workforce of over 80,000 people and an annual turnover exceeding 15 billion euro. LightingEurope is committed to promoting efficient lighting that benefits human comfort, safety and wellbeing, and the environment. LightingEurope advocates a positive business and regulatory environment to foster fair competition and growth for the European lighting industry. More information is available at www.lightingeurope.org.