

Comments on Equivalent Models in the EPREL database

Introduction

With this paper, LightingEurope would like to illustrate our member's interpretation of the Energy Labelling Framework Regulation requirements concerning equivalent models as discussed during the EPREL Consultation Forums in 2019. The same issue has also been highlighted in the stakeholder meeting with DG ENER on 12 February 2020 and in subsequent talks on EPREL between LightingEurope and DG ENER during 2020.

Market surveillance authorities from a Member State have recently made remarks on the registration of two lighting products from one of our members, referring to the issue of equivalent models. For this reason, we believe that clarification is needed on this point.

This paper expresses the LightingEurope interpretation of the applicable legislation and our contribution to clarify the issue. It is addressed to EU policymakers and market surveillance authorities and by no means represents an official interpretation of the requirements set by the legislation itself.

Our comments

LightingEurope's interpretation

We believe that Regulation (EU) 2017/1369 on the energy labelling framework does not require to register in the EPREL Database a model as equivalent just because the model itself fulfils the definition of Art. 2.

According to LightingEurope's interpretation, this choice remains therefore with the supplier who is responsible for the registration. **Only the supplier can decide**, considering the overall characteristics of a product, **if a model results equivalent to the base one and to declare this model as equivalent.**

We think that this interpretation is consistent with the wording of the Regulation (EU) 2017/1369. We believe that this does not constitute any loophole either, as suppliers will decide to upload information on base and equivalent models or instead information on every single model, with specific technical documentation and test results.

This interpretation is also based on the experience of Testing Houses all over Europe on test certifications based on Performance and Safety Standards for lighting products.

Why our interpretation?

Models that may seem equivalent considering only the technical characteristics relevant for the label and the same product information sheet can be very, very different in reality.

Such automatic equivalence, without a reasoned consideration behind, may lead to non-comparable equivalent models as illustrated by the examples below. In some of these 'equivalent' examples the lamps differ from 5 cm to 1.20 meter in length, or one model is a mains voltage lamp while the other requires an external ballast to function (see annex for more information).

Such products have different technical and performance characteristics (could be even different technologies), which makes it necessary to apply an individual model classification for testing and verification.

Background for our interpretation

This interpretation is based on several sources:

- **Both Commission's EPREL guidelines for model registration** (File Upload and UI) mention that suppliers can (see Annex II) create a new model as equivalent to another one (see page 10 of UI guide) or refer to a model (see page 15 of File Upload guide), **where this reference is only needed for base model** having equivalences declared within the same transaction. If you do not create or declare any equivalent models, you have only base models and you must upload the technical documentation for each single model.
- **Regulation (EU) 2017/1369, Annex I(3)** requires that, among the information to be entered in the compliance part of the database by the supplier, the supplier has to declare the model identifier of all equivalent models already placed on the market; this requires that, if the supplier has registered a model as equivalent, this has to be declared. This does not require the supplier to declare a model as an equivalent to another if he believes that these models, due to their general characteristics and functionalities, are not equivalent. Equivalence declaration cannot be done automatically but must be properly assessed.

Annex I

Examples of potential Equivalent Models EPREL

Example 1.	[lm]	EEL class	[kWh]	Lamp picture	Technology	Application
MASTER TL-D 90	2970	A	43		TL Fluorescent	Office & Industry
MASTERC CDM-Tm Mini	2970	A	43		Compact HID	Retail lighting
Example 2.						
Tomado High Lumen E27	3000	A	45		High Lumen Compact Fluorescent Integrated	Retail lighting
MASTER PL-T	3000	A	45		Compact Fluorescent Non-integrated (requiring external ballast)	Street / indoor lighting
Example 3.						
EconomyTwister CDL	1200	A	20		Compact Fluorescent Integrated	Home
MASTER TL-D Eco	1200	A	20		TL Fluorescent	Office & Industry
Example 4.						
MASTER Stairway E27	850	A	15		Compact Fluorescent Integrated	Hospitality / Industry
MASTER PL-T	850	A	15		Compact Fluorescent Non-integrated (requiring external ballast)	Indoor lighting

Annex II

EPREL User Guide – Model Registration (p. 10)

4.4. New equivalent model

The supplier can create a new model as equivalent to another one. To create a new one the user will click the button “New” and then “Equivalent”. The system shows a list of pre-entered “base models” (both “Completed” and “Published”) from the same supplier organisation. Only a “base model” can be selected when creating the “equivalent model”. Other equivalent models cannot be used as reference (“star” relation topology).

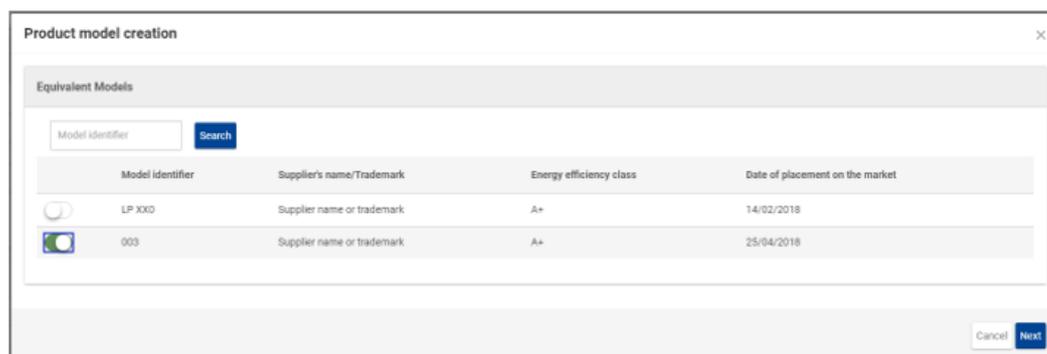


Figure 4 New equivalent model

EPREL User Guide – File Upload (p. 15)

Equivalent Models			
<i>Base Model</i>			
REFERENCE			Reference to the product model. This reference is only needed for base model having equivalences declared within the same transaction (same zip file). This reference can then be used when declaring an equivalent model to target the base model. This reference is not persisted in the EPREL Database. Models, that are equivalent If this is informed, this model becomes “Base model”.
<i>Equivalent Model (making reference to a model REFERENCE in this XML)</i>			
<i>If this tag is informed, the section “Label/Product Information Sheet data” will not be necessary, values will be taken from the “base model”.</i>			

Contact

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LightingEurope is the voice of the lighting industry, based in Brussels and representing 30 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 100,000 people and an annual turnover exceeding 20 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.