

LIGHTING –

New SLR and ELR guidelines

In December 2019, the European Commission published the new Single Lighting Regulation (SLR) (i.e. Ecodesign Regulation for lighting) and the Energy Labelling Regulation (ELR). Whereas the SLR sets product-specific performance requirements for energy-using and energy-related products, the ELR lists the labelling requirements for selling those products on the EU market.

While these changes have huge implications for lighting manufacturers and distributors, they also have huge significance for consultants when specifying lighting solutions. This article was prepared by LightingEurope as a guidance document for its members on SLR and ELR but contains information that could also prove invaluable for consultants.

The result of nearly five years of negotiations, the SLR and ELR will apply from 1 September 2021, except for the removal of labelling requirements for luminaires which started from 25 December 2019. Both will have significant consequences for the lighting industry.

ELR applies to light sources only, while

SLR applies to light sources and separate control gear, with luminaires only being indirectly addressed. However, luminaire manufacturers must review the rules and ensure that their products comply with the new requirements.

To ensure you have all the information you need to comply with these complex regulations, LightingEurope has put together the following summary.

Ecodesign – improving product performance

The Ecodesign Regulation (SLR) establishes EU-wide rules for improving product performance, including that of lighting. It pertains to light sources and separate control gear and to light sources and separate control gears within a containing product.

Similar to the ELR, the SLR defines a light source to include lamps, modules, and even some containing products. A containing product is defined as a product containing one or more light source(s), or separate control gears, or both. Examples of containing products are luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s) and furniture (shelves, mirrors, display cabinets) containing light source(s). According to the SLR, the supplier of a containing product must ensure that the light source and separate control gear used in their containing product complies with all relevant EU legislation – including the SLR.

As the SLR sets minimum mandatory requirements for energy efficiency, any product that fails to meet these requirements will be phased out, starting with products like CFL lamps in 2021 and followed by products like T8 fluorescent lamps in 2023. As this phase-

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out happens, these light sources will need to be replaced with new energy-efficient light sources and lighting installations will have to be renovated.

The new SLR introduces several elements of the circular economy. For example, manufacturers, importers and authorised representatives of containing products must ensure that light sources and separate control gears can be easily replaced using commonly-available tools and without permanently damaging the containing product. Furthermore, they need to provide instructions on how to “extract” a light source, which can be explained using drawings, text, images, etc. If a technical justification related to the functioning of the containing product is provided in the technical documentation explaining why the removal for verification of light sources and separate control gear is not appropriate, then the entire (containing) product has to satisfy all the performance/information requirements.

The SLR requires that manufacturers, importers and authorised representatives of containing products provide information about the replaceability or non-replaceability of light sources and control gears by end-users or qualified persons. This information must be made available on both the packaging and in the user instructions, typically in the form of a pictogram. However, these symbols are not to be used on containing products that are a light source (e.g., luminaires).

LightingEurope has also developed pictograms covering the required information on replaceability/non-replaceability, which are included in the guidelines.

Summarising the SLR

- All containing products must have replaceable light sources and control gear (unless there is a technical explanation for not doing so);
- If the light source and control gear of the containing product cannot be removed for verification, then the containing product is considered a light source for all requirements of the SLR and the corresponding energy labelling requirements;
- Information on the replaceability or non-replaceability of the light source and the control gear must be displayed on the packaging of the containing product.

ELR – empowerment through information

The ELR pertains to light sources and includes lamps, modules and even some containing products (there is no energy label requirement for luminaires), and requires manufacturers to provide more information about its energy performance and functional parameters.

One of the ELR’s main objectives is to empower the customer/end-user by giving them the information they need to choose energy efficient products.

So, first and foremost, the Regulation requires that specific product information be provided via a consumer-friendly energy label.

The ELR also requires that the manufacturer

provides information on the product’s class, along with relevant technical information.

As the Regulation applies to the entire supply chain, there are different requirements for what information must be provided by whom. For example, suppliers (i.e. manufacturers, authorised representatives and importers) must place an energy label on the packaging of all independently packaged light sources. Furthermore, upon the request of a dealer, the supplier has to provide a printed version of the product information sheet (the information must always be available electronically).

Dealers (i.e. retailers), on the other hand, must follow their own set of requirements. For instance, the energy label needs to be visibly displayed on a light source’s packaging and, in the case of distant selling, the label and product information sheet must also be provided. Advertisements promoting a product have to include not only that product’s energy efficiency class, but also the range of energy efficiency classes listed on the label.

The Regulation also includes specific obligations for online retailers and hosting platforms. For example, online retailers must include the energy label and the product information sheet on the website where the light source is sold.

By specifying the size that an energy label must be (72x36 mm or 54x20 mm), the ELR also regulates the minimum size that a package can be (i.e. no smaller than 54x20mm). All labels created based on the old regulation must be replaced with new labels before 1 March 2023. If one intends to cover an old label with a new label, one must ensure that the new label completely covers the old label. (Note: energy labels are no longer required for luminaire packaging).

In addition to the labels themselves, the ELR requires that all the information included on a product’s energy label and in its technical documentation also be entered into the European Product Database for Energy Labelling (EPREL). As is the case with the label and documentation themselves, entering the required data into the EPREL is a prerequisite for selling a product on the European market. Since 1 January 2019, registration of lamps in EPREL 1.0 and providing product information is already mandatory. The requirement of an energy label on luminaires has been withdrawn as of 25 December 2019.

However, although the details are not yet entirely clear, as of 1 September 2021, the EPREL 2.0 will also be mandatory for light sources and containing products considered to be a light source.

LightingEurope has also produced guidelines for existing EPREL requirements, while new guidelines for the next set of requirements (applicable from 1 September 2021) are also planned.

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Consequences following the SLR

- Phase-out of some conventional lighting technologies due to increased efficiency requirements on performance and quality of light;
- Removability and replaceability requirements for light sources and control gears in containing products.

Consequences following the ELR

- All light sources in scope of the SLR are also in the scope of the ELR;
- Discontinuation of energy labelling for luminaires (containing products must be labelled only if they are a “light source”);
- New information obligations through EPREL