

# The SLR, ELR and you



What the lighting industry, and lighting solutions designers, need to know about the new EU Ecodesign and Energy Labelling Regulations.

In December 2019, and after nearly five years of negotiations, the European Commission published the Single Lighting Regulation (SLR) (i.e. Ecodesign Regulation for lighting) and the Energy Labelling Regulation (ELR). The SLR and the ELR will apply from 1 September 2021, except for the removal of labelling requirements for luminaires which already took effect on 25 December 2019. Both will have significant consequences for the lighting industry, writes *Elana Scaroni, Policy Director, LightingEurope (pictured).*

The SLR sets product-specific performance requirements for energy-using and energy-related



products, whereas the ELR lists the labelling requirements for selling these products on the EU market. In February 2021 several additional requirements and corrections were introduced in both regulations: Regulation (EU) No 2021/341 amends the SLR and Regulation (EU) 2021/340 amends the ELR.

ELR applies to light sources only, while SLR applies to light sources and separate control gear, and luminaires

(now generally identified as “containing” products) are only addressed indirectly. Nevertheless, luminaire manufacturers must review the rules and ensure their products comply with the new requirements.

LightingEurope has published three sets of guidelines – on the SLR, the ELR and on the EPREL obligations for light sources – to help companies understand and apply the new rules to their products. Members of LightingEurope and their member lighting associations benefit from free access to the guidelines; members of the Lighting Association of Ireland can contact the organisation to get their free access code.

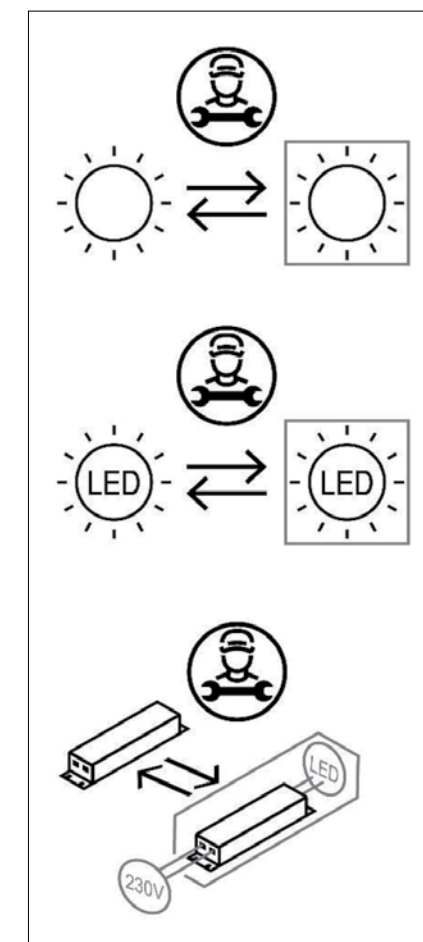
### Ecodesign – improving product performance

The Ecodesign Regulation (SLR) establishes EU-wide rules for improving the performance of light sources and separate control gear.

The SLR definition of a light source includes 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. This can include not only luminaires, but also light sources contained in household appliances or furniture. The supplier of a containing product must ensure that the light source and separate control gear used in the containing product complies with all relevant EU legislation, including the SLR and the ELR.

The SLR sets minimum mandatory requirements for energy efficiency, and any product that fails to meet these requirements will be phased out on 1 September 2021, starting with products like CFLi lamps and halogen R7s > 2700 lm lamps. As a result of this phase-out, these light sources will need to be replaced with new energy-efficient light sources



Placing these pictograms on the packaging can cover the information requirements on the replaceability of light sources and control gear by end-users or qualified persons. From top: Replaceable light source by a professional; Replaceable (LED only) light source by a professional; Replaceable control gear by a professional.

• Connected light source (CLS):	[yes/no]	Refer to Definition 6 of Annex 1 in Reg.2019/2015
• Colour-tuneable light source:	[yes/no]	Refer to Definition 8 of Annex 1 in Reg.2019/2015
• Envelope:	[no/second/non-clear/second & non-clear]	Refer to Definitions 36 and 37 of Annex 1 in Reg.2019/2015. Only applicable for HD light sources. Please note that the option “second and non-clear” is added at a later stage and available only in EPREL.

Details on the values to be uploaded to the EPREL database.

and lighting installations will have to be renovated.

### SLR and the circular economy

The SLR introduces several new elements that are related to the circular economy. For example, all 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.

They also need to ensure that light sources and separate control gears can be removed without being permanently damaged for verification purposes by market surveillance authorities. If the light sources cannot be removed for verification without damaging one or more of them, then the whole containing product must be tested as a light source and must comply with the requirements for light sources set out in the SLR and the ELR.

The SLR requires that manufacturers, importers and the 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.

LightingEurope has developed pictograms with the required

information on replaceability/non-replaceability. They are freely available on the LightingEurope website for all companies to download and use.

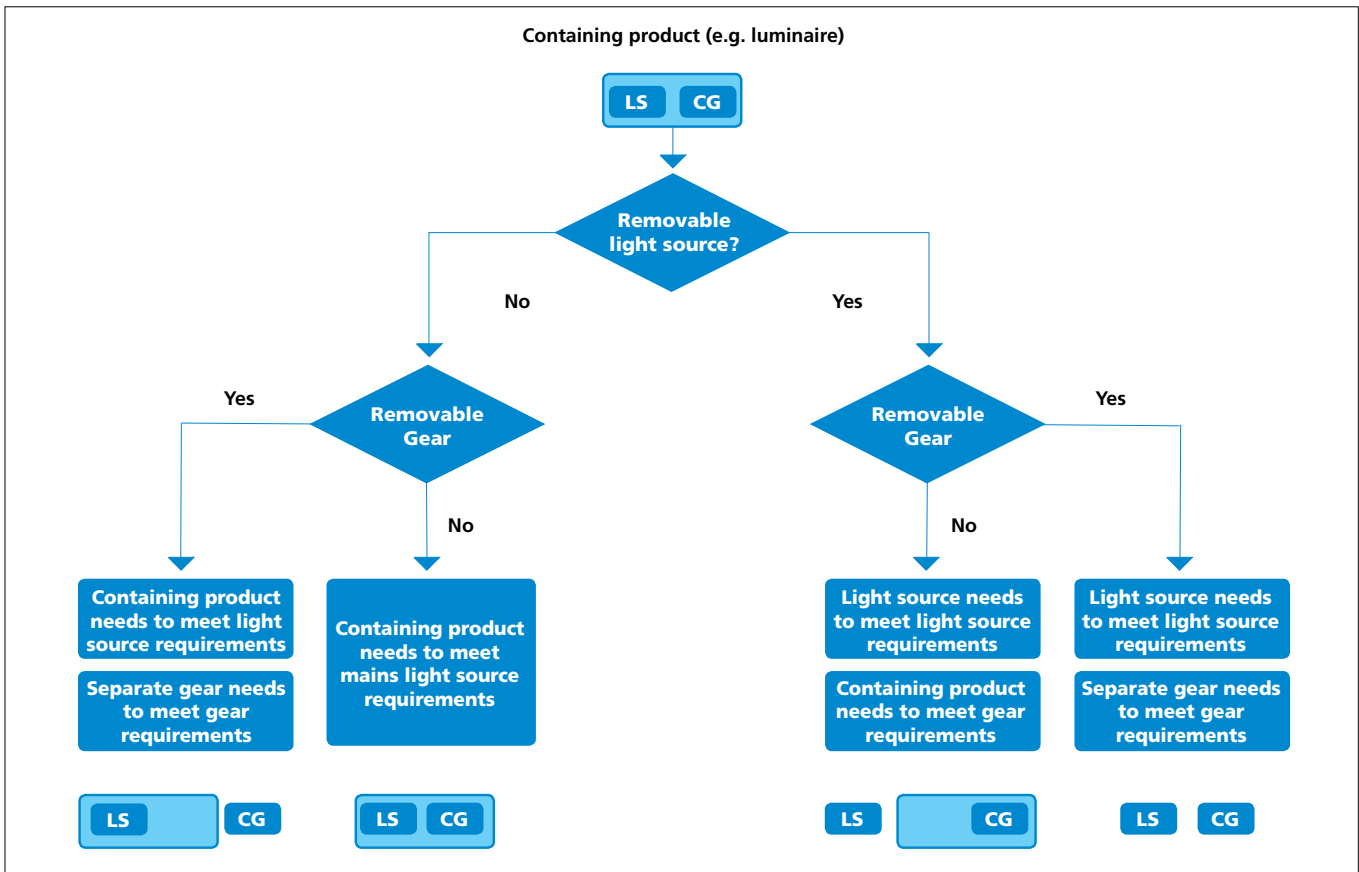
### ELR – empowerment through Information

The ELR addresses light sources that are defined in the SLR to include lamps, modules and even some containing products – please note that since 25 December 2019 there is no energy label requirement for luminaires.

The Regulation requires that specific product information be provided via an energy label that includes the rescaled energy classes: the new classes are set from A (most efficient) to G (least efficient) and will gradually replace the current system of A+++ to G energy labels. It also requires that the manufacturer provides information on the product’s class, along with other relevant technical information.

As the Regulation applies to the entire supply chain, there are varying requirements for what information must be provided, and by whom.

Suppliers such as manufacturers, authorised representatives, and importers must, for example, place an energy label on the packaging of all independently packaged light sources.



Compliance of luminaires, light sources and control gear on removability.

Dealers for example, on the other hand, are subject to a separate set of requirements. For instance, adverts promoting a product must include not only that product’s energy efficiency class, but also the range of energy efficiency classes listed on the label.

Given the large number of light sources with the old label that are already at points of sale, the law has delayed the deadline for relabelling to 1 March 2023. This 18-month timeline allows retailers to sell products with the old label until that date.

The recent amendment to the ELR (by EU Regulation 2021/340) has introduced a bit more flexibility for manufacturers of new models of light sources: it allows them to rescale the label in advance of the 1 September 2021 deadline, if they so wish. These products can also be registered on the EPREL database with a date of placement on the market starting from 1 July 2021, but the dealer cannot offer those light sources for sale before 1 September 2021.

**EPREL obligations for light sources**

The ELR also requires that all the information included on a product’s energy label, in its product information sheet and its technical documentation, has to be entered into the European Product Database for Energy Labelling (EPREL) before the product can be placed on the EU market.

The European Product Database for Energy Labelling (EPREL) is the common database for information on the energy labelling of products sold in the EU, including lighting. The database consists of a public part accessible to all consumers, and a compliance part accessible only to Member State market surveillance authorities and the European Commission.

The LightingEurope guidelines on the EPREL database explain who in the supply chain needs to upload what information to the EPREL database and by when, including:

- A clarification of the scope of the EPREL database, including when it

is necessary to register containing products to be tested as a light source;

- The values to be uploaded to each part of the EPREL database with a detailed explanation for each value;
- A non-exhaustive list of harmonised standards.

The EPREL guidelines also include an excel template to help companies upload information directly to the compliance part of the database.

**The voice of the lighting Industry**

As the voice of the lighting industry, LightingEurope is dedicated to helping companies understand and apply these complex new rules. The LightingEurope Guidelines on the SLR, the ELR and the EPREL database are available to download or order on the LightingEurope website.

To help you navigate regulatory changes and ensure you have the information you need to make informed lighting design and investment decisions, visit: [www.lightingeurope.org](http://www.lightingeurope.org) ■