



LIGHTINGEUROPE
THE VOICE OF THE LIGHTING INDUSTRY

LightingEurope Questions & Answers on the Commission Regulation (EU) No. 1194/2012 setting requirements for directional lamps, light emitting diodes lamps and related equipment

Version 1

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Questions & Answers

- 1) Are LED modules covered or not by Regulation 1194/2012, because they are hardly mentioned in the Regulation, e. g. in Annex III Ecodesign Requirements, and if then rather related to exemptions than to any requirement.

Yes, LED modules are covered.

Different from international standardisation (IEC/PAS, EN) that make a split between LED lamps and LED modules as being distinct products having a cap (LED lamps) or not (LED modules) the understanding of the terms in Regulations 874/2012 and 1194/2012 is that the term LED lamp has a more general meaning and includes LED module.

For that reason the requirements in Reg. 1194 which are addressed to LED lamps also include LED modules. For example see table 5 of Reg. 1194.

- 2) Is the understanding correct that on the packaging of applications mentioned under Article 2 4. (a) to (c) (e. g. a camera flashlight or control gear for emergency light) it is not required to provide the product information laid down in Annex 1 of the regulation, but only in case a manufacturer places on the market a spare part lamp for the application the manufacturer would need to meet the information requirements for this spare part lamp that is sold separately?

Yes, an application like a camera flashlight or control gear for emergency light does not become a special purpose product based on Article 2 4. (a) to (c). In case a lamp

is placed on the market as a spare part for the camera flashlight or emergency light is sold separately, this lamp would be a special purpose product and have to meet the information requirement laid down in Annex I of the regulation.

- 3) Article 2 4. (c) accidentally captures thousands of products as 'special purpose products':
products incorporating lighting products, where the primary purpose is not lighting and the product is dependent on energy input in fulfilling its primary purpose during use (such as refrigerators, sewing machines, endoscopes, blood analysers);

We think that this was not intended by the scope of the regulation, but as it written not only the camera flash light camera mentioned above, but also e. g. products with a LED standby indicator, televisions with LED backlight, toothbrushes & shavers with battery indicators for charging etc. would be captured.

How can a manufacturer of a product in question show compliance with the respective Article 2 4. (c) and Annex I in an easy way?

Stating the product name/photo on the packaging (e. g. remote control, camera flash light, refrigerator, television), technical file and declaration of conformity is considered to be sufficient to show compliance with Article 2 4. (c) and Annex I until an appropriate amendment has been adopted via the legal process.

- 4) Referring to question 3, is the understanding correct that in case a manufacturer has an application (e. g. backlighting in television, photo camera flashlight, video projectors) that includes e. g. a LED lamp, the information requirements do not apply to the application but only to the LED lamp – and only if that LED lamp is placed on the market as a spare part/replacement lamp?

Yes, it is the correct understanding.

- 5) Concerning Article 1, scope: it looks like that the wording “electrical lighting products” only applies to the first part of the article and not to the “special purpose products” part as the regulation states “the regulation also establishes product information requirements for special purpose products”. Therefore does the definition provided in Article 2, point 1 for ‘lighting’ cover special purpose products too or not?

'Special purpose products' are defined in Article 2 4. and therefore to be understood as 'special purpose lighting products'. For special purpose products the requirements of Annex 1 of this Regulation apply.

6) ANNEX I Product information requirements for special purpose products:

1. If the chromaticity coordinates of a lamp always fall within the following range:

$$- x < 0,270 \text{ or } x > 0,530$$

$$- y < - 2,3172 x^2$$

$$+ 2,3653 x - 0,2199 \text{ or } y > - 2,3172 x^2 + 2,3653 x - 0,1595;$$

the chromaticity coordinates shall be stated in the technical documentation file drawn up for the purposes of conformity assessment in accordance with Article 8 of Directive 2009/125/EC, which shall indicate that these coordinates make them a special purpose product.

It has not been the intention to require the product information requirements for special purpose products as stated in Annex I 2., if these products have been defined as special purpose product only based on Article 2 4. (c).