



LIGHTINGEUROPE
THE VOICE OF THE LIGHTING INDUSTRY

Guidance and Information Paper

On the use of lighting product
standards in Europe

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Preface

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Executive Summary

This document gives guidance on the use and timelines of standards in the European Union, the European Economic Area, the European Free Trade Association and the European Customs Union. The document also covers UK designated standards used in Great Britain.

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1. Scope

This document provides guidance and information on the use (Section 3) and timelines (Section 4) of standards, specifically European standards (EN), harmonized EN, OJEU listed harmonized EN and non-EN standards, in the European Union, the European Economic Area, the European Free Trade Association, and the European Custom Union.

The selection of the standards and their timelines is important for the manufacturer for the preparation and maintenance of the technical documentation and Declaration of Conformity for placing the product on the market. This document outlines all the different options available to manufacturers, leaving it up to them to choose which option to follow. This document also provides information for market surveillance authorities for checking conformity considering the option chosen by the manufacturer.

The document also covers UK designated standards used in Great Britain.

Section 3 of this guidance document provides an overview of the possibilities available to manufacturers when preparing and maintaining their technical file and Declaration of Conformity.

Section 4 focuses on a case in which the date of withdrawal from the OJEU or UK Designated List (end of presumption of conformity) is before the CENELEC DOW.

NOTE 1: The information given in this paper is fully applicable for Directives using Module A (Internal production control) where the manufacturer can declare the compliance with the essential requirements by using harmonized standards or other publications following their own risk assessment. Examples of Directives using module A are LVD, EMC, ROHS and RED¹ (for the part dealing with health, safety, and EMC essential requirement as in article 3, item 1 a) and b)). For other Directives, the information given is still applicable, but the use of non-harmonized standards may require the intervention of a notified body. Examples for these situations are the RED Directive (Essential requirements in article 3 item 2 dealing with the efficient use of radio spectrum) and Construction Products Regulations (CPR).

¹ Directives 2014/35/EU, 2014/30/EU, 2011/65/EU and 2014/53/EU.

2. Background

Standards provide important benchmarks for industry, consumers, and regulatory authorities against which to assess aspects such as a products safety, electromagnetic compatibility (EMC), performance, or quality. Many European Union (EU) Directives (e.g. LVD; EMC; RED, etc.) and the equivalent UK Regulations reference harmonized EN standards that are listed in the Official Journal of the European Union (OJEU) and UK Designated Standards Listings as providing a presumption of conformity against the essential requirements of the Directives/Regulations.

A very high proportion of the standards used in the European Union, the European Economic Area, the European Free Trade Association, and the European Custom Union are adopted either directly, or with small modifications, from international IEC and ISO standards. IEC and ISO standards are developed via a highly technical and consensus-based process involving industry, test houses, and regulatory experts who have been appointed by their own national standardisation organisations. The draft standards proposed by these experts are subject to consultation and voting at various stages. It is important that standards are kept up to date to address new technologies that are entering the market, protect against risks that were previously unforeseen, and to make improvements to assist the understanding and application of the standards. However, it is always the case that the availability of 'fully up to date' standards lags behind the new technologies and situations that are constantly evolving in the market.

3. General guidance and information - Description of present options

The EU Blue Guide gives some advice such as “manufacturers must keep themselves apprised of changes in the state of the art, assess the extent of the changes to the superseded version of the standard and, if necessary, take appropriate action.” Following the EU Blue Guide (clause 4.1), the options manufacturers have, are the following listed in Table 1. They may be applied individually or together. In Table 2 pro’s and con’s of each option are given.

TABLE 1: Possible Options for Demonstrating Conformity Against the Essential Requirements of EU/UK Product Directives or Regulations

OPTIONS	
1	Harmonised EN Standard (OJEU or UKDSL) + Risk Assessment
2	Latest Harmonised EN Standard (but not listed in OJEU or UKDSL) + Risk Assessment
3	Latest Non-Harmonised EN Standard (not listed in OJEU or UKDSL) + Risk Assessment
4	Use of other Standards (including latest IEC, When There Are No EN Standards) + Risk Assessment
5	Old + New EN Standards (“Cherry Picking”) + Risk Assessment
6	Own Assessments Against Essential Requirements + Risk Assessment

TABLE 2: Pro's and Con's per option of TABLE 1

PRO's	OPTIONS					
	1	2	3	4	5	6
Provides a legal presumption of conformity according to the Directive or Regulations for those aspects covered with the Annex ZZ.2	X					
Follows the state of the art and has been updated in line with innovation of products and technology.		X	X	X		
Is aligned with IEC and other non-European national standards that are also aligned with IEC.		X	X	X		
Is used for third party certification (e.g. ENEC Mark).		X	X			
May provide more design flexibility or be appropriate for highly innovative designs.					X	X
CON's						
Does not provide a legal presumption of conformity according to the Directive or Regulations. ²		X	X	X	X	X
May lag the state of the art and may not have been updated in line with innovation of products and technology, increasing product liability risk.	X				X	
May not be aligned with the latest IEC or other non-European national standards that are aligned with IEC.	X				X	X
May not be used for third party certification if its DOW date is passed (e.g. ENEC Mark).	X			X ³	X	X
A comparison with listed harmonised standard (if available) is needed under the risk assessment (differences between the standards should be considered)		X	X	X	X	X
A comparison with the most recent published EN standard is needed under the risk assessment (differences between the standards should be considered).	X			X	X	X
In the case of a superseded standard, the EU Commission (or UK Government) might decide to withdraw the standard from the OJEU (or UKDSL) without any transitional period.	X					
CEN/CENELEC will list the standard as withdrawn once the DOW (date of withdrawal) is passed.	X				X	
The OJEU and UK designated standards listings may not be aligned.	X					
There will be confusion as to why the standard is harmonised but not listed in the OJEU (or UKDSL).		X				

² The term "presumption of conformity" has a special legal meaning, it does not imply that this is the only method by which conformity can be demonstrated.

³ DOW is not applicable for IEC.

4. Use of CENELEC standards when the date of withdrawal from the OJEU or UKDSL (end of presumption of conformity) precedes the CENELEC DOW

4.1 Issue

When a new or amended standard is published, the typical term until the date of withdrawal (DOW) of previous (conflicting) publications granted by CEN/CLC is 36 months. When a new edition or amendment of a standard is listed in the OJEU/UKDSL, typically 18 months are granted until the date of withdrawal from the OJEU/UKDSL of a previous version of a standard. The timeline for harmonization of standards did not result, until recently, in a date of withdrawal from the OJEU/UKDSL before the date of withdrawal by CEN/CLC.

With the further development of the standardization system requiring the HAS consultant to validate standards for the harmonization, it is possible that some standards are validated during the IEC/CENELEC parallel voting process, so that they are published as harmonized and are listed in the OJEU (or in the UKDSL) just after their publication or with a short delay.⁴

Regarding the revision of European standards, the following process has been put in place:

- In CENELEC, when a standard is approved, a date for withdrawal of the previous editions or any conflicting standards (DOW) is established. In absence of critical safety issues 36 months is usually applied after the ratification.
- In the OJEU, the Commission defines a “date of withdrawal from OJ (end of presumption of conformity)” being usually 18 months after the listing in the OJEU.
- In the UKDSL, the UK Authority defines a “date of withdrawal from Designated

⁴ Please note that the case described is the best possible scenario (e.g., EN IEC 60598-2-22:2022), in most cases, the harmonisation process takes much longer or does not happen at all.

standards list (end of presumption of conformity)” being usually 18 months after the listing on the Designated List.

With the present process, there can be the case where the end of presumption of conformity on the OJEU /UKDSL is before the DOW provided by CENELEC (See Figure 1 for an example case).

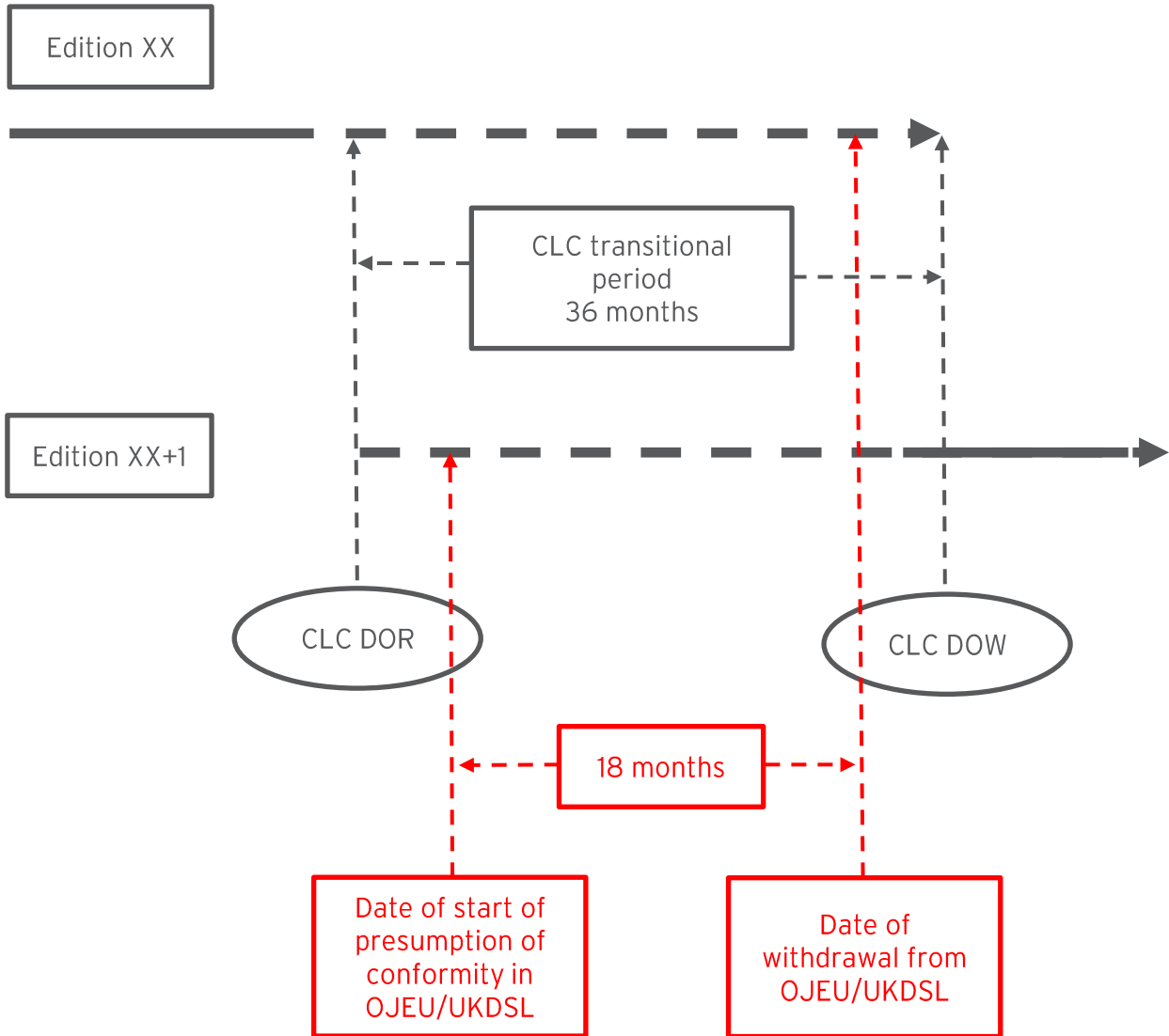


Figure 1: Graphical representation (example) of the respective timelines comparing transition provision of CLC (black colour) and that for the OJEU/UKDSL (red colour)

NOTE 2: the figure above also applies to amendments which will be applicable together with the base standard.

In the case of withdrawal of a standard from the OJEU/UKDSL, resulting in a cessation of the presumption of conformity, before the DOW fixed by the SDO, there is a period where the preceding edition of the standard is still valid, but does not provide a presumption of conformity, creating confusion in the market.

The usual 36-month DOW period between editions of a standard is granted by CENELEC to allow manufacturers and importers time for the following essential

tasks: Assessment of any new requirements for existing product designs; Redesigning of the product to comply with new or changed requirements; Implementation of necessary design changes into manufacturing; New testing and recertification of the modified product design; Allowing time for any required supply chain changes; Allowing time for turn-over of stock produced according to the previous standard. In many cases the 36-month timeframe allowed by CENELEC represents a very tight window for manufacturers and importers to conduct this work, especially when dealing with complex product designs or with manufacturing factories and supply chains that are based outside of Europe (see 5.2 in section 5). The 18-month transition period now allowed for by the OJEU (and UKDSL) is often insufficient for these tasks.

4.2 LightingEurope Advice

In Directives using Module A (Internal production control) (e.g. LVD, EMC, RoHS), where the manufacturer can declare compliance with the essential requirements by using OJEU/UKDSL listed harmonized standards or other publications following their own risk assessment, the use of OJEU/UKDSL listed harmonized standard is just an option, and it is not mandatory (see 5.2 in section 5). In principle, in the period after the date of withdrawal from the OJEU/UKDSL until the DOW fixed by the SDO, third-party certifications against standards are still valid.

Following the Blue Guide, the manufacturer shall provide a gap analysis to ensure that any safety issue or risk highlighted by the new standards has been considered. Standards often are updated to introduce additional requirements for some type of specific constructions or for innovative products, or the update is made for editorial review for alignment with other standards. In many cases the new requirements are not applicable or only partially applicable to products complying with the previous edition.

In case that the Date of withdrawal from OJEU/UKDSL is before the Date of withdrawal from the standard, the manufacturer does not benefit anymore from presumption of conformity and either should use the new OJEU/UKDSL listed harmonized standard or should demonstrate the conformity themselves. In the latter case they must demonstrate, in the technical file of a relevant product, how the standards or technical specifications they use provide conformity with the essential requirements, for instance by carrying out a risk assessment on the product, a gap analysis, etc. The list of all significant technical changes is given in the foreword of the standard and, for some standards, an annex providing the more onerous requirements compared with the previous edition is also given. This list can be used

as a check list for this purpose.

5. Notes

5.1: CENELEC Technical Committee TC34 (Lighting) is in active dialogue with CENELEC, EU Commission, and HAS Consultants to seek solutions for the improvement of these situations.

5.2: In the EU Commission Blue Guide 2022 the following statement is provided under clause 4.1.3:

“ The manufacturers can choose whether or not to apply and refer to harmonised standards. However, if manufacturers choose not to apply harmonised standards, they have the obligation to demonstrate that their products are in conformity with essential requirements by the use of other means of their own choice that provide for the level of safety or protection of other interests required by the applicable legislation. These can be other standards such as national standards, international standards, European standards the references of which are not published in the OJEU, or other technical specifications such as European standardisation deliverables (deliverables other than European standards developed by the ESOs), or the manufacturer’s own specifications. In these cases the manufacturers do not benefit from the presumption of conformity, but have to demonstrate the conformity themselves. This implies that they demonstrate, in the technical file of a relevant product, in a more detailed manner how the standards or technical specifications they use provide conformity with the essential requirements, for instance by carrying out a more in-depth risk assessment on the product, a gap analysis, etc.”

5.3: European based third-party certification schemes such as those run by ETICS (ENEC Mark), VDE, DEKRA, IMQ, BSI, etc., tend to base their certifications on the most recently published EN standards regardless of their harmonisation status or listing in the OJEU or UK Designated Standards list. When standards are updated, time for manufactures to arrange recertification and the updating of the product design is provided by observing the DOW period. The DOW date is detailed in the new incoming standard and defines the date of withdrawal for the superseded edition of the standard. During the DOW period both incoming and outgoing versions of the standard remain valid for third party product certification, providing a transition or ‘overlap’ period between the different versions of the standard. The typical DOW period is normally three years, but this may be reduced if there are special circumstances (e.g. if a critical safety deficiency in the outgoing standard has been recognised). Whilst providing an independent verification of standards conformity, a third-party certification may not necessarily cover all conformity aspects required by a Directive or Regulations.

5.4: To provide some clarity on the distinction between ‘Placing On The Market’ and ‘Making Available’: for maintaining EU CE or UKCA declarations of conformity, and their associated product files, it is important to understand correctly the legal terms ‘Placing On The Market’ and ‘Making Available’. The EU Commission ‘Blue Guide’ on the implementation of EU product rules (2022) provides extensive advice on this subject. Two particularly pertinent extracts taken from clause 2.3 of the ‘Blue Guide’ are given below:

“Products made available on the market must comply with the applicable Union harmonisation legislation at the moment of placing on the market. As for ‘making available’, the concept of placing on the market refers to each individual product, not to a type of product, and whether it was manufactured as an individual unit or in series. Consequently, placing on the Union market can only happen once for each individual product across the EU and does not take place in each Member State. Even though a product model or type has been supplied before new Union harmonisation legislation laying down new mandatory requirements entered into force, individual units of the same model or type, which are placed on the market after the new requirements have become applicable, must comply with these new requirements”

Glossary

CE - European conformity

CEN - European Committee for Standardization

CLC or **CENELEC** - European Committee for Electrotechnical Standardization

CPR - Construction Products Regulation (EU) 2024/3110

DOR - Date of Ratification

DOW - Date of withdrawal

EMC - Electromagnetic Compatibility Directive (2014/30/EU)

ENEC - European Norms Electrical Certification

ESO - European Standardisation Organisation

ETICS - European Testing Inspection Certification System

EU - European Union

IEC - International Electrotechnical Commission

ISO - International Organization for Standardization

HAS - Harmonised Standard

LVD - Low Voltage Directive (2014/35/EU)

OJEU- Official Journal of the European Union

RED - Radio Equipment Directive (2014/53/EU)

RoHS - Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment

SDO - Standards Development Organisation

UKCA - UK Conformity Assessed

UKDSL - UK Designated Standards List

Contact

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LightingEurope is the voice of the lighting industry, based in Brussels and representing 33 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.