

# Comments on Equivalent Models in the EPREL Database

With this paper, LightingEurope would like to outline our member's interpretation of the Energy Labelling Framework Regulation requirements concerning equivalent models. Market surveillance authorities from a Member State have recently made remarks on the registration of two lighting products by 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 (MSAs) and by no means represents an official interpretation of the requirements set by the legislation itself.

This paper is an update of our past position paper on the same topic published in March 2021.

## Our comments

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### Definition of equivalent models in the legislation

Art.2(6) of Regulation (EU) 2017/1369 has defined equivalent models as: "(...) a model which has the **same technical characteristics relevant for the label** and the **same product information sheet**, but which is **placed on the market** or put into service **by the same supplier** as another model with a different model identifier." This means that a supplier places a 'technically identical' model of a light source onto the EU market under different model IDs (in any free alphanumeric format or in EAN code) or with a different brand name (possibly, but not necessarily).

Please note that the technical documentation may be different due to different brands and model IDs. In such a case, the technical documentation has to be uploaded separately.

### What are the consequences of a declaration of equivalence between models?

By linking models together as base and equivalent models, information related to the energy labelling and the product information sheet does not have to be uploaded again. EPREL also allows for equivalent models to be uploaded before the base model.

Please note that when a non-compliance is found in one of the interlinked models by market surveillance authorities, the same results may apply to all models within the same 'equivalent model family'. In such a situation, the whole equivalent model family may be considered non-compliant.

### Equivalence of models in the EPREL Database

The EPREL database does not automatically set any equivalence. It is up to the supplier to declare the equivalence, if any.

It is the intention of the European Commission to progressively provide to MSAs cross-search tools to “smarten” the compliance control activity and foster better market surveillance. In the future the system will ‘suggest’ possible non-declared relations by listing suspect registrations, leaving it up to the MSA to then undertake a detailed verification of the assumed equivalence.

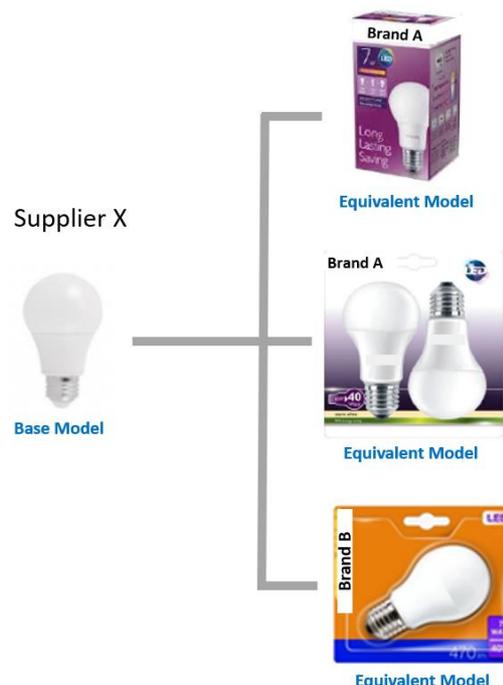
### Our interpretation

The supplier can decide, considering the overall characteristics of a product, if a model should be considered equivalent to the base one and to declare this model as equivalent.

We think that this interpretation is consistent with the wording of Annex I (3) of Regulation (EU) 2017/1369, which 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 means that if the supplier has registered a model as equivalent, it must be declared. It does not require the supplier to declare a model as equivalent to another if the supplier believes that these models, due to their general characteristics and functionalities, are not equivalent.

### Some examples of equivalent models

- Technically identical products sold in different packaging configurations e.g. blister card / carton box / multi-packs
- Technically identical products sold by the same supplier using different brands
- Technically identical products with differentiation on aesthetical aspects like paint colour
- Products with the same technical characteristics defined as equivalent models by the supplier.



# 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](http://www.lightingeurope.org).