

Products and producer responsibility: Lighting equipment

Further to legislation on producer responsibility for electrical and electronic equipment DPA-System decides whether equipment or products are covered by or exempt from the rules on producer responsibility, cf. the WEEE Order. Also, if the product is covered by the rules DPA-System will assign the product to one of the categories described in the Order¹. In addition, it will be assessed whether the product is used in private households or only in businesses².

The following assessment has been made for the product groups of lamps and luminaires and other equipment for the spreading or regulation of light.

June 2019

Assessment and definition of lighting equipment

Lighting equipment consists of three main product groups that are generally subject to producer responsibility for electrical and electronic equipment.

1. Lamps
2. Luminaires
3. Other equipment for the spreading or regulation of light.

1. Lamps

A lamp is the object from which the light is emitted, e.g. a bulb or a fluorescent lamp. Several terms are used for lamps, such as

- Energy-saving bulbs,
- Diodes,
- LED lights, or
- Fluorescent tubes.

2. Luminaires

Luminaires are the objects on/in which the lamps are fitted. In some cases the light source and the luminaire are jointly referred to as a lamp.

3. Other equipment for the spreading or regulation of light.

This group of lighting equipment covers products that are not luminaires or lamps according to the above guidelines. The light-emitting equipment covers various kinds of torches, such as pocket lamps, hand lanterns, headlamps, and cycle lamps. The product group also covers light-emitting equipment exclusively serving a decorative purpose, such as Christmas lights, light figures, birdhouses with electric light, “candles” with battery operated wicks, or other decoration where the main purpose of the product is not necessarily to light an area.

¹Read more about the WEEE Categories on the DPA-System website under [WEEE categories](#).

²Read more about end-users on the DPA-System website under [Identification of the end-user](#).

Criteria for producer responsibility

In pursuance of the WEEE Order producer responsibility applies to:

- Equipment which is dependent on electric currents or electromagnetic fields.
- Equipment for the generation, transfer and measurement of electric currents or electromagnetic fields.

Lighting equipment subject to producer responsibility

All three variants of lighting equipment mentioned under items 1-3 above comply with the first of the above two criteria and subsequently all three variants of lighting equipment are covered by the rules on producer responsibility of the Order.

Lighting equipment *not* covered by producer responsibility

Filament bulbs, including ordinary metal halide lamps are exempt from producer responsibility despite the fact that the equipment actually complies with the criteria for producer responsibility of the Order. This is due to the fact that these products can no longer be sold on the Danish market.

Lighting equipment categories

Lamps must be registered under Category 3. Lamps.

Luminaires and other equipment for the spreading or regulation of light must be registered under Category 4: Large equipment, if an outer dimension of the product is equal to or more than 50 cm, or Category 5. Large equipment, if an outer dimension of the product is less than 50 cm.

Note for lamps with "lifelong service life", such as LED lights:

Retro-fit LED falls under Category 3: Lamps.

Luminaries in which the light source (LED) is incorporated without being designed for replacement (i.e. not retro-fit LED) falls under Category 4. Large equipment, or Category 5. Small equipment, cf. the above.

Batteries in lighting equipment

Lighting equipment in the form of "*other equipment for the spreading or regulation of light*" often contains small batteries, referred to as "portable batteries" in the law. Portable batteries are also subject to producer responsibility. Portable batteries are subject to an excise duty and must be reported to SKAT (The Danish Tax and Customs Administration) on www.virk.dk.

Producers placing products dependent on small batteries such as pocket lamps with portable batteries³, alarm clocks with AA batteries or similar product types must therefore be reported to both DPA-System and SKAT.

Not all types of batteries are subject to an excise duty. Industrial batteries, i.e. more heavy-duty, specialised batteries, are not covered by the excise duty; therefore, this type of battery must only be reported to DPA-System.

³Read more about batteries on www.dpa-system.dk.