

Legal inspection requirements for double-capped LED lamps

By the Bureau of Standards, Metrology and Inspection (BSMI), Ministry of Economic Affairs (MOEA)

Introduction:

The use of double-capped LED lamps is becoming prevalent in domestic households. To enhance consumer protection and promote efficiency of energy use, the Bureau of Standards, Metrology and Inspection (BSMI) regulates double-capped LED lamps in aspects of safety (CNS 15438, CNS 15829, CNS 15983 or CNS 62931), performance (CNS 16027), EMC (CNS 14115) and use of hazardous substances (Section 5 of CNS 15663). The conformity assessment procedure will be Registration of Product Certification Scheme (Module II+III) or Type-Approved Batch Inspection Scheme.

Date of implementation: 1 January 2022

Scope of covered products:

Description of Goods	Inspection Standards	C.C.C. Code (the first 6 digits are the same as HS Code)(Reference)	Conformity Assessment Procedures
Double-capped LED lamps (inspection scope: those for general purpose, including CRI above 95)	1. CNS 15438(2019) or CNS 15829(2015) or CNS 15983(2019) or CNS 62931(2019) 2. CNS 16027(2019) 3. CNS 14115(2016) 4. CNS 15663 (2013) Section 5 “Marking of Presence”	8539.50.00.00.3B	RPC Scheme (Modules II+III) or TAB I Scheme

Description of the two kinds of conformity assessment procedures

1. Registration of Product Certification (RPC) Scheme : Modules II + III

Under the II+III combination of modules used in this scheme, domestic manufacturers or importers must have their products type-tested in advance (Module II) by the BSMI or BSMI-designated testing laboratories before applying for registration of their products. Manufacturers or importers will also be required to ensure by declaration (Module III, conformity-to-type declaration) that all products made at their manufacturing facilities or imported are in conformity with the prototypes submitted for type-test at Module II stage. The conformity-to-type declaration shall be drawn up by the manufacturer or the authorized local representative, declaring that the mass-produced products comply with the prototype as in the type-test report.

After being certified and registered by the BSMI, products will be allowed to use the Commodity Inspection Mark with the letter ‘R’ and the identification number given by the BSMI. Additionally, these products can clear customs directly without any further inspection if not being sampled by RPC border check procedures. The application fee and annual fee for RPC are both NT\$5,000 (about US\$170) for each certification, and the RPC certification is valid for 3 years. If there are any serial products, an extra NT\$3,000 (about US\$100) of application fee will be charged for every application in each certification. The fees for type testing vary by products and depend on the fee policies of the testing laboratories.

Further information on this procedure is available on the BSMI website at <https://www.bsmi.gov.tw/wSite/ct?xItem=4470&ctNode=9452&mp=2>

2. Type-Approved Batch Inspection (TAB I) Scheme

Under this procedure, manufacturers or importers shall have their products type-tested by the BSMI or BSMI-designated testing laboratories, and file an application for Type Approval to the BSMI or its branches.

After manufacturers or importers obtain a Type Approval certificate, they are required to file an application

for batch inspection to the BSMI each time before their products are released from the production premises or arrive at the port of entry. The BSMI will then review the application and the related documents while additional samples may be required for further testing if it is deemed necessary.

After the products have passed the inspection, they will be allowed to use the Commodity Inspection Mark with the letter 'T' and the identification number given by the BSMI. The application fee for a Type Approval is NT\$3,500, and a Type Approval certificate is valid for 3 years. The fees for type testing vary by products and depend on the fee policies of the testing laboratories.

Further information on this procedure is also available on the BSMI web site at <https://www.bsmi.gov.tw/wSite/ct?xItem=4447&ctNode=9452&mp=2>

Locations to apply for Registration of Product Certification:

The BSMI or its branches.

Time required for Registration of Product Certification:

14 working days. (This period does not include the time for corrective actions by the applicant due to deficiencies in the documents or samples. Extra 7 working days may be required if additional tests are required.)

Related requirements:

1. Upon the date of announcement of this measure, applications can be made to the BSMI for RPC certification. When the BSMI completes the review procedure and approves the application, a certificate will be issued and valid for 3 years.
2. For the requirement of Section 5 “Marking of presence” of CNS 15663, the certificate holders of the commodities shall clearly mark the presence condition of the restricted substances on the body, packages, stickers, or the instruction books of the commodities. Those who utilize website as a means to announce the presence condition of the restricted substances of the commodities shall clearly mark the website address on the body, packages, stickers, or the instruction books of the commodities, instead.
3. The Commodity Inspection Mark:
 - (1) The Commodity Inspection Mark shall be printed by the certificate holders. The identification number of the Commodity Inspection Mark consists of “Letter (R or T),” “Designated Code (5 digits)” and the presence conditions of the restricted substance (e.g., RoHS or RoHS (XX,XX)).
 - (2) The identification number shall be placed below or to the right of the graphic symbol and the presence conditions of the restricted substance shall be indicated in the second row.
 - (3) The size of the Mark can be applied proportionally on a prominent location of the commodities. The Mark shall use materials that are not easily altered, and the content shall be in a clearly identifiable and indelible form affixed permanently to the commodity.
 - (4) For RPC scheme, the examples of the Commodity Inspection Mark are listed below:



- (5) For TABI scheme, the examples of the Commodity Inspection Mark are listed below:



- (6) “RoHS” indicates the content of restricted substance(s), other than exemptions stated in CNS 15663, does not exceed the reference percentage value of presence condition.

“RoHS (XX,XX)” indicates the content of restricted substance(s) (element XX, element XX, ...), other than exemptions stated in CNS 15663, exceeds the reference percentage value of presence condition.

The restricted substances: indicates Pb, Cd, Hg, Cr⁺⁶, PBB, and PBDE.

Examples:

- RoHS (Pb): indicates that the Pb percentage content in certain parts of the commodity exceeds the reference percentage value of presence condition.
 - RoHS (Cd, Cr⁺⁶, PBB): indicates that the Cd, Cr⁺⁶, and PBB percentage content in certain parts of the commodity exceed the reference percentage value of presence condition respectively.
4. The C.C.C. Codes listed in the table are used for reference only. The commodities shall still comply with the requirements before entering into the market, even though their C.C.C. Codes are identified differently by the Customs Administration, Ministry of Finance or Bureau of Foreign Trade, Ministry of Economic Affairs.
 5. The inspection standards of the commodities listed in the table shall be the version published in this announcement. If any updated version is available, the BSMI shall publish the implementation date of the updated version in further announcement.
 6. Commodities with combined features or multifunctional products shall comply with the respective inspection standards and the conformity assessment procedures of RPC scheme.

Table 1. Example of markings for the presence conditions of the restricted substances exceeds the reference percentage value of presence conditions

Equipment name: Double-capped LED lamps, Model : XXX(*)						
Unit	Restricted substances and its chemical symbols					
	Lead (Pb)	Mercury (Hg)	Cadmium (Cd)	Hexavalent Chromium (Cr ⁺⁶)	Polybrominated Biphenyls (PBB)	Polybrominated Diphenyl Ethers (PBDE)
Cap	Exceeding 0.1 wt %	○	○	○	○	○
Lamp housing	○	○	○	○	○	○
LED Die	○	○	Exceeding 0.01 wt %	○	○	○
Driver	○	○	○	○	○	○
<p>Note 1: “Exceeding 0.1 wt %” and “exceeding 0.01 wt %” indicate that the percentage content of the restricted substance exceeds the reference percentage value.</p> <p>Note 2: “○” indicates that the percentage content of the restricted substance does not exceed the reference percentage value.</p>						

Table 2. Example of markings for the content of the restricted substances other than exemption do not exceed the reference percentage value of presence condition

Equipment name: Double-capped LED lamps, Model : XXX(*)						
Unit	Restricted substances and its chemical symbols					
	Lead (Pb)	Mercury (Hg)	Cadmium (Cd)	Hexavalent Chromium (Cr ⁺⁶)	Polybrominated Biphenyls (PBB)	Polybrominated Diphenyl Ethers (PBDE)
Cap	○	○	○	○	○	○
Lamp housing	○	○	○	○	○	○
LED Die	○	○	—	○	○	○
Driver	○	○	○	○	○	○
<p>Note 1: “○” indicates that the percentage content of the restricted substance does not exceed the reference percentage value.</p> <p>Note 2: The “—” indicates that the restricted substance is exempted.</p>						

(*) The “name and model” can be omitted if the position of the “markings for the presence conditions” clearly identifies the corresponding commodity. Multiple types could be shown together if the “markings for the presence conditions” are applicable.