

NMO GUIDANCE

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Rough Service Lamps, not suitable for household room illumination.

Rough Service lamps are designed for use in applications that may subject the lamp to vibration or mechanical shock whilst in operation; or in locations with extremes of environmental conditions. They are often used in harsh environments such as in unheated warehouses, on building sites or in portable inspection lamps.

This document aims to provide clarity on the way in which the National Measurement Office views Rough Service lamps as a subset of special purpose lamps which are defined in the legislation;

‘special purpose lamp’ means a lamp not intended for household room illumination because of its technical parameters or because the related product information indicates that it is unsuitable for household room illumination

Commission Regulation 244/2009, Article 2(4)

It is an offence to place on the market lamps which do not comply with the efficiency requirements laid out in Commission Regulation EC 244/2009. Special purpose lamps are exempt from aspects of these requirements. The manufacturer’s self declaration that a lamp is rough service, and therefore a special purpose lamp, enables them to market this type lamp for non household room illumination purposes.

In order for a product to be described as a rough service lamp, it must meet the requirements of the Regulations under Article 3(2).

For special purpose lamps, the following information shall be clearly and prominently indicated on their packaging and in all forms of product information accompanying the lamp when it is placed on the market:

- (a) their intended purpose; and
- (b) that they are not suitable for household room illumination.

The technical documentation file drawn up for the purposes of conformity assessment pursuant to Article 8 of Directive 2005/32/EC shall list the technical parameters (if any) that make the lamp design specific for the special purpose indicated on the packaging.

Commission Regulation 244/2009, Article 3(2)

All packaging (and associated advertising, as this would fall under ‘product information accompanying the lamp when it is placed on the market’) needs to state the purpose; for example “for industrial use, rough service”; and also indicate “not suitable for household room illumination” as specifically required in the legislation. Whether this indication has to be in words, or can be pictorial, is currently under consideration at the Commission. However, if it is written in words, it could reduce ambiguity over the meaning of a symbol. Without this information on packaging, the lamp is not considered to be a special purpose lamp.



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The manufacturer needs to hold a technical file in which information is stored which can justify a company's declaration that a lamp is special purpose. For a rough service lamp, examples of this kind of information might be detail of additional filament supports, vacuum lamp, single coil filament or many other different technical parameters considered by the lamp design team to constitute a rough service lamp.

A lamp being marketed as a Rough Service lamp is being declared by the manufacturer not to be suitable for household illumination. The National Measurement Office will carry out market surveillance to enforce the regulations; including looking at lamp packaging and advertisements to make sure they meet all of the requirements laid out in the regulations. NMO is also able to request technical documentation from the manufacturer in order to assess if the technical parameters declared are suitable to justify a declaration as a special purpose lamp.

Advice for the consumer:

Whilst all the major retail outlets market special purpose lamps very differently from those used for household illumination, there are a growing number of websites and other forms of distance marketing which do not make such a distinction.

Consumers should ensure that they do not use special purpose/rough service lamps for household room illumination as they are declared by the manufacturer as unsuitable for this purpose. Consideration should be given to the terms and conditions of any household insurance policy if such lamps are used for illuminating your house.



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