NEMA E-Labeling Summary of Position Paper (based on NEMA EL P-1 2018)

Electrical equipment manufacturers are motivated to provide guidance on electronic labeling of their equipment in order to forestall further loss of control of the outer surface of their products and/or product packaging as well as the information conveyed from those locations to the viewer.

Labeling is a means to facilitate required and supplemental markings on equipment, including symbols, pictograms, warnings, logos, short textual messages, or inscriptions used to identify equipment type, function, certification, compliance information, and other key characteristics. Labels give a manufacturer many ways to provide this information, including on equipment, on packaging, in instruction sheets packaged with the equipment and on marketing materials.

Electronic labeling (e-labeling) is an alternative method for equipment manufacturers to communicate compliance and other equipment information that has typically been displayed with a physical label as noted above. E-labeling allows compliance information to be created electronically and displayed on a detached screen via a machine-readable code leading to regulatory markings and statements; alternatively, markings, statements and technical data might also be presented on a display inclusive to or as part of the actual device itself or through a link to a website via a text URL.

NEMA supports the emerging concept and technology of e-labeling. Utilization addresses physical space availability challenges brought about by increasing numbers of worldwide required certification and conformity assessment marks. Further, e-labeling enables response to increasingly rapid changes of technical data that determines equipment suitability and selection, avoiding the case where printed labels become out of date. Additional practical considerations include enhancement of instruction-sheet accuracy, facilitation of packaging changes, and safeguards against equipment counterfeiting.

NEMA supports e-labeling as a non-exclusive option for manufacturers to the extent that they develop and proceed with e-labeling programs of their own as desired. In addition, NEMA supports ready access of available information by installers, regulators, end users and others as appropriate. Further, NEMA supports that those accessing the information via an e-labeling method be directed to where the company sees fit (e.g., its own website) as opposed to mandating the use of a website of a certifier, regulator or other third-party.

As a digital disclosure mechanism, e-labeling enables those who would utilize and benefit from it to get the information they need, providing it when they want it and in a shareable form.

Three primary types of e-labels are achieved through
• display on a device's screen
• a link to a website via a text URL, or
• scanning a machine-readable code.

Typical audiences that would benefit from e-labelling include:

• Regulatory authorities, including customs
• Certification officials
• Equipment installers
• Purchasers/End Users/Consumers

No longer constrained by physical space, e-labeling provides myriad benefits, including:

• Enhanced usefulness, increased accuracy, superior availability of detail, and greater access
• Easier enforcement and counterfeiting identification
• Digital equipment information for online purchases
• Reduced environmental Impact
• Increased capability with reduced footprint and reduced time to market
• Cost savings

NEMA recognizes that there are challenges associated with moving from physical labels to e-labels, including:

• Necessary legislative, regulatory and/or administrative reforms
• Possible divergent approaches, country by country, and
• Determining where to post the information that is to be accessed via the e-label and who controls and updates the website. NEMA believes it is imperative that any and all information related to the equipment be under the direct control of the manufacturer.

Best practices for manufacturers implementing e-labeling address:

• Website ownership and management, including security
• Instructions to regulators, installers, and consumers on how to access information
• Duration of the e-label and associated information, ensuring that equipment compliance information remains available for the lifecycle of the equipment, including for a period of time after the equipment has been discontinued