



Private Label Application Requirements for LED-based Horticultural Lighting

Version 2.0

Effective Date: March 31, 2021

*Note: The DLC will begin accepting private label applications for horticultural fixtures in June 2021.
Please reference the [Interim Application Period Guidance for V2.0](#) for details.*

Private Label Applications

Private label applications allow manufacturers the option to list qualified products under multiple manufacturers and brands without having to conduct duplicate testing.

Private label applications may only be submitted if the original equipment manufacturer's (OEM) product is already DLC qualified. Private label products must be identical to the originally qualified versions.

- If OEM test reports are used to submit an application for a product or family that has not been previously qualified on the Qualified Products List (QPL), a Test Report Authorization Form must also be completed and submitted for both single product and family grouping applications.

Organizations submitting information for multiple brands should provide the private label documentation described below and the applicable fees for listing the original single product or family grouping application. Wholly-owned subsidiaries wishing to use a different model/brand than what is listed on the QPL with the parent company must also follow this process.

Private labeled products are dependent on the qualification and maintained listing of the OEM product, and if for any reason the OEM product is delisted, all associated private labeled products will also be delisted. These private labeled products may be re-qualified as an OEM product by providing a new single product or family grouping application, with new testing for the product, or may be re-qualified as a private label product once the OEM product is updated and re-listed on the QPL.

- Delisting of an OEM product may occur for a variety of reasons, such as if a manufacturer voluntarily requests that their product be delisted, or if the product is delisted due to non-compliance with program requirements, logo use violation, or other misrepresentation.



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- Private label listings are based on a mutual agreement between the OEM and a private labeler.
- 29 If either party notifies the DLC that the private label agreement is no longer in place, the DLC will
- 30 delist the private labeled product.

31 **Qualified Products List (QPL) Listings**

32 The intent of the private label application policy is to allow listing of products that are exactly the same
33 as the OEM products already listed on the Horticultural QPL. Because of this, private label products do
34 not need to go through redundant testing, and application fees are reduced due to a simplified
35 application review process.

36 However, because this process is intended for products that are identical to listed OEM products, the
37 DLC lists private labeled versions of products with exactly the same performance information as their
38 OEM versions. The reasoning behind this is that identical products should have identical performance
39 ratings, even if brand, manufacturer, model number, date qualified, and product ID are different.

40 To ensure all products listed on the QPL are associated with at least one product that includes tested
41 data, private label applications must include at least one of the parent models of the OEM listing. If the
42 private labeler does not wish to include at least one of the parent models of the OEM listing, the private
43 labeler must provide test data for the worst-case model(s) of the OEM products they wish to private
44 label in a single product or family grouping application. The tested product(s) will then be listed as the
45 parent product for the private label listing.

46 Private label products and OEM products cannot be included in the same family on the QPL, i.e., a
47 privately labeled product cannot be considered a parent for an OEM child product and an OEM product
48 cannot be considered a parent for a private label product. Parent and child products on the QPL must be
49 part of the same family and listed with the same manufacturer.

50 **Model Numbers**

51 To avoid confusion in the market, the same private label model number cannot be used to represent
52 different OEM products. For example, if a private labeler is using Model-ABC to represent OEM product
53 Model-DEF, the private labeler cannot then update Model-ABC to represent a different OEM product
54 Model-XYZ.

55 In the event that a private labeler submits the same model number for multiple OEM products, the DLC
56 reviewer will inform the private labeler that a unique model number must be supplied in order for the
57 review to continue.

58 Resellers that sell DLC qualified products under the exact manufacturer name and model number
59 explicitly listed on the QPL under the OEM information (manufacturer name, manufacturer brand,
60 model number) do not need to use the private label application process.

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62 **New Versions of the Technical Requirements**

63 When the DLC releases new versions of the Technical Requirements, private labelers are held to the
64 same deadline for submitting private label applications under the previous Technical Requirements as
65 OEMs. Private label update applications submitted during transition periods will only be processed for
66 products qualified under the new Technical Requirements until the submission window for the previous
67 Technical Requirements version has closed. Transition periods are submission windows where the
68 deadline for new applications under the old Technical Requirements version has ended; however,
69 products qualified under the old Technical Requirements version have not yet been delisted.

70 **Third Party Relationships**

71 If a private labeler wishes to extend the private label to a third organization, there are two options:

- 72 1. The private label request can be signed by the original equipment manufacturer and the final
73 private labeler.
 - 74 • For example, if company B private labels a product from company A, and then company
75 C wishes to private label that product from company B, the private label request would
76 be signed by company A and company C.
- 77 2. Alternatively, the original equipment manufacturer can provide a blanket letter that grants the
78 first private labeler permission to private label any product they manufacture to a third
79 organization. This blanket letter must be provided with any requests for private labeling from
80 the initial private labeler and the third organization.
 - 81 • In this scenario, company A provides a blanket letter for company B to private label their
82 products, which company C includes in applications to private label products listed by
83 company B.