



Private Label Applications for LED-based Horticultural Lighting

Version 2.0 – Draft 1

Proposed Effective Date January 4, 2021

Private Label Applications

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

- Private label applications may only be submitted if the original equipment manufacturer's (OEM) product is already DLC qualified. Private label applications 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 QPL, a Test Report Authorization Form must 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 de-listed, all associated private labeled products will also be de-listed. 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.
 - De-listing of an OEM product may occur for a variety of reasons, such as if a manufacturer voluntarily requests that their product be de-listed, or if the product is de-listed due to non-compliance with program requirements, logo use violation, or other misrepresentation.



- Because private label listings are based on a mutual agreement between the original equipment manufacturer and a private labeler, if either party notifies the DLC that the private label agreement is no longer in place, the DLC will de-list the private labeled product.

QPL Listings

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

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

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

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

Model Numbers

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

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

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

New Versions of the Technical Requirements

When the DLC announces the Technical Requirements revision schedule, private labelers are held to the same deadline for submitting private label applications under the old Technical Requirements as OEMs. Private label update applications during transition periods will only be processed for products qualified under the old Technical Requirements if it is clear that the OEM's product will remain qualified under the new Technical Requirements.

Third Party Relationships

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

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

Private Label Application Instructions

The process for implementing private label applications is under development. Instructions will be available prior to the effective date of the V2.0 Technical Requirements.

Key Questions

1. The DLC has proposed to allow private label applications for horticultural products. What are the major questions or complication issues you have with this proposal and what are your suggestions to address them?

Please provide your responses to these key questions in the Excel-based Horticultural Lighting V2.0 Comment Form, under the Private Label Applications tab.