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NEMA Position Paper on Electronic Labeling

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Introduction

Although the objective of this white paper is to communicate the NEMA position on the concept of electronic labeling, introductory remarks on the historical need for electrical equipment and medical equipment labeling could enhance understanding of how electronic labeling may deliver benefits to firms wishing to avail themselves of this emerging technology.

Labeling is a means to facilitate required and supplemental markings that are on equipment. Markings on equipment labels include symbols, pictograms, warnings, logos, short textual messages, or inscriptions used to identify equipment type, function, certification, and other key characteristics. Accordingly, labels give the manufacturer a number of ways to provide this information; typical information provided includes:

- a. equipment label containing relevant markings;
- b. packaging label containing relevant markings;
- c. instructions for proper installation and/or use (an equipment label, a packaging label, or data insert within the packaging are typical);
- d. data reflecting a technical description of the equipment (service, equipment selection, and installation information is typical; labels on equipment, on the packaging, or inclusive to an insert are common);
- e. information concerning the sustainability of the equipment (including but not limited to material declarations, recycling, disposal);
- f. information concerning the energy efficiency of the equipment;
- g. information concerning cybersecurity.

Note: Supplier declaration of conformity may be used.

Equipment marketing materials are sometimes included as inserts or as key components of equipment packaging.

Labeling is not necessarily limited to written or printed documents. It can also involve auditory, visual, or tactile materials presented utilizing multiple media types.

NEMA Position Statement

- a. NEMA Position in Support of E-Labeling
 1. NEMA supports the emerging concept and technology of electronic labeling. The use of electronic labeling addresses physical space availability challenges brought about by increasing numbers of worldwide certification and conformity assessment marks that are required on labels. Further, electronic labeling enables a response to increasingly rapid changes in technical data that determine equipment suitability and selection, avoiding cases in which printed labels become out of date in fairly short order. Additional practical considerations related to enhancing instruction sheet accuracy and the facilitation of more flexible and cost-competitive packaging, along with emerging safeguards against equipment counterfeiting, are other strong reasons for NEMA's support of electronic labeling initiatives as they move forward and in conjunction with industry stakeholders.
 2. NEMA supports e-labeling as a nonexclusive 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 electronic labeling method be directed to where the company sees fit (e.g., its own