



Test Report

Report No.: BC-103E-1663/25

Product	:	LED lamp tube
Model/Type	:	S39928
Brand Name	:	/
Applicant	:	Satco products, Inc.
Application No.	:	BC-20250721-004
Date of Issue	:	2025-07-24
Standards	:	EN 62471:2008

Zhongshan Botech Certification and Testing Co., Ltd.

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Zhongshan City, Guangdong Province, P.R.China



TEST REPORT EN 62471 Photobiological safety of lamps and lamp systems	
Report No.	BC-103E-1663/25
Application No.	BC-20250721-004
Testing Laboratory	Zhongshan Botech Certification and Testing Co., Ltd.
Address	1-2F, Building 11, No. 2, MuLinSen Avenue, Xiaolan Town, Zhongshan City, Guangdong Province, P.R.China
Applicant's name	Satco products, Inc.
Address	110 Heartland Blvd., Brentwood, NY 11717 USA
Test specification:	
Standards	EN 62471:2008
Test procedure	N/A
Non-standard test method	N/A
Test Report Form No.	BC-FOR-103E/0
TRF Originator	BCT
Master TRF	2024-01
Test item description	LED lamp tube
Trade Mark(s)	N/A
Manufacturer and address	Same as Applicant
Factory and address	JIAXING SUPER LIGHTING ELECTRIC APPLIANCE CO., LTD No.1288 Jiachuang Road, Xiuzhou Area, Jiaxing, Zhejiang
Model/Type reference	S39928
Ratings	120-277V, 50/60Hz, 12W

Summary of testing:

The submitted samples are found to comply with the requirements of:

- EN 62471:2008

Tested by (signature).....: Regis Peng

Reviewed by (signature): Kerwin Zhou

Approved by (signature).....: Lechun Guan

Date of issue: 2025-07-24


General remarks:

The test results presented in this report relate only to the object tested.

This report shall not be reproduced, except in full, without the written approval of the Issuing testing laboratory.

“(see Appendix #)” refers to additional information appended to the report.

“(see appended table)” refers to a table appended to the report.

Throughout this report a point is used as the decimal separator.

Main report: Page 1 to 16 for EN 62471 test report;

Attachment 1: Page 17 for photo documentation.

Test item particulars:	
Tested lamp	☒ continuous wave lamps ☐ pulsed lamps
Tested lamp system	N/A
Lamp classification group	Risk group 0
Lamp cap	N/A
Bulb	N/A
Rated of the lamp.....	See rating
Furthermore marking on the lamp.....	N/A
Seasoning of lamps according EN standard	EN 62471
Used measurement instrument	OST-500(SPD-2)
Temperature by measurement	25 °C
Information for safety use	N/A
Possible test case verdicts:	
- test case does not apply to the test object.....	N/A
- test object does meet the requirement.....	P (Pass)
- test object does not meet the requirement.....	F (Fail)
Testing:	
Date of receipt of test item	2025-07-22
Date (s) of performance of tests	2025-07-24
Copy of marking plate: /	
General product information and other remarks: See rating	

EN 62471			
Clause	Requirement + Test	Result – Remark	Verdict
4	EXPOSURE LIMITS		P
4.1	General		P
	The exposure limits in this standard is not less than 0,01 ms and not more than any 8-hour period and should be used as guides in the control of exposure		P
	Detailed spectral data of a light source are generally required only if the luminance of the source exceeds $10^4 \text{ cd}\cdot\text{m}^{-2}$	see clause 4.3	P
4.3	Hazard exposure limits		P
4.3.1	Actinic UV hazard exposure limit for the skin and eye		P
	The exposure limit for effective radiant exposure is $30 \text{ J}\cdot\text{m}^{-2}$ within any 8-hour period		P
	To protect against injury of the eye or skin from ultraviolet radiation exposure produced by a broadband source, the effective integrated spectral irradiance, E_s , of the light source shall not exceed the levels defined by:		P
	$E_s \cdot t = \sum_{200}^{400} \sum_t E_\lambda(\lambda, t) \cdot S_{UV}(\lambda) \cdot \Delta t \cdot \Delta \lambda \leq 30 \quad \text{J}\cdot\text{m}^{-2}$		P
	The permissible time for exposure to ultraviolet radiation incident upon the unprotected eye or skin shall be computed by:		P
	$t_{\max} = \frac{30}{E_s} \quad \text{s}$		P
4.3.2	Near-UV hazard exposure limit for eye		P
	For the spectral region 315 nm to 400 nm (UV-A) the total radiant exposure to the eye shall not exceed $10000 \text{ J}\cdot\text{m}^{-2}$ for exposure times less than 1000 s. For exposure times greater than 1000 s (approximately 16 minutes) the UV-A irradiance for the unprotected eye, E_{UVA} , shall not exceed $10 \text{ W}\cdot\text{m}^{-2}$.		P
	The permissible time for exposure to ultraviolet radiation incident upon the unprotected eye for time less than 1000 s, shall be computed by:		P
	$t_{\max} \leq \frac{10\,000}{E_{UVA}} \quad \text{s}$		P
4.3.3	Retinal blue light hazard exposure limit		P
	To protect against retinal photochemical injury from chronic blue-light exposure, the integrated		P

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	spectral radiance of the light source weighted against the blue-light hazard function, $B(\lambda)$, i.e., the blue-light weighted radiance, L_B , shall not exceed the levels defined by:		
	$L_B \cdot t = \sum_{300}^{700} \sum_t L_\lambda(\lambda, t) \cdot B(\lambda) \cdot \Delta\lambda \leq 10^6 \quad \text{J} \cdot \text{m}^{-2} \cdot \text{sr}^{-1}$	for $t \leq 10^4 \text{ s}$ $t_{\max} = \frac{10^6}{L_B}$	N/A
	$L_B = \sum_{300}^{700} L_\lambda \cdot B(\lambda) \cdot \Delta\lambda \leq 100 \quad \text{W} \cdot \text{m}^{-2} \cdot \text{sr}^{-1}$	for $t > 10^4 \text{ s}$	P
4.3.4	Retinal blue light hazard exposure limit - small source		N/A
	Thus the spectral irradiance at the eye E_λ , weighted against the blue-light hazard function $B(\lambda)$ shall not exceed the levels defined by:	see table 4.2	N/A
	$E_B \cdot t = \sum_{300}^{700} \sum_t E_\lambda(\lambda, t) \cdot B(\lambda) \cdot \Delta\lambda \leq 100 \quad \text{J} \cdot \text{m}^{-2}$	for $t \leq 100 \text{ s}$	N/A
	$E_B = \sum_{300}^{700} E_\lambda \cdot B(\lambda) \cdot \Delta\lambda \leq 1 \quad \text{W} \cdot \text{m}^{-2}$	for $t > 100 \text{ s}$	N/A
4.3.5	Retinal thermal hazard exposure limit		P
	To protect against retinal thermal injury, the integrated spectral radiance of the light source, L_λ , weighted by the burn hazard weighting function $R(\lambda)$ (from Figure 4.2 and Table 4.2), i.e., the burn hazard weighted radiance, shall not exceed the levels defined by:		P
	$L_R = \sum_{380}^{1400} L_\lambda \cdot R(\lambda) \cdot \Delta\lambda \leq \frac{50\,000}{\alpha \cdot t^{0.25}} \quad \text{W} \cdot \text{m}^{-2} \cdot \text{sr}^{-1}$	$(10 \mu\text{s} \leq t \leq 10 \text{ s})$	P
4.3.6	Retinal thermal hazard exposure limit – weak visual stimulus		P
	For an infrared heat lamp or any near-infrared source where a weak visual stimulus is inadequate to activate the aversion response, the near infrared (780 nm to 1400 nm) radiance, L_{IR} , as viewed by the eye for exposure times greater than 10 s shall be limited to:		P
	$L_{IR} = \sum_{780}^{1400} L_\lambda \cdot R(\lambda) \cdot \Delta\lambda \leq \frac{6\,000}{\alpha} \quad \text{W} \cdot \text{m}^{-2} \cdot \text{sr}^{-1}$	$t > 10 \text{ s}$	P
4.3.7	Infrared radiation hazard exposure limits for the eye		P
	The avoid thermal injury of the cornea and possible delayed effects upon the lens of the eye (cataractogenesis), ocular exposure to infrared radiation, E_{IR} , over the wavelength range 780 nm to 3000 nm, for times less than 1000 s, shall not		P

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	exceed:		
	$E_{IR} = \sum_{780}^{3000} E_{\lambda} \cdot \Delta\lambda \leq 18\,000 \cdot t^{-0.75} \quad W \cdot m^{-2}$	$t \leq 1000 \text{ s}$	N/A
	For times greater than 1000 s the limit becomes:		P
	$E_{IR} = \sum_{780}^{3000} E_{\lambda} \cdot \Delta\lambda \leq 100 \quad W \cdot m^{-2}$	$t > 1000 \text{ s}$	P
4.3.8	Thermal hazard exposure limit for the skin		P
	Visible and infrared radiant exposure (380 nm to 3000 nm) of the skin shall be limited to:		P
	$E_H \cdot t = \sum_{380}^{3000} \sum_t E_{\lambda}(\lambda, t) \cdot \Delta\lambda \cdot \Delta t \leq 20\,000 \cdot t^{0.25} \quad J \cdot m^{-2}$		P
5	MEASUREMENT OF LAMPS AND LAMP SYSTEMS		P
5.1	Measurement conditions		P
	Measurement conditions shall be reported as part of the evaluation against the exposure limits and the assignment of risk classification.		P
5.1.1	Lamp ageing (seasoning)		N/A
	Seasoning of lamps shall be done as stated in the appropriate IEC lamp standard.		N/A
5.1.2	Test environment		P
	For specific test conditions, see the appropriate IEC lamp standard or in absence of such standards, the appropriate national standards or manufacturer's recommendations.		P
5.1.3	Extraneous radiation		P
	Careful checks should be made to ensure that extraneous sources of radiation and reflections do not add significantly to the measurement results.		P
5.1.4	Lamp operation		P
	Operation of the test lamp shall be provided in accordance with:		P
	– the appropriate IEC lamp standard, or		N/A
	– the manufacturer's recommendation		P
5.1.5	Lamp system operation		N/A
	The power source for operation of the test lamp shall be provided in accordance with:		N/A

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	– the appropriate IEC standard, or		N/A
	– the manufacturer's recommendation		N/A
5.2	Measurement procedure		P
5.2.1	Irradiance measurements		P
	Minimum aperture diameter 7mm.		P
	Maximum aperture diameter 50 mm.		P
	The measurement shall be made in that position of the beam giving the maximum reading.		P
	The measurement instrument is adequate calibrated.		P
5.2.2	Radiance measurements		P
5.2.2.1	Standard method		N/A
	The measurements made with an optical system.		N/A
	The instrument shall be calibrated to read in absolute radiant power per unit receiving area and per unit solid angle to acceptance averaged over the field of view of the instrument.		N/A
5.2.2.2	Alternative method		P
	Alternatively to an imaging radiance set-up, an irradiance measurement set-up with a circular field stop placed at the source can be used to perform radiance measurements.		P
5.2.3	Measurement of source size		P
	The determination of α , the angle subtended by a source, requires the determination of the 50% emission points of the source.		P
5.2.4	Pulse width measurement for pulsed sources		N/A
	The determination of Δt , the nominal pulse duration of a source, requires the determination of the time during which the emission is > 50% of its peak value.		N/A
5.3	Analysis methods		P
5.3.1	Weighting curve interpolations		P
	To standardize interpolated values, use linear interpolation on the log of given values to obtain intermediate points at the wavelength intervals desired.	see table 4.1	P
5.3.2	Calculations		P

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	The calculation of source hazard values shall be performed by weighting the spectral scan by the appropriate function and calculating the total weighted energy.		P
5.3.3	Measurement uncertainty		P
	The quality of all measurement results must be quantified by an analysis of the uncertainty.	see Annex C in the norm	P
6	LAMP CLASSIFICATION		P
	For the purposes of this standard it was decided that the values shall be reported as follows:	see table 6.1	P
	– for lamps intended for general lighting service, the hazard values shall be reported as either irradiance or radiance values at a distance which produces an illuminance of 500 lux, but not at a distance less than 200 mm	0.79m at 500lux	P
	– for all other light sources, including pulsed lamp sources, the hazard values shall be reported at a distance of 200 mm		N/A
6.1	Continuous wave lamps		P
6.1.1	Except Group		P
	In the except group are lamps, which does not pose any photobiological hazard. The requirement is met by any lamp that does not pose:		P
	– an actinic ultraviolet hazard (E_s) within 8-hours exposure (30000 s), nor		P
	– a near-UV hazard (E_{UVA}) within 1000 s, (about 16 min), nor		P
	– a retinal blue-light hazard (L_B) within 10000 s (about 2,8 h), nor		P
	– a retinal thermal hazard (L_R) within 10 s, nor		P
	– an infrared radiation hazard for the eye (E_{IR}) within 1000 s		P
6.1.2	Risk Group 1 (Low-Risk)		N/A
	In this group are lamps, which exceeds the limits for the except group but that does not pose:		N/A
	– an actinic ultraviolet hazard (E_s) within 10000 s, nor		N/A
	– a near ultraviolet hazard (E_{UVA}) within 300 s, nor		N/A
	– a retinal blue-light hazard (L_B) within 100 s, nor		N/A

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	– a retinal thermal hazard (L_R) within 10 s, nor		N/A
	– an infrared radiation hazard for the eye (E_{IR}) within 100 s		N/A
	Lamps that emit infrared radiation without a strong visual stimulus and do not pose a near-infrared retinal hazard (L_{IR}), within 100 s are in Risk Group 1.		N/A
6.1.3	Risk Group 2 (Moderate-Risk)		N/A
	This requirement is met by any lamp that exceeds the limits for Risk Group 1, but that does not pose:		N/A
	– an actinic ultraviolet hazard (E_S) within 1000 s exposure, nor		N/A
	– a near ultraviolet hazard (E_{UVA}) within 100 s, nor		N/A
	– a retinal blue-light hazard (L_B) within 0,25 s (aversion response), nor		N/A
	– a retinal thermal hazard (L_R) within 0,25 s (aversion response), nor		N/A
	– an infrared radiation hazard for the eye (E_{IR}) within 10 s		N/A
	Lamps that emit infrared radiation without a strong visual stimulus and do not pose a near-infrared retinal hazard (L_{IR}), within 10 s are in Risk Group 2.		N/A
6.1.4	Risk Group 3 (High-Risk)		N/A
	Lamps which exceed the limits for Risk Group 2 are in Group 3.		N/A
6.2	Pulsed lamps		N/A
	Pulse lamp criteria shall apply to a single pulse and to any group of pulses within 0,25 s.		N/A
	A pulsed lamp shall be evaluated at the highest nominal energy loading as specified by the manufacturer.		N/A
	The risk group determination of the lamp being tested shall be made as follows:		N/A
	– a lamp that exceeds the exposure limit shall be classified as belonging to Risk Group 3 (High-Risk)		N/A
	– for single pulsed lamps, a lamp whose weighted radiant exposure or weighted radiance does is below the EL shall be classified as belonging to the Exempt Group		N/A
	– for repetitively pulsed lamps, a lamp whose weighted radiant exposure or weighted radiance		N/A

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	dose is below the EL, shall be evaluated using the continuous wave risk criteria discussed in clause 6.1, using time averaged values of the pulsed emission		

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Table 4.1		Spectral weighting function for assessing ultraviolet hazards for skin and eye		P
Wavelength ¹ λ , nm	UV hazard function $S_{uv}(\lambda)$	Wavelength λ , nm	UV hazard function $S_{uv}(\lambda)$	
200	0,030	313*	0,006	
205	0,051	315	0,003	
210	0,075	316	0,0024	
215	0,095	317	0,0020	
220	0,120	318	0,0016	
225	0,150	319	0,0012	
230	0,190	320	0,0010	
235	0,240	322	0,00067	
240	0,300	323	0,00054	
245	0,360	325	0,00050	
250	0,430	328	0,00044	
254*	0,500	330	0,00041	
255	0,520	333*	0,00037	
260	0,650	335	0,00034	
265	0,810	340	0,00028	
270	1,000	345	0,00024	
275	0,960	350	0,00020	
280*	0,880	355	0,00016	
285	0,770	360	0,00013	
290	0,640	365*	0,00011	
295	0,540	370	0,000093	
297*	0,460	375	0,000077	
300	0,300	380	0,000064	
303*	0,120	385	0,000053	
305	0,060	390	0,000044	
308	0,026	395	0,000036	
310	0,015	400	0,000030	
¹ Wavelengths chosen are representative: other values should be obtained by logarithmic interpolation at intermediate wavelengths. * Emission lines of a mercury discharge spectrum.				

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Clause	Requirement + Test	Result – Remark	Verdict

Table 4.2	Spectral weighting functions for assessing retinal hazards from broadband optical sources		P
Wavelength nm	Blue-light hazard function B (λ)	Burn hazard function R (λ)	
300	0,01		
305	0,01		
310	0,01		
315	0,01		
320	0,01		
325	0,01		
330	0,01		
335	0,01		
340	0,01		
345	0,01		
350	0,01		
355	0,01		
360	0,01		
365	0,01		
370	0,01		
375	0,01		
380	0,01	0,1	
385	0,013	0,13	
390	0,025	0,25	
395	0,05	0,5	
400	0,10	1,0	
405	0,20	2,0	
410	0,40	4,0	
415	0,80	8,0	
420	0,90	9,0	
425	0,95	9,5	
430	0,98	9,8	
435	1,00	10,0	
440	1,00	10,0	
445	0,97	9,7	
450	0,94	9,4	
455	0,90	9,0	
460	0,80	8,0	
465	0,70	7,0	
470	0,62	6,2	
475	0,55	5,5	
480	0,45	4,5	
485	0,40	4,0	
490	0,22	2,2	
495	0,16	1,6	
500-600	$10^{[(450-\lambda)/50]}$	1,0	
600-700	0,001	1,0	

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700-1050		$10^{[(700-\lambda)/500]}$	
1050-1150		0,2	
1150-1200		$0,2 \cdot 10^{0,02(1150-\lambda)}$	
1200-1400		0,02	

Table 5.4 Summary of the ELs for the surface of the skin or cornea (irradiance based values)						P
Hazard Name	Relevant equation	Wavelength range nm	Exposure duration sec	Limiting aperture rad (deg)	EL in terms of constant irradiance $W \cdot m^{-2}$	
Actinic UV skin & eye	$E_s = \sum E_\lambda \cdot S(\lambda) \cdot \Delta\lambda$	200 – 400	< 30000	1,4 (80)	30/t	
Eye UV-A	$E_{UVA} = \sum E_\lambda \cdot \Delta\lambda$	315 – 400	≤ 1000 > 1000	1,4 (80)	10000/t 10	
Blue-light small source	$E_B = \sum E_\lambda \cdot B(\lambda) \cdot \Delta\lambda$	300 – 700	≤ 100 > 100	< 0,011	100/t 1,0	
Eye IR	$E_{IR} = \sum E_\lambda \cdot \Delta\lambda$	780 – 3000	≤ 1000 > 1000	1,4 (80)	$18000/t^{0,75}$ 100	
Skin thermal	$E_H = \sum E_\lambda \cdot \Delta\lambda$	380 – 3000	< 10	2π sr	$20000/t^{0,75}$	

Table 5.5 Summary of the ELs for the retina (radiance based values)						P
Hazard Name	Relevant equation	Wavelength range nm	Exposure duration sec	Field of view radians	EL in terms of constant radiance $W \cdot m^{-2} \cdot sr^{-1}$	
Blue light	$L_B = \sum L_\lambda \cdot B(\lambda) \cdot \Delta\lambda$	300 – 700	0,25 – 10 10-100 100-10000 ≥ 10000	$0,011 \cdot \sqrt{(t/10)}$ 0,011 $0,0011 \cdot \sqrt{t}$ 0,1	$10^6/t$ $10^6/t$ $10^6/t$ 100	
Retinal thermal	$L_R = \sum L_\lambda \cdot R(\lambda) \cdot \Delta\lambda$	380 – 1400	< 0,25 0,25 – 10	0,0017 $0,011 \cdot \sqrt{(t/10)}$	$50000/(\alpha \cdot t^{0,25})$ $50000/(\alpha \cdot t^{0,25})$	
Retinal thermal (weak visual stimulus)	$L_{IR} = \sum L_\lambda \cdot R(\lambda) \cdot \Delta\lambda$	780 – 1400	> 10	0,011	$6000/\alpha$	

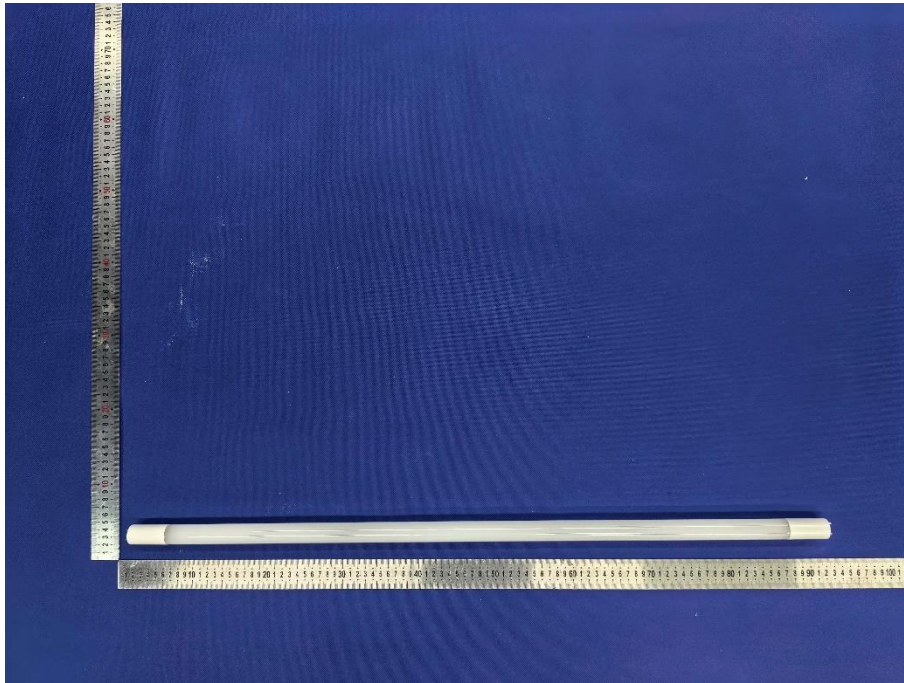
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Clause	Requirement + Test	Result – Remark	Verdict

ATTACHMENT TO TEST REPORT IEC 62471 EUROPEAN GROUP DIFFERENCES AND NATIONAL DIFFERENCES Photobiological safety of lamps and lamps systems			
Differences according to: EN 62471:2008			
Annex Form No.: EU_GD_IEC62471B			
Annex Form Originator: OVE			
Master Annex Form: 2019-01-24			
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	CENELEC COMMON MODIFICATIONS (EN)		P
4	EXPOSURE LIMITS		P
	Contents of the whole Clause 4 of IEC 62471:2006 moved into a new informative Annex ZB		—
	Clause 4 replaced by the following:		P
	Limits of the Artificial Optical Radiation Directive (2006/25/EC) have been applied instead of those fixed in IEC 62471:2006	See appended Table 6.1	P
4.1	General		P
	First paragraph deleted		—

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Clause	Requirement + Test	Result – Remark	Verdict

Table 6.1		Emission limits for risk groups of continuous wave lamps										P
Risk	Action spectrum	Symbol	Units	Emission Measurement								Mod risk
				Exempt		Low risk		Mod risk				
				Limit	Result	Limit	Result	Limit	Result			
Actinic UV	S _{UV} (λ)	E _s	W•m ⁻²	0,001	2.413E-5	--	--	--	--	--	--	
Near UV		E _{UVA}	W•m ⁻²	0.33	9.215E-5	--	--	--	--	--	--	
Blue light	B(λ)	L _B	W•m ⁻² •sr ⁻¹	100	1.883E+0	10000		4000000				
Blue light, small source	B(λ)	E _B	W•m ⁻²	0.01*	--	1,0		400				
Retinal thermal	R(λ)	L _R	W•m ⁻² •sr ⁻¹	28000/α	8.302E+1	28000/α		71000/α				
Retinal thermal, weak visual stimulus**	R(λ)	L _{IR}	W•m ⁻² •sr ⁻¹	545000	--							
				0,0017≤ α ≤ 0,011	6.440E-2							
IR radiation, eye		E _{IR}	W•m ⁻²	6000/α								
				0,011≤ α ≤ 0,1	100	7.778E-3	570		3200			
* Small source defined as one with α < 0,011 radian. Averaging field of view at 10000 s is 0,1 radian.												
** Involves evaluation of non-GLS source												

Attachment 1: Photo Documentation

Picture 1: whole view of S39928

--- End of Report ---