

TEST REPORT



REPORT NO: CTNT2507110020101

Product name: Laser Facial Mask

Model No.: TLM300-L

Applicant: Shenzhen Idea Light Limited

Test procedure: Type Test

Shenzhen Zhongwei Testing Technology Co., Ltd.



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TEST REPORT
EN 60825-1
Safety of laser products –
Part 1: Equipment classification and requirements

Report Number : CTNT2507110020101

Date of issue : August 6, 2025

Name of Testing Laboratory preparing the Report : Shenzhen Zhongwei Testing Technology Co., Ltd.
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Applicant's name : Shenzhen Idea Light Limited
Address : 3th Floor, Block B, Shengdelan Industry Park, Guanlan,
Longhua District, Shenzhen, Guangdong Province, China, 518110

Manufacturer's name : Shenzhen Idea Light Limited
Address : 3th Floor, Block B, Shengdelan Industry Park, Guanlan,
Longhua District, Shenzhen, Guangdong Province, China, 518110

Test specification:

Standard : EN 60825-1: 2014+A11: 2021

Test procedure : Type Test

Non-standard test method : N/A

Test Report Form No. : EU_GD_IEC60825_1G

Test Report Form(s) Originator : TÜV Rheinland LGA Products GmbH

Master TRF : Dated 2021-11-05

General disclaimer:

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

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The authenticity of this Test Report and its contents can be verified by contacting the CTNT, responsible for this Test Report.

Test item description : Laser Facial Mask

Trademark : N/A

Model/Type reference : TLM300-L

Ratings : 5V 0.7A

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Responsible Testing Laboratory (as applicable), testing procedure and testing location(s):		
Laboratory Name	Shenzhen Zhongwei Testing Technology Co., Ltd.	
Testing location/ address	Room 1A106, 1/F., No.109, Lijia Road, Henggang, Henggang Street, Longgang District, Shenzhen, Guangdong, China	
Tested by (Test Engineer)..... :	Andrea Xie	
Reviewed by (Supervisor)..... :	Oliver Long	
Approved by (Chief Engineer)	Flight Lee	
List of Attachments (including a total number of pages in each attachment)		
- Test data graph, Photo document		
Summary of testing:		
Tests performed (name of test and test clause): Determination of the result includes consideration of measurement uncertainty from the test equipment and methods. According to the test of EN 60825-1: 2014+A11: 2021 Safety of laser products – Part 1: Equipment classification and requirements. This product complied with the requirements of Class 3R.	Testing location: Shenzhen Zhongwei Testing Technology Co., Ltd. Room 1A106, 1/F., No.109, Lijia Road, Henggang, Henggang Street, Longgang District, Shenzhen, Guangdong, China Tel: 086-755-28680489 E-mail: admin@ctnt-cert.com Web: www.ctnt-cert.com	
Test item particulars	:	
Classification of installation and use:	: fixed	
Supply Connection	: internally powered	
laser Class as defined in 3.44 and 3.18 through 3.24 of IEC 60825-1:2014	Class 3R	
laser output (power or energy)	: See below	
Accessories and detachable parts included in the evaluation	N/A	
Options included	: N/A	

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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 : July 11, 2025

Date (s) of performance of tests : July 15, 2025

General remarks:

"(See Enclosure #)" refers to additional information appended to the report.

"(See appended table)" refers to a table appended to the report.

Throughout this report a ☐ comma / ☒ point is used as the decimal separator.

Other important notes:

1. If you have any objection to the inspection results in this report, please submit a written report to the company within 15 days from the date of receipt of the report.
2. Entrusting test only responsible for the incoming samples, and the test results are used by the entrusting party to understand the quality of the samples.
3. This test report is invalid without the "test stamp".
4. This report may not be reproduced in part without permission to avoid ambiguous interpretation.
5. Test items with "*" are unauthorized items by CNAS.
6. The remaining samples under test must be collected within three months of receipt of the inspection report. If the samples are not collected within the time limit, the laboratory will handle them by selves.

Company name: Shenzhen Zhongwei Testing Technology Co., Ltd.

Address: Room 1A106, 1/F., No.109, Lijia Road, Henggang, Henggang Street, Longgang District, Shenzhen, Guangdong, China

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Email: admin@cnt-cert.com

Website: www.cnt-cert.com

General product information:

- 1, The tested laser products are used for laser beauty and other purposes, emitting multi-point diverging lasers. According to the standard, the laser safety level is determined based on the power under condition 3. The test is conducted based on the most severe irradiation conditions.

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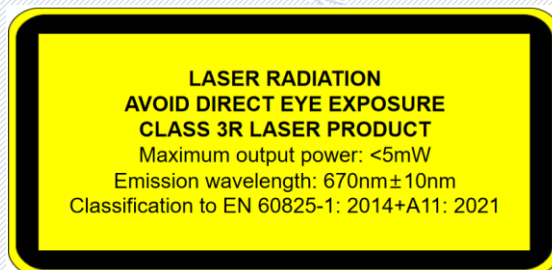
Web: www.cnt-cert.com

Copy of the label:

The artwork below may be only a draft. The manufacturer shall fix the label on the product at the appropriate position.



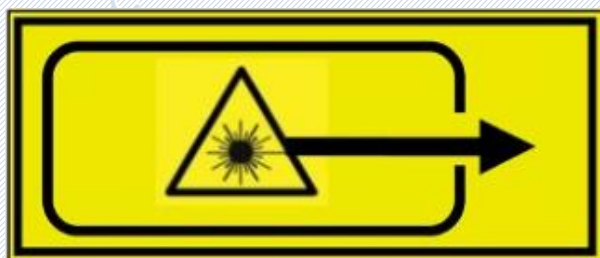
Label 1: Warning label – Hazard symbol



Label 2: Explanatory label



Label 3: Alternative label for Class 3R



Label 4: Alternative label for laser aperture

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EN 60825-1			
Clause	Requirement + Test	Result - Remark	Verdict
4	CLASSIFICATION PRINCIPLES		
4.3	Classification rules		--
4.3a	Radiation of a single wavelength	668nm	P
4.3b	Radiation of multiple wavelengths		N/A
	1) Laser product emits at two or more wavelengths shown as additive in Table 1		N/A
	2) Laser product emits at two or more wavelengths not shown as additive in Table 1		N/A
4.3c	Radiation from extended sources (see 5.4.3)		N/A
4.3d	Non-uniform, non-circular or multiple apparent source		N/A
4.3e	Time bases		--
	1) 0,25 s	For Class 3R	P
	2) 100 s		N/A
	3) 30000 s		N/A
4.3f	Repetitively pulsed or modulated lasers		N/A
	1) Any single pulse		N/A
	2) Average power for pulse trains		N/A
	3) Pulse duration $t \leq T_i$: Number of pulses N and C5.....:		N/A
	3) Pulse duration $t > T_i$: Number of pulses N and C5		N/A
4.4	Laser products designed to functions conventional lamps.		N/A
	measured at 200 mm distance from closest point of human access (> 5 mrad).		N/A
	Un-weighted radiance L measured at 200 mm distance (comparison with $LT = 1 \text{ MWm}^{-2}\text{sr}^{-1}$) under reasonably foreseeable single fault conditions.		N/A
	Evaluation of emission according to IEC 62471 series (optional): Standard applied (IEC 62471 series): Risk Group.....: Labelling.....: Classification of product based on accessible laser radiation (if no laser radiation accessible: Class 1).		N/A
5	DETERMINATION OF THE ACCESSIBLE EMISSION LEVEL AND PRODUCT CLASSIFICATION		
5.1	Tests		--
	Compliance under reasonably foreseeable single fault conditions.		P
5.3	Determination of the class of the laser product:		--

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Clause	Requirement + Test	Result - Remark	Verdict
	For Class 1C: vertical safety standard applied with requirements for Class 1C.		
5.4	Measurement geometry		--
5.4.1	General		--
5.4.2	Default (simplified) evaluation	See page 23 for details.	P
	Conditions applied	Condition 3	P
	Aperture diameter	7mm	P
	Reference point:	Physical location of the emitting chip	P
	Measurement distance	100mm	P
	(For each condition)		
5.4.3	Evaluation condition for extended sources		N/A
	Conditions applied		N/A
	Most restrictive position		N/A
	(Distance from reference point)		
	Angular subtense of the apparent source and C ₆ : (For each condition)		N/A
5.4.3a	Aperture diameters (for each condition)		N/A
5.4.3b	Angle of acceptance (for each condition)		N/A
6	ENGINEERING SPECIFICATIONS		
6.1	General remarks and modifications		P
6.2	Protective housing		--
6.2.1	General	The equipment is equipped with a complete protective casing to prevent personnel from coming into contact with radiation exceeding Class 1 AEL	--
	Protective housing prevents access to energy levels in excess of the AEL for Class 1.		P
	Protective housing prevents access to energy levels equivalent to Class 4 and withstands exposures under reasonably foreseeable single fault conditions.		N/A
	Maintenance of Class 1, 1C, 1M, 2, 2M, or 3R (access to emissions of Class 3B or 4 is prevented).		P
	Maintenance of Class 3B product (access to emission of Class 4 is prevented).		N/A
6.2.2	Service		N/A
6.2.3	Removable laser system (laser system complies with requirements of Clauses 6 and 7).		N/A
6.3	Access panels and safety interlocks		--

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Clause	Requirement + Test	Result - Remark	Verdict
6.3.1	Panel is intended to be removed during operation (or maintenance) and would give access to higher energy levels (see Table 13).		N/A
	Accessible emission (after removal of the panel) corresponds to product Class (designated by "X" in Table 13)		N/A
	Emission through the opening if interlocked panel of Class 1, 1C, 1M, 2, or 2M is removed (Emission < AEL of Class 1M or 2M).		N/A
	Emission through the opening if interlocked panel of Class 3R, 3B, or 4 is removed (Emission < AEL of Class 3R).		N/A
	Requirements regarding reasonably foreseeable single fault condition.		N/A
6.3.2	Override mechanism		N/A
	Behaviour of override in operation when the panel is replaced.		N/A
	Visible or audible warning for override mode.		N/A
6.4	Remote interlock connector		N/A
6.5	Manual reset		N/A
6.6	Key control		N/A
6.7	Laser radiation emission warning		N/A
6.7.1	Laser product is a 3R ($\lambda < 400$ nm; $\lambda > 700$ nm), 1C, 3B or 4 laser systems.		N/A
6.7.2	Audible or visible warning.		N/A
	Warning is failsafe or redundant.		N/A
	Viewing of the visible warning does not require exposure to emissions > AEL for Class 1M and 2M		N/A
6.7.3	Operational control and laser aperture are provided with a warning device when they are separated more than 2 m from warning device.		N/A
6.7.4	Visible indication of output aperture if laser emission may be distributed through more than one output.		N/A
6.7.5	Switch for handheld Class 3R device must be depressed for emission (in lieu of emission indicator).		N/A
6.8	Beam stop or attenuator		N/A
6.9	Controls	The position of the operation control will not come into contact with radiation higher than Class 1 and Class 2 AEL	P
6.10	Viewing optics		N/A
	a) Human access to laser radiation in excess of Class 1M prevented when the shutter is opened or attenuation varied.		N/A
	b) Opening of the shutter or variation of the attenuation prevented when exposure to laser radiation in excess of Class 1M is possible.		N/A
6.11	Scanning safeguard		N/A

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Clause	Requirement + Test	Result - Remark	Verdict
6.12	Safeguard for Class 1C products		N/A
	a) Human access to laser radiation in excess of AEL for Class 1 measured under Condition 3 is prevented.		N/A
	b) Human access to laser radiation in excess of AEL for Class 3B measured through 3,5 mm aperture at 5 mm distance from applicator is prevented.		N/A
6.13	"Walk-in" access		N/A
	a) Means provided so that any person inside the housing can prevent activation of Class 3B or 4 laser hazards.		N/A
	b) A warning device provides adequate warning of emission to any person within the housing.		N/A
	c) Where "walk-in" access during operation is intended or reasonably foreseeable, emission of laser radiation that is equivalent to Class 3B or 4 while someone is present inside the enclosure of Class 1, Class 2 or Class 3R product is prevented by engineering means.		N/A
6.14	Environmental conditions		--
	- climatic conditions		P
	- vibration and shock		N/A
6.15	Protection against other hazards		--
6.15.1	Non-optical hazards		N/A
	- electrical hazards;		N/A
	- excessive temperature;		N/A
	- spread of fire from the equipment;		N/A
	- sound and ultrasonics;		N/A
	- harmful substances;		N/A
	- explosion;		N/A
6.15.2	Collateral radiation		N/A
6.16	Power limiting circuit		N/A
7	Labelling		
7.1	General		--
	Labels durable, permanently affixed		P
	Labels clearly visible		P
	Reading of labels is possible without exposure to laser radiation in excess of AEL for Class 1.		P
	Colour combination		P
	Labelling impractical due to the size or design of the product.		N/A
	Warning label – Hazard symbol (Figure 3)		P
7.2-7.7	Text on explanatory label or pictogram (Laser class, warning text)		P
7.8	Aperture label		P
7.9	Radiation output and standards information		--
	Max output of laser radiation		P

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Clause	Requirement + Test	Result - Remark	Verdict
	Pulse duration		N/A
	Emitted wavelength(s)		P
	Name and publication date of the standard	Please refer to the user manual for details	P
7.10	Labels for access panels		--
7.10.1 a) – f)	Labels for panels - warning wording used		N/A
7.10.2	Labels for safety interlocked panels - Warning wording used		N/A
7.11	Warning for invisible laser radiation		N/A
7.12	Warning for visible laser radiation		P
7.13	Warning for potential hazard to the skin or anterior parts of the eye - warning wording used		N/A
8	Other informational requirements		
8.1	Information for the user		--
	a) adequate instructions for assembly, maintenance and safe use and description of the classification limitations, if appropriate.		P
	b) additional warning for Class 1M and 2M		N/A
	c) laser beam parameters for radiation above the AEL of Class 1		--
	Wavelength		P
	Beam divergence		N/A
	Pulse pattern		N/A
	(pulse duration, repetition rate, ...)		
	Maximum power or energy output		P
	d) safety instruction for embedded laser products and other incorporated laser products.		N/A
	e) MPE and NOHD for Class 3B and 4 laser products; For collimated beam Class 1M and 2M lasers the extended NOHD (ENOHD).		N/A
	f) information for the selection of eye protection.		N/A
	g) reproduction of all required labels and warnings.		P
	h) location of laser apertures		P
	i) list of controls, adjustments of procedures for operation and maintenance - and warning statement.		P
	j) information (compatibility requirements) about laser energy source if not incorporated.		N/A
	k) additional warning for Class 1, 1M, 2, 2M, and 3R regarding skin or corneal burns.		N/A
	l) Information for Class 1C products (e.g. warning that repeated application may pose a risk).		N/A
8.2	Purchasing and servicing information		P
	a) safety classification of each laser product stated in all descriptive material (e.g. brochures).		P

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	b) adequate instructions for servicing available: - warnings and precautions regarding exposure of laser emission above Class 1 - maintenance schedule - list of controls and procedures that could increase accessible emissions - description of displaceable parts - protective procedures for service personnel reproduction of labels and hazard warnings		P
9	Additional requirements for specific laser products		
9.1	Applicable other parts of the standard series IEC 60825		--
	IEC 60825-2 (Safety of optical communication systems)		N/A
	IEC 60825-4 (Laser guards)		N/A
	IEC 60825-12 (Safety of free space optical communication systems used for transmission of information)		N/A
9.2	Medical laser products: Class 3B and Class 4 medical laser products comply with IEC 60601-2-22		N/A
9.3	Laser processing machines: Comply with IEC/ISO 11553 series.		N/A
9.4	Electric toys: Comply with IEC 62115		N/A
9.5	Consumer electronic products: Comply with IEC 60950 (IT-equipment) or IEC 60065 (AV equipment)		N/A

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Clause	Requirement + Test	Result - Remark	Verdict
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	CENELEC COMMON MODIFICATIONS (EN)		P
1	Scope and object		P
	In Clause 1, replace the existing text: "This Part 1 describes the minimum requirements. Compliance with this Part 1 may not be sufficient to achieve the required level of product safety. Laser products may also be required to conform to the applicable performance and testing requirements of other applicable product safety standards. NOTE 3 Other standards may contain additional requirements. For example, a Class 3B or Class 4 laser product may not be suitable for use as a consumer product." Where a laser system forms a part of equipment which is subject to another IEC product safety standard, e.g. for medical equipment (IEC 60601-2-22), IT equipment (IEC 60950 series), audio and video equipment (IEC 60065), audio-video and IT equipment (IEC 62368-1), equipment for use in hazardous atmospheres (IEC 60079), or electric toys (IEC 62115), this Part 1 will apply in accordance with the provisions of IEC Guide 1042 for hazards resulting from laser radiation. If no product safety standard is applicable, then IEC 61010-1 may be applied." with the following:		P
	"This Part 1 describes requirements that are considered sufficient to achieve the required level of product safety for general laser products with respect to hazards to the eye and skin posed by laser radiation, provided that consumer laser products comply with EN 506891 (see 9.5 in EN 60825-1:2014/FprAA:2020). Also, as required in 5.3 b) of EN 60825-1, that laser products classified as Class 1C comply with the respective applicable part of either the EN 60601 series or the EN 60335 series that contains requirements for the safe exposure of the skin (note that the exposure of the skin is not necessarily limited to the MPE values of the skin), if applicable, as well as specific requirements for the performance and testing of the safeguard that prevents hazardous emission towards the eye. Depending on the type of the product, laser products such as for example medical lasers, machines or toys can be required to conform to the applicable performance and testing requirements of their relevant product safety standards. NOTE 3 See 3.92 for "general laser product". Where a laser system forms a part of equipment which is subject to another IEC product safety standard, e.g. for medical equipment (IEC 60601-2-22), IT equipment (IEC 60950 series), audio and video equipment (IEC 60065), audio-video and IT equipment (IEC 62368-1), electrical equipment for measurement, control, and laboratory use (IEC 61010-1), equipment for use in hazardous atmospheres (IEC 60079), or electric toys (IEC 62115), this Part 1 will apply in accordance with the provisions of IEC Guide 1042 for hazards resulting from laser radiation."		N/A
3	Terms and definitions <i>In Clause 3, add the following terms and their definitions:</i>		N/A
3.9.1	consumer laser product any product or assembly of components that: (a) is intended for consumers, or likely to be used by consumers under reasonably foreseeable conditions even if not intended for them; and (b) constitutes or incorporates a laser or laser system		N/A

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3.9.2	general laser product laser product that does not fall within the scope of another EN standard that addresses the safety of a specific category of laser products Note 1 to entry: Examples of products where such other EN Standards exist are medical lasers (EN 60601-2-22), electric toys (EN 62115) or laser processing machines (EN ISO 11553-1, EN ISO 11553-2). Note 2 to entry: General laser products are for instance laboratory equipment, laser products for measurements, laser pointers, display lasers and laser illuminated projectors. Note 3 to entry: EN 506891 is not considered as another EN standard that addresses the safety of a specific category of laser products, since it applies to all consumer laser products."		N/A

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Clause	Requirement + Test	Result - Remark	Verdict
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4.3

Classification rules

In Note 3 of 4.3 c), replace the following text:

"NOTE 3 A source is considered an extended source when the angular subtense of the source is greater than $\alpha_{\min}$, where $\alpha_{\min} = 1,5$ mrad. Most laser sources have an angular subtense α less than $\alpha_{\min}$, and appear as an apparent "point source" (small source) when viewed from within the beam (intra-beam viewing). Indeed a circular laser beam cannot be collimated to a divergence less than 1,5 mrad if it is an extended source, thus any laser where a beam divergence of 1,5 mrad or less is specified cannot be treated as an extended source. For a small source, α is set to $\alpha_{\min} = 1,5$ mrad and $C_6 = 1$."

with:

"NOTE 3 An apparent source is considered an extended source when the angular subtense of the apparent source (i.e. the angular subtense of the image of the source) is greater than $\alpha_{\min}$, where $\alpha_{\min} = 1,5$ mrad (note that different accommodation states as well as different positions in the beam have to be considered for the classification of extended sources). Most laser sources have an angular subtense α less than $\alpha_{\min}$, and appear as an apparent "point source" (small source) when viewed from within the beam (intra-beam viewing). Indeed, if a laser beam is to qualify as an extended source, it cannot be collimated to a divergence less than 1,5 mrad unless it is astigmatic (i.e. could be collimated in one dimension only) or scanning. Thus any non-scanning circularly symmetric laser beam, where a beam divergence of 1,5 mrad or less is specified, cannot be treated as an extended source, since accommodation to infinity for intrabeam viewing of such a source produces a retinal image that subtends an angle of less than 1,5 mrad. Also, more generally, any circular, non-scanning high quality Gaussian beam (TEM00) with a beam quality factor M_2 equal or close to unity is associated to a small apparent source, as either the beam waist subtends an angular subtense smaller than 1,5 mrad or the divergence is smaller than 1,5 mrad. For a small source, α is set to $\alpha_{\min} = 1,5$ mrad and $C_6 = 1$. See also definitions 3.7, 3.10, 3.36, 3.42. A frequent mistake is to associate the beam diameter, or the beam profile, at the laser aperture with the apparent source; the laser aperture as such has no special distinctiveness that is related to the apparent source. Examples of designs that might constitute an extended source are: transmissions through a diffusor, transmissions through a diffractive optical element (DOE), partially coherent beams (i.e. beams with low beam quality and therefore higher values of the beam quality factor M_2), scanned emission, fibres, and astigmatic beams (since the eye cannot accommodate to both waists at the same time). Measurements of the image of the apparent source are expected to be performed with sufficient accuracy, typically with a laser beam profiler CCD camera. As an alternative to characterizing the angular subtense of the apparent source (note that different accommodation states are expected to be considered, as well as different positions in the beam, see 5.4.3), C_6 can be set to unity (simplified evaluation, see 5.4.2)."

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Clause	Requirement + Test	Result - Remark	Verdict												
5.3	Determination of the class of the laser product <i>In subclause 5.3, replace the existing text of footnote d of Table 3, footnote f of Table 4, footnote d of Table 6 and footnote c of Table 7:</i> "In the wavelength range between 1 250 nm and 1 400 nm, the upper value of the AEL is limited to the AEL value for Class 3B." <i>with:</i> "In the wavelength range between 1 250 nm and 1 400 nm, two additional limitations apply. The value of the AEL in the table above is limited to the AEL value for Class 3B. The accessible emission, determined with the specified aperture stop, is limited by the following values (these limits are derived from the MPE of the skin and are required as an additional limit to protect the anterior parts of the eye). This limitation for the eye is to be treated as additive with the spectral region of 1400 nm to 10⁶ nm listed in Table 1. <table><tr><td>For $t < 10^{-9}$ s:</td><td>$7,9 \times 10^5$ W</td><td>Aperture stop diameter: 1 mm</td></tr><tr><td>For $10^{-9} \text{ s} \leq t < 10^{-7}$ s:</td><td>$7,9 \times 10^{-4}$ J</td><td>Aperture stop diameter: 1 mm</td></tr><tr><td>For $10^{-7} \text{ s} \leq t < 0,35$ s:</td><td>$4,3 \times 10^{-2} t^{0,25}$ J</td><td>Aperture stop diameter: 1 mm</td></tr><tr><td>For $t \geq 0,35$ s:</td><td>0,1 W</td><td>Aperture stop diameter: 0,35 s</td></tr></table> $\leq t < 10$ s: $1,5 t^{3/8}$ mm $t \geq 10$ s: 3,5 mm	For $t < 10^{-9}$ s:	$7,9 \times 10^5$ W	Aperture stop diameter: 1 mm	For $10^{-9} \text{ s} \leq t < 10^{-7}$ s:	$7,9 \times 10^{-4}$ J	Aperture stop diameter: 1 mm	For $10^{-7} \text{ s} \leq t < 0,35$ s:	$4,3 \times 10^{-2} t^{0,25}$ J	Aperture stop diameter: 1 mm	For $t \geq 0,35$ s:	0,1 W	Aperture stop diameter: 0,35 s		N/A
For $t < 10^{-9}$ s:	$7,9 \times 10^5$ W	Aperture stop diameter: 1 mm													
For $10^{-9} \text{ s} \leq t < 10^{-7}$ s:	$7,9 \times 10^{-4}$ J	Aperture stop diameter: 1 mm													
For $10^{-7} \text{ s} \leq t < 0,35$ s:	$4,3 \times 10^{-2} t^{0,25}$ J	Aperture stop diameter: 1 mm													
For $t \geq 0,35$ s:	0,1 W	Aperture stop diameter: 0,35 s													
6.2.1	General <i>In 6.2.1, replace the existing first paragraph:</i> "Each laser product shall have a protective housing which, when in place, prevents human access to laser radiation (including errant laser radiation) in excess of the AEL for Class 1, except when human access is necessary for the performance of the function(s) of the product." <i>with:</i> "Each laser product shall have a protective housing which, when in place, prevents human access to laser radiation (including errant laser radiation) in excess of the AEL for Class 1, unless human access to laser radiation is necessary for the performance of the function(s) of the product. Where human access to radiation levels above the AEL for Class 1 is necessary, the product shall be in the lowest feasible class commensurate with this function. NOTE Where such human access is necessary only at certain times and not during routine operation of the product (e.g. to allow specific maintenance procedures, which are described in the information for the user, to be undertaken by the user) the protective housing prevents human access to laser radiation in excess of the AEL for Class 1 during routine operation. This requirement for a protective housing does not mean that the product needs to meet all the requirements for, and to be classified as, Class 1. This is because classification as Class 1 cannot be achieved when access to levels of laser radiation of Class 3B or Class 4 is necessary during maintenance procedures."		N/A												

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Clause	Requirement + Test	Result - Remark	Verdict
9.5	Consumer electronic products <i>Replace the entire text of subclause 9.5 with the following:</i> “Consumer laser products shall comply with applicable requirements for laser products of their class as well as with EN 506891. In addition, these products may be subject to specific safety standards such as EN 62368-1 (AV/ICT equipment). Products that are classified as Class 1C need to comply with the requirements of the respective specific vertical standard of the EN 60335 series or the EN 60601 series. NOTE EN 506891 will be made available after the publication of EN 60825-1:2014/FprAA:2020. In the period of time until EN 506891 is published, there are no specific requirements for consumer products. It is noted that some EU member states have issued guidance documents and/or legal requirements that apply to consumer laser products and that are not harmonized amongst EU member states.”		N/A
ZB	ANNEX ZB		P
ZB.1	General remarks This informative annex is added to EN 60825-1:2014 in order to publish the content of the IEC Interpretation Sheets IEC 60825-1:2014/ISH1:2017 and IEC 60825-1:2014/ISH2:2017 by CENELEC. The content is published as an annex to EN 60825-1, because the publication type “Interpretation Sheet” is not available at CENELEC level. Because there are no page-number limitations for an annex (contrary to an Interpretation Sheet), the text of the IEC ISH1 and ISH 2 has been somewhat extended in order to increase the readability and clarity.		P
ZB.2	Subclause 4.3 Classification rules (IEC 60825-1:2014/ISH1:2017)		--
ZB.2.1	General remarks This subclause ZB.2 contains the text of ISH1; some examples were added for clarity. For some complex extended sources or irregular temporal emissions, the application of the rules of 4.3 may require clarification. In this subclause ZB.2, 4.3 (Classification rules) is clarified. NOTE 1 For the purpose of this annex, the abbreviation “AE” is used for “accessible emission”. NOTE 2 The clarifications also apply in an equivalent way to MPE analysis, i.e. for Annex A.		P
ZB.2.2	Subclause 4.3 c) (Radiation from extended sources) When using the default (simplified) evaluation method (5.4.2) for wavelengths ≥ 400 nm and $< 1\,400$ nm, the angle of acceptance may be limited to 100 mrad for determining the accessible emission to be compared against the accessible emission limit, except in the wavelength range 400 nm – 600 nm for durations longer than 100 s where the circular-cone angle of acceptance is not limited. When evaluating the emissions for comparison to the Class 3B AELs, the angle of acceptance is not limited.		N/A

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Clause	Requirement + Test	Result - Remark	Verdict
ZB.2.3	Subclause 4.3 d) (Non-uniform, non-circular or multiple apparent sources) In 4.3 d), for comparison with the thermal retinal limits, the requirement to vary the angle of acceptance in each dimension might appear to contradict the labelling in Figure 1 and Figure 2 of 5.4.3 where the field stop is labelled as circular.		N/A
ZB.2.4	Subclause 4.3 f) 3); determination of α The parameter $\alpha_{\max}$ is a function of emission duration, i.e. $\alpha_{\max}(t)$. For an analysis of pulsed emission and extended sources, $\alpha_{\max}(t)$ limits both the value of α for the determination of $C_6(\alpha)$ as well as the angle of acceptance γ for the determination of the accessible emission (see 4.3 c) and d) and subclause ZB.2.3 of this amendment). In this process, $\alpha_{\max}(t)$ is determined for the same emission duration t that is used to determine $AEL(t)$ (i.e. the pulse duration or the pulse group duration for 4.3 f) 3) and the averaging duration for 4.3 f) 2), respectively). However, the parameter α is also used in 4.3 f) 3) in the criteria to determine which C_5 is applied to $AELs.p.train(t)$. For these criteria to determine C_5, the parameter α is not limited to $\alpha_{\max}(t)$ in the same way as for the determination of C_6 according to 4.3 d). To determine $T_2(\alpha)$ and in the criteria of 4.3 f) 3) "For $\alpha \leq 5 \text{ mrad}$", "For $5 \text{ mrad} < \alpha \leq \alpha_{\max}$", and, "For $\alpha > \alpha_{\max}$", the quantity α is equal to the "long-term" α, i.e. equal to α as determined for a time base of 0,25 s or equal to the value of α of $T_2(\alpha)$. In the determination of this "long-term" α (applying the method specified in 4.3 d)), $\alpha_{\max} = 100 \text{ mrad}$. That is, for T_2 and these inequalities, α is not limited to a value of $\alpha_{\max}(t)$ smaller than 100 mrad, and is therefore the same as the value that applies for the determination of C_6 for the time base of 0,25 s or 100 s, as applicable. As is generally defined (see 4.3 d)) the arithmetic mean is applied to determine α, i.e. it is not necessary that both dimensions satisfy the criterion "For $\alpha \leq 5 \text{ mrad}$" independently. For the criterion "Unless $\alpha > 100 \text{ mrad}$", the angular subtense of the apparent source α is not restricted by $\alpha_{\max}$. For non-uniform (oblong, rectangular, or linear) sources, the inequality needs to be satisfied by both angular dimensions of the source in order for $C_5 = 1$ to apply. The value of α determined with $\alpha_{\max} = 100 \text{ mrad}$ (i.e. the "long-term" α) can also be used for this criterion, alternatively: in this case the criterion is written as "Unless $\alpha = 100 \text{ mrad}$", because for α to become exactly equal to 100 mrad, when applying $\alpha_{\max} = 100 \text{ mrad}$, the image of the apparent source has to be larger than 100 mrad in both dimensions. Since the "long-term" α is needed for the inequalities in 4.3 f) 3) to determine the applicable C_5, the usual sequence is as follows. An analysis of the image of the apparent source is performed as given in 4.3 d) while either using $AEL(t = 0,25 \text{ s})$, or $AEL(t = T_2(\alpha))$, depending on the time base. The angle of acceptance (as dimensions of the field of view) is varied between 1,5 mrad and 100 mrad in each dimension. Each field of view is associated to a certain value of T_2 and therefore $AEL(t = T_2)$. The accessible emission is also determined for the respective field of view. The result of the process to vary the field of view is the "long-term" α that is associated to the field of view that produces the maximum ratio of AE to AEL. For the case of classification as Class 1, this process to determine the "long-term" α at the same time determines the value of $T_2(\alpha)$. This "long-term" α is used for C_6 for $AEL(t = 0,25 \text{ s})$, or $AEL(t = T_2(\alpha))$, respectively, as well as the associated field of view to determine the AE for the comparison with these AEL. Following this step of the determination of the "long-term" α, all applicable shorter emission durations have to be analysed. For the analysis of emission durations less than 0,25 s, the "long-term" α is used to determine the appropriate C_5 in the equalities of 4.3 f) 3). $T_2(\alpha)$ is also relevant for the determination of N within $T_2(\alpha)$ or the time base, whichever is shorter.		N/A

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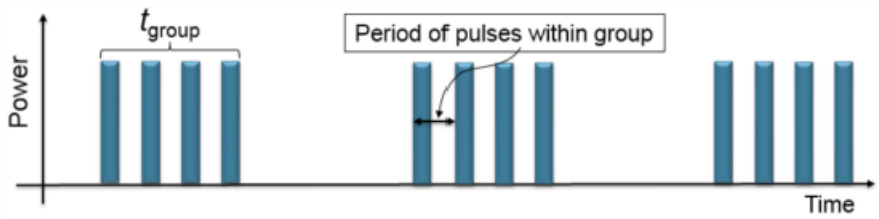
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Clause	Requirement + Test	Result - Remark	Verdict
ZB.2.5	Subclause 4.3 f) 3); groups of pulses with group duration longer than T_i For non-uniform repetitive pulse patterns, i.e. groups of pulses (see Figure ZB.2 for an example), when $\alpha > 5$ mrad and the duration of the group of pulses is longer than T_i, it is not clearly stated how the thermal additivity expressed by requirement 3) of 4.3 f) is applied. For <i>uniform</i> (i.e. constant peak power, duration and period) repetitive pulse trains, it is not necessary to analyse the emission patterns in terms of groupings of pulses. When individual pulses are close together, they are thermally grouped and thermally represent one “effective” pulse so that C5 also (additionally to analysing the pulse train based on the actual pulses and the average power) applies to these “effective” pulses, where N is the number of pulse groups within T_2 or within the time base, whichever is shorter.  Figure ZB.2 — Example of three groups of pulses (each group duration is longer than T_i) where each group is considered as one “effective” pulse and C5 is applied to the AEL that applies to the group duration, where C5 is determined with the number of pulse groups within the evaluation duration (in the example of the figure $N = 3$)		N/A
	For the analysis of pulse groups, the value of AEL_{single} is determined for the corresponding pulse group duration t_{group}. For the determination of C5, N is the number of pulse groups within T_2 or the time base, whichever is shorter. The respective value of C5 is applied to AEL_{single} to obtain AEL_{s.p.train} that limits the AE of the pulse groups, where AE is the sum of the energy of the pulses contained within the pulse group.		N/A
	For the application of C5 to groups of pulses, the AEL(t_{group}) applicable to the group needs to be determined, as well as the energy per group (AE_{group}). For groups of pulses where the peak power of the pulses within the group varies, the group duration is not well defined. In order to simplify the evaluation, t_{group} can be set equal to the integration duration for which the energy per group (i.e. AE_{group}) was determined; it is not necessary to determine the group duration based on the FWHM criterion, which for groups of pulses with varying peak power is not well defined. By setting t_{group} equal to the integration duration that is used to determine AE_{group} (expressed as energy), the application of C5 to groups of pulses is a simple extension of requirement 2) of 4.3. f) where the average power per group (equal to the energy within the averaging duration $t_{average}$ divided by the averaging duration) needs to be below the AEL($t_{average}$) determined for the duration over which the power was averaged (AE_{group} and AEL(t_{group}) expressed as power). As is common for the average power requirement, for irregular pulse trains, the averaging duration window (when expressed as energy: the integration duration window) has to be varied in temporal position and duration (for instance, if there are pulses with relatively low energy per pulse at the beginning or the end of the group of pulses, integration durations that exclude those low-energy pulses need to be considered also, not only the total group).		N/A

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Clause	Requirement + Test	Result - Remark	Verdict
	If individual pulses have sufficient temporal spacing (period larger than T_{crit}, see below), as a simplified analysis, they need not be considered for an analysis as a pulse group under 4.3 f) 3). The temporal spacing that is necessary for pulses to only be considered separate (and not analysed additionally as a group) depends on the angular subtense of the apparent source and the duration of the pulses t_{pulse} within the group. Note that there can be several levels of grouping, so that individual elements (with pulse duration t) within the group could themselves be "effective pulses", i.e. subgroups. When the — pulse group durations (t_{group}) are between T_i and 0,25 s, and — the angular subtense of the apparent source is larger than 5 mrad, and — the period of the pulses (see Figure ZB.2) is shorter than a critical period T_{crit} (if $t_{pulse} < T_i$, the value of t_{pulse} is set equal to T_i; further, for the determination of T_{crit}, α_{max} is determined for t_{pulse}, not the group duration) where: for $\alpha \leq \alpha_{max}$: $T_{crit} = 2 \cdot t_{pulse}$ where t_{pulse} is in seconds for $\alpha > \alpha_{max}$: $T_{crit} = 0,01 \alpha \cdot t_{pulse} 0,5$ where t_{pulse} is in seconds, and α is in mrad, not being limited to α_{max} then these pulses constitute a pulse group which is treated as effective pulses and C_5 (where N is the number of groups within the time base or T_2, whichever is shorter) is applied to the AEL applicable to the pulse group. For the determination of AE, α_{max} is determined using the duration of the evaluated pulse group, t_{group}. If one or more of the above conditions are not fulfilled, then the pulses within the group of pulses that is considered to be analysed as "effective pulse" need not be grouped, i.e. the group of pulses does not need to be analysed as one "effective" pulse. Note that if multiple pulses occur within T_i, the rule as stated in 4.3 f) 3) applies in parallel, i.e. they are counted as a single pulse to determine N and the energies of the individual pulses that occur within T_i are added to be compared to the AELs.p.train of T_i where the corresponding C_5 for emission durations $t \leq T_i$ is applied.		N/A
ZB.2.6	Subclause 4.3 f); simplifications		N/A
	a) Constant peak power but shorter pulses Depending on the angular subtense of the apparent source, it can be the case that the value of C_5 is more restrictive for pulses with pulse durations less than T_i than for pulses with durations longer than T_i which is against general biophysical principles for cases where the peak power is the same.		N/A
	b) Larger image of apparent source For emission durations exceeding T_i, due to the step-function of C_5 at 5 mrad and at α_{max}, the AEL (as a function of C_5 and C_6) can be more restrictive for larger values of the angular subtense of the apparent source as compared to smaller ones, which is contrary to general biophysical principles.		N/A
	c) Using a square aperture stop In some cases, such as 2D scanned laser beams, the use of a circular aperture stop to determine the accessible emission creates very complex pulse patterns. Due to the breakpoints in terms of pulse duration with step functions in the value of C_5, it might not be apparent that the usage of a square aperture is acceptable as a simplified worst case analysis.		N/A

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Clause	Requirement + Test	Result - Remark	Verdict
	d) Applicability of simplified default analysis For pulse durations longer than T_i, the value of C_5 is smaller (more restrictive) for angular subtense values α larger than 5 mrad compared to $\alpha \leq 5$ mrad. The assumption of $\alpha = 1,5$ mrad is the basis of the simplified (default) evaluation. It is therefore not obvious if the simplified (default) analysis still applies in terms of being a restrictive simplifying analysis even for the case that the angular subtense of the apparent source is actually larger than 5 mrad, where $C_5 < 1$.		N/A
	e) Determination of the most restrictive position For the extended analysis, it is necessary to vary the distance relative to the reference point to determine the most restrictive position. For each position in the beam, the accommodation is varied and the most restrictive image is determined. For determining the most restrictive image (where the ratio AE/AEL is maximum) at a given position, requirement 3) of 4.3 f) is not applied. Otherwise a blurred (larger) image of the apparent source, resulting from variation of the accommodation, could appear more restrictive, which is contrary to general biophysical principles. Once the most restrictive image (and associated α) is identified for each position in the beam, all three requirements of 4.3 f) are applied to determine the most restrictive position (identifying the position with the maximum ratio of AE/AEL) and the class of the product.		N/A

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Clause	Requirement + Test	Result - Remark	Verdict
	f) Application of the total-on-time-pulse method; For regular pulse trains, as well as for varying pulse durations and/or varying period of pulses (but excluding strongly varying peak powers; see below), the total-on-time pulse (TOTP) method (see also IEC 60825-1 Edition 2.0 subclause 8.3 f) 3b)) may be used as an alternative to requirement 3) of 4.3 f), i.e. as an alternative to the application of C5 to the single pulse AEL, provided that a_{max} is determined for the TOTP (or using the worst case value of 100 mrad). This is more restrictive than the rules of 4.3 f) because it is equivalent to an unlimited C5 (C5 not limited to 0,2 or 0,4), and because the value of a_{max} is typically larger for the TOTP as compared to the value applicable to the single pulse. For the total-on-time-pulse (TOTP) method the following applies, as reproduced from Edition 2 of IEC 60825-1: The AEL is determined by the value of the TOTP, which is the sum of all pulse durations within the emission duration or T_2, whichever is smaller. Pulses with durations shorter than T_1 are assigned pulse durations of T_1. If two or more pulses occur within a duration of T_1 these pulse groups are assigned pulse durations of T_1. For comparison with the AEL for the corresponding duration, all individual pulse energies are added. Note that the TOTP method in Edition 2 of IEC 60825-1 (incl. Corrigendum 1) was specified "For varying pulse widths or varying pulse intervals" and did not refer to varying peak powers. For the case of strongly varying peak powers, the TOTP method is not applicable, as adding pulses to the pulse train with small peak powers and low contributing energy-per-pulse values might increase the AEL (by increasing the total-on-time) more than this increases the total energy, and thus would make the emission less critical as compared to an emission based on the pulses with the large peak power only.		N/A
	g) Varying peak power but constant pulse duration For varying peak power but constant pulse durations, requirement 3) of 4.3 f) can be applied by counting the pulses for the determination of N based on the relative peak power, i.e. N is increased by 1,0 for each pulse with the maximum peak power, and by a value of less than 1,0 for pulses with lower peak power, such as for a pulse with 70 % peak power compared to the maximum peak power in the pulse train, N is increased by 0,7. For this, based on the strong nonlinearity of thermally induced injury with temperature, it is justified not to count pulses with peak powers that are more than a factor of 10 below the pulse with the maximum peak power (i.e. less than 10 % of the maximum peak power). Note that the resulting AELs.p.train is applied to the pulse with the largest AE, i.e. the largest energy per pulse, and that the interpretation in this paragraph applies only for the case of pulse trains with constant pulse durations.		N/A

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Clause	Requirement + Test	Result - Remark	Verdict
ZB.3	Subclause 4.4 conventional lamp replacement (IEC 60825-1:2014/ISH2:2017)		--
	This subclause ZB.3 contains the text of IEC 60825-1:2014/ISH2:2017 with some minor modifications for clarity. Subclause 4.4 introduces a criterion based on radiance, which is a quantity not normally determined for laser products. This interpretation clarifies the determination of radiance and the radiance limit. In this subclause ZB.3 of the Annex ZB, Subclause 4.4 is clarified.		N/A
ZB.4	Subclause 6.3.2 – safety interlocks Introduction In this subclause, additional interpretations are provided, that were not contained in the IEC Interpretation Sheets, due to limitations on the length of the Interpretation Sheets. The requirements for safety interlocks that are provided with a deliberate override mechanism are specified in 6.3.2. The exception, described in 6.3.2 for automatically returning an overridden interlock to normal operation when an open door is closed, needs clarification. The portion of text that may cause confusion is: “If a deliberate override mechanism is provided, the manufacturer shall also provide adequate instructions about safe methods of working. It shall not be possible to leave the override in operation when the access panel is returned to its normal position. An exception to this requirement is allowed if selection of a service “override” mode automatically isolates the laser beam and prevents automatic resumption of operation of the machine. This exception also requires a lockable mode selector and requires a manual override to use the beam.”		N/A

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Test summary

Model: TLM300-L

Additional measured and calculated data

Name	Symbol	Value	Unit
Wavelength	λ	668	nm
Angular sub tense of the apparent	α	1.5	mrad
Pulse width	t	-	ms
Pulse repetition frequency	F	-	Hz
Time base for evaluation	T	0.25	s
Correction factors and conversion points	C ₆	1	-

Note:

- 1, Laser is not a large quasi diameter beam, so condition 1 is not considered.
- 2, Laser non fiber optic communication system, therefore condition 2 is not considered.
- 3, The inspected laser product is a continuous type.

Condition	Symbol	Value	Unit
Normal operation Conditions 3	P ₁	2.354	mW
Regarding a potential skin hazard and/or cornea/iris	P ₂	13.02	mW

AEL for classification

Class 2 AEL=1*10 ⁻³ W=1mW	Class 3R AEL=5*10 ⁻³ W=5mW
Class 3B AEL=0.5W	

Conclusion

- 1, The measurement results of this product under conditions 3 are greater than Class 2 AEL and less than Class 3R AEL, therefore the laser safety level of this product is **Class 3R**.
- 2, No potential skin hazard and/or cornea/iris hazard.
- 3, Under fault conditions, the laser power of the inspected laser product remains unchanged.

Test data graph

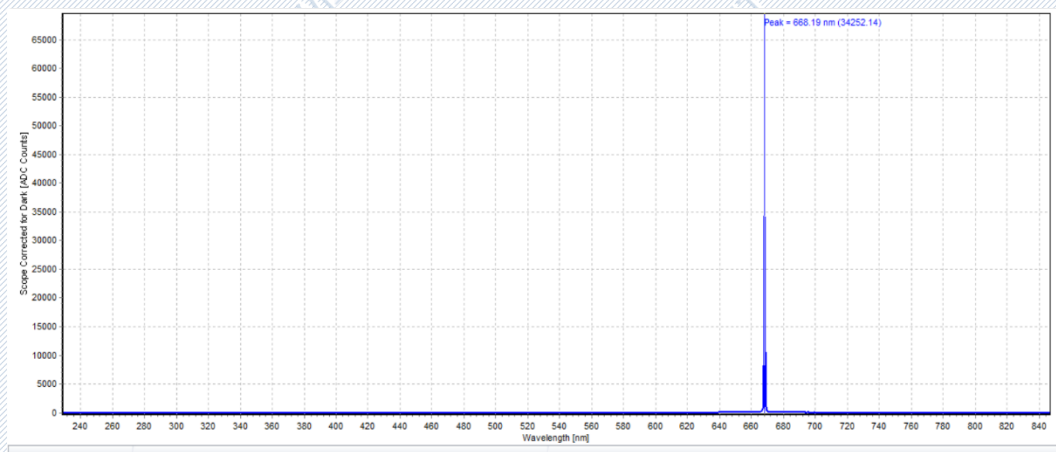


Figure 1: Laser spectrum

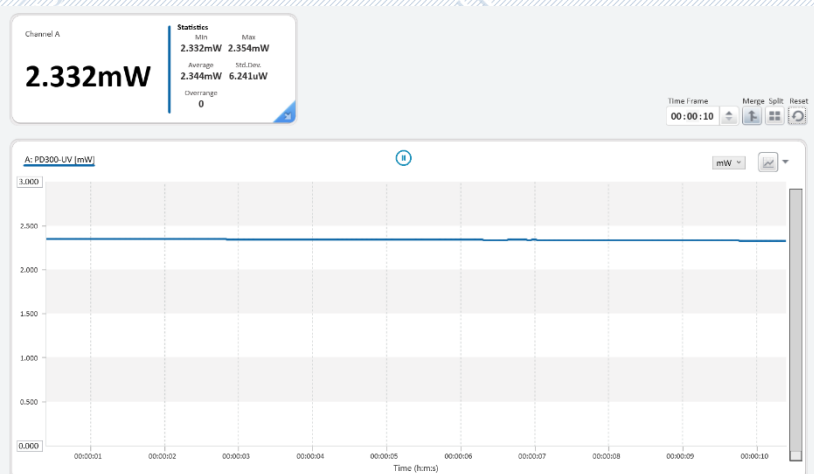


Figure 2: Continuous power measured under condition 3



Figure 3: Regarding a potential skin hazard and/or cornea/iris

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Photo Document



Figure 1: Photos of the samples

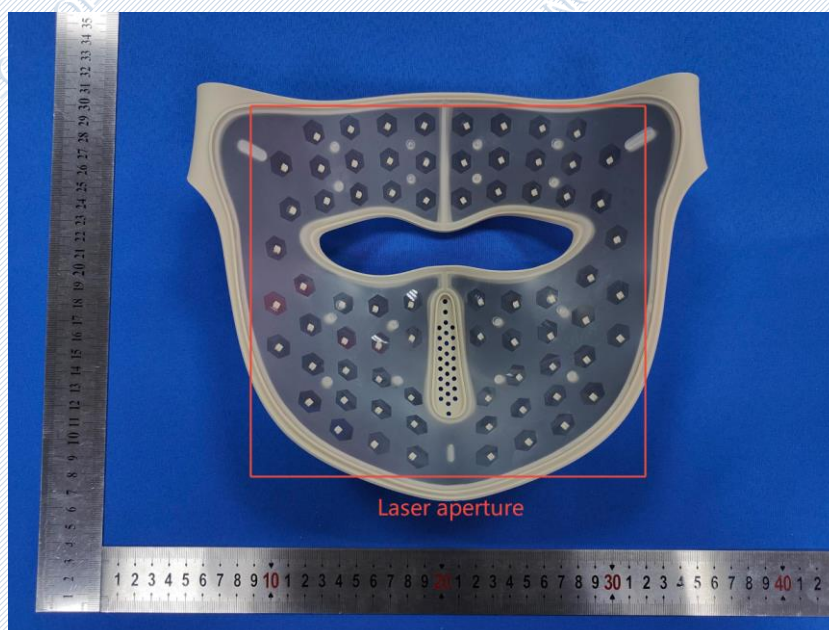


Figure 2: Photos of the samples

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