

Where It's Made and What It Is – Lies, Damn Lies and Gavita

Behind all the marketing hype is the world of physical reality. Physics. Shipping Records. FCC Filings. Facts are stubborn things, and no amount of marketing spin doctoring can alter the brightness of a lamp or a product's country of origin.

Case in Point, Gavita "Holland".

Gavita makes fine lights or, more accurately, has fine lights made for them. While claiming to be Made in Holland, their FCC filings clearly show otherwise:

<https://apps.fcc.gov/eas/GetApplicationAttachment.html?id=2449784>

The above test report, filed with the FCC, was done by a Chinese ballast maker on behalf of their Dutch client. Note the photos of the fully assembled "Gavita" product under test.

Spoiler alert: The pictures were not taken in Amsterdam

Gavita ballasts are made by Lumlux Lighting in Suzhou, China as filed by Gavita with the FCC. The electronics are manufactured, assembled, tested and certified in China. According to U.S. law, Gavita ballasts must be labeled Made In China, since the "essential character" of the device is provided by the Chinese-made electronics, not the cardboard box, power cord or Dutch shipping label:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=78e98ccb76cfed37a3f79e280534d8be&node=19:1.0.1.1.13&rgn=div5>

The Made In Holland appellation is, at the very least, intentionally deceptive. While Gavita claims to have a factory in Holland, their ballasts are of Chinese manufacture as they were forced to admit on their import documentation. Published photos of the Gavita factory show a facility for testing and packing product made elsewhere. They show no electronic assembly equipment, no automated soldering, no pick and place machines, no in-circuit test gear, none of the aging rooms or load banks you see at all other ballast makers. Just a lab for receiving inspection, light assembly, repacking and shipping.

Since Made in China does not have the marketing cachet of Made In Holland, Gavita has also very recently tried to obscure the origin of their product by changing the manufacturer of record on their FCC documents:

<https://apps.fcc.gov/eas/GetApplicationAttachment.html?id=2560699>

Gavita ballasts are still made by Lumlux Lighting in China, but newer documents will not be indexed that way, so finding that piece of data will take a little more effort.

Gavita also maintains that their products, while obviously and provably not made in Holland, are not copies of any other device, but are of their own design. Covers-off photographs of the Gavita next to the Philips ePapillon ends that discussion:



Labels are provided above since it is otherwise nearly impossible to tell them apart. They are twins down to the lengths and placement of the test loops, the choice of semiconductors, brand and size of capacitors, and the direction and placement of passive components. The circuit board even duplicates the shape and placement of the printed wiring traces as can be seen at the bottom of the photo. These are not analogues, these are COPIES. EXACT DUPLICATES. Look at the photo, it's pretty clear.

While Gavita maintains that the ePap is not a Philips product, and that they have nothing to do with it, the website <http://epapillon.com/index.php/2-ongecategoriseerd> says otherwise:

"Lights Interaction Agro b.v. was set up in December 2002 following Philips Lighting's decision to withdraw from the market for assimilation lighting luminaires for use in Glasshouse Horticulture. Thus although Lights Interaction Agro b.v. is a young company, it has a great deal of experience in assimilation lighting, since the majority of its employees have worked in Philips for long periods of time."

Whatever is good or bad about the Philips ePapillion design or about the Chinese, American or Nigerian manufacture of that design is not at issue.

What is at issue is marketing statements that claim this product was designed by Gavita and made in Holland. Neither of those statements have any basis in physical reality, as can be seen above just by looking. It's a lie, and a bold one.

Retrieved 12/10/2015 – <https://www.instagram.com/gavitalighting/>

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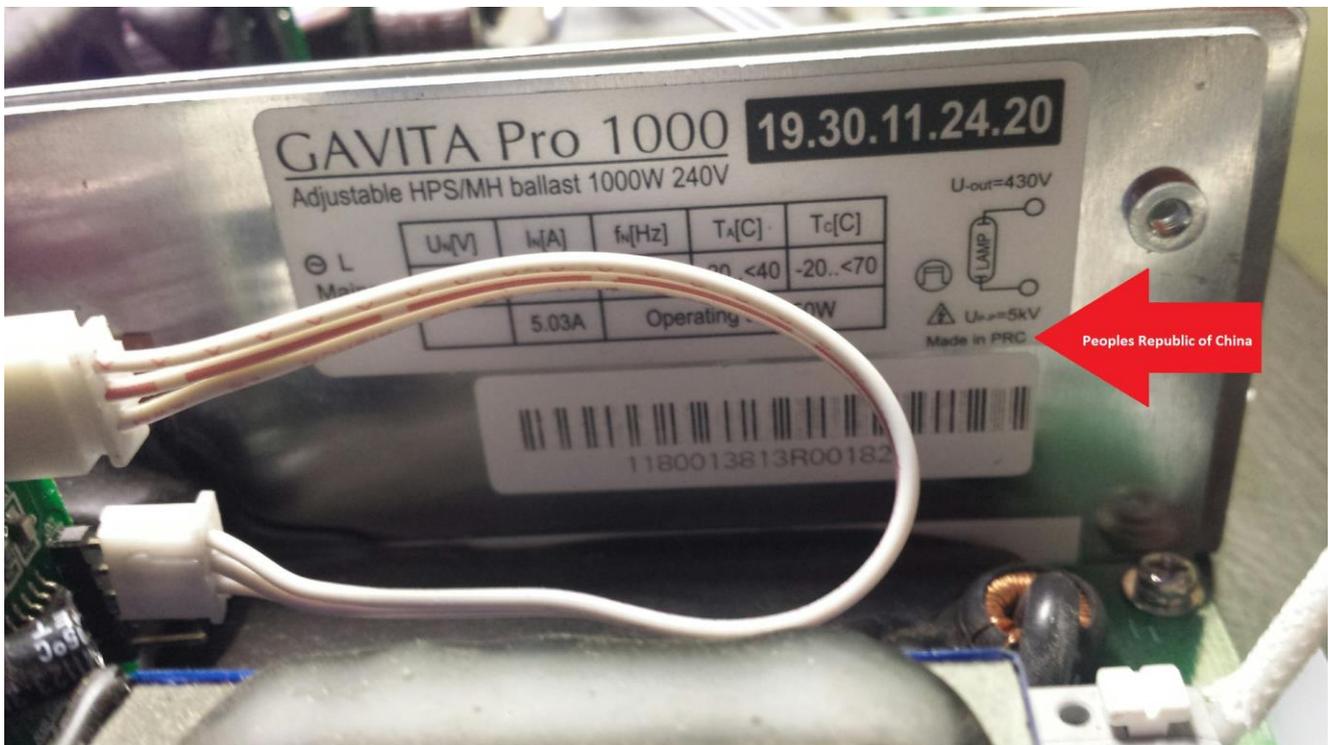
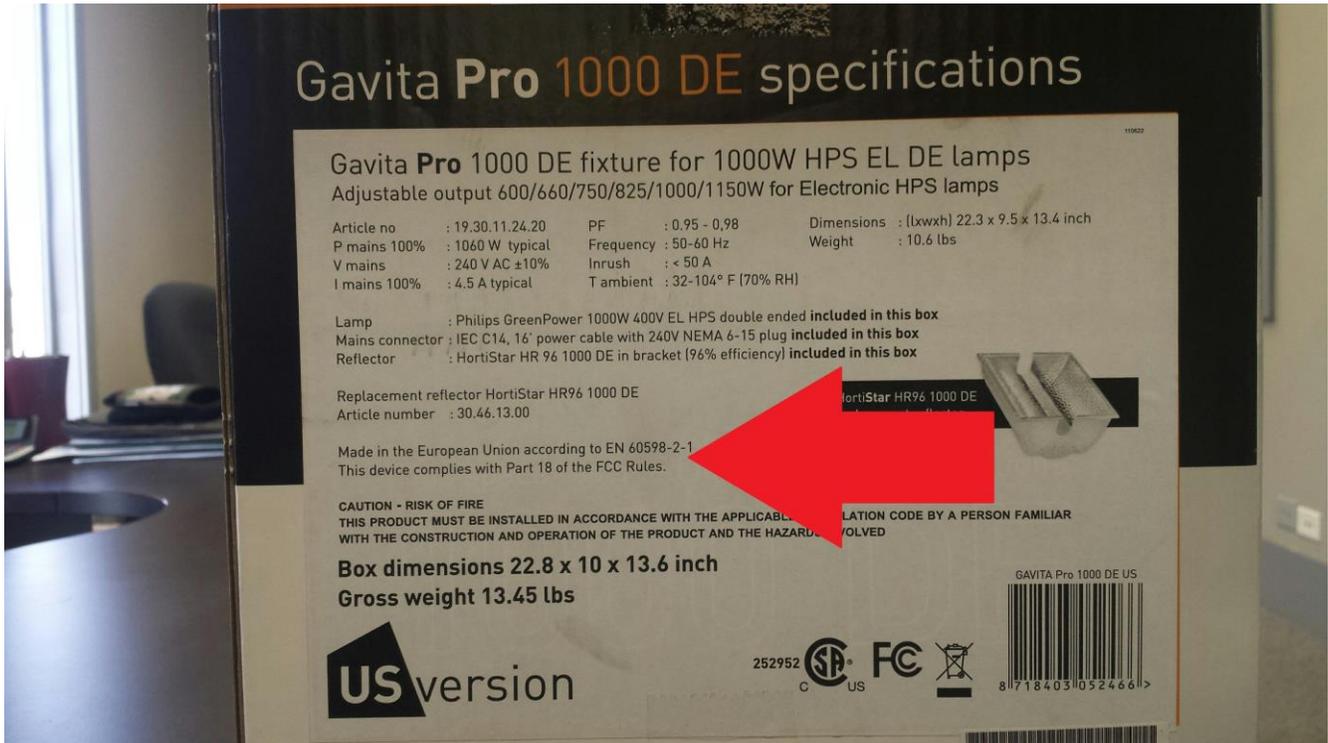
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Even if the Dutch cardboard box lies, the Chinese manufacturer is reputable enough to not misrepresent his work:



Questions worth asking:

1. According to public documents filed by you, your product is made, tested and certified in China. A quick Google search of { Gavita "made in holland" } turns up stores, magazines and your own Instagram web pages claiming "100% Made In Holland". Why do you keep saying Made In Holland on the packaging, advertising and all over the Internet when it is easily proven to be a complete lie?
2. On what basis do you claim to have a factory making these ballasts in Holland when they are, per your own public documents, made in Suzhou, China by someone else?
3. How is your product different from the ePapillion that looks exactly like it and why do you try to obscure the origins of that design?
4. According to your own public records, your FCC testing and certification is done in China by the real manufacturer. Why do you claim publicly and incessantly that this was done in Holland by your own lab?
5. Why did you file with FCC in March of this year to change the manufacturer of record to Gavita from LumLux when they are still making the product as of November, 2015?
6. You are no doubt familiar with the American import requirements indicating Country Of Origin under Title 19, Rule 102.11. How do you claim Made In Holland under this rule?
7. Given the clear, obvious and intentional violation of both EU and American Country of Origin regulations, will Gavita voluntarily change product packaging to state *Assembled in China* like Apple does, or wait until ordered to do so by Dutch and/or U.S. Customs?