



# NEW ENERGY LABEL FAQs for Manufacturers

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## BELT FAQs for manufacturers: what are they?

This document aims to be a collection of questions and answers, on the issues related to the implementation of the new energy label.

This FAQs document doesn't want to provide a full explanation of what is expected from manufacturers according to the new legislation in terms of obligations and timing of implementation. These aspects are in fact covered in detail in the document *Guidelines for Manufacturers*, created by BELT project. FAQs are a reference point for those who, perhaps after consulting the *Guidelines* document, are looking for additional details or clarifications on particular cases.

This text, unlike the *Guidelines for Manufacturers* which proposes a schematization of what is already defined by the legislation (legislative references are listed in the *Appendix*), is a *living* document. This means that explanations and answers will be added whenever manufacturers need them, and whenever they will ask us to address new issues and investigate new aspects, considering their different needs and in line with the different implementation stages of the new energy label.

Therefore, we suggest that, if you have not found the answers to your doubts today, you contact us: we will clarify and update the FAQs, gathering the opinion of experts and constantly discussing with the European Commission.

However, in the final section of this document, a set of useful links are reported and there more information can be found.

## FAQs

### The label

1. **Who will be responsible for generating the energy label? Does the manufacturer remain in charge for it or will the distributor be able to generate it directly from the EPREL database?**

Manufacturers must generate the energy label and it is responsibility of the manufacturers to verify the accuracy and reliability of the information reported on it.

2. **How will the new energy label be generated?**

From 1<sup>st</sup> January 2019, manufacturers are obliged to register their equipment on the *European Data Base for Energy Labelling* (EPREL) database before putting them on the European market. Through EPREL, it will be possible to generate the new energy label.

For products that will have to undergo a new registration starting with the application dates of the new regulation (i.e. for registration on EPREL these dates are 1<sup>st</sup> November 2020 and 1<sup>st</sup> May 2021 for lamps), a new identification number will be generated. **The possibility of re-registering products will be available from approximately the third quarter of 2020** and will include the possibility of generating the new rescaled energy label.

3. **Who will be responsible for printing the energy label?**

The manufacturers' obligation to provide a **printed version of the new energy label** (according to the timelines explained in the answer to question 4) inside the packaging of the product (or printed on the packaging of the product in the case of light bulbs and displays) remains unchanged from the previous legislation.

However, the **product information sheet will not necessarily have to be printed** and inserted into the packaging, but it will be enough to enter the relative information on the EPREL database.

Still, if requested by the distributor, the manufacturer must make available within 5 working days both the product information sheet and the rescaled label (in case this is not already present in the packaging).

### The timing

4. **During the transition period, does the manufacturer need to provide both labels in the product packaging to sell a product before the end of the transition period?**

The transition period for those appliances whose labels will be rescaled (such as refrigerators, washing machines, dryers, dishwashers and displays) runs between 1<sup>st</sup> November 2020 and 1<sup>st</sup> March 2021.

During this time:

- for products placed on the market before 1<sup>st</sup> November 2020, and which will not be put again on the market after this date, it is enough to accompany the product with **the old label only**. The product with the old energy label can be sold then until 30<sup>th</sup> November 2021;
- for products placed on the market before 1<sup>st</sup> November 2020 and that will be placed on the market also after this date, the manufacturer must also provide **the new rescaled label if requested by the distributor**;
- for new products, namely products placed on the market after 1<sup>st</sup> November 2020, for which then new testing procedures are applicable, suppliers **must provide the old and the new energy labels with new units of products** (so, old and new energy label should be both provided, but the new label will not be shown to consumers until 01.03.2021); this means that there is the possibility, during 4 months, that customers will receive products that contains, for example in the products packaging, both labels, the current and the new one;

- there is another option: the new products, put on the market after 1<sup>st</sup> November 2020, can contain **only the new label**; products containing only the new energy label can be sold starting from 1<sup>st</sup> March 2021.

The transition period for light sources is between 1<sup>st</sup> September 2021 and 28<sup>th</sup> February 2023. During this time:

- for products placed on the market before 1<sup>st</sup> September 2021, and which will not be put again on the market after this date, it is enough to accompany the product with **the old label only**. The product can be sold until 28<sup>th</sup> February 2023;
- for products that are placed on the market before 1<sup>st</sup> September 2021 and that will be placed on the market also after this date, the manufacturer must also provide **stickers with the new rescaled label if requested by the distributor**.

The new products put on the market after 1<sup>st</sup> September 2021 must have **the new label** printed on the packaging.

#### 5. What are the deadlines for the implementation of the new energy label for products in stock?

Regarding products in stock, which are then put on the market before the start of the transition period, distributors have the option to request the new rescaled label to the manufacturers. If manufacturers are not able to supply it, either because they have ceased their activities or because new testing methods are required for the generation of the new energy label, the distributor may sell the product in stock with only the old label by 30<sup>th</sup> November 2021 (or by 28<sup>th</sup> February 2023 in the case of light sources).

#### 6. What are the deadlines for the implementation of the new energy label for products that are put on the European market from abroad (extra-EU countries)?

Products from abroad (from extra-EU countries) and products from Europe must be subject to the same timeframes regulating the introduction of products on the European market. Therefore, at the time of production, you need to keep in mind when the product will arrive on the European market and whether the time of entry in the market will fall within the transition period or it will occur when the new energy label will be fully implemented (also with regards to the registration on the EPREL database requirements).

It should be considered that new products put on the market after 1<sup>st</sup> November 2020 (among those addressed by label rescaling, except for lamps), can be sold with only from 1<sup>st</sup> March 2021, if the product packaging will contain only the new energy label. Similarly, the new light sources, which will be put on the market after 1<sup>st</sup> September 2021, will have to have the new label on the packaging starting from the same date to be sold on the European market.

#### 7. Can we use the new energy label before 1<sup>st</sup> November 2020 (or 1<sup>st</sup> September 2021 for light bulbs)?

No, the timeline set out in the regulation must be met to avoid confusion in both distributors and end-consumers.

In the meantime, however, it is possible to prepare yourselves for the necessary changes, to activate information campaigns on the energy label issues (please, refer also to the answer to question 10) and to meet the training needs on the rescaling topic of the different professionals figures involved in the change (for this purpose we invite you to contact the partners of the BELT project; BELT is developing and will make available training and information material dedicated to producers).

#### 8. What is the impact of COVID19 on the new Energy Label implementation?

In the context of the COVID-19 pandemic and the impact it has had on the operations of home appliance manufacturers, the European Commission has published a Communication Notice ([here](#)) on the

application of the new Energy Labelling requirements for Washing Machines, Washer Dryers, Dishwashers and Refrigerators/Freezers and Electronic Displays.

The Notice **invites member States' Market Surveillance Authorities to consider this exceptional context when enforcing those Energy Labelling Regulations.** In particular, in order to avoid the unnecessary and unwanted scrapping of some new appliances, manufacturers would then be allowed to place accumulated stock of products on the market that only have the current energy label until 1<sup>st</sup> March 2021, i.e. four months after the deadline set in the legislation.

The Commission adopted the Covid-19 Notice in order to ask Member States to be more tolerant on the 2 labels requirements during the 4 months period, but **it maintains a strict date (1<sup>st</sup> March 2021) to show the new label to consumers.** The Notice text explicitly reports that: *"[...] the Commission will refrain from launching infringement procedures as long as that lack of enforcement does not go beyond what is required, is limited in time from 1 November 2020 to 1 March 2021 and suppliers provide missing labels to dealers before 1 March 2021."*

**Therefore, a supplier should re-register a product in EPREL before 1<sup>st</sup> March 2021 and be able to provide retailers with the rescaled label by that date, if s/he failed to provide the 2 labels with new products during the 4 months period.**

## The QR code

### 9. To which page and information dataset will the QR code contained in the new energy label be linked to?

The QR code in the new energy label will be generated as a result of the registration of the product on the EPREL database. Manufacturers will be able to use the following link to generate the QR-code:

<https://eprel.ec.europa.eu/qr/> [Registration number]

Today, the listed URL is existing, but the webpage is still not available

You will have the opportunity to generate the QR also separated from the energy label.

### 10. What layout will be used for showing to the consumer the data linked to the QR code?

Today, only prototypes of the information that will be shown to consumers (either through the public part of the EPREL website and through the mobile app) are available.

Consumers will have the opportunity to look at the energy label and read the information contained in the product technical datasheet. In addition, they will be able to compare the performance and characteristics of different products and models; they will be able to search through the products registered on the database by setting criteria and search filters; they will be able to see the general details of the suppliers.

Consumers will be able to access the information contained in the public part of the database directly from a URL or by scanning the QR code.

## Communication

### 11. When can we start communication activity about the new energy label?

Any graphic advertising (including via internet) relating to a specific product subject to the energy label rescaling process (and therefore containing the new label and the indication of the new energy classes) cannot be made public before the dates of application of the new regulation (i.e. 1<sup>st</sup> March 2020 or 1<sup>st</sup> September 2021 for lamps).

This does not mean, however, that **information campaigns**, such as the one the BELT project is performing, cannot be carried out before the dates of implementation of the new regulation. On the contrary, information activities are essential to be all ready (producers, distributors, consumers) when the new label will be implemented.

In any case, you have to carefully assess if the content you are publishing will be considered *advertising* (e.g. those that refer to a specific product or model of a particular brand that will be presented with the new energy label) or if it will be considered *informative* (e.g. those that introduce the objectives and characteristics of the new energy label that will apply to all products affected by the rescaling and put on the European market, regardless brand or model).

**12. When will manufacturers be able to show the new energy label in the product catalog?**

The answer to question 10 also applies in the case of catalogs. This means that catalogs, which refer to specific products, models and brands, can be made public from the application dates of the new regulation: 1<sup>st</sup> March 2020 or 1<sup>st</sup> September 2021 for lamps.

The catalogs can then be prepared before the application dates, but not made public.

## Appendix

### Framework regulation for energy labelling

Regulation (EU) 2017/1369 of the European Parliament and of the Council of 4 July 2017 setting a framework for energy labelling and repealing Directive 2010/30/EU (Text with EEA relevance. ) *OJ L 198, 28.7.2017, p. 1–23*

<https://eur-lex.europa.eu/eli/reg/2017/1369/oj>

### Refrigerators and Freezers

Commission Delegated Regulation (EU) 2019/2016 of 11 March 2019 supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of refrigerating appliances and repealing Commission Delegated Regulation (EU) No 1060/2010 (Text with EEA relevance.). C/2019/1806

<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1575537791838&uri=CELEX:32019R2016>

### Washing machines and washer-dryers

Commission Delegated Regulation (EU) 2019/2014 of 11 March 2019 supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of household washing machines and household washer-dryers and repealing Commission Delegated Regulation (EU) No 1061/2010 and Commission Directive 96/60/EC (Text with EEA relevance.). C/2019/1804

<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1575536811417&uri=CELEX:32019R2014>

### Dishwashers

Commission Delegated Regulation (EU) 2019/2017 of 11 March 2019 supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of household dishwashers and repealing Commission Delegated Regulation (EU) No 1059/2010 (Text with EEA relevance.) C/2019/1807

<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1575537989799&uri=CELEX:32019R2017>

### TVs and Electronic Displays

Commission Delegated Regulation (EU) 2019/2013 of 11 March 2019 supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of electronic displays and repealing Commission Delegated Regulation (EU) No 1062/2010 (Text with EEA relevance.) C/2019/1796

[https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L\\_.2019.315.01.0001.01.ENG&toc=OJ:L:2019:315:TOC](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2019.315.01.0001.01.ENG&toc=OJ:L:2019:315:TOC)

### Light sources

Commission Delegated Regulation (EU) 2019/2015 of 11 March 2019 supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of light sources and repealing Commission Delegated Regulation (EU) No 874/2012 (Text with EEA relevance.). C/2019/1805

<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1575537561243&uri=CELEX:32019R2015>



## Useful links

BELT for Market Actors:

<http://www.energylabelt.eu/>

BELT - Boost Energy Label Take up:

<https://www.belt-project.eu/>

Label2020:

<https://advice.label2020.eu/>

APPLIA – Home Appliance Europe:

<https://www.theenergylabel.eu/>

LightingEurope – The voice of the lighting industry:

<https://www.lightingeurope.org/>

EPREL database – European Commission information:

[https://ec.europa.eu/info/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/energy-label-and-ecodesign/product-database\\_en](https://ec.europa.eu/info/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/energy-label-and-ecodesign/product-database_en)

New energy label explained – European Commission information:

[https://ec.europa.eu/commission/presscorner/detail/en/MEMO\\_19\\_1596](https://ec.europa.eu/commission/presscorner/detail/en/MEMO_19_1596)



BELT – Boost Energy Label Take up - is a project funded by EU Horizon 2020 which aims to promote the uptake of more efficient energy-related products. BELT has the objective to facilitate the transition period informing and supporting all stakeholders and to reduce to a minimum error at all levels of the value chain from manufacturer to consumer.

Furthermore BELT aims to promote the new label on two key levels: primarily raising awareness and informing consumers (citizens but also public and business procurement staff) thus allowing them to make better and more informed choices; and secondly helping manufacturers, distributors and retailers to adapt their practices and use the rescaled

labels to push innovation in designing energy efficiency products.

BELT will create targeted communication campaigns for all stakeholders, it will organise workshops and events and it will develop training activities.

The project is coordinated by the ALTROCONSUMO and includes organisations from 16 EU Member States. For further information you may contact Luca Campadello (ERION): [luca.campadello@erion.it](mailto:luca.campadello@erion.it)



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