



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 does not 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

Generation and supply

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

Manufacturers are obliged to generate the energy label and it is their responsibility to verify the accuracy and reliability of the information reported on it. In fact, the framework legislation states that the labelling requirement falls on the **supplier** (supplier means a **manufacturer** established in the Union, the authorised **representative** of a manufacturer who is not established in the Union, or an **importer**, who places a product on the Union market); the regulation indicates also that the energy label obligation starts when a product is placed on the market.

2. I am a supplier. How will the new energy label be generated?

From 1st January 2019, manufacturers are obliged to register their appliances 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 from the entry into force day of the new regulation (i.e., for registration on EPREL these dates are 1st November 2020 and 1st May 2021 for lamps), a new identification number will be generated. **The possibility of re-registering products subjected to label change will be available from approximately the third quarter of 2020.** Therefore, through EPREL, it will be possible to generate the new rescaled energy label.

The new labels are downloadable in InDesign format at this link (the rescaled labels are the ones with the 2019 date): https://ec.europa.eu/energy/topics/energy-efficiency/energy-label-and-ecodesign/energy-label-templates_en?redir=1

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

The manufacturers' obligation to provide a **printed version of the new energy label** together with the product (or printed on the packaging of the product in case of light sources and display) remains unchanged from the previous legislation.

However, the **product information sheet does 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 and for the cases reported in the regulation).

4. I am a supplier; therefore, I have to provide the printed label to the retailers. Otherwise, is it possible to make arrangements with retailers so that they only get the label file in digital version? As manufacturer, I can compensate their printing expenses.

In accordance with the Framework Regulation, the supplier **must provide the printed labels**, when the product is put on the market and on request of a distributor (free of charge).

Operatively, for the products that will be registered on EPREL according to the new regulation, it will be possible to have access to the electronic version of the label directly through the database scanning the QR code; in this case, potentially the distributor would be able to download the label and autonomously print it. **However, in the regulation there are no instructions on this possibility.**

On the contrary, regarding the product information sheet, the Framework Regulation explicitly reports that this document can be provided by the suppliers in the electronic format; the Framework Regulation reports as well that the supplier has to provide the printed version of the information sheet only if the distributor asks for it; additionally, the Framework Regulation reports also that the distributor can autonomously download the information sheet from the product database to visualize it in electronic format or to print it.

5. I am a distributor. Where can I find the new label to print?

The new labels **have to be provided by the supplier** (a manufacturer established in the Union, the authorised representative of a manufacturer who is not established in the Union, or an importer, who places a product on the Union market). More specifically, for washing machines, washer-dryers, dishwashers, refrigerators and electronic displays:

- in the case of products placed on the market before 1st November 2020 and that will be placed on the market even after this date, the manufacturer must also provide **the new rescaled label if requested by the distributor**. The distributor could have done this request starting from the 1st of November 2020. The supplier is obliged to provide the label, free of charge, within 5 working days from the request;
- in the case of products placed on the market after 1st November 2020, these should have contained in the product packaging the new label; or the supplier should have provided the new label within 1st March 2021. Otherwise, the distributor needs to request the new label to the supplier;
- in the case of new products placed on the market starting from 1st March 2021, these should be accompanied only with the new label.

6. I am not a supplier, but I commercialize of products subjected to the label change. What should I do?

Following the definitions reported in the Framework Regulation, the distributor is *the retailer or other natural or legal person who offers for sale, hire, or hire purchase, or displays products to customers or installers in the course of a commercial activity, whether or not in return for payment*. In accordance with article 5 of the Framework Regulation, the obligations of the distributor shall include:

- the distributor displays, in a visible manner, including cases of online distance selling, the label provided by the supplier;
- to make available to customers the product information sheet, including, upon request, in physical form at the point of sale;
- if the dealer does not have a label, she/he shall request one to the supplier;
- if the dealer does not have a product information sheet, she/he shall request one to the supplier; or, if she/he prefers, she/he can print or download it from the product database to visualize it in electronic format, if those functions are available for the relevant product.

In summary, the subject qualified as supplier has to prepare and put the label on the product, while the dealer has to make it visible.

7. I am an importer of products subjected to label change. These products are only sold to subjects with VAT number (B2B transactions). What should I do to fulfil the obligations introduced with the new labelling system?

You have to fulfil all the labelling obligations, and among these there are the ones regarding the product registration on the EPREL database, which falls on the product supplier: namely, a manufacturer established in the Union, the authorised representative of a manufacturer who is not established in the Union, or an importer, who places a product on the Union market. In addition, the obligations refer to the act of *placing on the market the product*, thus the first making available of a product on the Union market. **The regulation does not consider who is the subject to whom the product is sold.**

8. I am a supplier of products subjected to label change, but I make products only on order. These products are not sold to big chains in contact with final users, but only directly to big subjects. Do I have to fulfil the label obligations?

Yes, the label obligations are related to the act of *placing on the market* of the products. The definition of placing on the market of a product is reported in the answer to question 2 of the section *Timing* of this document. The concept of placing on the market refers to every single product and not to a type of product, regardless of the fact that the products was produced as unique piece or in series.

9. I am a supplier of industrial products. Do I have to fulfil the new labelling obligations?

The products subjected to energy label change are mainly domestic, but there are some exceptions:

- **household** washing machines and household washer-dryers (it is specified that the regulation is applied to washing machines and washer-dryers that have the same technical characteristics of the domestic ones, regardless of the context in which they are used);
- refrigerating appliances powered by electric grid with a total volume of more than 10 litres and less than or equal to 1,500 litres. These also include:
 - chest freezers, also professional, because they can be used outside of a professional context;
 - wine storage appliances that are usually used in domestic contexts or restaurants;
 - minibars that are usually used in hotel rooms.
- dishwasher for **domestic use** (it is specified that the regulation applies to dishwashers that have the same technical characteristics of the domestic ones, regardless of the context in which they are used);
- light sources, that fall in the definition reported in article 2, subparagraph 1 of the DELEGATED REGULATION (EU) 2019/2015 and that are not reported among the ones of annex IV, points 1 and 2 of the same regulation;
- electronic display, including TVs, monitors and the signage displays excluded the ones reported in article 1, subparagraph 2 of the DELEGATED REGULATION (EU) 2019/2013;
- refrigerating appliances with a direct sales function: supermarket refrigerating (freezers or refrigerators) cabinets, beverage coolers, small ice-cream freezers, gelato-scooping cabinets and refrigerated vending machines. The products reported in article 1, subparagraph 2 of the DELEGATED REGULATION (EU) 2019/2018 are not included.

Graphical aspects

1. I am a supplier of washing machines, dishwashers, refrigerators and electronic displays. What is the maximum label size we can use?

The delegate acts referring to washing machines, washer-dryers, dishwashers, refrigerators and electronic displays, in annex III, *STRUCTURE OF THE LABEL* point, defines the energy label format requirements, indicating also the **minimum height and width** of the label.

A maximum label size is not mentioned. It is only specified that if the label is printed in a larger format, *the content shall nevertheless remain proportioned to the specifications* indicated in the delegate act.

2. I am a supplier of light sources. For my products, I am using packaging of different sizes (for example 78mm*118m and 94mm*184mm). Which label version do I have to use? Am I obliged to use the standard one or I can resize it to a smaller size?

The delegate act related to the implementation of the new label for light sources (and its changes published on 26th March 2021 and available [here](#)) states that the producer can choose among two label sizes (standard or small size):

- the **standard size** format, with minimum width of 36 mm and minimum height of 72 mm;
- the **small size** format cannot be used if the width exceeds 36 mm. The width has to be at least equal to 20 mm and the height 54 mm.

The small size format cannot be used if the packaging has a width greater than 36 mm. While the label can be printed in a larger format: in this case the content is proportioned to the specifications reported above. The sizes reported in the question have all a width greater than 36 mm, therefore the format that has to be used is the standard one.

3. The supplier's name and model identifier are mandatory information to be inserted in the design of the label?

Yes, the information SUPPLIER'S NAME and MODEL IDENTIFIER are mandatory. This information needs to be inserted in the EPREL database that will generate the label. It is also possible to verify that this information is present in the templates available at the page reported in the answer to question 2 of this section of the FAQ document.

The timing

1. During the transition period, and to sell a product before its, does the manufacturer need to provide both labels in the product packaging?

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

- for products placed on the market before 1st 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**. Product with the old energy label can be sold until 30th November 2021;
- for products placed on the market before 1st 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 1st November 2020 and that will be sold by the distributor before 1st March 2021, the producer has to provide **both the labels** (but the new label will not be shown to consumers until 1st March 2021);

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

The transition period for light sources runs between 1st September 2021 and 28th February 2023. During this time:

- for products placed on the market before 1st 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**. These products can be sold until 28th February 2023;
- for products that are placed on the market before 1st 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**.

New products put on the market after 1st September 2021 must have **the new label** printed on the packaging.

2. What is the meaning of placing on the market?

Following the definitions reported in the '**Blue Guide' on the implementation of EU products rules 2016** (that have to be used as reference point to understand the labelling requirements): "*For the purposes of Union harmonisation legislation, a product is placed on the market when it is made available for the first time on the Union market. The operation is reserved either for a manufacturer or an importer, i.e. the manufacturer and the importer are the only economic operators who place products on the market. When a manufacturer or an importer supplies a product to a distributor or an end-user for the first time, the operation is always labelled in legal terms as 'placing on the market'. Any subsequent operation, for instance, from a distributor to distributor or from a distributor to an end-user is defined as making available.*"

- 3. After the customs clearance activities, does the entry in EU correspond to the moment in which the product is placed on the market? Does the exit from the warehouse of the supplier correspond to the moment in which the product is placed on the market?**

Following the definition reported above and present in the ‘Blue Guide’ on the implementation of EU products rules 2016, the following are cases not related to placing on the market moment; among them is reported that: “*Placing on the market is considered not to take place where a product is in the stocks of the manufacturer (or the authorised representative established in the Union) or the importer, where the product is not yet made available, that is, when it is not being supplied for distribution, consumption or use, unless otherwise provided for in the applicable Union harmonisation legislation.*”.

Therefore, for *placing on the market* is considered the date of exit from warehouse, not the activity of custom clearance.

- 4. What are the deadlines for the implementation of the new energy label for products in stock?**

For products in stock, which are put on the market before the beginning of the transition period, distributors have the option to request the new rescaled label to the manufacturers. Following article 11, subparagraph 13 of the Framework Regulation, there are some specific cases in which products subjected to label change can still be sold with only the old label within 30th November 2021 (or within 28th February 2023 in the case of light sources). The cases are the following:

- when the distributor is not able to obtain a rescaled label for the stock units, because the supplier went out of the business;
- when the not-rescaled label and the rescaled one need different tests of the model and, therefore, the supplier is exempted from the obligation to provide a rescaled label for the units put on the market or put into service only before 1st November 2021.

If there are different steps before the final sale of the product subjected to label change (for example supplier-distributor-sub distributor-dealer) occurs, it is important to underline that the date of **placing on the market** of the product has always to be considered, following the definition reported in the answer to the question 2 of this section of the document.

- 5. 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 subjected to the same timeframes regulating the introduction of products on the European market. Therefore, when a producer of an extra-EU country produces the product and when it is imported from extra-EU countries, it is necessary to evaluate 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 (this evaluation is also important in terms of registration on the EPREL database).

It should be considered that new products put on the market after 1st November 2020 (among those addressed by label rescaling, except for lamps), can be only sold from 1st 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 1st September 2021, will have to have the new label on the packaging starting from the same date to be sold on the European market.

- 6. We import in Europe products produced in China and, considering the new legislation, we are subjected to the producers' obligations. Our business model involves different steps before reaching the final client (e.g., supplier – distributor - sub-distributor - dealer). Regarding the possible affix of the label on the products sold before 1st November 2020, do we have to proactively send a letter to our direct clients (ignoring the other steps of the chain) asking them to inform us on eventual products that do not have the new label and that remained unsold at a certain date?**

If these are products put on the market before 1st November 2020 and that will be put on the market even after this date, the supplier has to provide the rescaled label on request of the distributor. The

distributor could have done this request from 1st November 2020. The supplier is obliged to provide the label within 5 working days from the request and free of charge.

7. **I am an extra-EU producer of equipment subjected to label change (excluding light sources). I produced before 1st November 2020 a batch of products that may arrive at the French custom on 3rd November 2020. In this case, do the products contained in the batch have to have both labels, right?**
Yes, the packaging of the products will have to contain both labels (the old and the new one) because these products will be put on the European market after 1st November 2020. Unless they are units of new models (no single unit of these models or of equivalent models never put on the market) that will be put on the market only after 1st March 2021: in this case, they can have only the new label. It is important to underline that those cases of double labels during the transition period, that begins starting from 1st November 2020, are also regulated by the note of the European Commission on the effect of COVID 19 as it is expressed in the answer to question 9 of this section of the document.

8. **Can we use the new energy label before 1st November 2020 (or 1st September 2020 for light sources)?**
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 answer to question 1 of the section *The communication*) and to meet the training needs on the rescaling topic of the different professional figures involved in the energy labelling 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).

9. **What is the impact of COVID19 on the Energy Label implementation?**
In the context of the COVID-19 pandemic and its impact 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 1st 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 needed for new products (put on the market after 1st November 2020) during the 4 months period, but it maintains a strict date (1st 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 1st 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-month period.

The QR Code and EPREL Database

1. **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 find more information on the QR code at the following link: <https://eprel.ec.europa.eu/qr/>
From the EPREL Database, you will have the opportunity to generate the QR code also separated from the energy label.

2. What layout will be used for showing to the consumer the data linked to the information contained in the QR code?

By scanning with a smartphone the QR code present on the product label, consumers will have the opportunity to visualize the energy label and read the information contained in the product technical datasheet. Consumers will be able to have access to the information contained in the public part of the database directly from an URL or by scanning the QR code.

The following is an example of what is already possible to visualize by scanning the QR code present on the product label.



In addition, in future, they will be able to compare the performance and characteristics of different products and models; to search through the products registered on the database by setting criteria and search filters and to see the general details of the suppliers (for example name of the supplier, reference contact, telephone number...).

3. I am a supplier. How can I get the credentials to access EPREL?

The modality to register on the EPREL Database are the following:

- It is possible to register products by following the link: <https://energy-label.ec.europa.eu>
It will be necessary to create an account ECAS (European Commission's Authentication Service).
- The guidelines on how to register a new organisation (**How to register a new supplier user and his organisation in EPREL**) are downloadable at the following link <https://webgate.ec.europa.eu/fpfis/wikis/display/EPREL/EPREL+Guidelines>

Concerning the obtaining of the credentials to access EPREL, I suggest you visit the dedicated page (in Italian) of ASSIL - Associazione Nazionale Produttori Illuminazione at this link https://www.assil.it/news_433.

The database is active, also for lamps, since 1st January 2019; from 1st November 2020 (1st May 2021 for light sources) it will be necessary a re-registration of old products and a registration of new products following the indications of the regulation.

4. Which information has to be inserted by the supplier in the EPREL Database page dedicated to compliance checks?

The information that has to be inserted into the database is the one indicated in the FRAMEWORK REGULATION 2017/1369, Article 12 Subparagraph 5.

The mandatory specific parts of the technical documentation that the supplier has to insert into the database, in the section related to the verification of compliance, are the data related to:

- a general description of the model, that allows to uniquely and easily identify it;
- references to the harmonised standards applied or to other measurement standards used;
- specific precautions to be taken when the model is assembled, maintenance, installed or tested;
- measured technical parameters of the model;
- calculations performed with the measured parameters;

- f) testing conditions not described or determined in point (b);
- g) Model identification of all equivalent models already put on the market.

5. Which is the information that has to be inserted by the supplier in the public part of the EPREL Database?

The information to be inserted in public part of the database is the one indicated in the FRAMEWORK REGULATION 2017/1369, in Annex I Points 1 and 3.

The information to be inserted in the public part of the database is:

- a) supplier's name or trade mark, address, contact information and other legal identification of the supplier;
- b) supplier's model identifier;
- c) label in digital format;
- d) class or classes of energy efficiency and other parameters available on the label;
- e) parameters of the informative sheet of the product in digital format.

The informative sheet of the product can be generated (similarly to what is possible to do for the label) by inserting the information needed in the section "Public information" and subsequently going in the section "Label/Sheet".

On a voluntary basis the supplier can upload into the database additional parts of the technical documentation.

6. Will the supplier have the possibility to generate the label directly from the EPREL Database?

Once inserted all the public information in the database, this can automatically generate the label corresponding to the characteristics of the product that is under registration. In the event that this functionality is still not active, it is necessary to generate autonomously the label and upload it on the database.

The screenshot shows a user interface for uploading a label file. At the top, there is a blue header bar with the text 'Etichetta del fornitore' and a 'SELECTED' button. Below this, a message box contains the text: 'You have chosen not to allow EPREL to generate the label. You have to upload your own label in order to complete the registration.' Below the message is a dashed rectangular area for dragging files, with the placeholder text 'Trascina l'etichetta del fornitore qui (max. 2MB)'. To the right of this area is a blue 'Sfoglia' (Browse) button. At the bottom of the interface is a blue 'Carica etichetta' (Upload label) button.

7. For products registered on EPREL, but whose label does not have the QR code, which type of information can consumers visualize?

The registration of products on EPREL is mandatory since 1st January 2019 for all the types of products reported [here](#). However, there are some products that, even though are registered on EPREL, do not have the label with the QR code: for example, because they are not subjected to the rescaling (such as ovens), or because they were put on the market before 1st November 2020, or because they are part of the cases indicated as derogations (e.g., the producer is out of business). In all these cases, the information reported on EPREL is only visible to organisms of surveillance.

The goal of the European Commission is to develop, in future, an interface that enables citizens to have access to the information also for these types of appliances. For now, however, it is only possible to visualize information reported on the rescaled labels.

8. The new labelling system requires producers to register on EPREL products subjected to label change starting from 1st November 2020. Is it possible to do the registration in advance?

Yes, it is possible to register products in advance. On 1st November 2020 all the products put on the European market will have to be registered as prerequisite for entering.

9. The EPREL section dedicated to the registration of light sources seems not to be fully functional. What do I have to do?

It is only from 1st May 2021 that suppliers will have to re-register their products on the EPREL platform on the basis of the new regulation on light sources. However, right now it is possible to proceed to a first registration of products by inserting the main data. Some functionalities, such as the label generation and its technical sheet, have still not been implemented for light sources.

10. I registered a new company on the EPREL database; in the Trade Mark form I have to insert the Reference: what is it?

Reference: is a code to be used during the registration and associated to the brand. The code is a free alphanumeric text; the supplier can introduce any code s/he prefers; this reference will be used to know which brand of that supplier has to be assigned to the model.

The code production should enable the functionality system-to-system, this means that through the reference code the internal system of registration of the products used by the supplier (upload of the data in XLM format) can communicate with the EPREL database. The reference is requested even when the registration is done manually. In addition, the reference is requested not only in the screen Brand/Trademarks but also in the contact one.

11. I registered a new company on the EPREL database; what is the meaning of Status (Incomplete, Complete or Published)?

Status: is the status of the model that is being registered; during the creation is always "Incomplete" but it changes during the life cycle of the model, each time that the user saves the data changes or when an important date comes up (for example date of placing on the market). The link "Missing Fields"

opens a list of all the fields that are not yet been filled and that are necessary to change the status in "Complete".

12. I registered a new company on the EPREL database; in the *Loading* page, I cannot create the zip document. What can I do?

Creation of the zip document: the European Commission created the guidelines (*How to manually upload product models in EPREL using file upload* e *Examples of zip files for manual upload*) regarding the preparation and uploading of the zip files; in the guidelines is reported the right procedure for the generation and the uploading of the zip files and the indications of the possible mistakes that could be generated during the operation. The guidelines on the use of EPREL and examples of zip. files can be found at this link <https://webgate.ec.europa.eu/fpfis/wikis/display/EPREL/EPREL+Guidelines>.

13. I registered a new company on the EPREL database; can I see what the other company have registered?

It is not possible to see the registration of other producers; you can only see the models registered from other members of your own organization. In addition, it is possible to see the information reported in the public part of the database; while the information present in the section dedicated to the verification of conformity is only accessible to surveillance authorities.

14. I am an importer of appliances from Switzerland, and we distribute these products exclusively on the Italian territory. Who is responsible for the registration on the EPREL database of all the certification related to the imported products?

The obligations of labelling, and among these there are the ones related to the product registration on EPREL database, lie on the product producer: a manufacturer established in the Union, the authorised representative of a manufacturer who is not established in the Union, or an importer, who places a product on the Union market. In addition, these obligations refer to the placing on the market of the product, which means the first making available of a product on the Union market. Considering that the mentioned producer is based in Switzerland, it should be importer's duty to proceed to the registration of the products on EPREL.

In Switzerland the labelling system is harmonized to the European one; excluding the obligations of registration on EPREL and the generation of the QR code. More details on this topic can be found at the following page, on this dedicated website <https://newlabel.ch/it/letichetta-energia-2021/> (webpage not available in English).

Moreover, in EPREL is not possible to proceed to the registration of products placed on the Swiss market. Once inserted the information on the database, this should be able to automatically generate the label corresponding to the product characteristics that you are registering. It should be highlighted that, differently from the Swiss market, the products placed on the European market have to show the label with the QR code.

The communication

1. When is it possible to start the communication activity on the new energy label?

Any graphic advertising (including via internet) relating to a specific product subjected 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. 1st March 2020 or 1st 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 be applied to all products affected by the rescaling and put on the European market, regardless brand or model).

2. When will I be able to show the new energy label in the product catalogue?

The answer to question 1 also applies in the case of catalogues. This means that catalogues, which refer to specific products, models and brands, can be made public from the application dates of the new regulation (1st March 2021 or 1st September 2021 for lamps).

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

3. I am a distributor. What do I have to do to correctly manage the activity of promotion of the products if they are subjected to the new labelling system?

The Delegate Acts related to the new labelling system, demand specific obligations regarding the information to provide **in visual advertisements, in technical promotional material, in distance selling, in teleshopping and in distance selling on the Internet**. The specific obligations can be found in detail in the Delegate Acts related to every product subjected to the labelling system change, in ANNEX VII *information to provide in visual advertisements, in technical promotional material, in distance selling and teleshopping excluding distance selling on the Internet* and in ANNEX VIII *information to be provided in distance selling on the Internet*.

The products

The light sources

1. I am an importer and dealer in Italy of lighting products, with or without the light source. Lamps and light bulbs are physically produced in China, but my company is the first one to put these products on the European market (with its own brand). Is my company responsible of the energy labelling obligations?

As stated in answer to question 1 in the section *Generation and supply* of this document, the labelling obligations lie on supplier, intended also as importer, if s/he is the first to put the product on the European market. Nevertheless, in the case of light sources it is necessary to specify that they are not subjected to obligations of labelling and of registration on the EPREL database:

- the lightning appliances without the light source, starting from 25th December 2019;
- containing product.

2. How can I know if a product can be considered as light source or containing product?

A containing product is a product containing one or more light sources, or separate control gears, or both. Examples of containing products are **luminaires that can be taken apart to allow separate verification of the contained light source(s)**, household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s). **If a containing product cannot be taken apart for verification of the light source and separate control gear, the entire containing product is to be considered as light source.** If the light source is not removable, the whole containing product is considered as light source and the product informative sheet and the technical documentation refer to the entire combination.

3. Some examples of containing product.

Examples of containing products are:

- lightning appliances with removable LED module already assembled (that can only be substituted with an identical LED module);

- lightning appliances supplied with the light source (not assembled, but present into the packaging of the appliance), that is removable and replaceable (for example light bulbs with GU10 or E27 socket);
- other typologies of products that contain removable light sources such as: *above ground pool or portable SPA*; photographic equipment with tripod and lights.

4. I am a supplier of light appliances that only work with a specific LED (light source); each product has its own LED module, this one is not interchangeable but it is removable. Is the product a light source?

The legislation does not refer to the *interchangeability* but only to the disassembly of the light source. Therefore, this is a case of containing product.

5. Which are the obligations to comply with to correctly fulfil the labelling obligations in the case of containing products?

In case of containing products, the product producers have only to follow what is written in article 3, subparagraph 2 of the Delegate act related to light sources. They have to follow the point 2 of annex V, where there are the following indications: *if a light source is placed on the market as a part in a containing product, the following text shall be displayed, clearly legible, in the user manual or booklet of instructions: 'This product contains a light source of energy efficiency class <X>.'*

6. I am a supplier of a containing product, how can I know the energy efficiency of the light source contained in the containing product, to insert this information in the user manual of the product?

The information on the energy efficiency of the light source has to be obtained from the producer of the light source, also through EPREL. The company that put for the first time the light source on the European market is the one that has to do the registration on the database.

7. I am a supplier. In the case of containing product, is it necessary to provide the informative sheet of the product and its technical documentation?

If the containing product is an **appliance separately covered by label**, the supplier will have to provide the product sheet, its label and the technical documentation. Ovens and refrigerators are examples of containing products separately covered by label. If it is the case of containing product and the product is not covered by label (for example for closets and mirrors), the indications reported in the answer to question 5 in this section of the FAQ are apply.

8. I am a supplier of a containing product. I also am the first to put on the European market the light source contained in the containing product. Do I have to register on EPREL the information related to the light source (even if this one will never be sold individually)?

For containing products is not necessary to register on EPREL the product and print the energy label. However, if, as in the case described, the supplier of the containing product is also the first one to put on the European market the light source contained therein, the supplier has to fulfil all the labelling requirements related to the light source (detached from the lightning appliance): s/he has to register on EPREL the light source, prepare the technical documentation and realize the compliance evaluation.

9. Are the lightning appliances without the light source subjected to energy labelling?

Following what is written in answer to question 1 of this section, it is specified that lightning appliances without the light source, from 25th December 2019, are no more subjected to labelling (in fact, the Delegate Act 2019/2015 related to light sources specifies that the European regulation n. 874/2012 is repealed since 1st September 2021, except for article 3, subparagraph 2 and article 4, subparagraph 2, that are repealed since 25th December 2019). This means that lightning appliances do no longer have to be registered on EPREL and it is not necessary that they are accompanied by energy label.

Electronic displays and TV

10. I am a supplier of electronic displays without HDR. Which indications have to be inserted in the energy label in the part related to the HDR in terms of energy class and consumption?

Considering that the energy label is generated following the insertion of the product data on the EPREL database, we can refer to what is reported in article 3, subparagraph 1, letter b of the COMMISSION DELEGATED REGULATION (EU) 2019/2013. Following the regulation, the display data to be inserted in the product datasheet on EPREL are the ones reported in table 4 of annex V. Among them, the ones related to the product functioning in HDR modality are: the energy efficiency class (HDR) and the on-mode absorbed power for the High Dynamic Range (HDR). **If the product does not have the HDR function, the energy efficiency class will be n.a. while the absorbed power will be equal to zero**, as stated in annex V table 4 of the DELEGATED ACT on electronic displays.

In addition, as specified in the [modifications of the DELEGATED ACT, published on 26th March 2021](#), on the implementation of the new label for displays, “*If the electronic display does not support HDR, the HDR pictogram and the letters of energy efficiency classes are not displayed. The screen pictogram, indicating screen size and resolution, shall be vertically centred in the area below the indication of the energy consumption.*”.

11. I am a supplier of a thermal imaging, a product that has integrated a small LCD display of 7 inches. This display is neither separately sold nor an accessory for the thermal imaging, functionality. Does the energy label need to be applied to this product or only to the component?

The thermal imaging does not fall in the product categories subjected to the new labelling system. For what concerns the LCD viewer contained therein, also this one is excluded from the new labelling obligations for TV and displays (following what is stated in the DELEGATED REGULATION (EU) 2019/2013 of the Commission that is related to the energy labelling of electronic displays). The regulation is not applied to electronic displays with a screen area smaller or equal to 100 cm². All the typologies of displays excluded from labelling obligations are reported in the DELEGATED ACT article 1 subparagraph 2.

Refrigerating appliances with direct sale function

The refrigerating appliances with direct sale function are the only professional products to be involved in the energy label change.

12. Are the refrigerated wine cabinets with sale function subjected to the new requirements of labelling related to the refrigerating appliances?

No, the refrigerated wine cabinets (called *wine storage* appliances in the DELEGATED ACT 2019/2018) fall within the application context of the DELEGATED REGULATION (EU) 2019/2016 concerning the energy labelling of refrigerating appliances.

13. Are the ice-cream freezers subjected to the new labelling requirements related to the refrigerating appliances for direct sale function?

For what concerns professional products, the only ones to be involved in the label change are refrigerating appliances with direct sale function. As specified in the DELEGATED ACT (DELEGATED REGULATION (EU) 2019/2018), the products that are subjected to labelling obligations are refrigerating appliances with a direct sale function powered by electric grid, including appliances sold for refrigeration of non-food products; among these there are supermarket refrigerating (freezer or refrigerator) cabinets, beverage coolers, small ice-cream freezers, gelato-scooping cabinets and refrigerated vending machines. The legislation defines as gelato-scooping cabinet the refrigerating appliance with a direct sale function in which ice-cream can be stored, displayed and scooped, within prescribed temperature limits reported in the DELEGATED ACT; while defines the ice-cream freezer as an horizontal closed cabinet intended to store and/or display and sell pre-packed ice cream, where access by the consumer to the pre-packed ice-cream is achieved by opening a non-transparent or transparent lid from the top, with a net volume ≤ 600 litres (L) and, only in the case of transparent lid ice-cream freezers, a net volume divided by the TDA ≥ 0,35 meters (m).

Therefore, the ice-cream freezers are not subjected to the new labelling system. Article 1 subparagraph 2 of the DELEGATED ACT lists additional categories of products excluded from the regulation application.

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

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.energylabel.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

New energy label explained – European Commission information:

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 7 EU Member States. For further information you may contact Luca Campadello (ERION): luca.campadello@erion.it



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