



## European energy labels: rescaling and transition periods

### 1. Why a rescaled label?

As a result of the development of more and more energy efficient products, the classes above A (A+, A++ and A+++) in energy labels visible in shops are already or will become saturated. For example, roughly two-thirds of refrigerators and washing machines sold in 2006 were labelled as class A, whereas well over 90 % of those sold in 2017 were higher than class A. The solution is therefore to rescale these labels to **the original A to G scale**. The class A will initially be empty to leave room for technological developments in the future.

These **rescaled energy labels** include of a **QR code** allowing access to public information on the product in the European Product Registry for Energy Labelling (EPREL - *see 5*).

### 2. What is a “rescaling” in practice?

A product showing an **A+++** energy efficiency class could for example become a class **C** after rescaling, **without any change in its energy consumption**: the product remains the same. To establish the rescaled energy efficiency class, either new measurement methods and/or a new way of calculating the Energy Efficiency Index (EEI) that is behind the letter displayed on the label, have been introduced, for the 5 product groups listed below (*see 3*).

### 3. Which European energy labels are being rescaled?

The rescaling of the labels will take place for the 5 following groups of products:

- 1. washing machines and washer-driers (Regulation [\(EU\) 2019/2014](#))
- 2. dishwashers (Regulation [\(EU\) 2019/2017](#))
- 3. electronic displays (Regulation [\(EU\) 2019/2013](#))
- 4. refrigerators (Regulation [\(EU\) 2019/2016](#))
- 5. light sources (Regulation [\(EU\) 2019/2015](#))

### 4. What is the timing of the rescaling of these energy labels?

A rescaled label needs to be displayed in shops and for online sales:

from 1 March 2021 for the following 4 product groups:

- 1. washing machines and washer-driers
- 2. dishwashers
- 3. electronic displays (in this case, the scope is larger than for TV screens, the energy label is new for computer displays, signage's, ...)
- 4. refrigerators

from 1 September 2021 for :

- 5. light sources.

### 5. What is the EPREL?

Since 1 January 2019, an appliance that requires an energy label needs to be registered in [EPREL \(European Product Registry for Energy Labelling\)](#) before being placed on the European market by the **supplier**. The European Commission established and maintains this product database that consists of a public and a compliance part. Registering a product means to include product data in the compliance part for the monitoring of its compliance and for public information. Consumers will, as of end 2020 (estimated), be able to query in the public part of the product database for an appliance, being rescaled or not, and have access to the product information sheet and energy label.

## 6. EPREL and suppliers

Registration into EPREL of an appliance under rescaling requirements is possible for the 4 product groups with an application date from 1 March 2021. It will be available for light sources in the third quarter 2020. This includes the possibility of generating labels in four label formats: png, jpg, pdf and svg. EPREL allows also for the inclusion of “suppliers made” energy labels. In order to be able to create rescaled labels, EPREL can generate a QR-code by a pre-registration system. The rescaled labels source files are available in INDD format [here](#).

In case a **supplier** has to “re-register” a product as detailed in point 7, a new product registration has to be done in EPREL which entails the generation of a new EPREL identifier.

## 7. How to prepare the rescaling of the energy labels?

For product groups **1 to 4** with an application date from 1 March 2021

a) For units of a product in shops or for online sales **before and after 1 November 2020**<sup>1</sup>:

- the **supplier**<sup>2</sup> “re-registers” the product in [EPREL](#) (*see also derogations*) from 1 November 2020 according to the new regulation;
- the **supplier** shall deliver the rescaled label **on request** from the **dealer**<sup>3</sup> from 1 November 2020;
- the **dealer** shall replace the existing labels on products on display, both in shops and online, with the rescaled labels **within 14 working days** after 1 March 2021;
- the **dealer** shall not display the rescaled labels before 1 March 2021.

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<sup>1</sup> This is understood as units of a product placed on the European market or put into service before 1 November 2020 and that remain for sale in the shops after this date. Placing on the Union market is making a product available for the first time on the Union market with a view to its distribution or use within the European Union, whether for reward or free of charge and irrespective of the selling technique and ‘putting into service’ is the first use of a product for its intended purpose by an end-user in the European Union.

**NB:** Under the European Energy Labelling legal framework, products placed on the market include second-hand imported products. However, products that are made available on the Union market for a second or additional time are not be included.

<sup>2</sup> A supplier is a manufacturer or an importer, who places a product on the Union market

<sup>3</sup> A dealer is a 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

Derogations to the above requirements:

(1) A **dealer** who is unable to obtain a rescaled label for units already in its stock because the **supplier** has ceased its activities is allowed to sell those units exclusively with the non-rescaled label until **30 November 2021**<sup>4</sup>. After this date, units shall not be displayed in shops or for online sales, neither sold anymore.

(2) If no units belonging to the same model or equivalent models are placed on the market after 1 November 2020 **and** if the non-rescaled and the rescaled label require the testing of the model with different measurement methods, the **supplier** is exempt from the obligation to supply a rescaled label for units placed on the market before 1 November 2020. In that case, the **dealer** shall be permitted to sell those units exclusively with the non-rescaled label until **30 November 2021**<sup>5</sup>. After this date, units shall not be displayed in shops or for online sales, neither sold anymore.

b) For units of a product arriving in shops or for online sales **between 1 November 2020 and 28 February 2021:**

- the **supplier** registers the product in [EPREL](#) (see also derogations) from 1 November 2020 according to the new and the old regulations;
- the **supplier** shall provide **both** the existing and the rescaled labels and the 2 product information sheets to the **dealer**;
- the **dealer** shall replace the existing labels on products on display, both in shops and online, with the rescaled labels **within 14 working days after 1 March 2021**;
- the **dealer** shall not display the rescaled labels before 1 March 2021.

Derogation to the above requirements:

(1) If the existing and the rescaled label require the testing of the model with different measurement methods, the **supplier** may choose to supply only the rescaled label with units of models to be placed on the market or put into service during the four-month transition period<sup>6</sup>, from **1 November 2020 to 28 February 2021**, if no units belonging to the same model or

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<sup>4</sup> Nine months after the date specified in the relevant delegated act for starting the display of the rescaled label.

<sup>5</sup> Nine months after the date specified in the relevant delegated act for starting the display of the rescaled label.

<sup>6</sup> The 'transition period' is the four-month period before the date specified in the relevant delegated act for starting the display of the rescaled label.

*equivalent models are placed on the market or put into service before **1 November 2020**. In that case, the **dealer** shall not offer those units for sale before **1 March 2021**. The **supplier** shall notify the **dealer** concerned of that consequence as soon as possible, including when it includes such units in its offers to **dealers**.*

c) For units of a product in shops or for online sales **from 1 March 2021**:

- the **supplier** registers the product in [EPREL](#) before placing the product on the EU market according to the new regulation;
- the **supplier** shall provide the rescaled label and the product information sheet to the **dealer**.
- the **dealer** shall display the rescaled label.

Specific additional requirements for product group **3. electronic displays, from 1 March 2021** in shops and online:

- the **supplier** shall either print the rescaled colour label on the packaging or put a sticker with it on the packaging;
- at a point of sale where the electronic display is kept in on-mode and visible to consumers, an electronic label displayed on the screen may replace the printed label;
- at a point of sale where no units of an electronic display model are displayed out of the box, the **dealer** shall make the printed label visible for the consumers.

For the product group **5, light sources, with an application date from 1 September 2021**

a) For units of a product in shops or for online sales **before and after 1 September 2021**:

- the **supplier** "re-registers" the product in [EPREL](#) from 1 May 2021 according to the new regulation.
- the **dealer** shall replace within 18 months after 1 September 2021, **i.e. by 28 February 2023**, the existing label by a sticker with the rescaled label of the same size on the packaging or attached to the package;
- the **supplier** shall provide **on request** from the **dealer**, stickers with the rescaled label of the same size as the one which exists on the packaging or attached to the package and the related product information sheet (NB: the latter can be requested in a printed form).

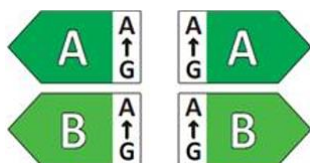
- the **dealer** shall not display the rescaled labels before 1 September 2021;
- the **dealer** shall replace the existing labels for products for online sales, with the rescaled labels **within 14 working days after 1 September 2021**.

b) For units of a product in shops or for online sales **from 1 September 2021**:

- the **supplier** registers the product in [EPREL](#) according to the new regulation;
- the **supplier** shall provide each light source in an individual packaging with the rescaled label printed in colour or monochrome (the latter if the information on the packaging is printed in monochrome) and the related electronic product information sheet to the **dealer**; **on request** from the **dealer**, the **supplier** shall provide the **printed** product information sheet.
- the **dealer** shall in shops and for online sales display units of a model in such a way that the rescaled label or the arrow with the energy efficiency class is clearly visible on the packaging for the consumer. For online sales, the rescaled label and related product information sheet can be requested to the **supplier** by the **dealer**.

### Internet or paper distance selling, visual advertisement, promotional material of rescaled product groups

An **arrow**<sup>7</sup> of the colour of the product energy efficiency class and the range of available energy efficiency classes shall to be placed next to the product model for paper or distance sales.



In the case of telemarketing, the (oral) information provided to the customer shall include the product energy efficiency class and the range of available energy efficiency classes. The customer can request a printed copy form of the label and product information sheet.

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<sup>7</sup> Specifications and the arrows graphical specifications are detailed in Annex VII & VIII of each energy labelling regulation. A monochrome version is possible for monochrome printed material.

In the case of sales on the internet<sup>8</sup> the label should be displayed in proximity of the price of the product. The label may be displayed via a nested arrow showing the product energy efficiency class and the range of energy efficiency classes (as illustrated above).

The timing of appearance of the arrows, rescaled energy labels and related product information sheets are indicated in the above a. and b. points. Please refer also to point 10, below.

## 8. EPREL and consumers

Consumers should be able to query EPREL from the end of 2020 (estimated):

- information according to the existing regulations will be displayed **until 28 February 2021** (or 31 August 2021 for light sources) and,
- information according to the new regulations will be displayed **from 1 March 2021** (or from 1 September 2021 for light sources).

The QR-code linking directly to the product page into EPREL will facilitate the search for a specific model. Possible actions include the download of label and access to product information sheet. When doing a query in EPREL, results will show only the products placed on the market (the ones with an “End of Placement” on the market with a past date, will not appear).

## 9. What information will be kept in EPREL and visible for Market Surveillance Authorities?

**Market Surveillance Authorities** will have access to all information provided for a product in EPREL Compliance part, under the new and old regulations.

## 10. Promotional material

Any visual advertisement **for a specific rescaled product** containing its new energy efficiency class, may not become public before the application date of the new regulation (1 March or 1 September 2021 depending on the product). Catalogues can be prepared but not disseminated before these dates. The same applies for advertisement on the Internet.

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<sup>8</sup> Specifications on the rescaled energy label and product information sheet for Internet distance selling are detailed in Annex VIII of each energy labelling regulation.

Information campaigns on the rescaling of the European energy labels accompanied by educational material can take place before the application dates of the new regulations. Member States authorities with the support of the Commission will organise such campaigns.

*General disclaimer: Please note that the European Commission cannot provide a legally binding interpretation of the EU legislation, as this is the sole competence of the European Court of Justice. Any remarks from the European Commission services are without prejudice to the position the Commission might take should related cases arise in a procedure before the Court of Justice.*

**NB 1:** Legal framework regulation is Regulation (EU) 2017/1369 : Article 11(13) "Procedure for the introduction and rescaling of labels"

**NB 2:** The rescaled labels source files are available in INDD format [here](#)

**NB 3:** Two Horizon 2020 projects are funded by the European Union for a smooth market transition towards rescaled energy labels and to support all actors involved in this process:

- LABEL2020 (<https://www.label2020.eu/>)
- BELT - Boost Energy Label Take up (<https://www.newenergylabelt.eu/en> )

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