Home Appliance Europe

Position Paper
12 March 2026

APPLiA's comments to call for evidence on simplification of energy-efficient products legislation

Executive Summary

We appreciate the efforts of the Commission to simplify the ecodesign and energy label framework. We trust that the energy product omnibus legislation will make it easier to market energy efficient appliances and reduce any red tape creating unnecessary burdens. As the home appliance industry navigates a complex regulatory landscape, APPLiA advocates for a transition toward digital-first solutions, the elimination of regulatory overlaps, and the restoration of procedural transparency to ensure legal certainty and industrial competitiveness. This position paper outlines APPLiA's strategic recommendations.

Key Recommendations

- **Transition to digital energy efficiency labels:** APPLiA proposes amending Article 3(1) to include digital labels alongside printed ones. The label should remain a tool to promote energy efficient products, i.e. products that combine a high performance and a low energy consumption.
- **QR code on the energy-labelled product:** It would allow consumers to get access to EPREL to obtain energy label-related information after the product has been purchased.
- **Legal certainty and timelines:** From the Commission, manufacturers require stable timelines when drafting regulations, in addition to reasonable timelines for implementation (minimum 24–36 months) to manage factory retooling and investment cycles.
- **Elimination of double regulation:** APPLiA urges the Commission to exempt components (e.g. motors, fans, light sources) that are already part of a compliant final appliance from their own vertical legislations. Regulating components within a compliant system adds administrative burden without increasing efficiency.

- **Support for the circular economy:** To promote product longevity, legislation must ensure that spare parts remain available and compliant as "originally built," preventing the forced scrapping of functional components due to evolving vertical regulations.
- **Avoid a one-size-fits-all for ESPR labels:** A common label layout for all products under the scope of the ESPR is unfeasible. Due to product specificities, the decisions on the layout and content of any potential future ESPR label shall be left to product-specific regulation.
- **Operational transparency:** The industry advocates for greater transparency in the legislative process, specifically requesting the timely distribution of draft Commission proposals. Providing early access to these drafts, particularly well in advance of Consultation Forum or Ecodesign Forum meetings, is crucial. This is essential to facilitate informed stakeholder feedback, prevent errors, and ensure a democratic legislative process.

1. Digital energy label

Energy labels are a mandatory requirement for many product categories, including major household appliances, air conditioners, and heating systems for both space and water.

Although a printed, colored energy label (EL) must be included with every unit sold, the majority of these labels are discarded and contribute to waste.

The paper energy label is intended to inform consumers when making a purchasing decision but has little value after the purchase. Several factors contribute to this waste:

- Retailers only apply one physical label to the product they display whilst consumers receive the products directly from the warehouse.
- Only one physical label is typically used on the same appliance while the model is available for purchase, which can be up to 5 years.
- With increasing online appliance purchases, consumers only receive the energy label after the purchase, with no influence on their buying decision.
- Similarly, in case of BtoB, professional installers, unpacking directly the appliance, are not systematically transferring the physical energy label after installation, so here again, with no influence on the buying decision of the consumer.

Approximately 100 million labeled home appliances, cooling, and heating units are introduced to the EU market each year. This results in significant waste of printed colored paper that leads to costs of several millions euros, only for our sector.

We therefore propose the following amendment to Energy Label Regulation (EU) 2017/1369 to allow digital energy labels as an alternative to physical labels.

Article 3,
General obligations of supplier

1.The supplier shall ensure that products that are placed on the market are accompanied, for each individual unit, free of charge, with accurate printed labels and with product information sheets in accordance with this Regulation and the relevant delegated acts. Delegated acts may provide that the label is printed on the packaging of the product.

As an alternative to supplying the label and product information sheet with the product, ~~delegated acts referred to in point (h) of Article 16(3) may provide that~~ it is sufficient for the supplier to enter the parameters of such label and product information sheet into the product database. In such a case,

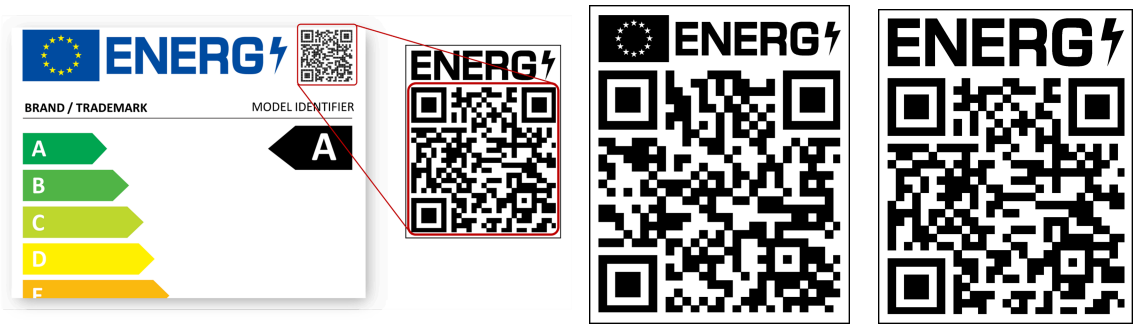
- the supplier shall provide the label and/or product information sheet in printed form to the dealer on request; and
- delegated acts referred to in point (h) of Article 16(3) shall provide technical details on how to ensure end-users' access to the digital label's and product information sheet's entry in the product database.

~~Delegated acts may provide that the label is printed on the packaging of the product.~~

With this change to the framework regulation, delegated acts have the liberty to decide on a case-by-case basis how to ensure the access to information in EPREL, during the product's use phase.

We see digitalisation as a great opportunity and believe that should be the end goal. To get there step by step, manufacturers should have the opportunity to substitute the printed label by a digital label, to which a QR code would give access. In that case we see the EU Commission's proposal to add a QR code to appliances as the alternative to the printed label provided with each labelled product. We would like to highlight that this is without prejudice of the consumer's and dealer's right to have a printed label on demand.

In particular, this QR code must be identical to the one on the energy label so it must link directly to the EPREL database. The QR code could include visual elements used on the energy label itself such as the "ENERG" wording, but it must exclude additional language text so that language neutrality must be ensured. Below you can see some examples below.



Below are some **specific inputs to the questions raised by the Commission** in the non-paper distributed in view of the reality check on 8 December 2025.

- APPLiA believes that there is no need to modify the current framework, except for including the reference to digital label in addition to printed label in Article 3.
- APPLiA does not oppose dealers' possibility to request a printed PIS or EL on demand. It is their right to do so and this right should be maintained as specified in Articles 3 2. and 5 2. of (EU) 2017/1369.
- Every commercial offer to the dealers must contain information about the energy label which contains the link to EPREL. In addition, (EU) 2024/994 clarifies in Art. 14 1. that suppliers must communicate the EPREL model registration number to dealers or to distributors. Further information would be redundant.
- To find an appliance in EPREL, the brand and model number are already a unique combination and easier to understand for end-users than other means.
- On how to make the product information available, current vertical label regulations already describe how to find the appliances in EPREL: it says that the *"user manual or other literature provided with the product shall clearly indicate the link to the model in the product database as a URL, QR code or registration number".*
- To allow for the possibility to find the details about the model, also after purchasing, online search engines are sufficient to find the information about models in customers' homes: the use of brand and model number are sufficient.

Finally, on energy labeling, we would like to stress that energy **labels must reward products in line with the legal definition of energy efficiency** (Article 2, point 17 of the Energy Labelling Framework): where efficiency is the ratio between energy consumption and performance. This means rewarding products that combine high performance with low energy consumption, rather than simply those with the lowest absolute energy consumption (irrespective of performance).

2. EPREL

For home appliance manufacturers, EPREL has been a considerable shared investment, which is now fully operational. As such, EPREL should be retained and used as the core reference database, instead of being replaced or duplicated. In that regard, APPLiA believes that no substantial simplification, functional or operational changes to EPREL are needed, as they will require further effort from manufacturers and a sufficient transition period. Simplification efforts should prioritise easing supplier registration processes over altering model registration rules, as changes to the underlying database structure risk adding complexity rather than reducing it. Therefore, future improvements should focus on documentation and usability, e.g. clearer API standards, better error messages and more user-friendly guidance.

Furthermore, when addressing the simplification of EPREL and the registration of new models, APPLiA requests a specific approach for the repair index on the energy label. We request that the EU Commission allow modifications to the repair index and repair class without requiring a new model registration in EPREL. This will enable manufacturers to improve the repair design of products without the burden of creating a new model.

Therefore, we request that the future energy labelling regulation includes a footnote (c) in the product information sheet for the repair index and repair class parameters as well. To prevent misuse, changes to the repairability index should be allowed only if they lead to a higher repairability class. In other words, changes that result in a product's downgrade must not be permitted without a new model.

Repairability information [a] [c]**:**	
Repairability Class (based on the index below) [a] [c]	[A/B/C/D/E] [d]
Repairability Index [a] [c]	x,xx/10
Disassembly Depth (S_{DD}) score [a] [c]	x,xx/10
Fasteners type score (S_F) [a] [c]	x,xx/10
Tools type score (S_T) [a] [c]	x,xx/10
Repair information score (S_{RI}) [a] [c]	x,xx/10
Detachability of the side panels score (S_{DS}) [a] [c]	x,xx/10

Example from the Tumble Dryers - Energy Label Regulation (EU) 2025/1353

(a) This item shall not be considered relevant for the purpose of Article 2(6) of Regulation (EU) 2017/1369.
(c) Changes to those items shall not be considered relevant for the purpose of Article 4(4) of Regulation (EU) 2017/1369.

Ultimately, we believe that further improvements are needed to address the inaccuracy of the data submitted. Whilst solutions have been put in place to address inconsistency for new entries, there is still a large number of entries from the past years where inconsistencies still exist. We encourage the Commission to introduce a mechanism to address old entries by amending Commission Implementing Regulation (EU) 2024/994.

3. Reasonable timeline and legal certainty

The current lack of planning security severely hampers production in the EU. Investments often have to be made on an assumption of future requirements, or they risk being untimely or insufficient in scope. Content security, particularly regarding specific requirements (like product efficiency formulas), is only guaranteed once the official text is published in the Official Journal (OJ), as legislators retain the ability to make changes right up to the final moment.

APPLiA understands the Commission's resource constraints in addressing the substantial backlog of ecodesign and energy label files. Therefore, we support the extension of the transition date defined in Ecodesign for Sustainable Products Regulation (ESPR) Article 79, from 2026 to 2028.

However, **it is crucial for home appliance manufacturers to have legal certainty**. The ongoing delays in publication and application dates negatively impact the planning of production processes**,** the retooling of factories and the introduction of new and more efficient product series.

Reliable timing and significantly longer transition phases are also needed due to the implementation of other legislation with unsynchronised implementation dates, e.g., Cyber,

AI, RoHS, etc. The legislator must remember that usually, companies also must plan several products with different investment needs over a period of 3-10 years.

Clear and definitive timelines are essential for the effective implementation of product changes. Therefore, we expect that delays are kept to a minimum. For those files that have already seen substantial progress. APPLiA's members remain available to support the Commission to facilitate the swift completion of pending files, while stressing the importance of adhering to the minimum time interval for application dates.

Solution: Appropriate transition time is needed. They must generally be **24 months and not 18 as stated in the ESPR.** For expectedly high investments and **high complexity, 36 months is a must**. For e.g. cooking appliances, there are particularly high investments due to the production peculiarities of metal processing and enamelling, as well as the variety of very different products (hoods, ovens, hobs, etc.). The same might be true for other product files addressing heating and cooling products, e.g. switch to other refrigerants due to F-Gas Regulation. We are pleased to see that this has already been implemented for regulation (EU) 2025/2052, where Art. 10 defines a 36-month transition time before new requirements for external power supplies apply.

Additionally, we recommend that the product changes requested by ecodesign regulations align with other product changes required by other legislation. In particular, we recommend the following changes in the F-Gas Regulation (EU) 2024/573: in the upcoming ecodesign regulation for Lot 2 (water heater), requirements of tier 2, could be aligned with the market prohibition described in Annex IV of (EU) 2024/573, especially point (17) relating to foams that contain fluorinated greenhouse gases, except if required to meet safety requirements. The suggestion, therefore, is to align the deadline for the ecodesign tier 2 requirement with that of point (17), setting both for 1 January 2033.

Also related to the F-Gas Regulation, we recommend reassessing the feasibility of some of the market prohibitions for heat pumps as described in Annex IV of the F-Gas Regulation, given the lack of available alternatives for some of these categories, such as multi-split heat pumps. Considering the strong impact on the heat pump industry, this reassessment should happen at a much earlier stage than the planned review of 2030.

Finally, APPLiA advocates for enhanced legal certainty within the online marketplace, emphasising that the regulatory framework must evolve to match current digital purchasing habits of the rapidly evolving online marketplace. The industry advocates for product legislation that is clear, predictable, and coherent, as vague provisions can lead to fragmented national implementation and increased compliance costs for companies. Discrepancies in enforcement across Member States threaten fair competition and permit non-compliant products to circulate freely, particularly through online sales channels. Therefore, APPLiA calls for a commitment to stronger and more uniform enforcement of EU rules, including prioritising the allocation of adequate resources and developing more effective tools to verify the compliance of online imports. This clarity and predictability are vital for industrial competitiveness, coherence, and innovation within the regulatory framework.

4. Stop double regulation on the same product and restrictions on spare part provisions

Manufacturers have to design products ensuring that specific appliance categories, as whole systems, achieve the highest possible energy efficiency. The responsibility for meeting these requirements falls on the producer, who must identify the optimal design and components for the complete product.

Components that are designed to be part of ED compliant products should be exempted from component specific legislation. Regulating the energy efficiency of individual components (such as electric motors, industrial fans, and light sources) that are part of an already regulated appliance offers no added value. On the contrary, this double regulation creates an unnecessary administrative burden, increases costs, and limits the flexibility needed for innovative product design. These components are integral parts of the final appliance and are not generic, standalone items. Their function is strictly tied to the specific system they are designed for.

Drawing inspiration from the ecodesign legislation for electronic displays (Regulation (EU) 2019/2021, Article 1.2(g)), which exempts "components or subassemblies of products covered by implementing measures adopted under Directive 2009/125/EC," we propose to apply a similar exemption also for other components. This would prevent double regulation under the Ecodesign and ESPR for industrial fans, motors, external power supplies, and light sources, as well as for the energy labelling of light sources and displays. These components are typically placed on the market only when integrated into home appliances or as spare parts for their repair. Since they are produced to the specifications of the appliance manufacturer, it is highly unlikely they would be used for other applications.

Furthermore, the existing legislation should be adapted to promote the repair and longevity of appliances. As ecodesign legislation becomes increasingly restrictive with each revision, spare parts that are not exempt risk becoming non-compliant with the latest requirements. This can lead to the unnecessary scrapping of parts intended for repairing older generations of appliances. This is contrary to EU circular economy objectives.

Below is a concrete proposal/amendments to prevent multiple and potentially contradicting layers of legislation on the same products.

Amend Article 4 of ESPR (EU)2024/1781

> NEW 5. In the delegated acts adopted pursuant to paragraph 1, the Commission shall, where applicable, avoid double regulation and prioritise ecodesign requirements for finished products over requirements placed on raw materials or components/subassemblies used in these products, also when placed on the market as spare parts. Such exemptions shall be placed in each delegated act for products with the potential to be integrated in other products.
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> NEW 6. Pursuant to article 4 point 5, the Commission shall review and amend the following regulations by July 2026: Ecodesign for light sources and separate

control gears (EU) 2019/2020; Ecodesign for electric motors and variable speed drivers (EU) 2019/1781; Ecodesign for industrial fans (industrial fans driven by motors with an electric input power between 125 W and 500 kW) (EU) 2024/1834 in order to avoid double legislation.

Amend Article 16 of the Energy Labelling Framework (EU)2017/1369

NEW 5. In the delegated acts adopted pursuant to Article 17, the Commission shall, where applicable, avoid double regulation and prioritise energy labelling requirements for finished products over requirements placed on raw materials or components/subassemblies used in these products, also when placed on the market as spare parts. Such exemptions shall be placed in each delegated act for products with the potential to be integrated in other products.

NEW 6. Pursuant to Article 16 point 5, the Commission shall review and amend the following regulations by July 2026: Energy Labelling for light sources (EU) 2019/2015; Energy Labelling for electronic displays (EU) 2019/2013.

5. Avoid a one-size-fits-all label layout/size for an ESPR label

We believe that a common label layout for all products under the scope of the ESPR is unfeasible and runs counter to the EU's agenda for simplification and digitalisation. Products such as appliances, furniture, and textiles have vastly different functions, sizes, and information requirements. It is impossible to define a single layout before knowing the specific information requirements for each product group.

The layout of a label will always depend on the amount and type of information requirements that will be set. We urge policymakers to **leave decisions on the layout and content of any potential future ESPR label to product-specific delegated acts (DA)** that thoroughly assess the most appropriate requirements relevant to the overall sustainability of the product, and the information considered relevant to be provided to consumers. We therefore propose to remove Article 16 point 5 from the ESPR.

“5. The Commission shall adopt implementing acts establishing common requirements for the layout of the labels required pursuant to Article 7(7), point (c)."

Instead of already investigating the adoption of a common label layout, the EU Commission should clearly outline the rationale for establishing another label during the development of product group-specific delegated acts. Alternative solutions for providing information to consumers, including digital ones, are already being developed under the ESPR or exist under other legislation for certain product groups, and many of them can and may soon be required to be delivered via a QR code. The creation of premature and overlapping labelling requirements would go against the EU Commission’s 2025 Single Market Strategy and the commitment to reducing regulatory complexity and fragmentation. Providing consumers with similar information through several channels risks overwhelming them and, thus, undermining the objective of efficiently informing consumer decisions.

To simplify these overlapping information requirements for the industry and ensure that data is easily accessible, the home appliance industry calls for a "**Single QR Code**" approach. This approach would allow linking all legally required information under a single digital portal, which must accommodate product-specific solutions and build on already existing databases (e.g. EPREL for products with energy labels).

. In that connection, prior to introducing a new label, the EU Commission should carefully assess whether it improves consumer understanding or, on the contrary, increases confusion. The assessment of the need for product group-specific ESPR labels should also take into consideration market surveillance authorities' capacities to ensure compliance, as they are at present insufficiently equipped to cope with overlapping requirements.

In addition, the EU Commission/study team's current approach is flawed as it prioritises label design over the definition of scope, key metrics, parameters considered, measurement methodologies, and compliance controls. Establishing a robust and measurable methodology is crucial before finalising the label's design. Article 16(5) of ESPR reverses this logical sequence and should therefore be removed to ensure regulatory coherence.

6. A more democratic and transparent dialogue that involves all stakeholders

DG ENER has recently decreased the transparency and the sharing of preparatory documents with both stakeholders and Member States. In particular, they decided not to distribute the ecodesign and energy label working documents ahead of the Ecodesign Forum meeting and only to share some of the content during the meeting. We urge the Commission to reinstate the practice of distributing Ecodesign and Energy Label draft Commission proposals well in advance of the Ecodesign and Consultation Forum meetings.

This approach has long been a cornerstone of transparent and effective policy development within the EU legislative process. Timely access to these documents enables industry experts, NGOs, Member State representatives and other stakeholders to prepare thoroughly and provide informed and constructive input during the meetings. The resulting dialogue has avoided errors, improved the quality of proposed measures and avoided additional delays in the process. Additionally, it helped avoid unnecessary discussions during meetings.

Without the early availability of such documents, the Commission risks undermining the transparency of the process and missing out on crucial feedback that could otherwise lead to more robust and effective legislation. The delay or absence of such documents also hampers meaningful participation, weakening stakeholder trust and the legitimacy of the outcomes.

Moreover, this choice would deviate from the standard practice in other dossiers, where stakeholders participate in preparing Commission proposals from the very early stages, leading to less contentious discussions during Ecodesign Forum meetings.

Without access to the actual drafts, stakeholders risk misunderstanding key provisions or overlooking critical implications. This can lead to feedback that is incomplete, misaligned, or

even counterproductive. We believe that sharing draft Commission proposals is essential for ensuring a sound, inclusive, and democratic legislative process under the Ecodesign and Energy Labelling framework.

7. Substances of Concern in ESPR

Before entering the market, product groups covered by the upcoming ESPR Delegated Acts must meet specific information requirements outlined in those acts. Article 7 of ESPR mandates that companies provide information to enable the tracking of Substances of Concern throughout a product's life cycle, including details like name, location, and concentration. The ESPR's broad definition of "Substances of Concern" creates legal uncertainties and overlaps with existing chemical legislation like REACH, as any substance could be targeted. We recommend removing the substances of concern from the scope of the ESPR. Please see also the *Joint Industry letter to the President of the European Commission on the Urgent Need for a Harmonised and Workable Approach to Substances of Concern.*

8. Reporting of unsold consumer products

Despite the recent publication of the Implementing Regulation on reporting details, a significant misalignment exists between two key deadlines.

Companies must submit their first disclosure reports for products discarded as of the first full financial year following the ESPR's entry into force. However, the standardised reporting format, defined by the just published Implementing Regulation, will only become applicable from the first full financial year after the Implementing Regulation's application date in March 2027.

This gap means companies will need to use non-standardised, self-developed templates for initial reports on discarded consumer products. This situation raises serious concerns regarding the **consistency, clarity and comparability of the data** reported during the first few years.

To ensure the reporting obligation is both credible and efficient, the most effective solution is to align the application date of the disclosure obligation with the application date of the standardised reporting format.

9. Market surveillance in heating and cooling

We believe it is essential to improve market surveillance by clarifying the responsibilities of manufacturers and national authorities, and clarifying the future legal obligations of intermediary actors such as installers.

A significant part of (non-mobile) heating and cooling appliances follows the BtoB circuit. In such a case, professional installers have the responsibility to provide relevant labels as part

of the documentation of the offer. In reality, the information is limited to that for distance selling. We would thus recommend adapting the requirements to this practice.

Moreover, installers are unpacking the appliance directly and are not systematically transferring the physical energy label after installation to the consumer, who has already made their choice, so here again, this physical energy label will have no influence on their buying decision.

10. Drinking Water Directive and hafnium-using products

The omission of hafnium and migration limits from the EU Positive List (EUPL) adopted under the Drinking Water Directive (DWD) remains a critical threat to the availability of enamelled water heaters, hot water storage tanks and heat pumps. Approximately 91,5% of storage tanks currently available on the market are enamelled and thus use hafnium. As a result of this omission, at least during the period 2027-2028, enamelled water heaters and storage heaters will be subject to a *de facto* market withdrawal and new products could be prevented from being put on the market.

In the meantime, manufacturers will have to modify products to comply with the DWD's requirements in addition to the requirements for ecodesign and energy labelling for water heaters. Therefore, while the ecodesign regulation sets requirements to advance the sustainability and durability of these products, another element of the current EU regulatory framework applicable to them will prevent compliance due to the absence of hafnium and migration limits in the EUPL.

APPLiA would like to point out that hafnium would pose an even greater challenge for Heat Pump Water Heaters (HPWHs). They are a key technology for decarbonising domestic hot water production and are actively promoted under EU energy and climate policies. Like conventional electric storage water heaters, HPWHs rely on enamelled storage tanks and are equally affected by the current EUPL gap regarding hafnium. Penalising this product category would run counter to the EU's own decarbonisation objectives, undermining industrial investment in the very technologies expected to contribute to the energy transition.

During APPLiA's multiple exchanges with DG Environment, no particular or scientific justification was mentioned for the missing listing of hafnium, other than the early deadline for finalising the draft EUPL that the Member State experts had back in 2021.

Furthermore, once the EUPL and the other delegated and implementing legislation adopted pursuant to Article 11 DWD start applying in 2027, the long transition period between 2027 and 2032 should provide a smooth shift to the new requirements. However, without the implementation of hafnium and migration limits and with a current patchwork of existing and non-existing national product certificates that will be recognised during the transition, the EU internal market is fragmented. There is the risk that product compliance would have to be assessed for each Member State.

In view of this, the current simplification of energy-efficient products legislation should permit the use of hafnium in the coating of hot water storage tanks, either through an amendment of Article 11(2)(b) of the DWD or via the upcoming ecodesign regulation on water heaters.

Therefore, APPLiA proposes a postponement of the application of the EUPL for water heaters and hot water storage tanks until the status of hafnium under the EUPL is resolved. Alternatively, the postponement could coincide with the implementation of the second tier of ecodesign requirements applying from 48 months after the entry into force of the ecodesign regulation on water heaters. The proposed amendment would provide a transition period until hafnium is added to the EUPL, as it is already the case in Germany under its national Positive List.

11. Concluding Remarks

APPLiA and its members are committed partners in achieving the EU's environmental goals. However, for the industry to innovate and remain competitive, the regulatory framework must be clear, coherent, and predictable.

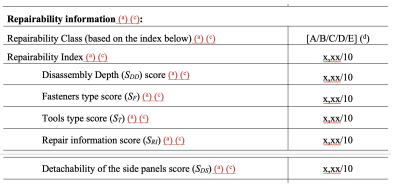
We call on the Commission to:

- Modernise: Transition to digital-first labelling in order to reduce waste and reflect digital purchasing habits.
- Provide Certainty: Ensure definitive timelines with a 24 to 36-month transition period to accommodate complex industrial cycles.
- Simplify: Eliminate "double regulation" for components and ensure spare parts remain exempt from new restrictions to support the right to repair.
- Provide Flexibility: Leave decisions on the layout and content of any potential future ESPR label to product-specific delegated acts.
- Restore Transparency: Reinstate the practice of sharing draft proposals well in advance of meetings to ensure high-quality, democratic policy-making.

By aligning legislation with industrial reality, the EU can meet its climate targets while fostering a resilient and innovative market.

Technical Annex

Proposed changes to the amendment to the energy label for tumble dryers, which introduces a repair index (EU)2025/1353

Topic	Existing Article	Proposed change	Justification and comments
Improvements to repair index w/o new model creation	Annex Va of amended (EU) 2023/2534, respectively Annex IV of (EU) 2025/1353	 **Repairability information** (a) (c): Repairability Class (based on the index below) (a) (c) — [A/B/C/D/E] (d) Repairability Index (a) (c) — x,xx/10 Disassembly Depth (S_{DD}) score (a) (c) — x,xx/10 Fasteners type score (S_F) (a) (c) — x,xx/10 Tools type score (S_T) (a) (c) — x,xx/10 Repair information score (S_{RI}) (a) (c) — x,xx/10 Detachability of the side panels score (S_{DS}) (a) (c) — x,xx/10 (a) This item shall not be considered relevant for the purpose of Article 2(6) of Regulation (EU) 2017/1369. *(c) Changes to those items shall not be considered relevant for the purpose of Article 4(4) of Regulation (EU) 2017/1369.*	We request that in the Product Information Sheet, footnote (c) be included also for the **repair class** and the **repair index** and not only for the parameters of the index. Changes in the repair index should not necessitate re-registration of a model in the database, ensuring alignment with Article 4(4) of Regulation (EU) 2017/1369. Manufacturers should be able to make internal changes to improve the repair design of products without the burden of creating a new model.

Proposed changes to Commission Ecodesign Regulation (EU) 2019/2020 and (EU) 2019/2015 on lighting

Topic	Existing Article	Proposed change	Justification and comments
Exclusion from scope		Reintroduce the concept of luminaires as a subgroup of containing products and another subgroup consisting of products subject to other regulations under 2009/125/EC or (EU) 2024/1781, then exclude all light sources integrated in containing products that fall into the ecodesign group included when placed on the market as spare parts.	See document 3 below (APPLiA amendments to STOP double regulation under the Environment Omnibus)
Exclusion from scope	Art. 1 (1) (c)	Increase the 60 lumen threshold to 150 lumen.	Exclusion of small light sources with little output to decrease the administrative burden.
Exclusion from scope	Art. 1 (1) (c), Annex II Table 1	Instead of lumen, use P_onmax to define the scope. Grant exemption for light sources below 2W when used for household appliances.	
Information requirements	Annex V, 2.	Remove the requirement to include a sentence about the contained light source(s) energy efficiency class in the user manual.	No benefit to end-users, especially for home appliances, can cause issues when switching from one complementary light source to another.
Reference control setting	Annex I, definition (29)	As reference control settings for light sources placed on the market in containing products, use the boundary conditions in which the light source can operate in the	If the containing product limits the use of the light source for its specific purpose, the worst case within these boundaries shall be used to reflect

		containing product, rather than the reference control setting of an isolated light source that end users can freely operate.	real use.
lifetime declaration values	Annex IV, (4), of (EU) 2019/2015	‘(4) Light sources specifically designed and exclusively marketed for products in the scope of **implementing or delegated acts under regulation (EU) 2024/1791 or directíve 2009/125/EC** ~~**Commission Regulations (EU) 2019/2023, (EU) 2019/2022, (EU) No 932/2012 and (EU) 2019/2019,**~~ shall be exempt from the requirements of points 1(e)(7b), 1(e)(7c) and 1(e)(7d) of Annex VI to this Regulation.’”	Level the playing field for all already regulated containing products.

Proposed changes to Commission Ecodesign Regulation (EU) 66/2014 on cooking appliances

Topic	Existing Article	Proposed change	Justification and comments
Removal of redundant information requirements	Annex I, 2. Product information requirements	Modify Annex I, 2. to better reflect target audience: "From 1 year after entry into force, the following product information shall be provided in the technical documentation of the product, the booklet of instructions and on the free access websites of manufacturers of domestic ovens, hobs and range hoods, their authorised representatives, or importers: (a) short title or reference to the measurement and calculation methods used to establish compliance with the above requirements; (b) information relevant to users in order to reduce total environmental impact (e.g. energy use) of the cooking process."	This information is irrelevant for consumers and their purchasing decisions. It is relevant for technical documentation, as required in (EU) No 65/2014 Annex V A. 1. Proposal of new text: "From 1 year after entry into force, the following product information shall be provided in the technical documentation of the product as set out in (EU) No 65/2014 Annex V. From 1 year after entry into force, the following product information shall be provided in the booklet of instructions and on the free access websites of manufacturers of domestic ovens, hobs and range hoods, their authorised representatives, or importers: - information relevant to users in order to reduce total environmental impact (e.g. energy use) of the cooking process."

Removal of redundant information requirements	Annex I, 2. Product information requirements	Remove Annex I, 2.1.	Every oven in scope of this requirement is also in scope of regulation (EU) No 65/2014 and its product fiche and energy label. Both fiche and energy label hold all the information required in Annex I 2.1 (table 4) relevant for end-users. Missing are only "type of oven", a term that is not defined in both regulations and therefore neither helpful nor verifiable; and "mass of the appliance", which is relevant for the distinction of portable oven or not and should be placed into the technical documentation rather than information targeted at end-users.

Additional documents

1. Recommendations for the Next Omnibus Simplification Package (February 2025)
2. Joint Industry letter to the President of the European Commission on the Urgent Need for a Harmonised and Workable Approach to Substances of Concern.
3. APPLiA amendments to STOP double regulation under the Environment Omnibus
4. Joint Industry Letter on ESPR Label

For further information on any of the points raised above, please contact:

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