Home Appliance Europe

Position Paper
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# Omnibus on small-mid caps and paper reduction: APPLiA's proposal of a digital energy label

APPLiA, representing home appliance manufacturers in Europe, proposes a digital energy label as a more environmentally and economically sound alternative to the millions of coloured paper labels printed annually, most of which are wasted and rarely utilised for their intended purpose.

## Printed Energy Labels: A Source of Waste

In light of the upcoming **Omnibus proposal on small-mid caps and paper reduction**, we would like to take this opportunity to share our insights on paper-based energy labels and to **advocate for the use of the digital option** as part of the efforts to reduce costs while reducing paper waste.

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 must be included with every unit sold, the majority of these labels are discarded and contribute to waste.

The energy label is intended to inform consumers when making a purchasing decision but has no 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 model** until that model is available, which can be **up to 3 years**.
- With increasing online appliance purchases, consumers only receive the energy label after the purchase, with no influence on their buying decision.

The average cost of producing, printing, coloring, and handling a single energy label is 0.20€. However, if we estimate that **only 1 in 500** printed labels are actually used as intended, this results in an effective cost of **€100 per used label** (€0.20 × 500).

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 at least 20 million 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.**

The modification to the framework regulation could be incorporated into Article 3, section 1, as indicated below.

> 1.1. 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.
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> As an alternative to supplying the label and the 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 the product information sheet in printed form to the dealer on request.
>
> ~~Delegated acts may provide that the label is printed on the packaging of the product.~~
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> 2. The supplier shall deliver printed labels, including rescaled labels in accordance with Article 11(13), and product information sheets, to the dealer free of charge, promptly and in any event within five working days upon the dealer's request.

As point 2 of Article 3 remains unchanged, dealers retain the option to request printed versions to the suppliers or print them from the online version, which is already available via EPREL, the energy label database set up by the European Commission.

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