

APPLiA's recommendations for Energy Efficiency Product Legislation

Executive Summary

This position paper outlines APPLiA's strategic recommendations to optimise the EU's energy labeling and ecodesign framework. 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.

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.
- **Legal Certainty and Timelines:** 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 calls for the reinstatement of the practice of distributing **draft Commission proposals** well in advance of Consultation Forum or Ecodesign Forum meetings. Early access is vital for informed stakeholder feedback, error prevention, and 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 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.

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 access to information in EPREL can be ensured during products' use phase.

In general, we see the EU Commission's proposal to add a QR code on appliances as one good way of ensuring this. In the first step, this QR code should be the same as on the energy label, see some examples below:



Below some **specific input 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. 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 acknowledge the investigation whether to extend 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 unsynchronized 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 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 (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 enameling, as well as the variety of very different products (hoods, ovens, microwaves, hobs, ...). The same might be true for other product files addressing heating and cooling products. 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**: in the coming 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 proposal would thus be to set the tier 2 requirement of EcoDesign to the same deadline as the point (17), so on 1 January 2033.

Related to the F-Gas Regulation, we recommend to reassess the feasibility of some of the market prohibitions for heat pumps as described in Annex IV of the F-Gas Regulation (EU) 2024/573, 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.

3. 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 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 Ecodesign for Sustainable Products Regulation (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 to prevent multiple and potentially contradicting layers of the 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.

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.

4. 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, especially when alternative solutions for providing information to consumers, including digital ones like the Digital Product Passport and QR codes, are already being developed under the ESPR or exist under other legislation for certain product groups. In the context of the DAs development, the EU Commission needs to specify the problems this label is intended to solve (e.g., providing pre-sale or post-sale information) and demonstrate why existing EU tools, such as the DPP and the Energy Label, are not sufficient.

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. 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) reverses this logical sequence and should therefore be removed to ensure regulatory coherence.

5. Document distribution to maintain a transparent and democratic discussion

DG ENER has 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.

6. 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](#).

7. 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:

- Modernize: Transition to digital-first labeling 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.
- Leave decisions on the layout and content of any potential future ESPR label to product-specific delegated acts (DA)
- 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 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 containing product, rather than the reference control setting of an isolated light source that end users can freely operate.	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 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 directive 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.
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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](#)

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