

Tumble dryers, questions and answers

from the Compliance Services tumble dryer webinar for suppliers,
which took place on the 7th of February 2025

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Ecodesign requirements

EEI

1. Product, that does not meet the EEI score after the 1st of July 2025

Question

We sell a standard condenser dryer (with a heating element) that will not meet the EEI score of <85. One of the early slides stated that "only heat pump dryers" apply after July 2025, so does this mean this old model can be sold with its old format label? Or must we rescale and create new QR code labels for the 2-label transition in March and then 1 label in July? Thanks.

Answer

Tumble dryers placed on the market from the 1st of July 2025 must comply with the requirements of the new ecodesign and energy labelling regulations.

Tumble dryers not meeting the new ecodesign requirements and are placed on the market before the 1st of July 2025 can be sold until the 18th of July 2025 with the current energy label and hereafter only with the new energy label. In this case, there is no time limit to sell these products.

Therefore, you as a supplier must rescale and create a new energy label. Both the current and the new energy label must be provided from the 1st of March until the 1st of July 2025. For your information, the retailer has 14 working days, until the 18th of July 2025, to replace the current energy label with the new energy label on the products.

The only circumstance in which a retailer is allowed to sell a tumble dryer with a non-rescaled energy label after the 18th of July 2025 is if the supplier of the tumble dryer has ceased operations. In such cases, the shop has nine months to sell the tumble dryer.

Legal references

The energy labelling frame regulation [\(EU\) 2017/1369](#) article 11 describes the procedure for the introduction and rescaling of labels.

In 13) (b) it is stated: *the supplier shall, for products placed on the market or put into service before the four-month period, deliver the rescaled label on request from the dealer as from the start of that period (i.e. by 1st of March 2025).*

13) (b) (i): *“A dealer who is unable to obtain a rescaled label in accordance with the first subparagraph of this point for units already in its stock because the supplier has ceased its activities shall be permitted to sell those units exclusively with the non-rescaled label until nine months after the date specified in the relevant delegated act for starting the display of the rescaled label.”*

Cycles

2. Standard for the cycles

Question

What are the preset standards for the cycles? The regulation does not specify at which RPMs, Humidity Level, or which Drying Level (standard, minimum, maximum) for example. meaning is it needed just to put Eco program and run it, without moving any other setting?

Answer (provided by APPLIA) and references to the legislation

The requested information can be found in the regulations.

- RPM – not relevant (ergo not defined)
- Humidity level = initial moisture content – fixed by regulation [\(EU\) 2023/2534](#) Annex I 21. Definition of the “eco-program”
- Drying Level = final moisture content – fixed by regulation [\(EU\) 2023/2534](#) Annex I 21. Definition of the “eco-program”
- Eco-program without any other setting: [\(EU\) 2023/2534](#) Annex IV 3rd paragraph (and [\(EU\) 2023/2533](#) Annex III 3rd paragraph)

Standard, that could be used: EN 61121:2013+A11:2019

Publication of EN 61121:2013 + A12:2025 is forecasted for 2025-08-31

The measurement method did not change in this amendment A12:2025.

The reference to “eco” programme replacing ‘dry cotton programme’ is introduced.

Repair score

3. Repair score – timeline and details

Question

Timeline and details of the repair score

Answer

„The current versions of the new regulations (EU) 2023/2533 and (EU) 2023/2534 do not provide any provisions regarding repair score. There is an amendment to (EU) 2023/2534 expected to be adopted most likely in 2025, which will foresee the introduction of the repair score. As the amendment is not yet final, we cannot provide any details. The current plan is that the repair score will be applicable by 2027. “

Spare parts

4. Spare parts for professional repairers

Question

It was mentioned at the webinar, that all products (tumble dryers) placed on the market after 1.7.2023 must comply with the requirement to have spare parts available based on new ecodesign regulation 2023/2533. We disagree: Spare parts must be available only on tumble dryers which comply with new ecodesign requirements and it could not be earlier than the 1st of March 2025 (see Article 12 part 2 of Ecodesign 2023/2533).

Answer

Article 12, part 2, allows the manufacturer to forgo checking compliance with the current regulation if the product meets the requirements of the new regulation. You are welcome to make spare parts available on the 1st of March 2025, but it is not mandatory.

Spare parts for professional repairers must be available

- For models placed on the market before or on the 1st of July 2023:
By the 1st of July 2025.
- For models placed on the market after the 1st of July 2023:
Two years after the model's market launch.

However, for models that will not be placed on the market after the 30th of June 2025 anymore, this requirement is not applicable as all other requirements of the new regulations.

References to the legislation

Ecodesign regulation [\(EU\) 2023/2533](#), article 12, part 2:

“Where no unit belonging to the same model or equivalent models was placed on the market before 1 March 2025, the units of models placed on the market between 1 March 2025 and 30 June 2025 which comply with the provisions of this Regulation shall be considered to be in compliance with the requirements of Regulation (EU) No 932/2012.”

Ecodesign regulation [\(EU\) 2023/2533](#), Annex II, 5 Resource efficiency requirements, (1) (b):

“Availability of spare parts referred to in point (a), shall be ensured for a minimum period starting at the latest on 1 July 2025 or two years after the placing on the market of the first unit of the model, whichever is the later date, and ending at least 10 years after placing on the market the last unit of the model concerned”

Energy labelling

Transition period

5. Transition period – energy labels

Question

Details of the transition period: condition to be allowed to put appliances with the old label still on the market after the 1st of July 2025.

Answers

There is no way to place tumble dryers with the old label on the market from 1st of July 2025 onwards.

The only circumstance in which a shop is allowed to sell a tumble dryer with a non-rescaled energy label after the 18th of July 2025 is if the supplier of the tumble dryer has ceased operations. In such cases, the shop has nine months to sell the tumble dryer.

References to the legislation

The energy labelling frame regulation [\(EU\) 2017/1369](#) article 11 describes the procedure for the introduction and rescaling of labels.

In 13) (b) it is stated: *the supplier shall, for products placed on the market or put into service before the four-month period, deliver the rescaled label on request from the dealer as from the start of that period (i.e. by 1st of March 2025).*

The only exception is: 13) (b) (i): *a dealer who is unable to obtain a rescaled label in accordance with the first subparagraph of this point for units already in its stock because the supplier has ceased its activities shall be permitted to sell those units exclusively with the non-rescaled label until nine months after the date specified in the relevant delegated act for starting the display of the rescaled label*



Energy label on the packaging

6. Energy label on the packaging

Question

The label must not be printed on the packaging of tumble dryer

Answer

It is not forbidden to print the label onto the packaging; however, it is not mandatory either. The slide in the presentation reflected this accordingly.

Horizontal topics

Placing on the market

7. Placing in the market EU and custom clearance and EPREL database.

Question

Can we understand the case : first placing on the market into EU understandable also the date of selling the product on invoice from manufacturer outside of EU to retailer in EU ? (Product should be on the way 1-2 months and customs clearance can be done 2 months later and product can physically enters into EU also two months later.). Just to understand what date should be mentioned in EPREL database as first one.

Answer

In EPREL the field “Date of first placing on the market” means the date when the first unit of the model will be placed on the market. Please be aware that this is also the date when the model will become PUBLISHED in EPREL.

“Placing a product on the market” refers to the first time of “making available on the market” of a product.

For example, a manufacturer of household appliances finishes manufacturing a batch of tumble dryers and sells them directly to a home appliance store. At this point, the tumble dryers are placed on the market.

A product is not placed on the market (nor made available) when the product is:

- Produced and will be directly exported to a market outside the EU.
- Still in the stage of testing and validation.
- At the EU customs territory in transit, placed in free zones, warehouses, temporary storage or other special customs procedures.
- Manufactured for own use

References to the legislation

In the [Blueguide](#), chapter 2.3 Placing on the market, you can find the definition of “placed on the market”:

A product is placed on the market when it is made available for the first time on the Union market. According to Union harmonisation legislation, each individual product can only be placed once on the Union market. This operation should be done by the manufacturer or by an importer (46). When a manufacturer or an importer supplies a product to a distributor (47) or an end-user for the first time, the operation is always labelled in legal terms as ‘placing on the market’.

Placing a product on the market requires an offer or an agreement (written or verbal) between two or more legal or natural persons for the transfer of ownership, possession or any other property right concerning the product in question; it requires that the manufacturing stage has been completed. This transfer could be for payment or free of charge. It does not require the physical handover of the product.

Sometimes products are manufactured following the placing of an order. An offer or agreement concluded before the stage of manufacture has been finalised cannot be considered as placing on the market (e.g. an offer to manufacture a product according to certain specifications agreed by the parties to the contract, where the product will only be manufactured and delivered at a later stage).

Please look in [the EPREL user guide](#), (11.2.3.1, page 104) for further explanation of “Date of first placing on the market”:

“Date of first placing on the market: (mandatory) this is the date when the first unit of the product model will be placed on the EU market for the first time. It is recommended that you register products in EPREL way in advanced to the date of placing the product on the market. The date of first placing on the market is a highly important product asset in EPREL application, as this date defines when the product will be made publicly available in the Public and MSA Compliance platforms.”

8. Placing in the market EU – the EU importer is from the same company as the non-EU manufacturer

Question

I have one question regarding the Placing in the market, regarding one precise case: The Producer is outside the EU and the importer (both producer and importer belong to the same company) is in the EU territory. When the importer finishes the customs clearance operations, the product should be classified as “placed in the market” so any stock of this product in the importer warehouse (and not yet sold to the trade) should be again classified as “placed in the market”. Is it correct?

Answer

Products held in stock by the manufacturer (or their representative) or the importer are not considered to be placed on the market unless ownership has been transferred to other actors in the distribution chain, such as a distributor or if the products have been made available.

So the answer depends on the exact situation: Who has the ownership of the products? Have the products been made available for example, by being offered through online sales or distance selling targeted at end-users in the EU market?

In the case, you describe, we assume, that the ownership of the products belongs to the manufacturer, who is located both in an EU country and a non-EU country, and that the products have not been made available on the EU market yet, then the answer would be: The products are not placed on the market yet.

References to the legislation

In the [Blueguide](#), chapter 2.3 Placing on the market, you can find the definition of “placed on the market”:

A product is placed on the market when it is made available for the first time on the Union market. According to Union harmonisation legislation, each individual product can only be placed once on the Union market. This operation should be done by the manufacturer or by an importer (46). When a manufacturer or an importer supplies a product to a distributor (47) or an end-user for the first time, the operation is always labelled in legal terms as ‘placing on the market’.

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In the [Blueguide](#), chapter 3.1. Manufacturer, you can find more information about the definition and the responsibilities of the manufacturer:

“The manufacturer is any natural or legal person who manufactures a product or has a product designed or manufactured, and places it on the market under his own name or trademark.”

9. Leeway on placed on the market?

Question

Is there any leeway on the "place on the market" date if you purchase orders from retailers on your system?

Answer

No, there is no leeway, except for the situation where you purchase orders where the product has not been manufactured yet according to certain specifications agreed by the parties to the contract, and the product will only be manufactured and delivered at a later stage.

References to the legislation

In the [Blueguide](#), chapter 2.3 Placing on the market, you can find the definition of "placed on the market":

A product is placed on the market when it is made available for the first time on the Union market. According to Union harmonisation legislation, each individual product can only be placed once on the Union market. This operation should be done by the manufacturer or by an importer (46). When a manufacturer or an importer supplies a product to a distributor (47) or an end-user for the first time, the operation is always labelled in legal terms as 'placing on the market'.

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Disclaimer

The information provided in this document reflects the project's understanding and as such is not legally binding. A binding interpretation of European Union law is the sole competence of the European Court of Justice. Any advice or instruction provided cannot substitute the requirements of the energy labelling and ecodesign regulations or the individual delegated acts, which are binding in their entirety and directly applicable in all EU Member States.



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