

Guidelines for dealers

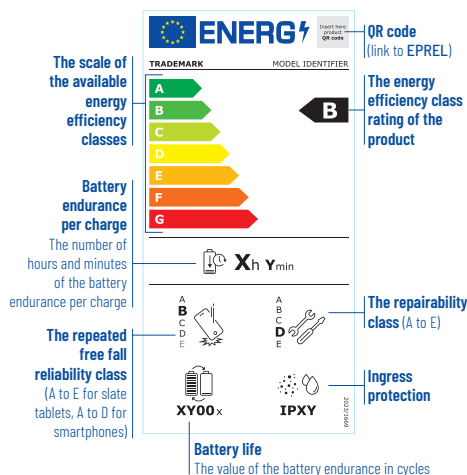
New energy labels for smartphones and slate tablets



As a dealer, it is your responsibility – and a legal requirement – to display energy labels for smartphones and slate tablets you market or sell.

The energy label for smartphones and slate tablets

For more than 20 years, the energy labels have supported consumers in choosing more energy-efficient products. Starting on the **20th of June 2025**, smartphones and slate tablets will have to comply with the new energy labelling regulation (EU) 2023/1669. The energy label provides consumers with new information about smartphones and slate tablets, such as battery endurance, the number of charging cycles over the battery's total lifespan, and how easy the product is to repair.



Example of an energy efficiency arrow



- Ensure that the model identifier on the energy label matches the product.

Online sales

It is your responsibility, among other things, to fulfill these requirements:

- The energy label and the PIS must be shown in proximity to the price of the product.
- It is permitted to show an energy arrow instead of the full energy label, and a link instead of the full product information sheet, provided that the full energy label or PIS appears when the arrow or link is clicked on or hovered over.
- The energy label and PIS must open with only one click. For the PIS, you can also set a link to the specific product information on EPREL.
- The link for PIS must be named “Product Information Sheet”
- The energy arrow must follow a specific layout and point to the left (example see in the left column beside the label) and be of a size that ensures it is clearly visible and legible.
- The letter inside the arrow must be the same size as the price.
- The energy arrow must be shown every time a product is displayed – even if it is not possible to “add the product to the basket.” This also applies to list views.

Visual advertisements, technical promotional material and distance selling, except online sales

It is your responsibility, among other things, to fulfill these requirements:

- The energy arrow (see above) must be displayed
- Only materials in black and white may use a black and white version of the energy arrow.
- The energy arrow must point to the left and be of a size that ensures it is clearly visible and legible.
- If the price is shown, the size of the letter inside the energy arrow must be at least as large as the price.
- Upon request, the customer must be able to receive a printed copy of the energy label and the PIS.
- Telemarketing: Inform the customer about the product's energy efficiency class and range (energy arrow), and provide access to the full energy label and the PIS either via a free-access website or, upon request, as a printed copy.

Market surveillance

The national market surveillance authority carries out regular inspections to verify compliance of products and product information. Improper or missing use of the energy label may result in a non-compliance report and a fine.

What are your obligations as a dealer?

As a dealer, there are several requirements to be aware of. The specific requirements depend on whether the product is:

- Sold in physical shops or displayed/sold at trade fairs
- Sold online
- Featured in marketing or sales material

Physical shops/trade fairs

It is your responsibility, among other things, to:

- Ensure that all products – whether unpackaged or not – have an energy label displayed in proximity to the product or hung on it or placed in such a way as to be clearly visible and unequivocally associated to the specific model.
- Provide the product information sheet (PIS) if the customer requests it.
- Display energy labels on products also in the shop's display windows.
- Request an energy label or PIS from the supplier if you do not have one. Or download it from [EPREL – The European Product Registry for Energy Labelling](#).

Avoid the most common mistakes

**In the shop/at trade fairs**

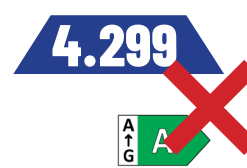
Missing energy label or a black and white energy label next to the product

All products must have an energy label.
The energy label must be in the correct colours.
Be aware that if you print the energy label yourself, your printer must be of sufficient quality to reproduce the colours accurately.

**Online sales**

The product information sheet is incorrectly named

It is not permitted to use a different name.
The link or button must be labelled "Product information sheet".

**Online sales, visual advertisements, technical promotional materials**

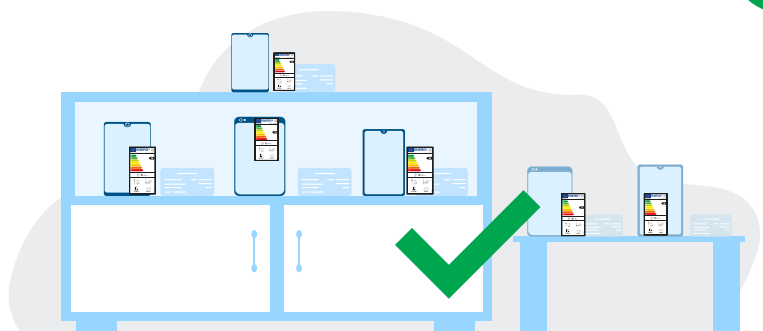
Wrong energy efficiency arrow

The arrow must point to the left and be close to the price if displayed (in any case for online sales). The letter inside the arrow must be at least the same size as the price (exactly same size for online sales). For online sales, the link for PIS has to be displayed.

Example of **correct** placement of the energy label in the shop/trade fair**The energy label must be visible**

The energy label must be displayed in proximity to the product or hung on it or placed in such a way as to be clearly visible and unequivocally associated to the specific model.

The energy label must be at least 68 mm wide and 136 mm high, unless the packaging is smaller. In that case, a proportionally smaller label is permitted – but it must not be smaller than 47.6 mm wide and 95.2 mm high.

**Particularly important points to be aware of:**

- The new energy labelling rules apply to product units placed on the market from the 20th of June 2025 onwards. This means that the energy labelling requirements apply only to product units placed on the market since and including the 20th of June 2025. For example, if you received a delivery of 1,000 smartphones on the 20th of March 2025 and still have 200 units from that delivery for sale on the 21st of June 2025, those products are not subject to the energy labelling requirements. Therefore, you are not required to display the energy label on those products. In cases of uncertainty about when a product has been placed on the market, we recommend to display the energy label.
- If the energy label is not included with the product, or if the label has been damaged, you are entitled to receive a new printed energy label from the supplier within five working days. The energy label can also be downloaded from EPREL.
- Smartphones and tablets with a flexible main display which the user can unroll and roll up partly or fully (also called rollable smartphones and tablets) are not subject to the energy labelling requirements.
- Products with an energy label have to be registered in the EPREL database by the suppliers. Specific models can be found by the model identifier, scanning the QR code on the energy label or by searching by GTIN (however, suppliers are not obliged to state the GTIN).

Important links:

Compliance Services project portal: <https://www.product-compliance-services.eu/>

You can download the label arrow graphic files here: <https://circabc.europa.eu/ui/group/7f4824e3-f72c-4126-b6b8-842a4443a4ca/library/3c497bea-d930-44b5-a90f-889e43125dcd>

Commission Delegated Regulation (EU) 2023/1669 of 16 June 2023 with regard to the energy labelling of smartphones and slate tablets: https://eur-lex.europa.eu/eli/reg_del/2023/1669/oj

