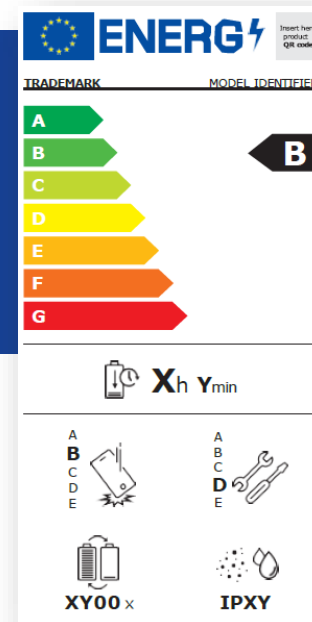# Ecodesign and energy labelling requirements smartphones, slate tablets, other mobile phones and cordless phones

**Webinar for suppliers**

**September 30, 2025**

**Edited November 21, 2025**

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# Agenda

▶ **Introduction**

▶ **External speakers**

▶ **Introduction to new legislation**

▶ **Ecodesign requirements**

▶ **Energy labelling requirements**

▶ **Documentation**

▶ **Market surveillance**

▶ **Q and A section / clarifying grey areas**

▶ **Compliance Services – at your service**

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**Moderator**

Ms. Joana Fernandes, ADENE, Portugal

**Guest speakers**

Mr. Davide Polverini, European Commission

Ms. Giorgia Murgia, DIGITALEUROPE

**Speakers**

Mr. Franz Zach, AEA, Austria

Ms. Elisabeth Dreier, vores bureau, Denmark

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# POLL no. 1

**The type of your organisation:**

## Share of votes

▶ Supplier            14%

▶ Supplier and dealer    14%

▶ Test lab           14%

▶ MSA             14%

▶ Other            43%

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# European Commission

Mr. Davide Polverini, DG Internal Market, Industry, Entrepreneurship and SMEs, European Commission.

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# Digital Europe

Ms. Giorgia Murgia, Manager for Sustainability Policy at DIGITALEUROPE

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# Scope and timing of ecodesign and energy labelling regulation

Mr. Franz Zach, Senior Expert Energy Economics, Austrian Energy Agency

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# The regulations and the timing

## Ecodesign (EU) 2023/1670

➤ Sets minimum requirements, such as battery endurance, resistance to accidental drops, scratch resistance, repairability, etc.

## Energy labelling (EU) 2023/1669

➤ Guides consumers to choose more energy-efficient and durable products

➤ Encourages manufacturers to develop new, more energy-efficient and durable products

All provisions have been applicable since the 20th of June 2025
(for products placed on the market since that date)

| Legislation | Smartphones | Slate tablets | Cordless phones | Other mobile phones |
|---|---|---|---|---|
| Ecodesign | X | X | X | X |
| Energy labelling | X | X | | |

▶ żʄśÃÁπ

a) Designed for long-range voice communication over a cellular or a satellite telecommunications network, with SIM card, eSIM or similar
b) Used in battery mode (connection to mains mainly for battery charging)
c) Not to be worn on the wrist
d) Wireless network connection, mobile use of internet services, operating system optimised for handheld use, able to accept original and third-party software
e) Integrated touch screen display with diagonal size of ≥ 10,16 cm (or 4,0'') and < 17,78 cm (or 7,0'').
    For devices with foldable display or more than one display, at least one of the displays falls into the size range in either opened or closed mode.

▶ z€ʄśπšʄ €πšπ̧Œ«π≥ΔÁīÁˉšʄ Œ€ŒsĞ:

a) Integrated touch-sensitive display with diagonal size of ≥ 17,78 cm (or 7,0'') and < 44,20 cm (or 17,0'')
b) Does not have an integrated, physically attached keyboard
c) Primarily relies on a wireless network connection
d) Powered by an internal battery and not intended to work without battery
e) Placed on the market with an operating system designed for mobile platforms, identical or analogous to smartphones

> Please find the definitions in (EU) 2023/1669 or (EU) 2023/1670 art. 2

**Please note**: Second-hand and used products are generally outside the scope of the regulation, but there are exceptions. For example, used products imported from outside the EU are within the scope of the regulation. For a complete list of provisions, please refer to the Blue Guide, page 16.

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# Which products are in scope?
# Only Ecodesign

▶ [garbled] ‡ [garbled]

a) Designed for long-range voice communication over a cellular or a satellite telecommunications network, with SIM card, eSIM or similar.
b) Designed for battery mode usage (connection to mains mainly for battery charging).
c) Not to be worn on the wrist.
d) It is no smartphone.

▶ [garbled]

a) Designed for long-range voice communication over a landline telecommunications network.
b) Connected to a base station through a radio interface.
c) Designed for battery mode usage (connection to mains mainly for battery charging).

Please find the definitions in (EU) 2023/1670 art. 2

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# POLL no. 2

**In which of these cases is the product out of scope?**

**Share of votes**

▶ A slate tablet, 8 inches in diameter      0%

▶ A computer tablet      77%

▶ A slate tablet placed on the market on 22$^{nd}$ of June      23%

▶ I don't know/I do not want to answer      0%

**The correct answer is "A computer tablet".**

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# **Products out of scope**

▶ Mobile phones and tablets with a flexible main display to be unrolled and rolled up partly or fully ("rollable smartphones").

▶ Smartphones for high security communication.

▶ Mobile phones designed to be worn on the wrist ("smart watches" or "wearable mobile phones")

▶ Computer tablets (without an operating system designed for mobile platforms)

▶ *By amendment (not yet published): Devices intended for use in potentially explosive atmospheres and covered by Directive 2014/34/EU*

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# Ecodesign requirements

Mr. Franz Zach, Senior Expert Energy Economics, Austrian Energy Agency

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# Ecodesign – main requirements

1    Spare parts:

    ▶    Availability, Delivery time, Disassembly – replacement, Access to information

2    Preparation for reuse

3    Recyclability

4    Marking of plastic components

5    Resistance against accidental drops

6    Scratch resistance

7    Dust and water protection

8    Battery endurance

9    Battery Management

10   System updates

11   Low-power modes

12   Circumvention

# Spare parts – availibility

The ecodesign regulation **(EU) 2023/1670** distinguishes between two types of spare parts:

- Spare parts available to professional repairers and end-users
- Spare parts available only to professional repairers

# Spare parts – maximum delivery time

▶ From **1 month after placing the first unit** of a model on the market until **7 years after placement of the last unit** of the same model on the market, required spare parts, including fasteners if not reusable, must be available.

> ▶ 'Fastener' means a hardware device or substance that mechanically, magnetically or by other means connects or fixes different parts. Fasteners shall be removable, resupplied or reusable.

▶ Until 5 years and 1 month after placing the first unit of a model on the market, you must deliver spare parts within 5 working days after receipt of the order.

▶ Afterwards the deadline is 10 working days.

(EU) 2023/1670 Annex II

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# Spare parts available to prof. repairers and end-users

| Spare part to be available to professional repairers and end-users | Smartphones, Other mobile phones and Slate tablets | Cordless phones |
|---|---|---|
| Battery/-ies | Either on this or the other list (see slide 19), depending on specifications (see next slide) | X |
| Battery compartment cover | | X |
| Back cover (assembly), if to be fully removed for replacement of the battery | X | |
| Protective foil for foldable displays | X | |
| Display assembly | X | |
| Charger, unless the device complies with article 3 (4) of Directive 2014/53/EU | X | |
| SIM tray and memory card tray, if there is an external slot for them | X | |
| Charger, unless the base-station is equipped with the USB Type-C receptacle | | X |
| Charging cradle | | X |

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# Spare parts available only to prof. repairers – exception for batteries

**Batteries can be made available only to professional repairers (not to end users), if the following requirements are fulfilled (except cordless phones):**

- After 500 full charge cycles, the battery has, in a fully charged state, a remaining capacity of at least 83% of the rated capacity and 80% after 1.000 full charge cycles.

- The device meets:
  - IP67 rating (smartphones and other mobile phones)
  - IP42 rating (slate tablets).

- I.e. batteries are either to be available to professional repairers and end-users or only to professional repairers.

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# Spare parts available only to prof. repairers

| Spare parts to be available to professional repairers | Smartphones, other mobile phones and slate tablets | Cordless phones |
|---|---|---|
| Battery/-ies | Either on this or the other list (see slide 17), depending on specifications (see previous slide) | |
| Front- and/or rear-facing camera assembly | X | |
| External audio connector(s) | X | X |
| External charging port(s) | X | X |
| Mechanical button(s) | X | X |
| Main microphone(s) | X | X |
| Speaker(s) | X | X |
| Hinge assembly | X | |
| Mechanical display folding mechanism | X | |
| Display assembly | | X |

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# Spare parts – Disassembly, replacement

| Item | Spare parts available to prof. repairers and end-users *without display assembly* | Spare parts available only to prof. repairers *and* display assembly |
|---|---|---|
| **Fasteners must be...** | Removable (except batteries), resupplied or reusable | |
| **Replacement shall be feasible with…** | no tool, a tool or set of tools that is supplied with the product or spare part, or basic tools | as on the left **OR** commercially available tools |
| **Replacement shall be feasible in a...** | use environment (i.e. everywhere) | workshop environment |
| **Replacement shall be feasible by a...** | layman (i.e. everyone) | generalist |

A **generalist** has general knowledge of basic repair techniques and safety precautions.
**Workshop environment**: No production site; machinery and/or tools are used under controlled conditions as suitable for the repair activities.
**Batteries** are treated as spare parts only available to professional repairers, if they fulfil the criteria (see slide 16)

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# POLL no. 3

**Spare parts only available to professional repairers:**

**Can the supplier restrict the professional repairers' access to information about the spare parts?**

**Share of votes**

▶ No, the information must be on a publicly accessible website     74%

▶ Yes, by requiring registration     23%

▶ I don't know/I do not want to answer     0%

**The correct answer is "Yes, by requiring registration".**

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# Spare parts – access to information

| Information must be available... | Spare parts for end-consumers and professional repairers | Spare parts only available to professional repairers |
|---|---|---|
| ...on a... | supplier's free access website | supplier's free access website or upon request, as the supplier decides, see slide 24 |
| ...from... | 1 month after placing the first unit of a model on the market | |
| ...until... | 7 years after placement of the last unit of the model on the market | |
| (note that... | if you stop providing this info, everyone else can do it (unaltered)) | |
| ...requiring... | nothing more than internet access | Internet access, either free or by registration, as the supplier decides, see slide 24 |
| ...charging... | nothing (must be for free) | reasonable fees |
| ...including... | indicative pre-tax prices, at least in euros, for spare parts, fasteners and tools | |
| | the level of detail needed to be able to replace parts | |
| | | Moreover: see next slide |

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# Information to be provided on spare parts available only to professional repairers

Beside the unequivocal product identification, you need to provide (for all product types):

- Disassembly map or exploded view
- Wiring and connection diagrams required for failure analysis
- Electronic board diagrams
- List of necessary repair and test equipment
- Technical manual of instructions for repair, including marking of individual steps
- Diagnostic fault and error information incl. manufacturer-specific codes when present
- Component and diagnosis info (e.g. bandwidth of possible measurement values)
- Instructions for software and firmware (including reset software)
- Information on how to access data records of reported failure incidents stored on the device, where applicable, except personal data as on user behavior and location
- Information that professional repairers need if you require authentication (next slide)

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# Spare parts – access to information

**If you require professional repairers to register on the supplier website to request access, the following requirements apply:**

- Before providing information, you can require that the professional repairer has:
  - The technical competence to do the repair
  - A liability insurance.
- You must either accept or reject (with clear justification) it within 5 working days.
- Registration must be free of charge, but you can charge reasonable and proportionate fees for access.
- If you accept the request, you must provide access by the next working day – including for equivalent models or models in the same product family.

Please find the definitions in (EU) 2023/1670 Annex II

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# Recyclability

▶ The dismantling information needed to access the components referred to in Directive 2012/19/EU, Annex VII (1) (e.g. batteries and PCB) must be available on a free access website, including information about the sequence of dismantling steps, tools and/or technologies.

▶ This information shall be available until at least 15 years after the placing on the market of the last unit of a product model.

# Preparation for reuse

## For smartphones and tablets, you must ensure that devices:

➤ Encrypt by default, using a random encryption key, user data stored on the device.

➤ Have a function that resets the device to its factory settings and erases securely by default the encryption key and generates a new one.

➤ Record the following data from the battery management system in the system settings or another location accessible for end-users:

　➤ Battery manufacturing date

　➤ Date of first use of the battery after the set-up of the device by the first user

　➤ Number of full charge/discharge cycles based on rated capacity

　➤ Remaining full charge capacity relative to the rated capacity in %

## For other mobile phones and cordless phones, you must ensure that devices:

➤ Have a function that resets the device to its factory settings and erases securely by default all personal information, e.g. address book, text messages, pictures, videos, settings and call history.

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# Marking of plastic components

Plastic components above 50 g shall be legibly marked: Type of polymer with appropriate standard symbols or abbreviated terms set between '>' and '<'.

**No marking required:**

▶ If not possible due to shape or size.

▶ If it would impact performance or functionality (e.g. transparent parts).

▶ If technically not possible because of the molding method.

▶ For packaging, tape, labels and stretch wraps.

▶ For wiring, cables and connectors, rubber parts.

▶ For PCB assemblies, PMMA boards, optical components, electrostatic discharge components, electromagnetic interference components, speakers.

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# Resistance against accidental drops – only smartphones and other mobile phones

**Without loss of functionality:**

▶▶ Devices must pass 45 falls without any protective foil or separate protective cover.

▶▶ Exception: Foldable devices designed to be used with a protective foil shall pass 35 falls in unextended state and additional 15 falls in extended state.

The test procedure is set out in Annex IV of **(EU) 2023/1669** resp. Annex III of **(EU) 2023/1670**.

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# Scratch resistance and Solid object and water protection

**Scratch resistance (except cordless phones)**

The screen of the device must pass the hardness level 4 on the Mohs hardness scale, except for foldable devices designed to be used with a protective foil.

**Solid object and water protection (except cordless phones)**

▶▶ Smartphones and other mobile phones must be protected against the ingress of solid foreign objects of size bigger than 1 millimeter and splashing of water.

▶▶ Tablets must be protected against accidental spills of water.

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# Battery endurance in cycles

Minimum number of charging cycles until the battery has reached 80 % remaining capacity:

▶ Smartphones and tablets: 800

▶ Other mobile phones: 500

This number is measured under conditions where the charging rate is limited by the battery management system (not by the power delivery capabilities of the power supply).

There is no requirement for cordless phones.

# Battery management – features to be provided for the user (except cordless phones)

## Optional charging

▶ Terminates the charging process automatically when the battery is charged to 80% of its full capacity.

▶ The user shall be informed when charging the device for the first time or during the installation process that the life span of the battery will increase by using this feature.

▶ Suppliers may enable the device to periodically fully charge the battery to maintain accurate battery state of charge estimates.

## Power management

▶ By default, once the battery is fully charged, there is no further charging power supplied unless the charge level drops below 95% of the maximum battery capacity.

# System updates (except cordless phones)

➤ An update of the operating system may include a security update, a corrective update, and a feature update.

➤ There are several requirements regarding operating system updates, including, for example, that updates must be provided free of charge for at least five years after a product is no longer placed on the market.

➤ You find all the requirements for the operating system in **(EU) 2023/1670** Annex II, 1.2.6.

   ▸ Provisions (a) to (e) in the regulation are the same for the 3 product categories, but:
   ▸ Note that there is a specific requirement (f) for smartphones and tablets (not present for other mobile phones or cordless phones) on deterioration of performance by updates.

# Low power modes
# (only for cordless phones)

▶ **Base station**

The networked standby power consumption $P_n$ shall not exceed 1 W (with and without headset).

▶ **Charging cradle without base station functionality**

The standby power consumption $P_n$ shall not exceed

- 0,6 W with the handset placed on the charger
- 0,3 W without handset.

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# Circumvention

A product must not alter its behaviour or characteristics when tested by the authorities. Likewise, it is not permitted to include test instructions intended to produce a more favourable result for the product.

A product must not change its behaviour of characteristics shortly after being put into use leading to a deterioration of the declared values of the product.

*By an amendment, the clause of Article 40 of [(EU) 2024/1781](#) (ESPR regulation) will replace the Article 6 of the current regulation on circumvention; the main spirit of most provisions remains unchanged.*

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# Energy labelling regulation

## Smartphones and slate tablets

Ms. Elisabeth Dreier, Senior Consultant, vores bureau, Denmark

# EPREL

▶ A database operated by the European Commission

▶ **Your obligations**:

  ▸ Register and verify your organisation in EPREL

  ▸ Enter product information into EPREL for each energy labelled product **before** you place the product on the EU market

▶ EPREL consists of two sections:

  ▸ Compliance (the information is only accessible to the MSAs)

  ▸ Public (the information is accessible to everybody)

▶ **Useful link for more information**

  How to register in EPREL - Compliance Services

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# The energy label – values and layout
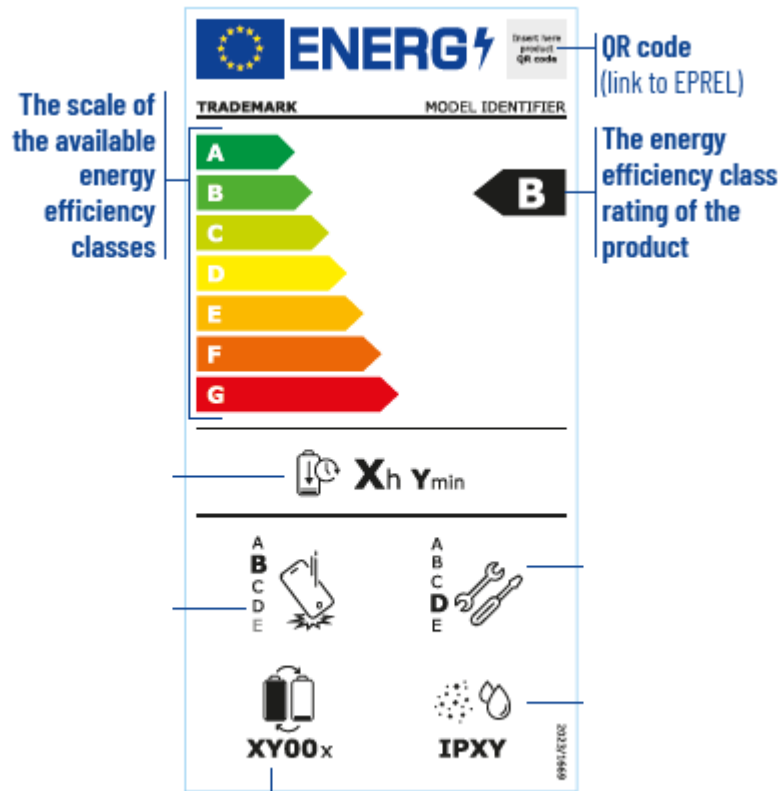


## QR code
The QR code links to the product's description in the public part of EPREL.

## Energy efficiency class
It is determined based on the energy efficiency index

## Formula

$$EEI = \frac{END_{device}}{U_{nom} \times C_{rated}} \times 1.000$$

Where:
- ✓ $END_{device}$ is the battery endurance in hours
- ✓ EEI is the Energy Efficiency Index in 1/W,
- ✓ $U_{nom}$ is the nominal voltage in V,
- ✓ $C_{rated}$ is the rated battery capacity in mAh.

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# Energy Efficiency Index (EEI)

| Energy efficiency class | Energy efficiency index (EEI) | |
|---|---|---|
| | Smartphones | Tablets |
| A (most efficient) | > 2,70 | > 7,90 |
| B | > 2,30 | > 6,32 |
| C | > 1,95 | > 5,06 |
| D | > 1,66 | > 4,04 |
| E | > 1,41 | > 3,24 |
| F | > 1,20 | > 2,59 |
| G (least efficient) | ≤ 1,20 | ≤ 2,59 |

➤ The EEI represents the operating time of a device without recharging, divided by the battery's energy capacity — the higher the value, the better.

## Calculation EEI

➤ Calculated with the operating system version installed on the product model on the date of placement on the market.

➤ Detailed information on measurement and calculation methods can be found in Annex IV., and, until a harmonised standard is available:

  ▸ https://ec.europa.eu/docsroom/documents/50214, referenced in the same Regulation;

  ▸ Considering the standards 'samples' (video, audio, etc.) available on the Commission website:https://circabc.europa.eu/ui/group/418195ae-4919-45fa-a959-3b695c9aab28/library/01c3b805-a11f-4805-a2c6-99ea88936a5e?p=1&n=10&sort=modified_DESC

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# The repeated free-fall reliability class
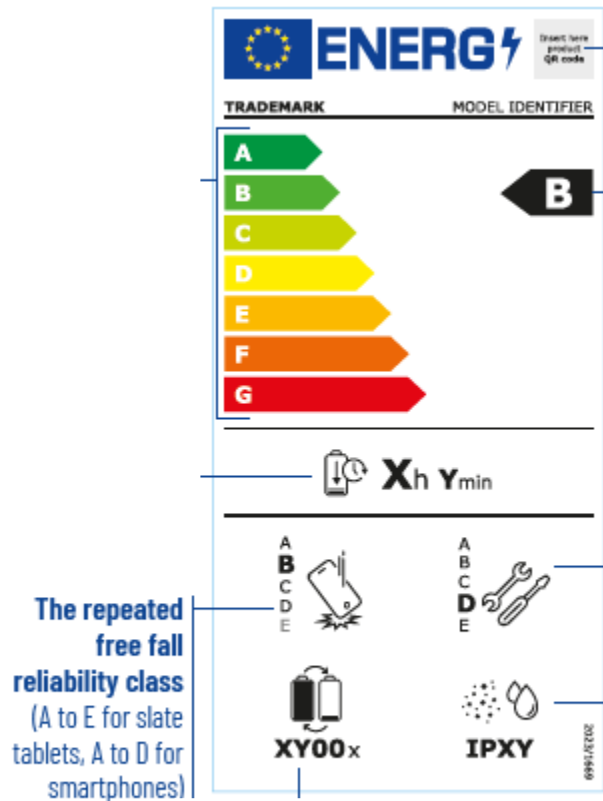


Based on the number of falls from 1 meter (based on a standardised test) that five units of each model can withstand without functionality problems.

A is the most robust, and D/E is the least robust.

# Repeated free fall reliability classes

| Repeated Free Fall Reliability Class | FALLS WITHOUT DEFECT | | | | | |
|---|---|---|---|---|---|---|
| | Non-foldable smartphone | Non-foldable tablet | Foldable smartphone* | | Foldable tablet* | |
| | | | In un-extended state | In fully extended state | In un-extended state | In fully extended state |
| A (most robust) | ≥ 270 | ≥ 208 | ≥ 210 | ≥ 45 | ≥ 182 | ≥ 20 |
| B | ≥ 180 | ≥ 156 | ≥ 140 | ≥ 35 | ≥ 130 | ≥ 15 |
| C | ≥ 90 | ≥ 104 | ≥ 70 | ≥ 25 | ≥ 78 | ≥ 10 |
| D | ≥ 45 | ≥ 52 | ≥ 35 | ≥ 15 | ≥ 52 | ≥ 5 |
| E (least robust) | - | < 52 | - | - | < 52 | < 5 |

* For foldable products, both requirements for the respective energy label class must be met.

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# Battery endurance per cycle (i.e. charge)
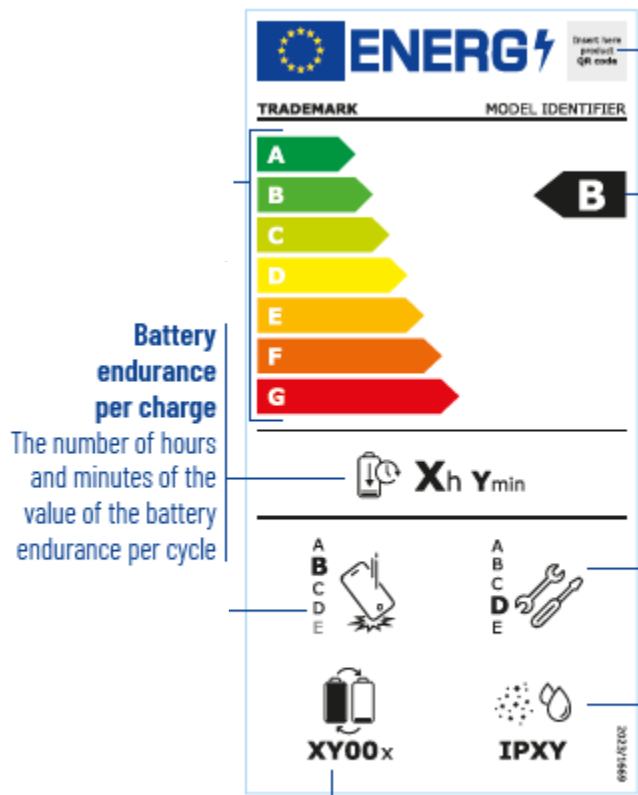


The number of hours and minutes a smartphone or slate tablet can operate with a fully charged battery until the device automatically shuts down due to an empty/drained battery.

The test shall be performed with the operating system version installed on the unit on the date of its placing on the market.

# Repairability class
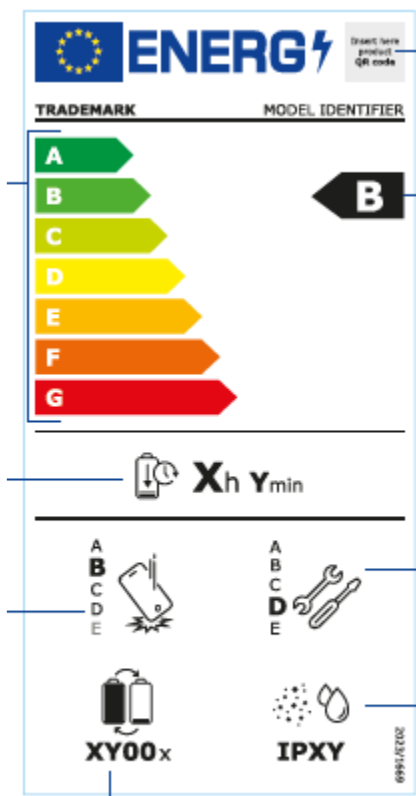


| Repairability class | Repairability index (R) |
|---|---|
| A (most repairable) | ≥ 4,00 |
| B | ≥ 3,35 |
| C | ≥ 2,55 |
| D | ≥ 1,75 |
| E (least repairable) | ≥ 1,00 |

Please note that due to the calculation formula, a result R < 1,00 is not possible.

# The repairability index

▶ **The repairability index (R)** is calculated by adding six scoring parameters together. However, the six parameters carry different weights in the overall score.

| Abbreviation | Score parameter | Concerns | Share |
|---|---|---|---|
| SDD | The Disassembly Depth | The number of steps required to remove a part, without damaging the product | 25% |
| + SF | The Fasteners (type) | Removability and reusability | 15% |
| + ST | Tools (type) | Complexity and availability | 15% |
| + SSP | Spare Parts score | Availability to end-user | 15% |
| + SSU | Software Updates | Duration of availability after placement on the market has ended | 15% |
| + SRI | Repair Information | Costs for repair information to professional repairers | 15% |
| = R | **Repairability index** | | **100%** |

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# Ingress protection rating
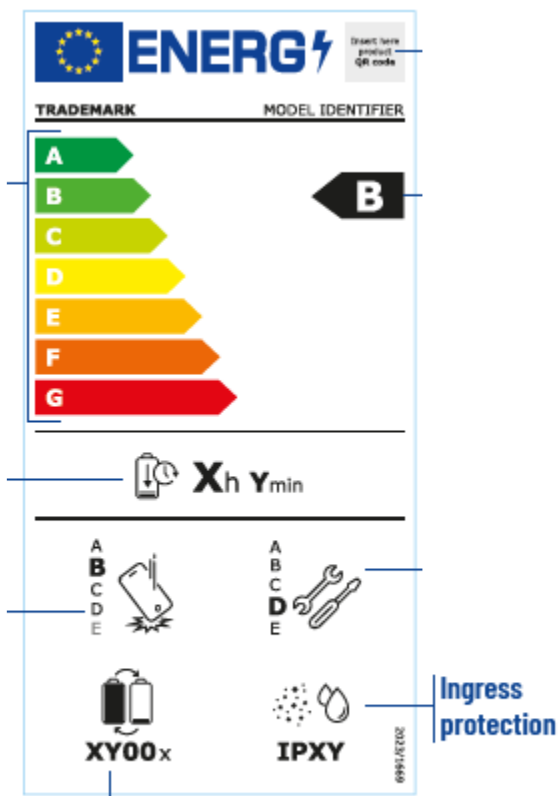


**Indication of the product's resistance to water and/or solid objects.**

Indicated by an IP code:
- X shows the level of protection against solid objects (0-6)
- Y shows the level of protection against water (0-8)

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# The ingress protection

➤ Tests shall be performed without protective cover.

| Rating level | Ingress of solid foreign objects (X) | Ingress of water with harmful effects (Y) |
|---|---|---|
| | Object size | Protection against |
| 0 | No protection | No protection |
| 1 | ≥ 50 mm | Vertical water dripping |
| 2 | Protected from touch by fingers and ≥ 12 mm | Water spray less than 15 degrees from vertical |
| 3 | ≥ 2,5 mm | Water spray less than 60 degrees from vertical |
| 4 | ≥ 1 mm | Splashing of water |
| 5 | Dust-protected | Jetting of water |
| 6 | Dust-tight | Powerful jetting of water |
| 7 | n.a. | Temporary immersion, 1 m depth |
| 8 | n.a. | Continuous immersion, 1 m or more depth |
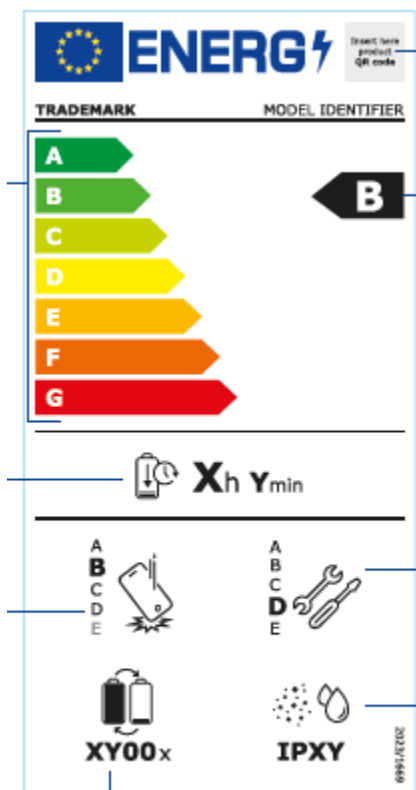
# Battery endurance in cycles



The test runs until the battery has, in a fully charged state, a remaining capacity of at least 80 % of the rated capacity.

The battery shall be tested according to the default charging algorithms implemented by the manufacturer.

The resulting number of cycles shall be rounded down to full hundreds.

The battery endurance shall be calculated with the operating system version installed on the product model on the date of placement on the market.

# Information requirements

▶▶ **Energy label (printed and digital)**

▶▶ **Product Information Sheet (PIS)**

▶▶ **User manual**

▶▶ **The obligations of the dealers**

    ▶ Promotion and advertisement

    ▶ Online sales

    ▶ Physical shops/trade fairs

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# The energy label (printed and digital)

**As a supplier, you must ensure that:**

▶ Each smartphone and slate tablet unit is supplied with a printed energy label.

▶ An electronic energy label is made available to the dealers.

▶ **On request, provide the dealers with a new printed energy label within 5 working days.**

▶ Any visual advertisement or technical sales/promotional material for each model contains the energy efficiency class and the range of energy efficiency classes available on the energy label shown by an arrow (so-called energy arrow).

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# Size and creation of the energy label

▶ At least 68 mm wide and 136 mm high unless the packaging is too small; then it can be printed scaled down, but not less than 70% of the above specification, i.e. at least 47,6 mm wide and 95.2 mm high.

▶ If the energy label is printed in a smaller (see above) or larger format, all items must remain proportional.

▶ The QR code must be readable by a standard QR reader, like readers used on smartphones.

▶ It is permitted, but not mandatory, to print the energy label on the packaging.

▶ The energy label can be generated automatically when the product model is registered in EPREL.

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# Product Information Sheet (PIS)

Compared to the energy label, the PIS provides consumers with more detailed product information on energy performance and environmental-related aspects.

## Your obligations

▶ **Provide an electronic PIS to dealers for each smartphone and slate tablet**.

▶ If requested by the dealer, provide them with a printed PIS.

▶ Enter the values of the parameters of the PIS and of the energy labelling technical documentation into EPREL.

▶ The energy label and the PIS can be generated automatically when the product model is registered in EPREL.

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# User manual

▶ The user manual and any other documentation provided with the product must clearly reference the model's EPREL entry.

▶ This can be done by including either the link (URL) to the EPREL entry of the product, a QR code or the EPREL registration number.

# Requirements – Visual advertisements, technical promotional material and in distance selling, except for online sales

- An energy arrow must be displayed per product.
- 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.
- Customers must be able to access the energy label and PIS via a link to EPREL or by requesting a printed copy.
- Only materials in black and white may use a black and white version of the energy arrow.
- 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.
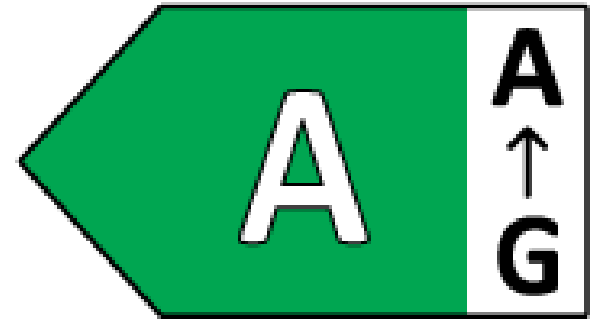
The arrows can be downloaded here.

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# Defining your role

▶ Please note that economic operators can have several roles and therefore must meet several requirements. A supplier has the same obligations as a dealer if the supplier e.g. imports products and sells them to customers.

# Requirements for dealers – physical shops/trade fairs

➤ Ensure that all products displayed in the shop – whether unpackaged or not – bear an energy label - close to the product or hung on it or placed in such a way as to be clearly visible and unequivocally associated with the specific model.

➤ Display energy labels on products also in the shop's display windows.

➤ Provide the product information sheet (PIS) if the customer requests it.

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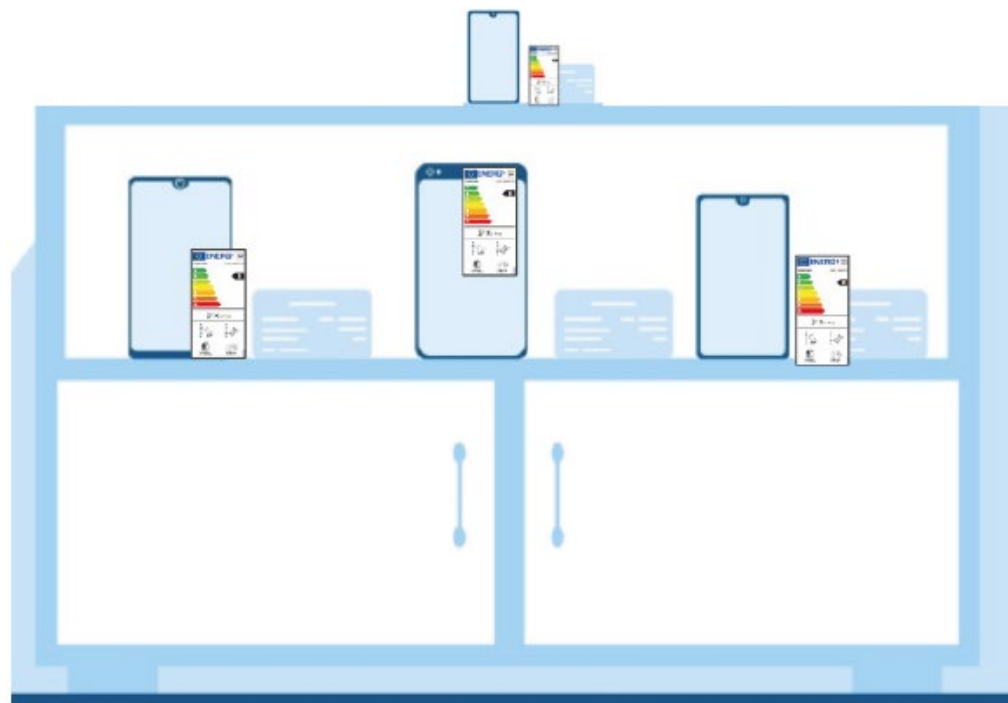
# Requirements for dealers – Online sales

- Energy label and PIS must be shown close to the product's price.
- Instead, you can show an energy arrow and a link to the PIS (see on the right), if the energy label or PIS appear when being clicked on or hovered over.
- The energy arrow and PIS must open with only one click. For the PIS, you can also set a link directly to EPREL.
- The link to the PIS must be named "Product Information Sheet" (in local language - as in legislation)
- The energy arrow must follow a specific layout and point to the left. Its size must ensure that it is clearly visible and legible.
- The letter inside the arrow must be the same size as the price.



**PRODUCT INFORMATION SHEET**

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# POLL no. 4

A webshop has a subpage displaying/mentioning the products,

but it is not possible to "add the products to the basket" For example, a list view.

**Share of votes**

▶ **Option 1**

No specific requirements apply. 7%

▶ **Option 2**

Each product must be shown with an energy arrow and link to PIS. 85%

▶ **Option 3**

One single general link to EPREL is sufficient,

allowing customers to find the specific information they need. 7%

▶ **Option 4**

I do not know/I do not wish to answer 0%

## The correct answer is option 2.

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# Help the dealers to avoid the most frequent mistakes
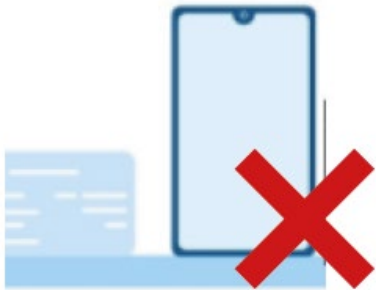
### In the shop/at trade fairs

**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 colors.

Be aware that if the dealers print the energy label, the dealer's printer must be of sufficient quality to reproduce the colors 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" *(in the local language – as in legislation)*

### Advertisements, promotional materials

**The energy arrow is incorrectly formatted**

The energy arrow must point to the left.

The letter in the energy arrow must be at least as large as the product price.

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Many manufacturers have a shop-in-shop solution provided by the supplier. The solution is displayed electronically on the product itself, allowing consumers to view the different model options.

For example, a smartphone model may be available in five different colours and with different memory sizes.
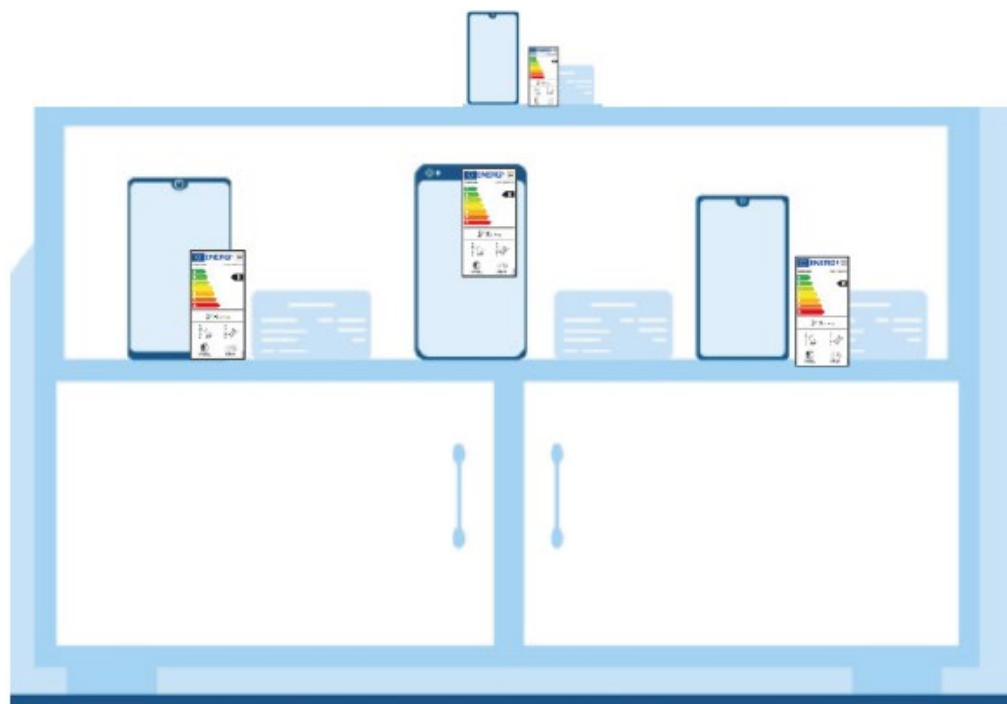
# POLL no. 5

**The supplier must ensure…**

**Share of votes**

▶ **Option 1**

Nothing. There are no requirements.      0%

▶ **Option 2**

Displaying a QR code for EPREL      30%

▶ **Option 3**

Displaying the energy arrow per model option      70%

▶ **Option 4**

I do not know/I do not wish to answer      0%

# The correct answer is option 3.

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# Market surveillance

## Ecodesign and energy labelling

Ms. Elisabeth Dreier, Senior Consultant, vores bureau

# How to prepare for market surveillance

## Your national market surveillance authority (MSA) verifies:

▶ Whether products and their documentation, suppliers and retailers on the EU market comply (among others) with the energy labelling and ecodesign requirements

## MSAs have several methods for market surveillance activities:

▶ Online inspections: Web-shops, manufacturer websites, etc.

▶ Physical inspections: Shops, product testing, inspections at the borders, etc.

▶ Document inspections: Technical documentation, user manual, advertisements, etc.

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# Enforcement



## MSAs have several methods for enforcement (towards suppliers or dealers):

- ▶ Demand additional or missing information (technical documentation, DoC, energy label, arrow, product information sheet, etc.) or its correction
- ▶ Apply fines if information is not correct or missing
- ▶ Remove products from the EU market (e.g. in case of severely wrong declarations on the energy label with no supplier remedy action)

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# Documentation

## Ecodesign and energy labelling

Ms. Elisabeth Dreier, Senior Consultant, vores bureau

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# CE marking and EU declaration of conformity

➤ As a supplier, it is your responsibility to ensure that your product is correctly CE marked before placing it on the market.

➤ You must also prepare an EU declaration of conformity (also known as a DoC), which states that your product complies with all applicable requirements. The declaration must explicitly reference the relevant ecodesign regulation (not the energy labelling regulation).

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# **Technical documentation**

▶ You must ensure a complete technical documentation that demonstrates the product's compliance with ecodesign and energy labelling requirements.

▶ The values and classes published on the energy label or in the PIS shall not be more favourable for the supplier than the values declared in the technical documentation. **The tolerances mentioned in [Annex IV, (EU) 2023/1670](#) (ecodesign) and [Annex IX, (EU) 5256/1669](#) (energy labelling) only apply to the MSAs.**

▶ The technical documentation must be available **before** the product is placed on the market.

▶ The documentation must be kept for:
- ▶ Energy labelling: 5 years from the date the last unit was placed on the market
- ▶ Ecodesign: 10 years from the date the last unit was placed on the market

# Technical documentation

The technical documentation must include, among other things

| | Available on request | Uploaded into EPREL |
|---|---|---|
| A general description of the model, sufficient to clearly and easily identify it. | x | x |
| References to the harmonised standards applied, or any other measurement standards used. | x | x |
| A description of the disassembly steps for each priority part as listed in Annex IV, point 5, including any tools and fasteners required at each stage, if applicable. | x | |
| Specific precautions that must be taken when assembling, installing, maintaining or testing the model. | x | x |
| The values of the technical parameters as specified in Annex VI, table 9. These values are regarded as the declared values for the purpose of the verification procedure in Annex IX. | x | x |
| The details and results of the calculations carried out, as described in Annex IV. | x | x |
| Measurement or testing conditions, if not sufficiently covered by the applicable standards – this includes any algorithms used for battery charging under standard charging procedures, if relevant. | x | x |
| Parameters for the initial test procedure for the energy efficiency index, if not sufficiently described under the settings in Annex IV, point 1, and Annex IV. | x | |
| A list of equivalent models, i.e. models with the same technical characteristics and specifications | x | |

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# Q&A

▶ **Question 1**

If an organisation observes a phone manufacturer's shop is not complying with the requirements for displaying the energy label, how should this be escalated?

# Q&A

**Question 1**

If an organisation observes a phone manufacturer's shop is not complying with the requirements for displaying the energy label, how should this be escalated?

**Answer provided by Elisabeth Dreier**

The organisation should inform the national MSA about the situation. It is helpful to provide documentation to support the report, such as a screenshot if an online shop is concerned, or some photos in case of a physical shop.

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# Q&A

▶ **Question 2**

The availability of harmonised standards for the compliance of products.

# Q&A

▶ **Question 2**

The availability of harmonised standards for the compliance of products.

▶ **Answer provided by Franz Zach**

In each country, there is a national standardisation body (NSB) that acts as the distributor for European / harmonised standards. Here you can purchase the standard.

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# Q&A

## Question 3

In the field of energy efficiency, will adding circular economy requirements to regulations become a trend for all products?

# Q&A

▶ **Question 3**

In the field of energy efficiency, will adding circular economy requirements to regulations become a trend for all products?

▶ **Answer provided by Davide Polverini**

Yes, the EC Commission analyses it carefully for every product group under review for new regulations, whether and how circular economy aspects can be included.

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# Q&A

▶ **Question 4**

What is the appropriate test method for defining the EEI?

**Q&A**

▶ **Question 4**

What is the appropriate test method for defining the EEI?

▶ **Answer provided by Davide Polverini**

Testing procedure laid down in Annex IV, Section 1, to Delegated Regulation (EU) 2023/1669;

- ▶ Test specifications available on the Commission website[1];
  (→ to be superseded by the harmonised standard, under development)
- ▶ Standards samples (video, audio, etc.) available on the Commission website[2].

▶ NB: Commission will possibly develop a tool (app) for EEI calculation

[1] https://ec.europa.eu/docsroom/documents/50214
[2] https://circabc.europa.eu/ui/group/418195ae-4919-45fa-a959-3b695c9aab28/library/01c3b805-a11f-4805-a2c6-99ea88936a5e?p=1&n=10&sort=modified_DESC

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# Compliance Services … at your service

Ms. Joana Fernandes, Coordinator of the European technical projects unit, ADENE

# AVAILABLE TOOLS: Full website section

Information for suppliers online:

https://www.product-compliance-services.eu/suppliers/product-specific-guidelines/electronic-devices/smartphones-slate-tablets-cordless-phones-and-other-mobile-phones



All information for dealers and most elements for suppliers are available in seven languages: EN, DE, FR, IT, PT, CZ and DK

# AVAILABLE TOOLS: Quick guide for suppliers

Quick guide for suppliers:

https://www.product-compliance-services.eu/suppliers/product-specific-guidelines/electronic-devices/smartphones-slate-tablets-cordless-phones-and-other-mobile-phones/quick-guide-smartphones-slate-tablets-cordless-phones-and-other-mobile-phones

# AVAILABLE TOOLS: Guidelines for dealers

Guidelines for dealers on how to display energy labels at the points of sale:

https://www.product-compliance-services.eu/dealers-and-installers/quick-guides-dealers-installers/guidelines-for-dealers/smartphones-slate-tablets-dealers

# AVAILABLE TOOLS: Webinar PPT

Presentation from a webinar for dealers:

https://www.product-compliance-services.eu/dealers-and-installers/webinars-e-learning/webinar-dealers-smartphones-and-slate-tablets-has-been-held

# AVAILABLE TOOLS: Q and A document for dealers

Questions and Answers for dealers:

https://www.product-compliance-services.eu/dealers-and-installers/webinars-e-learning/webinar-dealers-smartphones-and-slate-tablets-has-been-held



**Smartphones and slate tablets: Questions and answers**
from the Compliance Services webinar for dealers,
which took place on the 11th of June 2025

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Compliance Services project is funded by the LIFE programme under contract no. 101120843.

Co-funded by the European Union. Views and opinions expressed are however those of the authors only and do not necessarily reflect those of the European Union or CINEA. Neither the European Union nor the granting authority can be held responsible for them.

**23. Timing for implementation in EPREL**

**Question**
According to the most recent information in the API documentation, the implementation of the new energy labels is not yet complete. Although we are aware of the new attributes, we are currently unable to fully test their integration within our systems.
We believe that the two-week period leading up to the directive's enforcement should be dedicated solely to updating the information on our website. As we prepare in advance to ensure a smooth flow of data between our systems and the EPREL API, this timeframe should not be used to troubleshoot or resolve unforeseen issues in the API implementation itself. We kindly ask for your support in this matter.

**Answer**
Please, be aware that our project is not directly linked to the EU Commission, which manages the EPREL database and we cannot influence its operation and structure. Therefore, please address this question to the EPREL database helpdesk.

**Useful links**
The email address for the EPREL helpdesk is ENER-EPREL-HELPDESK@ec.europa.eu

Please also see the Q&A from the EPREL Support help desk (you need an EU login to enter this link. You can create an EU login here: EU Login user portal - European Union)

# TOOLS COMING SOON: E-learning course

E-learning courses for suppliers and dealers, module on smartphones and slate tablets

https://elearningcomplianceservices.adene.pt/
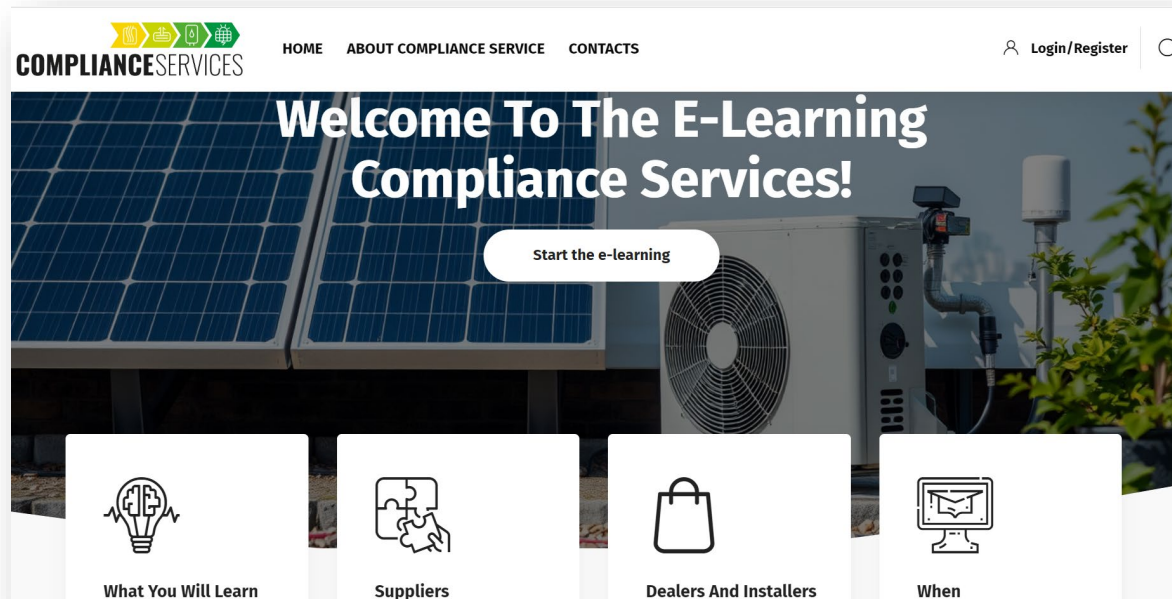
# About the project

## Compliance Services

**At your disposal to help you properly implement the ecodesign and energy labelling legislation**

## Services for suppliers

*If you produce or import a product for the EU market, you have to ensure that the product and the related documentation as well as information and promotion materials comply with the requirements specified in the product–specific ecodesign and energy labelling regulations.*

coordinated by

**AUSTRIAN ENERGY AGENCY**

European organisations

**ehi**
European Heating Industry
ASSOCIATION OF THE EUROPEAN HEATING INDUSTRY

**ehpa**
EUROPEAN HEAT PUMP ASSOCIATION

**Solar Heat Europe** ESTIF
SOLAR HEAT EUROPE/ EUROPEAN SOLAR THERMAL INDUSTRY

**SolarPower Europe**
EPIA SOLARPOWER EUROPE

**ecos**
ENVIRONMENTAL COALITION ON STAND.

National organisations

RÉPUBLIQUE FRANÇAISE / ADEME
ADEME
Agence de l'environnement et de lamaitrise de l'energie
France

**adene** Agência para a Energia
ADENE
Agencia para a energia
Portugal

**ALTROCONSUMO**
ALTROCONSUMO EDIZIONI srl
Italy

**aped** Associação Portuguesa de Empresas de Distribuição
APED
Associação Portuguesa de Empresas de Distribuição
Portugal

**Danish Energy Agency**
ENERGISTYRELSEN
Danish Energy Agency
Denmark

**SEVEn** THE ENERGY EFFICIENCY CENTRE
SEVEn
The Energy Efficiency Center z.u.
Czechia

**vores bureau**
VORES BUREAU
Denmark

# COMPLIANCE SERVICES project

▶ Product categories covered so far:

- Smartphones, slate tablets, other mobile phones and cordless phones
- Tumble dryers
- Local space heaters (only ecodesign)

▶ In the pipeline (once the new regulations are published):

- Heating products
  - Water heating products
  - Air-conditioning products
- PV and solar panels

# Visit our project webpage:

## [www.product-compliance-services.eu](www.product-compliance-services.eu)

- Guidelines (horizontal/product-specific)

- FAQs

- Webinars

- Helpdesk service (ticket system under preparation)

- E-learning (smartphones and tablets, and more)
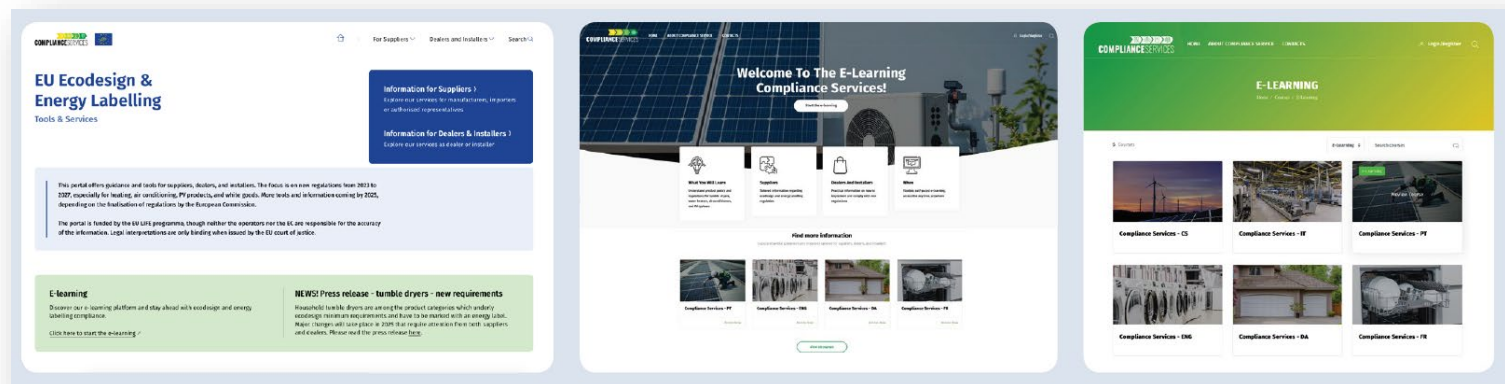
# Compliance Services newsletter

Sign up to the project newsletter to obtain future project materials and guidelines, webinar invitations, updates on new energy labelling and ecodesign legislation:



**Newsletter**

https://www.product-compliance-services.eu/sign-up-for-the-project-newsletter

# Links

Project website
www.product-compliance-services.eu

E-mail
project@product-compliance-services.eu

LinkedIn
https://www.linkedin.com/company/product-compliance-services

Newsletter
https://www.product-compliance-services.eu/sign-up-for-the-compliance-services-newsletter

E-learning
https://elearningcomplianceservices.adene.pt/

EC portal:
https://energy-efficient-products.ec.europa.eu/product-list/smartphones-and-tablets_en

# We will share with you per e-mail links to:

- Webinar presentation

- Answers to specific questions

- Guidelines to suppliers on ecodesign and energy labelling requirements for smartphones, slate tablets, cordless phones and mobile phones

- Guidelines to dealers on new energy labels for smartphones and slate tablets

# Poll no. 6

Please evaluate this webinar

## Share of votes

▶ **Option 1**

I found it very useful      65%

▶ **Option 2**

It was ok      30%

▶ **Option 3**

I did not learn anything new      4%

▶ **Option 4**

I do not know/I do not want to answer      0%

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WWW.PRODUCT–COMPLIANCE–SERVICES.EU