Energy labelling requirements, questions and answers

from the Compliance Services help desk service and the Compliance Services webinar for suppliers about energy labelling requirements, which took place on the 21st of October 2026.

October 30th, 2026.

The energy label 2

The energy label in the packaging 2

Physical shops 4

Displaying the energy label 4

Online sales 5

Energy arrow 5

Image gallery 6

Product-specific questions 8

Solar thermal products 8

Combination heaters 10

Packaging design 11

Light sources 11

EPREL 13

Incorrect QR code 13

Horizontal topics 14

Other regulations, tools and future regulations 14

Supplier's guidance of dealers 15

The energy efficiency class 16

Future energy labelling regulations 16

Second-hand or used products 17

ESPR 18

The energy label

The energy label in the packaging

1. How to supply the energy label in the packaging?

Question
Is it acceptable to place the energy label loose inside the product packaging? For example, some small duct fans are smaller than the energy label itself, and their final installation position may be unknown.

Answer
The energy label must be placed loose inside the packaging when the product is supplied to the dealer. However, the requirements for displaying the energy label on the product at the point of sale must also be respected.

According to the energy labelling regulation for residential ventilation units (EU) 1254/2014:

- Suppliers:
  Article 3(1)(a) requires each residential ventilation unit to be accompanied by a printed energy label, which must be provided at least inside the product packaging.

- Dealers:
  Article 4(a) requires the energy label to be displayed on the outside of the front or top of the appliance, clearly visible to customers at the point of sale.

Therefore, placing the energy label loose inside the packaging is acceptable for the supplier, but it does not fulfil the dealer's obligations when the product is displayed for sale.

The fact that the energy label is larger than the product, or that its final installation position is unknown, does not exempt an in-scope product from the applicable energy labelling requirements.

Please visit our Quick guide for the minimum sizes of energy labels, especially if you print them on your own.

Please note: Not all duct fans are necessarily covered by the energy labelling requirements for residential ventilation units. The product must be assessed against the scope and definitions of the regulation.

References to the legislation and relevant links
The energy labelling regulation for residential ventilation units (EU) 1254/2014

Please find a list of product-specific regulations on the website of the EU Commission: Product List - European Commission

The Compliance-Services website: Quick guide for minimum sizes of energy labels.

Physical shops

Displaying the energy label

2. Washing machine

Question
Is it mandatory to display the energy label on the front of a washing machine, or can it also be placed on the top or side of the appliance?

Answer
According to Article 4(a) of the energy labelling regulation for washing machines (EU) 2019/2014, the energy label must be displayed for built-in appliances in a clearly visible way and for non-built-in appliances clearly visible on the outside on the front or top of the machine.

References to the legislation
The energy labelling regulation for washing machines (EU) 2019/2014

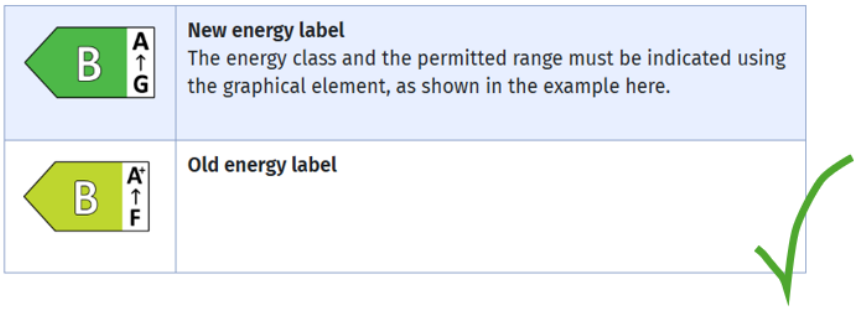
Online sales

Energy arrow

3. Old versus new energy arrows

Question
Is it ok to have old type arrow near a product one cannot buy?

Answer
Dealers and suppliers must use an energy arrow – in visual advertisements and online sales – no matter if you can buy the product or not. The energy arrow must include the available range of classes, even if the energy label has not been rescaled yet.



This means that even if the regulation still shows the old design of the energy efficiency class arrow, without indicating the range of energy efficiency classes, these old arrows are no longer permitted and must be replaced by arrows showing the available range of classes.

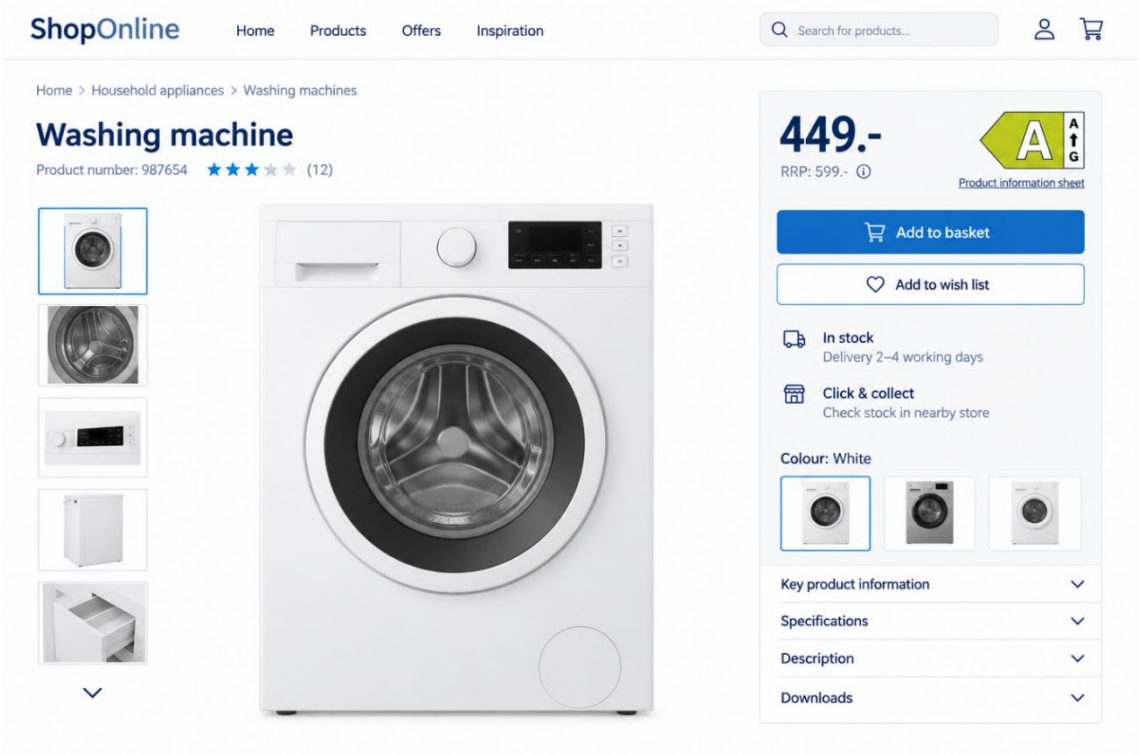


Relevant links
European Court of Justice ruling in October 2023
EC website for downloading all templates of energy arrows

4. Image gallery

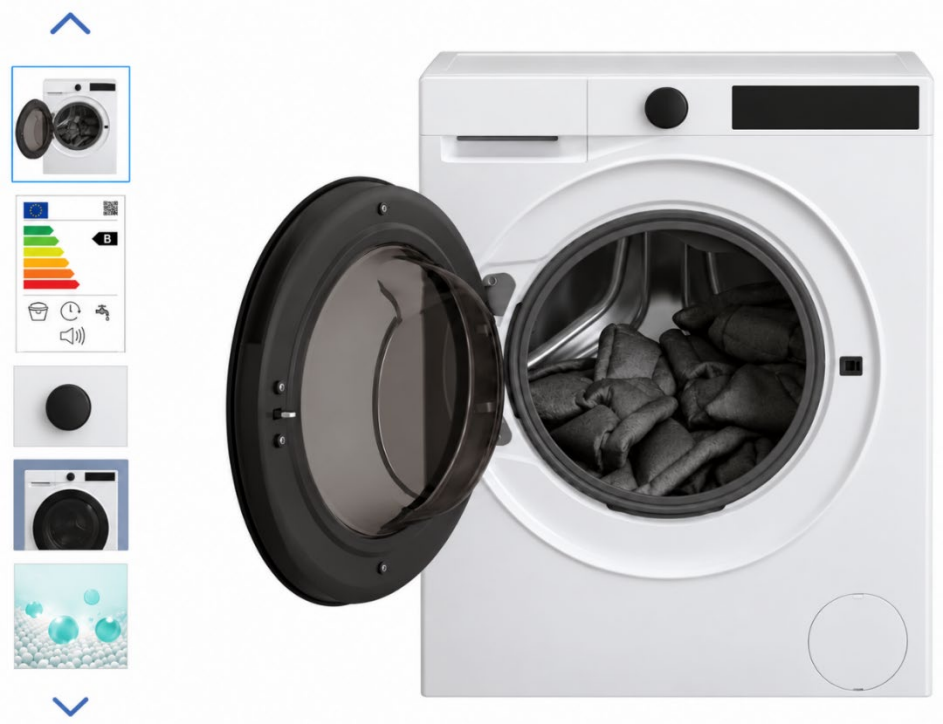
Question
For online sales, does the label have to appear both in the picture gallery and on the click of the nested label near the price?

Answer
As illustrated in the example below, the energy arrow and the link to the Product Information Sheet (PIS) must be displayed in proximity to the price. The energy arrow must provide access to the full energy label.



If the energy efficiency class arrow and the PIS link are correctly displayed near the price, there is no requirement to display the energy label or arrow in the product image gallery as well.

Another example:



If the energy label or arrow is displayed only in the product image gallery, it must still comply with the requirements to be displayed in proximity to the price (if no price, then near the product's image or name), open with one click, clearly visible, etc.

If the gallery automatically rotates or changes images, causing the energy label or arrow to disappear from view, this would be considered non-compliant, as the required information is not continuously visible We cannot say whether a situation where the energy label is shown in the first picture of the gallery is compliant, because the user could switch to another picture and then the energy label would not be visible. Please contact the market surveillance authority (MSA) responsible in case this is an option you consider.

Please note that the interpretation of *"in proximity to the price"* may vary between national MSAs.

Relevant links

The relevant product specific energy labelling regulation. For example the energy labelling regulation for washing machines (EU) 2019/2014.

Product-specific questions

Solar thermal products

5. Scope of the energy labelling regulation

Question
Is energy labelling mandatory for solar thermal products (under the solar Keymark certification), such as solar water heaters and solar thermal systems used for domestic hot water production and space heating?

Answer
The energy labelling requirements depend on the type of solar thermal product and how it is placed on the market.

Under regulation (EU) 812/2013:

- Solar collectors and solar-only systems: No individual energy label is required. However, suppliers must provide a product fiche and technical documentation in accordance with Article 3(3), Annex IV (3) and Annex V (3).
- Solar water heaters: If the product qualifies as a solar water heater under the regulation, an energy label is mandatory in accordance with Article 3(1).
- Hot water storage tanks: An energy label is mandatory for tanks within the scope of the regulation, in accordance with Article 3(2).
- Packages of water heater and solar device: An energy label for the complete package is mandatory in accordance with Article 3(4).

For solar thermal systems used for space heating, regulation (EU) 811/2013 may also apply, depending on the configuration of the system and whether it is marketed as a package with a space heater or combination heater.

Therefore, Solar Keymark certification does not, in itself, determine whether an energy label is required. This depends on the product's classification and the applicable EU energy labelling regulation.

References to the legislation

The energy labelling regulation for water heaters, hot water storage tanks and packages of water heater and solar device (EU) 812/2013.

The energy labelling regulation for space heaters and combination heaters (EU) 811/2013.

6. Energy labelling requirements

Question
What are the energy labelling requirements for combination heaters - heat pumps with an integrated domestic hot water storage tank.

Answer
If you are a dealer, you must ensure:

- The point of sale (physical shops)
  To display the energy label provided by the supplier and provide the product information sheet on request from the customer.
- Online sales
  To display the energy label/energy arrow and a link to the product information sheet close to the price (if no price then close to the picture or name of the product)
- Visual advertisements
  Include a reference to the seasonal space heating energy efficiency class (the regulation does not further specify the form of this reference) and water heating energy efficiency class under average climate conditions.

  Please find all the requirements in the regulation (EU) 811/2013

References to the legislation
The energy labelling regulation for space and combination heaters (EU) 811/2013

Packaging design

Light sources

7. Requirements for packaging design

Question
Is it permitted to print the energy label in black and white on the packaging of light sources, such as small lamps with integrated lightsource, if the packaging contains no other colours?

Answer
Yes. According to the energy labelling regulation for light sources (EU) 2019/2015, Annex III, point 1, the energy label may be printed in monochrome (black and white), provided that all other information, including graphics, on the packaging is also printed in monochrome.

This means that if the packaging only contains black-and-white text and graphics, the energy label may also be printed in black and white.

However, if any other information or graphics on the packaging are printed in colour, the energy label must also be printed in colour.

Please note, that for lamps with integrated light sources it is important to determine whether the entire lamp is considered a *light source* or a *containing product*.

This depends on whether the light source can be removed for verification test without permanently damaging the light source itself.

- If the light source can be removed without permanent damage: The lamp is considered a *containing product* and does not require an energy label on its packaging. Only the light source itself is subject to energy labelling requirements.
- If the light source cannot be removed without permanent damage: The entire lamp is considered a *light source* and must carry an energy label, provided it falls within the scope of the regulation.

Please note that damage to the lamp during removal is not relevant to this classification. The decisive factor is whether the light source itself can be removed without permanent damaging it.

References to the legislation

The energy labelling regulation for light sources (EU) 2019/2015:

- Article 2(1) and 2(3) – Definitions of light sources and containing products.
- Annex III, point 1 – Requirements for monochrome energy labels.
- Article 3(2) and Annex V, point 2 – Information requirements for containing products.

EPREL

Incorrect QR code

8. QR code is not displayed correctly when printing it

Question
When I download an energy label from EPREL and print it, the QR code is not displayed correctly – part of the code is missing. What should I do, and how can I ensure that the complete QR code appears on the printed label?

Answer
In this case, we recommend that you contact the supplier or the EPREL help desk (address see below).

If you are the supplier we recommend you to contact the EPREL help desk by email: ENER-EPREL-HELPDESK@ec.europa.eu

Horizontal topics

Other regulations, tools and future regulations

9. Tools to check compliance

Question
Are there any automated tools available to check whether online shops comply with ecodesign and energy labelling requirements?

For example, is there a tool where users can simply enter the URL of an online shop and receive a report identifying potential non-compliances, such as missing or incorrectly displayed energy labels and product information sheets?

Similar tools already exist for checking environmental claims, such as the Green Claims Scanner.

If no such tools are available, what other solutions could help organisations, such as NGOs, monitor compliance more efficiently without having to check each product listing individually?

Answer
Unfortunately, we are not aware of such a tool.

10. Supplier's guidance of dealers

Question
As a supplier, how can I help my dealers comply with the energy labelling requirements?

Answer
As a supplier, you can support your dealers in several ways:

- Provide energy labels and Product Information Sheets (PIS)
  Mandatory: Ensure that dealers have access to the correct energy labels/energy arrows and PIS, including through EPREL, and provide printed energy labels and PIS as required by the applicable legislation.
- Share guidance and training materials
  Help dealers understand their obligations by providing relevant guidance, practical examples and training materials.
- Explain the requirements for different sales channels
  Make dealers aware of the differences between displaying energy labels and PIS in physical shops, visual advertisements and online, as well as any product-specific requirements.
- Highlight the commercial benefits
  Explain that energy labelling is not only a legal requirement but also helps customers compare products, make informed purchasing decisions and potentially increases sales of energy-efficient products.

Please note that your contact data must be available and updated if needed in all EPREL entries.

Relevant links
Four dealer Quick guides on the Compliance Services website: QUICK GUIDES - Compliance Services
Several e-learning modules for dealers: E-learning for dealers
Download the energy arrows:
https://circabc.europa.eu/ui/group/7f4824e3-f72c-4126-b6b8-842a4443a4ca/library/3c497bea-d930-44b5-a90f-889e43125dcd
and: https://circabc.europa.eu/ui/group/7f4824e3-f72c-4126-b6b8-842a4443a4ca/library/c757c05c-0718-4922-8f3acfe2d64b2960?p=1&n=10&sort=modified_DESC

The energy efficiency class

11. How to determine the energy efficiency class

Question
How do we know one product is A or B or C?

Answer
The energy efficiency class (A, B, C, etc.) of a product is determined by the supplier and according to the calculation methods and thresholds specified in the relevant product-specific energy labelling regulation.

Links
Please find a list of product-specific regulations on the website of the EU Commission: Product List - European Commission

Future energy labelling regulations

12. Future energy labelled product groups

Question
What are the next product groups for new energy labelling and when are they coming?

Answer
You can find the ongoing policy developments at the EU commissions website: https://energy-efficient-products.ec.europa.eu/policy-making-0_en

From 1st of January 2027 an updated energy label for tumble dryers, including a repairability index, will be required for products placed on the market from that date. Find more information here.

Based on the current timetable, no other new or revised energy labels are expected to become mandatory in shops or online stores during 2027.

Second-hand or used products

13. Used products

Question
Refurbished/second-hand phones & tablets: must dealers show the energy label, or only on products sold as new?

Answer
As a general rule, energy labelling requirements do not apply to refurbished or second-hand products that have already been placed on the EU market.

However, there are exceptions. For example, second-hand or used products imported from outside of the EU and substantially modified second-hand or used smartphones. Please read more in the EU Blue Guide.

Links and reference to the legislation
Framework energy labelling regulation (EU) 2017/1369, Article 1(2)(a) and Recital 5.

Energy labelling regulation for smartphones and slate tablets (EU) 2023/1669.

The EU Blue Guide (2022), Section 2.1 – Product coverage.

ESPR

14. The energy label and the Digital product passport?

Question
Will energy labels need to be included in Digital Product Passports (DPPs), where applicable?

Answer
Not necessarily. Under the Ecodesign for Sustainable Products regulation (EU) 2024/1781 (ESPR), the information to be included in a Digital Product Passport (DPP) will be specified in the relevant product-specific delegated acts.

This means that energy labels may be included in, or linked to, a DPP where required by the applicable legislation, but there is currently no general requirement for all energy labels to be included in DPPs.

Importantly, the introduction of a DPP does not automatically replace the existing energy labelling requirements. Where an energy label is mandatory under the framework regulation for energy labelling (EU) 2017/1369 and the relevant product-specific regulation, these requirements continue to apply.

References to the legislation
The framework regulation for energy labelling (EU) 2017/1369
Ecodesign for Sustainable Products regulation (EU) 2024/1781 (ESPR)

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.

COMPLIANCESERVICES

Co-funded by the European Union

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.