

Energy labelling requirements, questions and answers

from the Compliance Services help desk service and the Compliance Services webinar for dealers about energy labelling requirements, which took place on the 10th of February 2026.

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Obligations of the dealers

Who is responsible for the correctness of the product information sheet?

1. Is the dealer responsible?

Question

Is it the responsibility of the dealer to check the format of the product fiche/product information sheet, such as correct decimal numbers provided by the manufacturer?

Answer

No, it is the obligation of the supplier to ensure that products placed on the market are accompanied, for each individual unit, free of charge, with accurate printed energy labels and product information sheets, and to ensure the accuracy of the energy labels and product information sheets.

References to the legislation

The energy labelling regulation ([EU 2017/1369](#), article 3, General obligations of suppliers, points 1) and 3).

Physical shops

Displaying the energy label

2. Display the energy on digital displays

Question

Is it ok to display the energy label on a digital screen directly beside the product? I am thinking of smaller items, like smartphones specifically.

Answer

No, dealers shall ensure that each smartphone and slate tablet, at the point of sale, including at trade fairs or in shop windows (just as any other product with an energy label), bears the printed energy label provided by suppliers displayed in proximity 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.

The only exceptions to this are electronic displays such as televisions: Where the electronic display is kept in on-mode while visible to customers for sale, the electronic energy label shown on the screen may replace the printed energy label.

The other exceptions are light sources, due to their small size, where the energy label is printed on the packaging.

References to the legislation

The energy labelling regulation for smartphones and slate tablets ([EU](#) [2023/1669](#) article 4 Obligations of dealers, point a), which refers to the also relevant article 3 Obligations of suppliers, point 1.a).

The energy labelling regulation for electronic displays ([EU](#) [2019/2013](#) article 4, (a).

Online sales

Energy label, energy arrow and PIS

3. The physical product

Question

It is stated that the label must be affixed and visible on the front/top. However, if the product was purchased online, is it really necessary for the purchased physical product to have the energy label visible once it is sent to the customer? Given that the customer has already purchased the product and seen the energy label on the website, the energy label affixed to the product no longer provides them with additional information.

Answer

The requirements for displaying energy labels on the front or top side of the products refers to selling products in physical shops.

For online sales, the product must display the energy label and product information sheet online before purchase.

The supplier shall, according to the energy labelling regulation [\(EU\) 2017/1369](#), ensure that the products are accompanied, for each unit, free of charge, with accurate printed labels. The reason for this requirement is that it is thereby possible to use an energy label for display with the respective product for every unit that is displayed in a physical store – and indeed visible to the customer before the purchase.

Therefore, all products are supplied with a printed energy label delivered together with the product inside the packaging.

This means that when you sell the product online and send it to the customer, the energy label accompanies the product, as it is included inside the packaging but it does not have to be displayed in any specific way.

The only exception is light sources. According to the energy labelling regulation for light sources [\(EU\) 2019/2015](#), the energy label must be printed on the packaging and must not be supplied as a separate printed energy label.



Legal references

The energy labelling regulation ([EU 2017/1369](#), article 3, General obligations of suppliers, point 1) and for light sources ([EU 2019/2015](#) art. 4 “Obligations of dealers” (b)).

4. The product information sheet (PIS)

Question

Can the product information sheet be detailed on the same website where I sell an item online, in the section on the characteristics of the product in question?

Answer

The product information sheet is a standard document and must be displayed in proximity to the product's price (in case you do not show prices, close to its name or picture) - so that customers can find it at the same place for all products offered for sale.

However, you can choose to display a link to the product information sheet in proximity to the product's price instead of displaying the entire product information sheet. This link must, when hovered over or with one click, link to either the full product information sheet on your website, for example, in the section of characteristics, or even directly to EPREL.

As the product information sheet is a standard document, it is not permitted to change the order or content of the requested information.

Legal references

Please find more information in the relevant product-specific regulation. For example, the energy labelling regulation for light sources ([EU 2019/2015](#), annex VIII, point 4) and the corresponding provisions in the regulations for other product categories as well

5. Energy label within the product's image carousel

Question

Is it sufficient to include only the energy label within the product's image carousel (see screen shot)? As shown in the examples, when a user clicks on the image, the energy label is clearly visible and positioned near the price. Given this setup, I would like to know if it is still necessary to include the separate energy arrow with the category.



Answer

The situation you describe and illustrate with a screenshot is not compliant as the energy label is not visible all the time in the carousel as the number of pictures determines whether the energy label is visible and the prime picture will always be the product.

Secondly, an interpretation of “proximity to the price” also applies. In other words: Is the energy label placed close enough to the price, or in this case the product? That decision would ultimately be for the national MSA to determine

Regarding your question about whether it is necessary to include the separate energy arrow in a webshop. According to the energy labelling regulation for washing machines ([EU 2019/2014](#), Annex VIII: “The appropriate label made available by suppliers shall be shown on the display mechanism in proximity to the price of the product. The size shall be such that the label is clearly visible and legible and shall be proportionate to the size specified in Annex IV. The label may be displayed using a nested display (the energy arrow).”

So, it is optional whether to display the full energy label or the energy arrow, when displaying a product in a webshop. But unfortunately, the case you send us is not compliant.

Advertisement

Customer emails, black&white energy arrows and websites

6. Emails to customers

Question

Does advertisements include emails to customers?

Answer

Yes, advertisements include emails to customers.

In the legislation, advertisement in this context is referred to as “distance selling”.

According to the energy labelling regulation ([EU 2017/1369](#), article 2, Definitions point (15):

“Distance selling’ means the offer for sale, hire or hire purchase by mail order, catalogue, internet, telemarketing or by any other method by which the potential customer cannot be expected to see the product displayed.”

and in the introduction (14)

“Where it is not feasible to display the energy label, such as in certain forms of distance selling, visual advertisements and technical promotional material, potential customers should be provided at least with the energy class of the product and the range of the efficiency classes available on the energy label’.

Every such advertisement for a specific model, therefore also has to contain the information about the energy efficiency class of the product in the form of an energy arrow.

Reference to the legislation

The energy labelling regulation ([EU 2017/1369](#), (14) and article 2, Definitions point (15).

7. Black and white energy labels

Question

If a printed catalogue is displaying a product in black and white, is it then permitted to display the energy arrow in black and white?

Answer

It is only allowed to display a black and white (monochrome) energy arrow, if the entire catalogue is printed in black and white.

Reference to the legislation

Please find the relevant information in the product-specific regulation in the Annex regarding “Information to be provided in visual advertisements, in technical promotion material and in distance selling, except distance selling on the internet”.

8. Websites – not webshops

Question

We noticed that a lot of companies don't have the required energy labels and product fiches on their websites. On such websites, you can not purchase the products, but only find more information about the products. We also notice that some sites offer the energy label, but you have to email them to request it. I am assuming that this is not correct?

Answer

Websites that market but do not sell products must comply with the energy labelling requirements for visual advertisements. This means that each product must bear an energy arrow that is clearly visible and readable for the customer.

Additionally, customers must be able to access the energy label and product information by requesting a printed copy.

Reference to the legislation

Please find the information in the relevant product-specific regulation in the Annex regarding “Information to be provided in visual advertisements, in technical promotion material and in distance selling, except distance selling on the internet”.

Online marketplaces

Displaying the energy labels

9. Obligations of online marketplaces

Question

Marketplaces should enable the dealers/traders to provide information concerning the energy labelling of the products. Does that mean that marketplaces should also show the energy label on every subpage where the trader's product is shown?

Answer

Yes, the online marketplaces shall ensure that the energy label and product information sheet can be shown on their platforms as set out in the energy labelling regulation in the respective annex for online sales. Furthermore, the online marketplaces must randomly check if the requirements are fulfilled by the dealers/traders.

References to the legislation

The Digital Services Act [Regulation - 2022/2065 - EN - DSA - EUR-Lex](#)

Product-specific questions

Buffer tanks

10. The content of the energy label

Question

Does the energy label on the buffer tanks imply the position for which they are designed (vertical or horizontal)?

Answer

No, vertical or horizontal installation is not indicated on the energy label, nor on the product fiche.

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](#), Annex III and Annex IV.2).

Light sources

11. Inside the packaging

Question

Is it required to have a printed energy label inside when the energy label is printed on the back of the box and the energy arrow on the front?

Answer

No, it is not required to have a printed energy label inside the package of a light source.

References to the legislation

The energy labelling regulation for light sources ([EU\) 2019/2015](#) art. 4

12. Size of the letter in the energy arrow

Question

This question concerns light sources offered for sale in physical retail stores:

Must the size of the letter shown in the energy efficiency arrow printed on the front of the packaging be the same size as the price when the packaged product is displayed in a shop? Or does this requirement apply only to online sales?

Answer

No, the size of the letter shown in the energy arrow printed on the front of the packaging does not need to be the same size as the price.

The size shall be such that the energy arrow is clearly visible and legible. However, please pay particular attention to the fact that nothing, such as shelf-edge labels displaying the price or other product information, may cover the energy efficiency arrow.

References to the legislation

The energy labelling regulation for light sources ([EU\) 2019/2015](#), Annex III, 1. and the energy labelling regulation ([EU\) 2017/1369](#), art. 6) point c.

Laptops

13. Energy labelling and repair index

Question

What about an energy labelling and repair index for laptops: timeline, requirements, is the process still pending, and at what stage is it?

Answer

Unfortunately, we are not aware of the timeline or the future requirements for laptops. You can follow the Ecodesign and Energy labelling working plan here: [Ecodesign and Energy Labelling Working Plan 2022- 2024 - European Commission](#)

14. Operational system updates

Question

Will OS updates and duration for laptops be included as criteria?

Answer

Unfortunately, we are not aware of the timeline or the future requirements for laptops. You can follow the Ecodesign and Energy labelling working plan here: [Ecodesign and Energy Labelling Working Plan 2022- 2024 - European Commission](#)

Tumble dryers

15. A+++–G, when stop selling?

Question

On some slides, I have noticed Tumble Dryers are still showing A+++. As a dealer, when do I have to stop selling tumble Dryers with A+++?

We have not received any from suppliers with the new A–G scale for Tumble Dryers.

Answer

It has not been permitted to sell tumble dryers with the old energy label since the 18th of July 2025. The only circumstance in which a shop was 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 after the applicability date (1st of July 2025) to sell the tumble dryer, i.e. until end of March 2026.

The supplier is obligated to deliver printed energy labels free of charge, promptly and in any event within five working days to you upon your request.

References to the legislation

The energy labelling regulation ([EU 2017/1369](#), article 3 “General obligations of suppliers” and article 11, point 13, (b), (ii).

Heating units, fans and air-conditioners

16. Labelling requirements

Question

What are the labelling requirements?

Answer

Please, review the webinar for suppliers on ecodesign legislation for local space heaters - it contains info on energy labels as well, which includes the presentation and Q&A-document: <https://www.product-compliance-services.eu/suppliers/webinars-e-learning/webinar-local-space-heaters-5-11-25>

Please subscribe to our newsletter to be informed about our upcoming webinars (Q1-Q2/2026) for installers and dealers of HVAC products on energy labelling at the points of sale: <https://www.product-compliance-services.eu/sign-up-for-the-compliance-services-newsletter>

References to the legislation

The energy labelling regulation for local space heaters (EU) 2015/1186.

More information about the product groups can be found here on the EC website:

- **Space heaters:** https://energy-efficient-products.ec.europa.eu/product-list/space-heaters_en?prefLang=cs
- **Air conditioners and comfort fans:** https://energy-efficient-products.ec.europa.eu/product-list/air-conditioners-and-comfort-fans_en?prefLang=cs
- **Water heaters:** https://energy-efficient-products.ec.europa.eu/product-list/water-heaters_en?prefLang=cs
- **Solid fuel boilers:** https://energy-efficient-products.ec.europa.eu/product-list/solid-fuel-boilers_en?prefLang=cs

17. Energy arrow

Question

Must the energy arrow always point to the left?

Answer

Regarding tumble dryers and smartphones/slate tablets, the arrow must be oriented to the left. A right-pointing arrow will be a case of non-compliance and could result in fines, depending on your national market surveillance authority.

Our best assessment is that this change will extend to upcoming regulations, given that it has already been implemented in the most recent ones – specifically, those for tumble dryers and smartphones/tablets.

Our recommendation is therefore to use a left-pointing arrow for all product groups.

Please note that the design of the energy arrow for each product group must include the range of energy classes applicable to the respective product category.

References to the legislation

Energy labelling regulation for tumble dryers [\(EU\) 2023/2534](#), Annex VII, 4, Figure 5 and Annex VIII, 2, (iv) Figure 6

Energy labelling regulation for smartphones/tablets [\(EU\) 2023/1669](#), Annex VII, 4, Figure 1 and annex VIII, 2, (d) figure 2

Please find the left-pointing arrow here:

<https://circabc.europa.eu/ui/group/7f4824e3-f72c-4126-b6b8-842a4443a4ca/library/3c497bea-d930-44b5-a90f-889e43125dcd>

Please find the black/white left-pointing arrow here:

https://circabc.europa.eu/ui/group/7f4824e3-f72c-4126-b6b8-842a4443a4ca/library/c757c05c-0718-4922-8f3acfe2d64b2960?p=1&n=10&sort=modified_DESC

Packaging design

The requirements

18. Requirements for packaging design

Question

What are the requirements for the packaging design?

Answer

Only electronic displays and light sources are subject to specific energy labelling requirements relating to packaging design. Compliance with these requirements is the responsibility of the supplier.

As a dealer, you must ensure that, when these products are displayed to customers in their packaging at the point of sale, the energy label – or the energy arrow in the case of light sources – is clearly visible and facing the customer.

References to the legislation

The energy labelling regulation for light sources ([EU 2019/2015](#), Annex III, 1.

The energy labelling regulation for electronic displays ([EU 2019/2013](#) article 4, (a).

19. The energy arrow printed on the packaging

Question

Do you need to print the energy arrow on the packaging?

Answer

There is no requirement to print the energy efficiency arrow on the packaging. For light sources, you are permitted to print the energy efficiency arrow on the part of the packaging intended to face the prospective customer, provided that the full energy label is not printed there. However, in such cases, the full energy label must be printed elsewhere on the packaging.

References to the legislation

The energy labelling regulation for light sources ([EU 2019/2015](#), Annex III, 1.

EPREL

Imports, EAN code and digital seal

20. Imports directly from a third country

Question

If a Chinese seller sells via a marketplace and imports a product from China. Does the seller have to register their product on EPREL?

Answer

Yes, all products in the scope of an energy labelling regulation must be registered in EPREL before placing the products on the EU-market.

Please pay attention to these different roles:

- **Supplier** means a manufacturer established in the EU, the authorised representative of a manufacturer who is not established in the EU, or an importer who places a product on the EU market.
- **Manufacturer**
A manufacturer produces products OR has them produced by others and places them on the EU market under their own name/trademark.
- **Authorised representative**
An entity with written consent from a manufacturer outside the EU to act on their behalf.
- **Importer**
An entity that imports products and places them on the EU market (either for money or free of charge).

This means that every manufacturer from a third country, for example from China, must have an authorised representative registered in the EU market. In this case, the registration in EPREL must be done by either the authorised representative registered in the EU market or the importer (if any).

References to the legislation

The energy labelling framework regulation ([EU 2017/1369](#) art. 4, point 1.

Find more information about “placing on the market” and “products imported from countries outside the EU in the [Blue Guide](#) chapter 2.2 and 2.5.

21. EAN code

Question

We use the EPREL API to obtain accurate data regarding energy labels. The issue we are facing is that the EPREL API works based on the EPREL registration number, and it is not possible to search by the product’s EAN code. Is this expected to change in the future?

Answer

Quote from the EPREL helpdesk (10th of June 2025): *“The GTIN is not requested by the regulations, so we can't make it mandatory. But we hope suppliers will find it useful and will start filling it in. We are putting all the tools to make it more prominent, but we can't force them”.*

Useful links

[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).


22. Digital seal

Question

We are distributing some products subject to energy labelling under our own brand, so we have to use the EPREL website to display the product information sheets. The website now requires a qualified electronic stamp in order to check the economic actor. The process to get this seems to be very complicated and my colleague has failed at getting the stamp to this day, even with the support of our IT organization, possibly disabling the access to our PIS when reading the QR code. Is it something that you have heard of and are there any actions to solve these problems and/or simplify the process?

Answer

We are not aware of any problems in this respect. But we often experience that suppliers find the verification process difficult.



Therefore, we have developed a step-by-step Quick Guide on how to manage the verification process. You can find the guide [here](#).

Please note that if you represent a company, you need to purchase an electronic seal and not a stamp.

You can find a complete list, managed by the EU commission, of providers of electronic seals [here](#).

Horizontal topics

Other regulations and future regulations

23.ESPR

Question

Are you considering how energy labelling will change with the introduction of new requirements under the ESPR?

Answer

Energy labelling will not change. It is here to stay. The ESPR sets minimum requirements for all products – not only products in scope of energy labelling and does not include or imply any changes to the energy labels, and is not intended to replace energy labels.

24. Sustainability labels

Question

How to address the co-existence of energy labels and sustainability labels?

Answer

For both products covered and not covered by energy labels:

- It is not allowed to provide or display other labels, marks, symbols or inscriptions which do not comply with the requirements of energy labelling, as it could mislead or confuse customers with respect to the consumption of energy or other resources during use (unless provided for in national law).
- Source: Article 6 of [Regulation \(EU\) 2017/1369](#)

For other environmental claims, e.g. climate-neutral products

- Prohibited unless the trader can demonstrate recognised excellent environmental performance relevant to the claim
- Source: [Directive \(EU\) 2024/825](#) on empowering consumers for the green transition (since 9/2026)

25. Digital product passports

Question

Will the energy labels be incorporated into the Digital Product Passports?

Answer

The [European Union](#) will implement a new regulation requiring nearly all products sold in the EU to feature a Digital Product Passport (DPP). This initiative, part of the [Ecodesign for Sustainable Products Regulation](#), aims to enhance transparency across product value chains by providing comprehensive information about each product's origin, materials, environmental impact, and disposal recommendations. The DPP is designed to close the gap between consumer demands for transparency and the current lack of reliable product data.

At present, the EU's Digital Product Passport (DPP) framework does not explicitly state that energy labels themselves must be incorporated as a required data field in every DPP. However, the legislative architecture strongly suggests that product compliance information – and potentially energy-related data – could become part of the passport dataset, depending on future delegated acts.

Useful links

Commission consultation on Digital Product Passport

https://single-market-economy.ec.europa.eu/news/commission-launches-consultation-digital-product-passport-2025-04-09_en

Information on the Digital Product Passport and sustainability objectives

<https://data.europa.eu/en/news-events/news/eus-digital-product-passport-advancing-transparency-and-sustainability>

Training materials and tools

26. Compliance Services tools and materials

Question

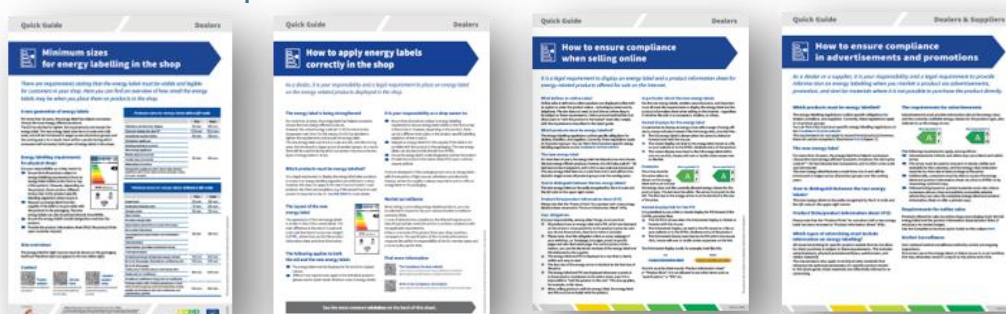
Are all training/materials compiled on a single site?

Answer

Yes, you can find all the materials on the CS-website: [Compliance Services](#), and here you can also find a dedicated library for this purpose only: [Tools and materials available for download - Compliance Services](#)

Please note, that the Compliance Services project has published four relevant Quick Guides for dealers explaining the requirements for physical shops, online sales and advertisement and the minimum sizes of the energy labels to be used in the physical shops .

You can find the Quick Guides here: [Tools and materials available for download - Compliance Services](#)



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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