

# Smartphones and slate tablets: Questions and answers

from the Compliance Services webinar for dealers,  
which took place on the 11<sup>th</sup> of June 2025

<b>Energy labelling</b> .....	<b>2</b>
The energy label – in the packaging .....	2
The energy label – in the store/trade fair .....	4
The energy arrow and PIS – online sales .....	7
The scope of the regulation .....	10
Placing on the market and the transition period .....	14
Availability of energy labels .....	17
EPREL .....	18
<b>Ecodesign</b> .....	<b>20</b>
Ecodesign requirements .....	20
<b>Energy labelling and ecodesign regulations</b> .....	<b>21</b>
General questions .....	21
<b>Compliance Services</b> .....	<b>24</b>
Services by the project .....	24
Downloads and important links .....	25

# Energy labelling

## The energy label – in the packaging

### 1. Missing energy label

#### Question

Is it the manufacturer or the retailer who is responsible for the energy label if it is missing in the packaging?

#### Answers

It is the supplier's obligation to provide each smartphone and slate tablet with a printed energy label.

However, as a dealer, you are responsible for ensuring that the energy label is displayed close to each smartphone and slate tablet displayed at the point of sale.

If the package of a smartphone or tablet, which was placed on the market from the 20<sup>th</sup> of June 2025 onwards, does not include a printed energy label, you must contact the supplier and request it. The supplier is required to send you the printed energy label within five working days.

#### References to the legislation

The energy labelling regulation [\(EU\) 2023/1669](#), art. 3 and 4 regarding the dealers' and the suppliers' obligations.

The energy labelling frame regulation [\(EU\) 2017/1369](#) article 3, 2 describes the procedure for requesting a new energy label.

## 2. The energy label in the packaging

### Question

The energy label can be part of the instruction manual, or a leaflet included in the packaging? Not provided as a separate printed item?

### Answers

No, the supplier must provide each smartphone and slate tablet with a separate printed energy label in the packaging.

### References to the legislation

The energy labelling regulation [\(EU\) 2023/1669](#), art. 3 regarding the dealers'.

## The energy label – in the store/trade fair

### 3. Size of the energy label displayed in a store

#### Question

Regarding the size of the energy label, is it permitted to adjust its size to fit the store interior and similar aspects in retail?

#### Answer

The energy label must be at least 68 mm wide and 136 mm high. As a dealer you may print the label in a larger format, provided that all content remains proportionally scaled. You are not allowed to print the energy label smaller than this.

Only suppliers are allowed to print the energy label in a smaller size if it is necessary to fit the label on the product packaging. In such cases, the label may be scaled down, but not to less than 70% of the specified width and height. The content must remain proportionate, and the QR code must still be easily readable using a standard QR reader, such as those integrated into smartphones.

#### References to the legislation

The energy labelling regulation [\(EU\) 2023/1669](#), Annex II, 2.2.

### 4. Demo units in a store

#### Question

How should the label be presented at demo units in a store?

#### Answer

The energy label must be present close to the product. Please see the illustrations of examples in the [quick guide for retailers](#).

#### References to the legislation

The energy labelling regulation [\(EU\) 2023/1669](#), art. 4 (a) regarding the dealers' obligations.

## 5. Several products – in the shop

### Question

How do we manage communications with several products?

### Answer

Each physical product present in your shop must bear a printed energy label.

If you use materials (also in your shop)—whether digital or printed—that present or illustrate different product models, this is considered a visual advertisement. In such cases, you must display the energy label arrow close to each product.

### References to the legislation

The energy labelling regulation [\(EU\) 2023/1669](#), art. 4 (a) regarding the dealers' obligations and Annex VII regarding visual advertisement.

## 6. Dealers' obligation to inform customers

### Question

Are dealers required to display a general explanatory display or poster that explains how to read an energy label?

### Answer

No. There is no legal obligation to provide an explanatory display or poster; however, dealers may choose to offer such information voluntarily as a service towards their customers.

### References to the legislation

The energy labelling regulation [\(EU\) 2023/1669](#), art 4 Obligations of dealers.

## 7. Electronic display of the energy label in the shops

### Question

Is there/will there be the option to display the Energy Label on Electronic Display in shop instead of printed label?

### Answer

No. Electronic displays are currently not recognised as a substitute for printed labels, primarily due to concerns regarding legibility and compliance with regulatory requirements..

### References to the legislation

The energy labelling regulation [\(EU\) 2023/1669](#), art 4 Obligations of dealers.

## 8. The date for mandatory display of the energy label

### Question

Date of exposure of the energy label in shop, dealer's obligations, mandatory exposure

### Answer

Every smartphone and slate tablet placed on the market from the 20<sup>th</sup> of June must bear an energy label at the point of sale.

### References to the legislation

The energy labelling regulation [\(EU\) 2023/1669](#), art 4 Obligations of dealers.

## The energy arrow and PIS – online sales

### 9. Requirements, website

#### Question

Please explain the requirements for products being displayed on a website.

#### Answer

If a product is displayed on a website, but cannot be purchased directly, the display is considered a visual advertisement. In this case, you must show the energy label arrow pointing to the left, positioned close to the product. If there is a price, the letter in the arrow must have at least the same size as the price

If a product is displayed on a website and can be purchased directly, it is considered online sales. In this case, you must display the energy label arrow (pointing to the left) as well as a link to the product information sheet, both positioned close to the product and if there is a price, the letter in the arrow must have the same size as the price

Please investigate the [CS Quick guide for dealers](#) for the complete set of requirements.

#### References to the legislation

The energy labelling regulation [\(EU\) 2023/1669](#), Annex VII (visual advertisement) and Annex VIII (online sales).

## 10. Online materials, TVC, OOH, etc.

### Question

How big should the arrow be on the materials (online, TVC, OOH etc.)?

### Answer

The size shall be such that the energy arrow is clearly visible and legible. The letter in the energy arrow shall be in a size at least equivalent to that of the price, when the price is shown.

### References to the legislation

The Energy Labelling regulation ([EU\) 2023/1669](#), Annex VII and [CS Quick guide for dealers](#)

## 11. Online materials, TVC, OOH, etc.

### Question

In advertising, is the placement of the energy efficiency arrow flexible, or must it be positioned so that it points to the product — i.e., to the right of the product so that it points left, towards the product?

### Answer

The energy arrow must always point to the left, regardless of whether the product is placed to the left or right of the arrow. It is not specified if the arrow must point towards the product, it shall just be positioned so that it is clear to which product it belongs.

### References to the legislation

The Energy Labelling Regulation ([EU\) 2023/1669](#), Annex VII.



## 12. More than one device – visual advertisements

### Question

How about when we display more devices on one creative - where does the arrow go?

### Answer

Each product model has to bear an energy arrow in the specified size and format, and the energy arrow shall always point to the left.

### References to the legislation

The Energy Labelling Regulation ([EU\) 2023/1669](#), Annex VII and [CS Quick guide for dealers](#)

## The scope of the regulation

### 13. Smartphones larger than 7,2 inches

#### Question

How to manage smartphones with screens > 7,2 inches, which are considered by the test method as 'tablets'?

#### Answer

The product's characteristics determine its legal definition and, consequently, whether it falls within the scope of an ecodesign or energy labelling regulation, and to which product category it belongs (i.e. smartphone or slate tablet in this specific case).

Please ask the manufacturer for the definition of the specific product.

The manufacturer will have to determine whether the product is defined as a:

- Smartphone or slate tablet; it must comply with the energy labelling regulation [\(EU\) 2023/1669](#) and the ecodesign regulation [\(EU\) 2023/1670](#).
- Mobile phone, other than smartphones, it must comply with the ecodesign regulation [\(EU\) 2023/1670](#).

or if the product is out of the scope of these regulations.

#### References to the legislation

The Energy Labelling Regulation [\(EU\) 2023/1669](#), Art. 2 1. (2) regarding the definition of smartphone.

The Energy Labelling Regulation [\(EU\) 2023/1669](#), Art. 2 1. (5) regarding the definition of slate tablet.

## 14. Refurbished or used smartphones and tablets

### Question

How do the regulations handle refurbished or used smartphones and tablets sold online?

### Answer

The new regulations do not apply to second-hand products that are already on the EU market. However, they do apply to used or second-hand devices imported from a third country, as these are considered to be placed on the EU market for the first time.

After a product has been placed on the market, the product may be subject to life extension processes.

While some of these processes intend to maintain or restore the product to its original condition, others imply that substantial modifications are made to the product:

If substantial modifications are made to the product to the extent that the compliance of applicable requirements such as energy efficiency is affected, these are considered as 'new products'. In this case, the person carrying out the substantial modification has to fulfil the same requirements as an original manufacturer, for example preparation of the technical documentation, drawing up a EU declaration of conformity, affixing the CE marking on and providing an energy label and product information sheet with the product.

Products which have been repaired (for example following a defect), without being considered as new products, do not need to undergo conformity assessment again and are considered as used products and shall not be displayed with an energy label. In this case, make sure that the customer is being informed that this is a repaired product.

### Useful links

[The 'Blue Guide' on the implementation of EU product rules 2022](#), repairs and modifications to products.

## 15. Energy labels on older smartphones

### Question

Where to find energy labels for older smartphones or for those where the label is not included in the packaging?

### Answer

Products placed on the market before the 20<sup>th</sup> of June 2025 fall outside the scope of the regulation and shall not bear an energy label. However, if the model is continued to be placed on the market from the 20<sup>th</sup> of June onwards, you will find the energy label in the EPREL database from the 20<sup>th</sup> of June 2025. For products, where the supplier did not include the energy label in the packaging although the product falls within the scope of (EU) 2023/1669, you can either request a printed energy label from the supplier, which shall then be sent to you within five working days or you can also use the EPREL database and search the product via brand and model identifier.

### References to the legislation

The Energy Labelling Regulation [\(EU\) 2017/1369](#) Article 6 (d).

## 16. E-readers

### Question

Do e-readers count as tablets, or are they exempt from this regulation?

### Answer

There is no simple answer to this question, since there are many different e-reader models with different functionalities and intended purposes, and the answer depends on the characteristics of the specific product. Please ask the importer or the manufacturer for clarification.

The product is being defined as a slate tablet if the product is designed for portability and has the following characteristics:

- (a) it has an integrated touch-sensitive display with a viewable diagonal size greater than or equal to 17,78 centimetres (or 7,0 inches) and less than 44,20 centimetres (or 17,4 inches);
- (b) it does not have an integrated, physically attached keyboard in its designed configuration;
- (c) it primarily relies on a wireless network connection;
- (d) it is powered by an internal battery and is not intended to work without battery; and
- (e) it is placed on the market with an operating system designed for mobile platforms, identical or analogous to smartphones;

### References to the legislation

The energy labelling regulation [\(EU\) 2023/1669](#), art 2 Definitions, (5)

## Placing on the market and the transition period

### 17. Products placed on the market before the 20<sup>th</sup> of June

#### Question A.

If a dealer received a smartphone or slate tablet before the 20<sup>th</sup> of June 2025, and the supplier is not able to deliver an energy label for that product, will it be possible to sell these devices after the 20<sup>th</sup> of June 2025 or not, if they were not sold before that date?

#### Answer

Products placed on the market before the 20<sup>th</sup> of June 2025 fall outside the scope of the regulation and may be sold without an energy label, without any time limitation. Remark: The date of receipt may differ from the date of placing on the market.

#### Question B.

Can you still display in store and on online shop, smartphones put on market before June 20, that do not have energy label?

#### Answer

Products placed on the market before the 20<sup>th</sup> of June 2025 fall outside the scope of the regulation and may be sold without an energy label, without any time limitation.

#### References to the legislation

[The 'Blue Guide' on the implementation of EU product rules 2022](#), 2.3

Placing on the market and 2.10. Transitional periods in the case of the new or revised EU rules.

## 18. Transition period

### Question

Is there any transition period?

### Answer

In the case of a new or revised legislation, economic operators are given additional time to adapt to the new rules which is called transitional period and correspond to the lapse of time between the entry into force of a new rule and the moment it starts applying.

The energy label regulation for smartphones and slate tablets ([EU 2023/1669](#)) entered into force on the 20<sup>th</sup> of September 2023 and applies from the 20<sup>th</sup> of June 2025. The transition period is the time between these two dates.

### References to the legislation

The Energy Labelling Regulation for smartphones and slate tablets ([EU 2023/1669](#), Art. 8).

## 19. Deadline for selling non-compliant devices

### Question

How long may clients of importers of smartphones, that is to say dealers, sell those devices imported prior to 20 June 2025 and thus not being fully compliant with Ecodesign and Energy Labelling regulations?

### Answer

Products placed on the market before the 20<sup>th</sup> of June 2025 fall outside the scope of the regulation and may be sold, without any time limitation, even if they are not compliant with the ecodesign and energy labelling requirements.

### Useful links

[The 'Blue Guide' on the implementation of EU product rules 2022](#), 2.10. Transitional periods in the case of the new or revised EU rules.

## 20. Located in a warehouse

### Question

Does the regulation also apply to old smartphones imported to the EU before the 20<sup>th</sup> of June and still in the warehouse and still being sold?

### Answer

The answer depends on the specific situation and, most importantly, on the date when the product units are considered to be “placed on the EU market.”

Importantly, placement on the market does not necessarily require physical delivery of the product units, so the presence of product units in a EU warehouse does not automatically mean the products have been placed on the market in the legal sense.

In legal terms, a product is placed on the market when there is an offer or agreement (either written or verbal) between two or more legal or natural persons concerning the transfer of ownership, possession, or any other right related to the product. For instance, a product is considered as placed on the market when the ownership of the product units is transferred from a non-EU manufacturer or an EU-based importer to an EU-based dealer or end-user.

So if the importer has imported the products and located them in a warehouse within the EU before, this does not constitute placing them on the EU market.

But if the importer has transferred the ownership to a dealer before the 20<sup>th</sup> of June 2025, the products are considered as being placed on the market before the 20<sup>th</sup> of June 2025 and shall not be provided with an energy label.

### Useful links

[The ‘Blue Guide’ on the implementation of EU product rules 2022, 2.3](#)

Placing on the market



## Availability of energy labels

### 21. Availability of energy labels

#### Question

Are the energy labels of all smartphones currently on the market already available, so they can be used starting from June 20?

#### Answer

For products placed on the market from the 20<sup>th</sup> of June 2025 onwards, suppliers must provide a printed energy label with each smartphone and slate tablet and make a digital product information sheet available to dealers.

Starting on the same date, both the energy label and the product information sheet will also be available for download from the EPREL database.

If you need the energy label before the 20<sup>th</sup> of June 2025, please contact the supplier or manufacturer directly. They are not required to provide it before this date, but they may have it ready in advance.

Please note, that it is not permitted to display the energy label on smartphones and slate tablets before the 20<sup>th</sup> of June 2025.

#### References to the legislation

The Energy Labelling Regulation [\(EU\) 2023/1669](#), Art 3 Obligations of suppliers

### 22.EPREL – EAN/GTIN codes

#### Question

When will the EPREL API be updated so that EAN codes of products are linked to the EPREL website, allowing online stores to find energy labels and product sheets? Currently, you need to have the EPREL product code in order to obtain information from the API.

#### Answer

Quote from the EPREL helpdesk (June 10<sup>th</sup> 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. 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](#))

## 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](mailto: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](#))

# Ecodesign

## Ecodesign requirements

### 24. Ecodesign requirements for retailers/dealers

#### Question

Can you please explain the ecodesign requirements for retailers?

#### Answer

The Ecodesign Regulation [\(EU\) 2023/1670](#) does not include any requirements for dealers, only for suppliers.

In general, it can be said that the EU ecodesign regulations help make products better for the environment by setting minimum requirements for energy efficiency. This means the least efficient products are removed from the market, helping the EU reach its energy and climate goals. At the same time, ecodesign encourages companies to innovate and stay competitive by improving the environmental performance of their products across the EU.

The Ecodesign Regulation [\(EU\) 2023/1670](#) applies to smartphones, slate tablets, cordless phones and mobile phones other than smartphones.

The ecodesign requirements introduced by the Ecodesign Regulation for smartphones and tablets (. [\(EU\) 2023/1670](#)) include, among others, requirements for:

- resistance to accidental drops or scratches and protection from dust and water
- sufficiently durable batteries which can withstand at least 800 charge and discharge cycles while retaining at least 80% of their initial capacity
- rules on disassembly and repair, including obligations for producers to make critical spare parts available within 5-10 working days, and for 7 years after the end of sales of the product model on the EU market
- availability of operating system upgrades for longer periods (at least 5 years from the date of the end of placement on the market of the last unit of a product model)
- non-discriminatory access for professional repairers to any software or firmware needed for the replacement

#### Legal references

The ecodesign regulation [\(EU\) 2023/1670](#) for smartphones, slate tablets, cordless phones and mobile phones other than smartphones

# Energy labelling and ecodesign regulations

## General questions

### 25. Rules and thresholds

#### Question

How were the rules and thresholds for the labels determined (i know this requires a long answer, even just giving a source document is enough for me)

#### Answer

You can find more information on this subject on the EU Commissions website: [Smartphones and Tablets - European Commission](#) and [Policy Making - European Commission](#)

### 26.The purpose of the classification

#### Question

Why is the classification based on purely efficiency criteria rather than focusing on battery life (a criterion that is nonetheless key in the efficiency formula) and battery cycle count? Smartphones are not energy-intensive products like household appliances, so electrical efficiency is not a strong selection criterion, while the smartphone's lifespan (obtainable by using battery life and cycle count values) would have been a better selection criterion.

#### Answer

We can not provide an answer to this question. Please approach your national authority for an answer.

## 27.Certification of the accuracy of the values

### Question

Who certifies the accuracy of the information on the energy label?

### Answer

The legal entity responsible for the placing on the market of the product (i.e. the manufacturer or importer) is responsible for the accuracy of the values on the energy label.

The national market surveillance authority verifies whether products placed in the EU market follow the requirements laid out in ecodesign and energy labelling regulations.

When the legal entity responsible for the placing on the market of the product (i.e. the manufacturer or importer) introduces a product to the EU market, the product may be selected for inspection (market surveillance) by the relevant authorities.

Market surveillance refers to inspections or other verification activities undertaken by market surveillance authorities (MSAs) to check the compliance of products sold on the EU market with the relevant EU legislation.

The scope of a market surveillance inspection may vary and can include the product documentation (for example test reports to verify the values in the energy label)/information and/or the physical product (for example product tests to verify the values in the test reports).

## 28. Transposition of the Directives

### Question

Will this directive require formal transposition by the Portuguese government, or will it be directly applicable starting 20 June?

### Answer

While the Ecodesign Directive (Directive 2009/125/EC) was addressed to Member States and had to be transposed into national law, the Ecodesign Regulations (implementing measures) and the Energy Labelling Regulations (both the main Regulation and the implementing measures) are binding in their entirety and directly applicable in all Member States (and EEA countries).

# Compliance Services

## Services by the project

### 29. Timing of the webinar for suppliers about smartphones, etc.

#### Question

Why is the webinar for suppliers scheduled for the 30<sup>th</sup> of September 2025, given that the directive comes into effect on the 20<sup>th</sup> of June 2025? We are concerned about the risk of non-compliance and potential fines if suppliers are not properly informed in time.)

#### Answer

The reason for organising this webinar in September is to allow time to gather initial experiences, collect questions, and identify any potential grey areas in the implementation of the legislation — so that we can prepare well-informed answers in advance. However, it is not an official information channel provided by the EC; but a service within an EU-funded project. You can register for the webinar [here](#).

### 30. Signing up for the webinar for suppliers about smartphones etc.

#### Question

As our company also manufactures some of the products we sell, would it be possible for us to attend or gain access to the webinar intended for suppliers?

#### Answer

Absolutely yes. You can register for the webinar [here](#).

Please, follow our website [www.compliance-product-services.eu](http://www.compliance-product-services.eu), our [LinkedIn](#) profile, or subscribe to our [newsletter](#), where we will announce further details about it in the following weeks.



## Downloads and important links

### 31. The graphic files (the energy arrows)

#### Question

Where do we find graphic file for the letter in the arrow?

#### Answer

You can download the energy arrows here:

<https://circabc.europa.eu/ui/group/7f4824e3-f72c-4126-b6b8-842a4443a4ca/library/17bc1987-e20e-49d5-a847-f7e28070c23b/details>

### 32. The dealers' quick guide

#### Question

Where do we find the dealers' quick guide?

#### Answer

You can download the quick guide here: [Quickguide, smartphones & slate tablets – dealers \(to be downloaded\) – 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.



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.