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**REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND
THE COUNCIL**

**Report on the Implementation of Regulation (EU) 2017/1369 setting a framework for
energy labelling**

1. INTRODUCTION

1.1. Policy and legal context

The first formal EU act on consumer information about energy efficiency of appliances was adopted 50 years ago in the wake of the 1973 oil crisis ⁽¹⁾. It was followed in 1979 by a first EU Energy Labelling Framework that was since revised and improved three times, last in 2017. The EU Energy Label has meanwhile become well-known and appreciated by consumers. A 2024 Eurobarometer ⁽²⁾ found that 75% of people stated that the energy label directly influences their purchasing decisions when buying home appliances.

EU Energy labels provide easily understandable information to stimulate demand for, and development of, more efficient products. They work in tandem with minimum energy efficiency and other requirements adopted under the EU ecodesign framework. The EU currently regulates over 30 product groups under ecodesign of which 15 have an energy label ⁽³⁾. Together these policies are estimated to have cut average household energy bills by ca. 317 EUR in 2024, set to increase to EUR 480 by 2030 with the label contributing an estimated average of 27 % to savings and the bulk from ecodesign ⁽⁴⁾.

The legal basis for the Energy Labelling Regulation ⁽⁵⁾ (“ELR”) is Article 194 of the Treaty. The ELR sets out rules for creating product-specific labels through delegated acts. It imposes certain obligations on suppliers (manufacturers, importers and authorised representatives) and dealers as regards the supply and display of labels and standardised product information. The Commission has issued two notices with specific clarifications: one on implementation during the COVID-19 pandemic ⁽⁶⁾ and one in 2024 on indications of the energy labelling range and the class following a prejudicial ruling by the Court ⁽⁷⁾.

1.2. Main changes in the 2017 revision of the energy labelling framework

The 2017 revision changed the framework from a directive to a regulation and modified the existing rules to (i) provide for a gradual rescaling of labels to the familiar A-G scale, (ii) strengthen market surveillance and (iii) introduce mandatory registration in an EU-wide product database (European Product Registry for Energy Labelling - EPREL⁽⁸⁾) as a precondition for placing a model on the market. Eight revised or new labels have been introduced under the new framework. Those labels are language-neutral, have a modernised look and include a QR code linking to the model information in EPREL. Some for the first time include information icons on reparability or durability aspects.

⁽¹⁾ Council recommendation 76/496/EEC of 4 May 1976 on the rational use of energy for electrical household appliances, OJ L 140, 28.5.1976, pp. 18–19.

⁽²⁾ [Special Eurobarometer 555 2024](#).

⁽³⁾ https://energy-efficient-products.ec.europa.eu/product-list_en.

⁽⁴⁾ Ecodesign Impact Accounting 2025 Overview report, <https://circabc.europa.eu/ui/group/418195ae-4919-45fa-a959-3b695c9aab28/library/c06608a7-9e47-4737-b0d2-da9aec097171/details>.

⁽⁵⁾ Regulation (EU) 2017/1369 of the European Parliament and of the Council of 4 July 2017 setting a framework for energy labelling and repealing Directive 2010/30/EU, OJ L 198, 28.7.2017, p. 1.

⁽⁶⁾ Commission Notice [2020/C 182/02](#), OJ C 183, 2.6.2020.

⁽⁷⁾ [Case C-761/22](#).

⁽⁸⁾ <https://eprel.ec.europa.eu>.

1.3. Scope of this report

Article 19 of the ELR tasks the Commission to submit a report on the implementation of the Regulation to the European Parliament and to the Council, assessing “*how effectively this Regulation and the delegated and implementing acts adopted pursuant thereto have allowed customers to choose more efficient products, taking into account its impacts on business, energy consumption, greenhouse gas emissions, market surveillance activities, and the cost to establish and maintain the database*”.

Impacts on businesses, energy use and emissions are assessed in detail for each product-specific act under this framework, the present report provides an aggregate view. More horizontal aspects are analysed as part of the Impact Assessment accompanying the omnibus simplification proposal on energy-efficient product legislation adopted in parallel with, and informed by, this report. A separate report on the implementation of the tyre labelling regulation (Regulation (EU) 2020/740) is adopted in parallel to the present report.

The present report thus in particular focuses on the following topics:

- Progress in rescaling and introducing new labels
- The label rescaling process (transition from old to new label)
- The product database (and related cost and benefits)
- Market surveillance
- The label as tool for lead markets for efficient products
- Effectiveness of the new energy labels.

1.4. Analytical basis

This report notably builds on a survey ⁽⁹⁾ with a sample of 20,073 consumers who had purchased at least one – and at most three – of the product types covered within the past two years, conducted across 10 EU Member States: Czech Republic, Finland, France, Germany, Italy, Netherlands, Poland, Portugal, Romania and Sweden. The survey also included a sample of 204 suppliers and 207 retailers of energy labelled products in the product groups with the new labels, and 123 professional users of commercial refrigerating appliances to test the new label for these.

Input into the present report was received from 14 Member States ⁽¹⁰⁾ in the Ecodesign and Energy Labelling Consultation Forum ⁽¹¹⁾ (the EELCF) and/or the Administrative Cooperation Expert Group on energy labelling and eco design (AdCo) ⁽¹²⁾ and from 7 other EELCF members ⁽¹³⁾. The analysis also draws on data from EPREL, the Information and Communication System for Market Surveillance (ICSMS) ⁽¹⁴⁾ and from other publicly available analyses and resources.

⁽⁹⁾ [Study on consumer understanding of the EU energy labels applied since 2011.](#)

⁽¹⁰⁾ AT, BG, DE, DK, EE, IE, IT, LT, LV, NL, PT, SI, NO, IS.

⁽¹¹⁾ [Register of Commission expert groups.](#)

⁽¹²⁾ [List of administrative cooperation groups.](#)

⁽¹³⁾ APPLIA, Digital Europe, EHI, EHPA, EPEE, EuroCommerce, Lighting Europe.

⁽¹⁴⁾ [ICSMS.](#)

2. PROGRESS IN RESCALING AND INTRODUCING NEW LABELS

The ELR tasked the Commission with reviewing and rescaling all energy labels that were in force on 1 August 2017 and empowered it to introduce new labels. It set out a schedule for reviewing existing labels by August 2018 (starting with a priority group: washing machines, washer-dryers, dishwashers, refrigerators, light sources and electronic displays). It set a general deadline of August 2023 for rescaling and a longer deadline of August 2025 for solid fuel boilers, space heaters and water heaters ⁽¹⁵⁾.

Rescaling of the priority group was completed in March 2019 and labels were in display online and in shops from 1 March 2021 ⁽¹⁶⁾. An omnibus regulation corrected technical issues with these rules just in time for that date ⁽¹⁷⁾.

State of play on product-specific label reviews under the ELR					
Product group	Reference	Review deadline in ELR	Entry into force of review	Date of application of new label	Status
Electronic displays (including televisions)	Regulation (EU) 2019/2013	2018-08-02	2019-03-31	2021-03-01	Adopted
Washing machines/ washer driers	Regulation (EU) 2019/2014	2018-08-02	2019-03-31	2021-03-01	Adopted
Light sources	Regulation (EU) 2019/2015	2018-08-02	2019-03-31	2021-09-01	Adopted
Household refrigerators	Regulation (EU) 2019/2016	2018-08-02	2019-03-31	2021-03-01	Adopted
Household dishwashers	Regulation (EU) 2019/2017	2018-08-02	2019-03-31	2021-03-01	Adopted
Refrigerating appliances with direct sales function	Regulation (EU) 2019/2018	New	New	2021-03-01	Adopted
Smartphones and tablets	Regulation (EU) 2023/1669	New	New	2025-06-20	Adopted
Vacuum cleaners	Label annulled by the Court in 2018	-	-	-	Re-introduction in preparation Have your say
Tumble driers	Regulation (EU) 2023/2534	2023-08-02	2023-11-22	2025-07-01	Adopted
Ovens and range hoods	Regulation (EU) 65/2014	2023-08-02	-	-	In preparation Have your say

⁽¹⁵⁾ These deadlines should be seen as complementing the five-year review dates set out in the delegated acts for each product.

⁽¹⁶⁾ The rescaled label for lighting products was on display in shops from 1 September 2021.

⁽¹⁷⁾ [Regulation \(EU\) 2021/340](#).

Residential ventilation	Regulation (EU) 1254/2014	2023-08-02	-	-	In preparation Have your say
Professional refrigerating storage cabinets	Regulation (EU) 2015/1095	2023-08-02	-	-	In preparation Have your say
Air conditioners incl. air-to-air heat pumps	Regulation (EU) 626/2011	2023-08-02	-	-	In preparation Have your say
Local space heaters	Regulation (EU) 2015/1186	2023-08-02	-	-	In preparation Have your say
Space and combination heaters	Regulation (EU) 811/2013	2025-08-02	-	-	In preparation Have your say
Solid fuel Boilers	Regulation (EU) 2015/1187	2025-08-02	-	-	In preparation Have your say
Water heaters	Regulation (EU) 812/2013	2025-08-02	-	-	In preparation Have your say

The vacuum cleaner label was annulled by a General Court ruling in 2018⁽¹⁸⁾ and is therefore no longer in force. Work is also ongoing on possible new energy labels for (i) photovoltaic modules, (ii) vacuum cleaners, (iii) computers, (iv) low-temperature heat emitters (radiators), (v) professional dishwashers and (vi) professional laundry appliances.

The review process for an EU energy label is set out in detail in the ELR and follows better regulation rules. It involves work to (i) understand the market as part of a review, (ii) develop reproducible and representative test methodologies, (iii) collect input from the consultation forum and (iv) produce an evaluation and impact assessment. The draft act is then published for feedback from stakeholders and notified to the World Trade Organisation. Member State experts are consulted before adoption by the Commission. The Commission notifies the act to the European Parliament and the Council. Finally, the act is published in the Official Journal and enters into force provided neither institution objects. The energy labels revised in 2019 took between four and five years from start of the review to publication. Since then, progress has tended to be slower because of parallel work on EPREL, court proceedings, emergencies linked to COVID-19 and the 2022 energy crisis and the renegotiation of the ecodesign framework.

Nine decisions or communications referring to harmonised standards for presumption of conformity under the ELR have so far been adopted and published in the *Official Journal*.

3. THE LABEL RESCALING PROCESS

The ELR establishes a four-month transition period when a rescaled label is introduced. During this period, suppliers must supply both the old label, the new label and the product information sheet. Dealers must replace old labels in display within 14 working days of the date specified in the delegated act of each product. Technical material for advertising must also be updated. Most dealers (63%) responding to the survey carried out in support of this report found the relabelling process to be easy or very easy. Some manufacturer

⁽¹⁸⁾ [Case T-544/13](#).

associations (e.g. lighting products) pointed to challenges to change labels when products are already in transit or were previously placed on the market.

Consumers may receive products accompanied with two labels during this transition period, the non-rescaled and the rescaled one. These labels are rarely comparable because the test and calculation methods often change, and the stringency of the scale increases. For example, products that were previously A+++ may be rated B or C under the new scale. The ELR anticipated that the label change could be challenging for consumers, suppliers and dealers, and therefore required the Member States to launch information campaigns. Some of these campaigns were organised under EU-funded projects such as Label2020 ⁽¹⁹⁾, Belt ⁽²⁰⁾ and Compliance Services ⁽²¹⁾. Some Member States reported good outreach, whereas others pointed to the challenges faced in introducing the first rescaled labels due to COVID-19 restrictions.

4. THE PRODUCT DATABASE

One of the major elements in the 2017 revision was a step forward in terms of the digitalisation of the EU Energy Label. Article 12 of the ELR tasked the Commission with setting up and maintaining a database (EPREL) with a public part, a compliance part and an online portal giving access to both parts. The objectives were to (i) support market surveillance authorities, (ii) provide the public with information on products placed on the market and (iii) provide the Commission with up-to-date information for reviewing labelling legislation. This database is a reality today after a major collaborative effort by the Commission, manufacturers and other stakeholders, is populated with around two million models and was visited 6.6 million times in 2025.

4.1. Implementation

Product registration for manufacturers was possible in time for the first reviewed labels in 2019, with market surveillance authorities receiving access soon after. A helpdesk service has been available since the launch to assist with registration. EU business associations often help their members with this task. The public part of EPREL was accessible via QR codes as of March 2021 when the first rescaled product labels became applicable. Since 2022, an EPREL search interface has offered many features (such as selection filters and sorting). The online portal for public access to EPREL referred to in Article 12 and Annex I point 2 of the ELR has been operational since April 2022 ⁽²²⁾.

The implementing regulation adopted in 2024 ⁽²³⁾ sets out further operational details for EPREL, *inter alia* clarifying the rules for managing sensitive information and introducing mandatory verification of suppliers using e-IDAS signatures and seals.

In implementing EPREL, the Commission aimed to:

⁽¹⁹⁾ [LABEL2020](#).

⁽²⁰⁾ [BELT](#).

⁽²¹⁾ <https://www.product-compliance-services.eu>.

⁽²²⁾ <https://energy-efficient-products.ec.europa.eu/>.

⁽²³⁾ [Implementation Regulation \(EU\) 2024/994](#).

- minimise the administrative burden for suppliers through bulk registrations, application programming interface (API) services ⁽²⁴⁾ and automatic generation of labels and product information sheets in all official EU languages;
- facilitate compliance with obligations for online display of energy labels and product information (API download)
- facilitate use by individual consumers, bulk purchasers and public buyers and authorities to identify the most populated efficiency classes

Manufacturers welcomed the fact that the product-specific delegated acts do not require systematic delivery of *printed* product information sheets (under the alternative option provided by Article 3(1) of the ELR), which instead are available via EPREL.

EPREL also allows anyone to monitor developments in the markets for energy-labelled product model registrations. However, the ELR does not require suppliers to provide sales data for models, so additional information is usually needed to estimate the market share of models – and to establish whether there is a need to trigger a label review.

National market surveillance authorities state that EPREL reduces the time and effort spent for compliance checking.

The database is accessed mainly via QR codes on labels rather than through the website. Survey data and feedback from national authorities confirm that EPREL is not yet widely known by the public or public procurement buyers. Similar product databases for energy-related products exist in other regions of the world (e.g. in the United States ⁽²⁵⁾, China ⁽²⁶⁾, Canada ⁽²⁷⁾ and Australia ⁽²⁸⁾).

4.2. Costs and benefits of EPREL

The Commission spent EUR 9.5 million setting up and maintaining EPREL between 2017 and 2024. The annual operational budget increased to EUR 1.9 million in 2024. The anticipated one-off cost of EUR 3 million for setting up EPREL and the annual maintenance budget of EUR 300 000 underestimated the needs. This was mainly because these figures were based on estimates for a radio equipment database ⁽²⁹⁾ with far fewer registrations and registering parties and without the publicly accessible part that EPREL has. EPREL also eventually had far more registrations than anticipated in the impact assessment. This was in part due to the later decision to include tyres in EPREL (representing 13% of all EPREL registrations). Finally, e-IDAS verification was not originally planned for but was later found to be necessary to ensure the registry's integrity and involved additional one-off development costs.

Opinions diverge amongst suppliers interviewed in the survey on whether EPREL results in higher or lower overall compliance cost compared to before. 38% reported that the costs of complying – including time, financial expenses and staff resources – have increased.

⁽²⁴⁾ Around 1000 API keys were provided so far, mostly to dealers (54 %), but also suppliers, researchers, search engines, etc.

⁽²⁵⁾ <https://www.regulations.doe.gov/cems>; <https://www.energystar.gov/products>.

⁽²⁶⁾ <https://www.energylabel.com.cn/>.

⁽²⁷⁾ [Searchable product list | Natural Resources Canada](#).

⁽²⁸⁾ [Energy Rating - Search the Registration Database](#).

⁽²⁹⁾ [SWD \(2012\) 329](#).

28% indicated that costs have decreased compared to before 2019. The remaining 33% stated that the costs have remained unchanged. Most manufacturers enter data themselves, with a quarter of the interviewed suppliers outsourcing registration tasks⁽³⁰⁾. Dealers can access EPREL information free of charge and get printed labels from suppliers. Dealers report higher levels of satisfaction with the policy than suppliers but point to the missing level playing field with online marketplaces.

5. MARKET SURVEILLANCE AND ENFORCEMENT

Market surveillance in the Single Market is framed by the Market Surveillance Regulation (Regulation (EC) No 765/2008) which also applies to products under the ELR. The ELR strengthened these general provisions in 2017 with i) provisions to encourage cooperation between national MSAs ii) clarification of how to deal with risky products and iii) a (so far unused) Union safeguard procedure. Article 7(4) of the ELR obligated Member States to lay down rules for penalties and enforcement mechanisms and notify such rules by 1 August 2017 if not previously notified under the labelling Directive.

Compliance with energy efficient product legislation mainly relies on self-declaration⁽³¹⁾. This requires a sufficient level of market surveillance and enforcement to ensure fair competition and achieve the expected energy savings. Market surveillance is an exclusive power of national authorities, but the EU provides financial support: between 2017 and 2024, more than EUR 20 million for national market surveillance activities and wider implementation support through Horizon Europe, the Single Market Programme and LIFE. As regards compliance with energy efficient product legislation on products entering the EU market, customs controls at the EU external borders remained limited and, accordingly, the discovery of non-compliance cases low.

Evidence from EU-funded actions, Member State checks and a 2020 special report by the European Court of Auditors⁽³²⁾ suggests persistent and significant non-compliance levels (particularly by online shops). Price-comparison websites also often fail to fully display the required information. The EEPLIANT 3 Concerted Action⁽³³⁾, funded by the EU and involving 24 national surveillance authorities, in a non-representative risk-based exercise for six product groups⁽³⁴⁾ found 82% of products in stores and 97% in online shops had minor or major issues around the label display, declaration of conformity or technical documentation (hence covering all documentation including under ecodesign, not only for labelling). Online non-compliance was a particular issue for light sources⁽³⁵⁾. Missing or wrong data on labels, product information sheet or other technical documentation does not always mean that a product is non-compliant. Laboratory testing in accredited laboratories is needed to establish non-compliance and this is costly (typically EUR 1 000-10 000 per model, more for large or complex products). 43% of the 265 laboratory-tested products in the EEPLIANT 3 compliance verification project had energy performance issues above the tolerance level. The overall level of non-compliance in the single market is difficult to estimate though, since checks are almost always risk-based and MSAs target limited

⁽³⁰⁾ Analysis for the EPREL services project funded under LIFE, May 2025 (unpublished).

⁽³¹⁾ Third-party certification is mandatory for boilers.

⁽³²⁾ [Special Report 01/2020](#).

⁽³³⁾ [EEPLIANT3 Public Report Final.pdf](#).

⁽³⁴⁾ Air conditioners, lighting, tumble driers, water heaters, space heaters and ventilators.

⁽³⁵⁾ [Online shopping study - CLASP](#).

resources on products for which most problems are expected. The findings cannot be extrapolated to all product groups and across the EU.

The total number of products inspected per year under this framework ranged from 10-100 in some Member States to 24 000 in Ireland and 73 000 in Germany in 2024. Most cases involved document checks in shops and online and only some in-depth performance checks. As required under the Market Surveillance Regulation, Member States have as of end 2025 encoded 3 147 cases of in-depth ELR inspections⁽³⁶⁾ in the ICSMS database since 2017 (of which 57% were cases of non-compliance). The Commission launched two infringement proceedings in mid-2025 against Portugal and Romania for not having reported any in-depth checks in 2023 and sent a reasoned opinion to Portugal in November 2025.

450 product models have a cross link between ICSMS and EPREL, which should make inspections for those more effective. An option for users to easily report any issues with registered models or related information directly in EPREL has so far been used for 3 300 model registrations. Bigger online platforms often cooperate to remove non-compliant products, but do not have responsibilities for label display themselves and their wide ranges of products offered have also increased the overall enforcement task.

The Commission launched the European Product Compliance Network (EUPCN) under the Market Surveillance Regulation in 2021. It set up the first EU testing facility for ecodesign and energy labelling in 2024⁽³⁷⁾. The Commission and Member States jointly ensure that the energy label is not mimicked for products not covered by delegated measures or for non-energy products and have in this respect notably engaged with the industry behind a voluntary unified water label to have its design adapted⁽³⁸⁾.

6. THE LABEL AS TOOL FOR LEAD MARKETS FOR EFFICIENT PRODUCTS

Article 7(2) of the ELR requires that any incentives provided by Member States for products subject to EU energy labelling shall target products in the *two highest significantly populated label classes of energy efficiency, or at higher classes*. The aim is to focus demand-side incentives (such as low-interest loans, grants, tax rebates or vouchers) on the most efficient products, thus creating a lead market for these products.

The same or very similar criteria are also used in other legislation including the Energy Efficiency Directive requirements on public procurement⁽³⁹⁾, the EU Taxonomy⁽⁴⁰⁾ and the VAT rules on reduced rates for efficient heating systems⁽⁴¹⁾. Four EU Member States currently apply the reduced VAT rate on his basis.

The 2010 labelling framework directive already had provisions to promote the use of the label as the basis for lead markets, but the more precise formulation of the criterion and

⁽³⁶⁾ In-depth checks are understood as comprising laboratory checks and document checks with a view to assessing whether a product is compliant.

⁽³⁷⁾ [Commission Implementing Decision \(EU\) 2024/1456](#).

⁽³⁸⁾ [Unified Water Label](#).

⁽³⁹⁾ [Directive \(EU\) 2023/1791](#).

⁽⁴⁰⁾ [Regulation \(EU\) 2023/2486](#).

⁽⁴¹⁾ [Council Directive \(EU\) 2022/542](#).

the EPREL feature allowing easy insights into the distribution across classes of any sub-selection of products facilitates operationalising such policies. The Commission and national authorities can use EPREL to apply the criterion in Article 7(2) of the ELR with a simple search in EPREL as the starting point, reducing the need for dedicated market surveys and reinforcing competition through transparency of what is placed on the Single Market. To support application of the criterion, the Commission presented guidance thereon ⁽⁴²⁾.

7. EFFECTIVENESS OF THE NEW LABELS

7.1. Understanding of the new labels

Most consumers interviewed for the survey say they understand labels and more than 90% said they found the label and its elements (very) easy to understand. Only a few product-specific pictograms were reported by more than 10% of survey respondents as being difficult to understand. This positive result is probably because label designs are generally tested before they are proposed. 77-87% of surveyed consumers found the amount of information on a label was appropriate. The rest felt there was either too much or too little (or had no view). Overall, these results thus show no evidence of information overload or insufficient information.

62% of consumers in the survey said they had used the main energy-related information at the top of the label. 37% said they had also used the non-energy pictograms in the lower part. Recent buyers of white goods were most likely to say that they had used the energy label when making their purchase decision (around 90% of those who saw the label). The label helped buyers of commercial refrigerators in 80 % of cases and for 70 % of buyers of TVs and monitors, where performance criteria such as resolution or screen size are important in buying decisions.

7.2. Impact on availability of affordable efficient products

A 2021 report on appliance efficiency standards and labelling ⁽⁴³⁾ by the International Energy Agency (IEA) found that energy performance requirements and labelling generally increase the underlying rate of improvement for new models by a factor of two or three. This translates over time into an increase in the average efficiency of the total stock. The IEA notes that average purchase prices tend to fall by 2-3% per year due to competition (after briefly increasing when new rules come into force), but price reductions observed for different products vary, reflecting the degree of competition in any particular market. These estimates are global, a recent evaluation on vacuum cleaners in the EU found a 1 % annual decrease in purchase prices during the period the label was in application. Recently published research confirms that the EU Energy Label is effective regarding the environmental objective of shifting consumer choices, and finds that supply-side competition is a key driver behind the market adjustment thanks to a pattern of falling

⁽⁴²⁾ https://energy-efficient-products.ec.europa.eu/consumers_en#what-does-significantly-populated-mean.

⁽⁴³⁾ [IEA 2021 Energy Efficiency Appliance and Equipment Standards and Labelling Programmes](#).

prices as entry increases and more producers begin to offer products at the higher label classes, generating consumer surplus whilst stimulating further innovation⁽⁴⁴⁾.

To guarantee the innovation effect the ELR states that where a label is introduced or rescaled, the Commission shall ensure that no products are expected to fall into class A at the moment of the introduction and that the estimated time before a majority of models falls into that class is at least 10 years later. EPREL data show that class distributions for light sources, refrigerating appliances, TVs and dishwashers have largely developed in line with these requirements since 2019. However, 90% of the washing machine models registered in EPREL achieved A-class within just six years of the review. In contrast, performance of electronic displays has developed more slowly than anticipated and are clustered in the bottom classes (25% of models are in class G)⁽⁴⁵⁾.

The market share of best-in-class washing machines increased by 50% in 2024 according to independent market analysis⁽⁴⁶⁾. Academic research based on actual market data from 2021 suggests that the rescaled label increased people's willingness to pay for top-rated refrigerators compared to the previous label which was less well understood⁽⁴⁷⁾.

8. CONCLUSION

The ELR has laid the foundation for modernised labels that so far work well, but the transition is not yet complete. Six of the 15 product group labels have been revised so far, and two new labels have been introduced under this framework. The lengthy revision cycles of product-specific delegated acts have reduced the overall impact of the policy framework until now. Insufficient national market enforcement and high levels of non-compliance in at least some market segments (notably online) distort the level playing field and reduce projected energy savings.

The broader policy context has changed substantially since 2017 as a result of (i) the rise in online sales, (ii) the EU's climate change targets, (iii) the global pledge to double energy efficiency by 2030 and (iv) the emphasis on competitiveness in the Draghi Report and the single market strategy and more recently efforts around energy affordability and independence. In this context, energy labels remain relevant. All relevant stakeholder groups that attended the implementation dialogue on energy product legislation⁽⁴⁸⁾ in October 2025 emphasised the role played by energy product legislation (including the ELR) in promoting energy efficiency, affordability and the competitiveness of EU industry, but also pointed to non-compliance undermining effectiveness.

⁽⁴⁴⁾ Anne Kesselring, Energy labels in the European Union: Consumer inattention and producer responses, *Energy Economics*, Volume 144, 2025, ISSN 0140-9883, <https://doi.org/10.1016/j.eneco.2025.108275>.

⁽⁴⁵⁾ An evaluation of the delegated regulation on displays is under way. Several complex factors probably explain why models remain in the lowest performing classes (including consumer and manufacturer preference for large screen sizes and high resolutions).

⁽⁴⁶⁾ GfK 2024 Market Outlook.

⁽⁴⁷⁾ Corinne Faure, Marie-Charlotte Guetlein, Joachim Schleich, *Effects of rescaling the EU energy label on household preferences for top-rated appliances*, *Energy Policy*, Volume 156, 2021, ISSN 0301-4215, <https://doi.org/10.1016/j.enpol.2021.112439>. The same study also demonstrated that showing both labels to consumers (as is the case during the ELR transition phase) does not increase willingness to pay.

⁽⁴⁸⁾ [Implementation dialogue on energy efficient product legislation with Commissioner Dan Jørgensen – Energy](#).

The available evidence on how labels work indicates that the EU Energy Labels decades after their invention still hold more potential for reducing energy use and can also contribute to other policy aims. The EPREL product registry for all energy related products with an EU Energy Label allows for more market transparency and evidence-based policy making. However, EPREL is not yet as widely known or used as the label itself and could be used more also to support compliance and market surveillance. The modifications in the Omnibus proposal presented in parallel to this report aim to better exploit these opportunities whilst also simplifying where possible for suppliers and retailers.