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DIGITALEUROPE's communication on Energy Labelling Rescaling

Why are the energy labels changing?

First introduced for a number of appliances in 1994 and subsequently expanded in 2004, the energy label constitutes a successful tool to help consumers choose products with increased energy efficiency and to drive innovation towards more energy efficient technologies.

The publication of the new Energy Labelling Framework Regulation¹ announced in August 2017, requires the EU Commission to rescale the current energy labels with an aim to simplify the scale by removing the A+, A++ and A+++ classes, and to re-distribute the appliances on the market in the available energy classes in a way that enables consumers to better differentiate their energy efficiency.

In 2019 the EU Commission adopted Delegated acts that establish a new label format for multiple product groups, including electronic displays. Regulation 2019/2013² replaces the old energy label with a cleaner and clearer design, and introduces a QR code that when scanned by the consumer will link to a portal that provides access to the public data registered in EPREL.

¹ 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 - <https://eur-lex.europa.eu/eli/reg/2017/1369/oj>

² COMMISSION DELEGATED REGULATION (EU) 2019/2013 of 11 March 2019 supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of electronic displays and repealing Commission Delegated Regulation (EU) No 1062/2010 - https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2019.315.01.0001.01.ENG&toc=OJ:L:2019:315:TOC

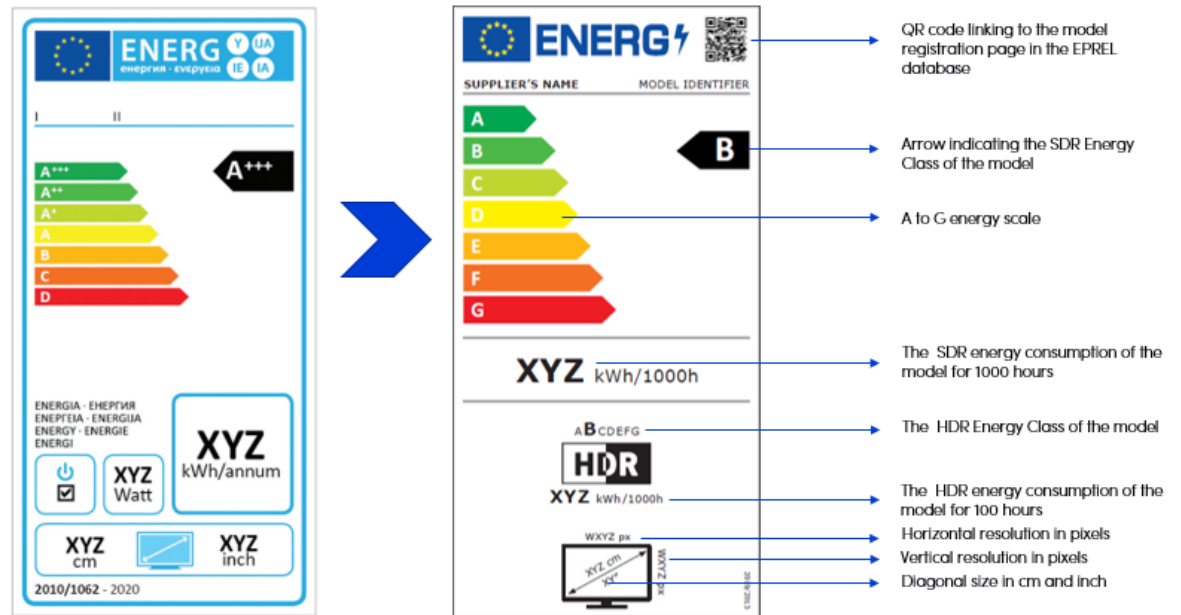


Figure 1: A comparison between the old and new label



When will the labels change?

The official application date for the new labels is 1 March 2021. However, the Energy Labelling Framework requires manufacturers to provide, between 1 November 2020 and 28 February 2021, in the packaging of any new units placed on the EU market, both the old and the new label. Despite it being available for some new units, the new label must not be displayed in shops and online before 1 March 2021. Retailers are therefore required to display in shops the old label up until 1 March 2021, and afterwards to replace it, within 14 working days, with the new label.³

An additional requirement to print the new energy label on the packaging of the electronic display will apply to units placed on the market from 1 March 2021 onwards.⁴

³ Article 11, point 13(c) of the Energy Labeling Framework Regulation

⁴ Article 3, point 1(i) of Regulation 2019/2013

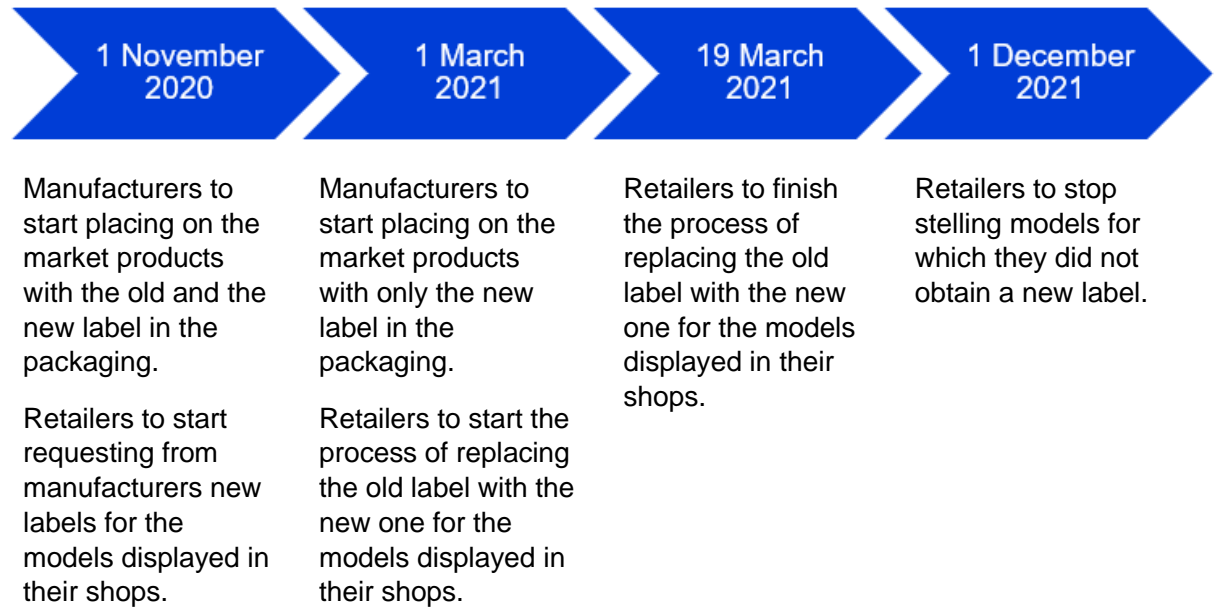


Figure 2: The timeline for energy labelling rescaling



How will products on the market score on the new A to G scale?

The old energy label has been affected by an overpopulation of the top classes, while the bottom ones are empty. To address this, the new energy criteria for each of the classes have been set much stricter than before, and the top energy classes have been deliberately left empty to allow differentiation of more energy efficient models that will be produced in the future.⁵ As a result, the energy class of all products on the market will be downgraded. The effect of downgrading is very serious for electronic displays, where the majority of premium models will be downgraded to the bottom classes (F and G). It should be noted that the downgrade does not mean that the product in itself is less energy efficient, but that the metric used for calculating the energy class has been substantially changed.

⁵ Article 11, points 8 and 9 of the Energy Labeling Framework Regulation



Important information for consumers

It is understandable if the transition to the new energy label creates some degree of confusion for consumers in the initial phase.

The presence of 2 labels with different energy classes in the packaging of the products may lead to situations where it is not fully clear which is the actual rating of the electronic display. To avoid any misunderstanding of the efficiency of the device, we advise consumers purchasing an electronic display between 1 November 2020 and 28 February 2021 to disregard the new energy label they may find in the box, and use only the old label for information related to the efficiency of their purchased product. Conversely, since double labelled products are expected to remain on the market after the official date of entry into force of the new label, we advise consumers purchasing an electronic display after 1 March 2021 to disregard the old energy label they may find in the box, and use only the new label for information related to the efficiency of their purchased product.

In some situations, display models may still be found in shops after 1 March 2021 without the new label. These would normally be older stocks for which the retailer was not able to obtain an energy label from the manufacturers. This situation may add to the confusion created by the rescaling process, but it will only occur temporarily, as retailers will no longer be allowed to sell these units after 30 November 2021. Before this date, consumers will not be able to compare the efficiency of electronic displays by directly comparing the power consumption values on the old label with those on the new label, as the metrics used for power consumption calculation as well as testing methodologies are different.



Important information for distributors and retailers

Distributors and retailers will be playing a pivotal role in the transition to the new label, as they hold the responsibility to replace the old labels with the new ones. It is therefore extremely important to understand the relevant obligations as well as the applicable timelines.

As manufacturers will be placing on the market, starting on 1 November 2020, products containing both labels, it is expected that for new products

the transition to be uneventful.⁶ However, the obligation to display the new energy label in shops does not apply only to models newly placed on the market, but also to older models that may still be present in the stock of retailers after 1 March 2021. To cope with this obligation, retailers are advised to reach out to the manufacturers starting on 1 November and request new labels. Manufacturers have an obligation to provide such labels within 5 working days. It should be noted that the retailer's obligation is to display the new Energy Label for the models they are offering for sale in their shops, and not to provide the New Label for each and every product they sell to final consumers.⁷

It is also important to note that the Energy Labelling Framework Regulation contains a derogation for products that have been placed on the market before 1 November 2021, and which have been subsequently discontinued by the manufacturer, as long as the new energy label requires re-testing with a different method. In the case of electronic displays, a completely new method is required for testing, therefore all models placed on the market before 1 November and subsequently discontinued will benefit from this derogation. Manufacturers will therefore be allowed to refuse the provision of new labels for these models. Retailers will be allowed to sell such stocks while displaying the old label until 30 November 2021.⁸

To correctly identify such products, it is important for retailers to know the date of placement on the market of the last units, as well as whether those particular models have been discontinued or not. Since the date of placement on the market represents when a product is made available for the first time on the Union Market, and not when a unit reaches the retailer's shop or warehouse⁹, retailers should request this information from manufacturers, along with information whether the older models they still have in stock have been discontinued or not.

Finally, manufacturers have the obligation to print or stick the new energy label on the packaging of products placed on the market from 1 March 2021. There is no obligation to start adding printed labels on the packaging before this date, and units already placed on the market do not require any

⁶ In some cases the COVID-19 pandemic may affect the capacity of manufacturers to provide rescaled labels. This topic is being addressed in the "COMMISSION NOTICE on the application of energy labelling requirements for electronic displays, household washing machines and washer-dryers, refrigerating appliances and household dishwashers, and of ecodesign requirements on the provision of information for external power supplies" - [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020XC0602\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020XC0602(01)&from=EN)

⁷ Article 4 of Regulation 2019/2013

⁸ Article 11 point 13(b) of the Energy Labeling Framework Regulation

⁹ See chapter 2.3 of the Blue Guide - [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016XC0726\(02\)&from=BG](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016XC0726(02)&from=BG)

package labelling by retailers, distributors, or manufacturers. Retailers should only display packages with new energy labels printed on them from 1 March 2021, if available, following the regulation requirements where the new label must not be displayed in shops or online before this date.¹⁰



Important information for public procurement

The energy label rescaling will also impact the rules to be followed by public organizations when procuring electronic displays. Currently, public authorities across the EU Member States have in place, based on Regulation 1062/2010, particular rules for the energy efficiency class of the displays that can qualify for tenders. However, when the new energy label enters into force, the energy class will be substantially downgraded, and no electronic display will qualify for the top classes. Some Member States have already updated their rules for public procurement in accordance with Regulation 2019/2013, which enables them to use the rating on the new label for their procurement decisions, but a majority are still lagging behind. It is important that public organizations in those Member States continue using the rating under the old label until their tender rules are adapted in accordance with the new energy classes. Additionally, there are Member States which have already updated their rules but have opted to require relatively high classes¹¹ that are not reflecting the energy efficiency of displays currently on the market, in the sense that even top performing displays will remain in lower classes for quite some time and thus will not be able to meet such requirements.

¹⁰ Article 11, point 13(c) of the Energy Labeling Framework Regulation

¹¹ For example, Sweden has already updated their energy efficiency requirements for public tenders, however the level of strictness currently will not be met by several categories of electronic displays - <https://www.upphandlingsmyndigheten.se/en/sustainable-public-procurement/sustainable-procurement-criteria/it-and-telecom/av-products/large-format-displays/improved-energy-performance/#avancerat>

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National Trade Associations

Austria: IOÖ

Belarus: INFOPARK

Belgium: AGORIA

Croatia: Croatian

Chamber of Economy

Cyprus: CITEA

Denmark: DI Digital, IT

BRANCHEN, Dansk Erhverv

Estonia: ITL

Finland: TIF

France: AFNUM, Syntec

Numérique, Tech in France

Germany: BITKOM, ZVEI

Greece: SEPE

Hungary: IVSZ

Ireland: Technology Ireland

Italy: Anitec-Assinform

Lithuania: INFOBALT

Luxembourg: APSI

Netherlands: NLdigital, FIAR

Norway: Abelia

Poland: KIGEIT, PIIT, ZIPSEE

Portugal: AGEFE

Romania: ANIS, APDETIC

Slovakia: ITAS

Slovenia: GZS

Spain: AMETIC

Sweden: Teknikföretagen,

IT&Telekomföretagen

Switzerland: SWICO

Turkey: Digital Turkey Platform,

ECID

Ukraine: IT UKRAINE

United Kingdom: techUK