

ELR: Energy Labelling Framework Regulation (Regulation (EU) 2017/1369), explained

The Energy Labelling Framework Regulation sets the rules for the A to G energy label, product information sheet and EPREL database for energy-related products, with duties for suppliers (manufacturers, authorised representatives, importers) and dealers. It has applied since 1 August 2017; EPREL registration since 1 January 2019, and the newest rescaled labels from 1 July 2025 for tumble dryers.

Reviewed 24 September 2026 by Conphora compliance team · Next review 12 March 2027 · Not legal advice

Key facts

Reference	Regulation (EU) 2017/1369	Act type	Regulation
In force	1 August 2017	Applies from	1 August 2017
Amended by	Regulation (EU) 2020/740	Enforced by	National market surveillance authorities enforce the regulation and its delegated acts with the powers of Regulation (EU) 2019/1020; in Denmark, Sikkerhedsstyrelsen, part of Erhvervsstyrelsen since January 2026, has carried out the market surveillance of ecodesign and energy labelling for Energistyrelsen since 1 August 2018 and is today named as the control authority in executive order nr. 1322 of 9 June 2021 (§ 2) under the produktenergimærkningsloven (lovbekendtgørelse nr. 186 of 2 February 2022), while Energistyrelsen keeps the overall responsibility for developing and interpreting the rules and is the Danish authority responsible for the EPREL database.

Key dates

4 July 2017 Regulation (EU) 2017/1369 adopted by the European Parliament and the Council in Strasbourg title and signature block after Art. 21

1 August 2017 Entry into force, the fourth day after publication in OJ L 198 of 28 July 2017, and application; Directive 2010/30/EU repealed; existing delegated acts under the directive stay in force until replaced Art. 20(1), Art. 20(4) and Art. 21

2 November 2018 Deadline for the Commission to adopt rescaled A to G labels for dishwashers, refrigerating appliances, washing machines, televisions, lamps and washer-dryers; the six delegated regulations were adopted on 11 March 2019 Art. 11(5)(b); title

1 January 2019 Article 4 applies: suppliers must register every new model covered by a Art. 4(1) and Art. 21, third paragraph

delegated act
in the public
and compliance
parts of the
product
database
(EPREL) before
placing a unit
on the market

30 June 2019

Deadline to
register in
EPREL the
models placed
on the market
between 1
August 2017
and 1 January
2019

Art. 4(2)

25 June 2020

Regulation (EU) 2020/740 on
tyre labelling in
force, the
twentieth day
after
publication in
OJ L 177 of 5
June 2020; it
amends Article
12(2)(a) so that
the product
database also
supports
surveillance of
tyre labels

Art. 16 and Art. 18

1 March 2021

First rescaled A
to G labels
apply, in shops
and online, for
electronic
displays,
household
washing
machines and
washer-dryers,
household
refrigerating
appliances,
household
dishwashers
and

Art. 9 and Art. 11; Art. 9 and Art. 11; Art. 9 and Art. 11; Art. 9 and Art. 11; Art. 9

refrigerating
appliances with
a direct sales
function; the
2010 delegated
acts on
televisions,
washing
machines,
refrigerating
appliances and
dishwashers
are repealed

1 May 2021

Regulation (EU) 2020/740
applies: tyres
carry their own
label under that
regulation and
are registered
in the product
database;
Regulation (EC)
No 1222/2009
repealed

16 July 2021

Regulation (EU) 2019/1020 on
market
surveillance
applies;
Chapter III of
Regulation (EC)
No 765/2008,
which contains
the Articles 16
to 29 that
Article 8(1)
applies to
labelled
products, is
deleted,
references to it
are read as
references to
the new
regulation, and
Regulation (EU)
2017/1369 is
listed in point

1 September 2021	Rescaled A to G label applies for light sources; Delegated Regulation (EU) No 874/2012 on lamps and luminaires repealed	Art. 9 and Art. 10
2 August 2023	Deadline for the Commission to adopt A to G rescaled labels for the remaining product groups labelled under Directive 2010/30/EU, other than the heaters in Article 11(5) (a); the deadline passed without those delegated acts, and in its implementation report of 24 June 2026 the Commission still lists the reviews of air conditioners, domestic ovens and range hoods, residential ventilation units, professional refrigerated storage cabinets and local space	Art. 11(4); section 2, table 'State of play on product-specific label reviews under the ELR'

heaters as in
preparation

22 April 2024	Implementing Regulation (EU) 2024/994 on the operational details of the product database in force and applicable; its Articles 3, 4, 5, 7, 11 and 15 apply from 22 October 2024	Art. 1 and Art. 20
20 June 2025	Energy label applies to smartphones and slate tablets under Delegated Regulation (EU) 2023/1669	Art. 1 and Art. 8
1 July 2025	Rescaled label applies to household tumble dryers under Delegated Regulation (EU) 2023/2534, which repeals Delegated Regulation (EU) No 392/2012; the supplier's label and product information sheet duties in Article 3(1)(a) and (b) applied from 1 March 2025	Art. 8 and Art. 10
2 August 2025	Deadline for the Commission's evaluation report on the regulation and	Art. 11(5)(a) and Art. 19

for its reviews
of the space
heater, water
heater and
solid fuel boiler
labels with a
view to
rescaling; the
implementation
report was
published on
24 June 2026
and records
that the
reviews of
space and
combination
heaters, water
heaters and
solid fuel
boilers were
still in
preparation at
that date

2 August 2026

Deadline for
the
Commission,
where
appropriate, to
adopt A to G
rescaled labels
for space
heaters, water
heaters and
solid fuel
boilers; the
deadline
passed without
such a
delegated act,
and in any
event the
rescaled heater
labels must be
adopted no
later than 2
August 2030

Art. 11(5)(a)

Obligations by role

Supplier: manufacturer established in the Union

- Ensure that every unit you place on the market is accompanied, free of charge, by an accurate printed label and a product information sheet in the form fixed by the delegated act for the product group; where the delegated act allows it, entering the sheet's parameters in EPREL replaces the paper sheet, which you then print for the dealer on request, and the label may be printed on the packaging. Art. 3(1)
- Deliver printed labels, including rescaled labels, and product information sheets to dealers free of charge, promptly and in any event within five working days of the dealer's request. Art. 3(2) and Art. 11(13)
- Ensure the accuracy of the labels and product information sheets you provide and produce technical documentation sufficient for market surveillance authorities to assess that accuracy, including test reports or similar technical evidence. Art. 3(3) and Art. 2, point (23)
- Ensure the accuracy of the labels and product information sheets you provide. Art. 3(3)
- Produce technical documentation sufficient for market surveillance authorities to assess the accuracy of the label and product information sheet, including test reports or similar technical evidence.
Art. 3(3) and Art. 2, point (23)
- Register every new model covered by a delegated act in the public and compliance parts of EPREL before placing a unit on the market, entering the Annex I information: your identity and contact details, the model identifier, the label in electronic form, the energy class and label parameters, the product information sheet parameters, the identifiers of equivalent models and the specific parts of the technical documentation listed in Article 12(5). Art. 4(1), Art. 12(5) and Annex I, points 1 and 3
- Treat a product whose label-relevant characteristics change as a new model, indicate in EPREL when you no longer place units of a model on the market, and keep the model's information in the compliance part for 15 years after the final unit was placed on the market unless the delegated act sets a shorter period; public data is never deleted. Art. 4(4) and Art. 4(6)
- Treat a product whose label-relevant characteristics change as a new model and register it in EPREL as such. Art. 4(4)
- Indicate in EPREL when you no longer place units of a model on the market. Art. 4(4)
- Keep the model's information in the compliance part of EPREL for 15 years after the final unit was placed on the market, unless the delegated act sets a shorter period; public data is never deleted.
Art. 4(6)
- Do not place on the market products designed so that their performance is automatically altered under test conditions to reach a more favourable value for any label or documentation parameter, and once a unit is in service ask the customer's explicit consent before any update that would worsen a label parameter, explaining the change and offering the option to refuse it without avoidable loss of functionality. Art. 3(4) and Art. 3(5)
- Do not place on the market products designed so that their performance is automatically altered under test conditions to reach a more favourable value for any label or product information sheet parameter.
Art. 3(5)
- Once a unit is in service, ask the customer's explicit consent before any update that would worsen a label parameter, explaining the change and offering the option to refuse it without avoidable loss of functionality. Art. 3(4)
- Reference the energy efficiency class and the range of classes on the label in every visual advertisement and technical promotional material for a specific model, as the delegated act prescribes, and do not provide or display other labels, marks, symbols or inscriptions that could mislead or confuse customers about energy or resource consumption. Art. 6(a) and Art. 6(c)

- When a label is rescaled, supply both the existing and the rescaled label and product information sheet with products placed on the market during the four months before the display date fixed in the delegated act, and deliver rescaled labels for earlier products on the dealer's request from the start of that period. Art. 11(13)(a) and Art. 11(13)(b)
- Cooperate with market surveillance authorities, take immediate action to remedy any non-compliance under your responsibility, on your own initiative or when required, extend corrective or restrictive action to all products concerned across the Union and to all units of the model and its equivalent models, and bear the cost of document inspection and testing where a product is found non-compliant.

Art. 6(b), Art. 8(5), Art. 9(2), Art. 9(4) and Art. 10(5)

- Cooperate with market surveillance authorities on the products you supply. Art. 6(b)
- Take immediate action to remedy any non-compliance under your responsibility, on your own initiative or when required, extend corrective or restrictive action to all products concerned across the Union and to all units of the model and its equivalent models, and bear the cost of document inspection and testing where a product is found non-compliant. Art. 6(b), Art. 8(5), Art. 9(2), Art. 9(4) and Art. 10(5)

Supplier: authorised representative of a non-EU manufacturer

- As the authorised representative who places a non-EU manufacturer's product on the Union market you are the supplier: ensure each unit is accompanied by an accurate printed label and product information sheet free of charge and deliver them to dealers within five working days of a request.

Art. 2, points (11) and (14), Art. 3(1) and Art. 3(2)

- As the authorised representative who places a non-EU manufacturer's product on the Union market, you are its supplier and carry the supplier obligations. Art. 2, points (11) and (14)
- Ensure each unit is accompanied, free of charge, by an accurate printed label and product information sheet in the form the delegated act prescribes. Art. 3(1)
- Deliver printed labels and product information sheets to dealers free of charge, promptly and in any event within five working days of a request. Art. 3(2)
- Ensure the accuracy of the labels and sheets and hold technical documentation sufficient for the authorities to assess it, including test reports. Art. 3(3)
- Ensure the accuracy of the labels and product information sheets you provide. Art. 3(3)
- Hold technical documentation sufficient for market surveillance authorities to assess the accuracy of the label and product information sheet, including test reports. Art. 3(3)
- Register every new model in EPREL before placing a unit on the market, keep the compliance data for 15 years after the final unit, and register any changed model as a new model. Art. 4(1), Art. 4(4) and Art. 4(6)
- Register every new model in EPREL before placing a unit on the market, and register any changed model as a new model. Art. 4(1) and Art. 4(4)
- Keep the model's compliance data in EPREL for 15 years after the final unit was placed on the market. Art. 4(6)
- Show the energy class and class range in visual advertisements and technical promotional material, cooperate with market surveillance authorities and remedy non-compliance immediately. Art. 6(a) and Art. 6(b)
- Show the energy class and the range of classes in visual advertisements and technical promotional material for a specific model. Art. 6(a)
- Cooperate with market surveillance authorities on the products you supply. Art. 6(b)
- Take immediate action to remedy any non-compliance under your responsibility. Art. 6(b)
- Make the technical documentation available electronically within 10 days of a request for models placed on the market under Directive 2010/30/EU before 1 August 2017, for five years after the final unit was manufactured. Art. 20(3)

Supplier: importer

- As the importer who places a product from a third country on the Union market you are the supplier: ensure each unit is accompanied, free of charge, by an accurate printed label and product information sheet in the form the delegated act prescribes, and deliver them to dealers within five working days of a request. Art. 2, points (12) and (14), Art. 3(1) and Art. 3(2)
- As the importer who places a product from a third country on the Union market, you are its supplier and carry the supplier obligations. Art. 2, points (12) and (14)
- Ensure each unit is accompanied, free of charge, by an accurate printed label and product information sheet in the form the delegated act prescribes. Art. 3(1)
- Deliver printed labels and product information sheets to dealers free of charge, promptly and in any event within five working days of a request. Art. 3(2)
- Ensure the accuracy of the labels and sheets and hold technical documentation sufficient for the authorities to assess it, including test reports; this applies also to second-hand products you import from a third country. Art. 1(2)(a) and Art. 3(3)
- Ensure the accuracy of the labels and product information sheets you provide, also for second-hand products you import from a third country. Art. 1(2)(a) and Art. 3(3)
- Hold technical documentation sufficient for market surveillance authorities to assess the accuracy of the label and product information sheet, including test reports. Art. 3(3)
- Register every new model covered by a delegated act in the public and compliance parts of EPREL before placing a unit on the market, treat a changed model as a new model, mark the end of marketing in the database and keep the compliance data for 15 years after the final unit.
Art. 4(1), Art. 4(4), Art. 4(6) and Annex I
- Register every new model covered by a delegated act in the public and compliance parts of EPREL before placing a unit on the market, with the Annex I information, and treat a changed model as a new model. Art. 4(1), Art. 4(4) and Annex I
- Indicate in EPREL when you no longer place units of a model on the market. Art. 4(4)
- Keep the model's compliance data in EPREL for 15 years after the final unit was placed on the market.
Art. 4(6)
- Do not import products with defeat mechanisms that alter performance under test conditions, and seek the customer's consent before updates that worsen a label parameter. Art. 3(4) and Art. 3(5)
- Do not import products with defeat mechanisms that alter their performance under test conditions to reach a more favourable label value. Art. 3(5)
- Seek the customer's explicit consent before any update to a unit in service that would worsen a label parameter. Art. 3(4)
- Show the energy class and the range of classes in visual advertisements and technical promotional material for a specific model, and do not display other labels or symbols likely to mislead customers about energy consumption. Art. 6(a) and Art. 6(c)
- When a label is rescaled, supply both labels with products placed on the market in the four months before the display date and rescaled labels for earlier products on request; cooperate with the authorities, remedy non-compliance immediately across all units of the model and its equivalent models, and bear inspection and testing costs where the product is non-compliant.
Art. 6(b), Art. 8(5), Art. 9(2), Art. 10(5) and Art. 11(13)
- When a label is rescaled, supply both the existing and the rescaled label with products placed on the market in the four months before the display date, and rescaled labels for earlier products on request.

Art. 11(13)

- Cooperate with market surveillance authorities on the products you supply. Art. 6(b)
- Take immediate action to remedy any non-compliance under your responsibility across all units of the model and its equivalent models, and bear the cost of document inspection and testing where the product is found non-compliant. Art. 6(b), Art. 8(5), Art. 9(2) and Art. 10(5)

Dealer (retailer, online shop, wholesaler displaying to installers)

- Display the label provided by the supplier in a visible manner for every unit of a model covered by a delegated act, in the shop and in online distance selling, in the position and form the delegated act prescribes. Art. 5(1)(a) and Art. 16(3)(e) and (g)
- Make the product information sheet available to customers, including in physical form at the point of sale on request. Art. 5(1)(b)
- If you have no label or sheet for a product, request them from the supplier, who must deliver within five working days; the sheet may instead be printed or downloaded from EPREL where that function is available. Art. 5(2), Art. 5(3) and Art. 3(2)
- Reference the energy efficiency class and the range of classes in every visual advertisement and technical promotional material for a specific model, and do not display other labels, marks or symbols likely to mislead customers, nor labels that mimic the EU label on products without a delegated act or on non-energy-related products. Art. 6(a), Art. 6(c), Art. 6(d) and Art. 6(e)
- When a label is rescaled, replace the existing labels on products on display, in shops and online, with the rescaled labels within 14 working days after the date fixed in the delegated act, and do not display the rescaled label before that date; obtain rescaled labels for earlier stock from the supplier, and where the supplier has ceased activities you may sell that stock with the old label for up to nine months.

Art. 11(13)(b) and Art. 11(13)(c)

- For packages of space heaters, water heaters or solid fuel boilers that you assemble with controls or solar devices, provide the package label yourself; the supplier's EPREL duty does not cover such packages. Art. 4(5)
- Cooperate with market surveillance authorities, take immediate action to remedy non-compliance under your responsibility, and where required take corrective or restrictive action, including withdrawal, for all the products concerned that you have made available in the Union. Art. 6(b), Art. 9(2) and Art. 9(4)
- Cooperate with market surveillance authorities on the products you make available. Art. 6(b)
- Take immediate action to remedy any non-compliance under your responsibility and, where required, take corrective or restrictive action, including withdrawal, for all the products concerned that you have made available in the Union. Art. 6(b), Art. 9(2) and Art. 9(4)

Penalties

Member States lay down the rules on penalties and enforcement mechanisms for infringements of the regulation and its delegated acts and take all measures to implement them; the penalties must be effective, proportionate and dissuasive. Where an authority has sufficient reason to believe that a product presents a risk to the public interests the regulation protects, it evaluates the product against all relevant labelling requirements, requires the supplier or dealer to take corrective action, to withdraw or to recall it within a period commensurate with the risk, and if the operator does not act takes provisional measures to prohibit or restrict its availability, withdraw or recall it and informs the Commission and the other Member States; the measures extend to all units of the model and its equivalent models unless the supplier shows they comply, and the authority may recover the costs of document inspection and testing from the supplier. Market surveillance and border control follow Regulation (EU) 2019/1020, since the Articles 16 to 29 of Regulation (EC) No 765/2008 cited in Article 8 were deleted from 16 July 2021. In Denmark the produktenergimærkningsloven (lovbekendtgørelse nr. 186 of 2 February 2022) makes Erhvervsministeren or the authority it empowers the control authority, and executive order nr. 1322 of 9 June 2021 names Sikkerhedsstyrelsen, part of Erhvervsstyrelsen since January 2026, as that authority; it can order suppliers to carry out measurement and product testing at their own expense where the product fails, enter business premises and means of transport without a court order, issue påbud to bring the product into conformity, to stop misleading marketing, to withdraw or to recall it, forbud against placing it on the market or making it available, orders to owners of online interfaces to change or remove content or to display a warning and, by court order, blocking, and publish the results; its decisions may be appealed to Energiklagenævnet within four weeks. Failing the supplier duties under Articles 3, 4, 12(5) and 20(3), the dealer duties under Article 5 or the advertising duties under Article 6 is punishable by a fine, with companies liable under chapter 5 of the criminal code.

Art. 7(4), Art. 8(1), Art. 8(5), Art. 9 and Art. 10(5); Art. 39 and Annex I, point 68; § 2, § 3, § 4, § 5, § 5 b, § 5 c, § 8, § 11, § 11 a and § 1

Checklist

- 1. Confirm the product is energy-related under Article 2, point (1), and that no Article 1(2) exclusion applies (second-hand products already on the Union market, means of transport).
- 2. Identify the delegated regulation for the product group, for example 2019/2016 for refrigerating appliances, 2019/2014 for washing machines, 2019/2013 for displays, 2019/2015 for light sources, 2023/1669 for smartphones and tablets or 2023/2534 for tumble dryers, and note its display date and label design; tyres follow Regulation (EU) 2020/740.
- 3. Decide who is the supplier for each model: the EU manufacturer, the authorised representative of a non-EU manufacturer, or the importer (Article 2, point (14)); everyone else who sells or displays the product is a dealer.
- 4. Test or calculate the label parameters with the measurement methods of the delegated act and harmonised standards, and compile technical documentation sufficient to prove the label and sheet (Article 3(3) and Article 13).
- 5. Register the model in EPREL before the first unit is placed on the market, with the label, the product information sheet parameters, equivalent models and the Article 12(5) documentation; register any changed model as a new model and keep the data for 15 years (Article 4 and Annex I).
- 6. Supply each unit with the printed label and product information sheet, or use the EPREL sheet where the delegated act allows it, and answer dealer requests within five working days (Article 3(1) and 3(2)).
- 7. Display the label and the sheet in the shop and next to the price online, and put the energy class and class range in every visual advertisement and technical promotional material (Articles 5 and 6).
- 8. Plan each rescaling: double labels for the four months before the display date, dealers swap labels within 14 working days after it, and the old label never appears after the nine-month tail for stock from a supplier that has closed (Article 11(13)).
- 9. Check that no product carries mimic labels or misleading energy symbols, that firmware updates do not silently worsen label parameters, and that no test-detecting behaviour exists (Articles 3(4), 3(5) and 6(c) to (e)).

Sources

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15. Commission Delegated Regulation (EU) 2025/1353 amending Delegated Regulation (EU) 2023/2534 on tumble dryers (EUR-Lex) — <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32025R1353>
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