EuroCommerce
Retail & Wholesale

Position Paper

15 October 2026

Simplification of the Energy Labelling Framework Regulation – Energy-efficient product legislation Omnibus

EXECUTIVE SUMMARY

The present position paper outlines the views of European retailers and wholesalers on the Commission's proposal for Simplifying the Energy Labelling Framework Regulation (ELFR). **We welcome the Commission's efforts to simplify the ELFR and reduce unnecessary administrative obligations for retailers. However, certain provisions of the proposal may create significant administrative burdens on our sector, as opposed to simplification, and therefore should be reconsidered.**

Our sector has specific obligations under the Energy Labelling Framework Regulation (EU) 2017/1369, as we assume the role of "dealers" or "importers". Our obligations include displaying the energy label provided by the supplier in a visible manner, and making available to customers the relevant complementary information, i.e. the product information sheet. The obligations on dealers, to facilitate the provision of information on product efficiency, cover not only classical, brick & mortar stores, but also on-line stores, distance selling, catalogues and promotional material. Additional obligations and details are set in delegated regulations on specific products.

EuroCommerce welcomes the Commission's initiative to improve the existing framework. In particular, we support the following:

1. The 12-month period from the rescaling date to sell products with the non-rescaled label and the removal of the obligation to replace old labels with the rescaled ones within 14 days are positive steps.
2. The full digitalization of the Product Information Sheets.
3. For the display of the energy label in physical stores: The flexibility to place the labels in proximity to the product and the possibility to display them digitally (as long as this remains optional).
4. The "once-only" principle and the closer alignment between EPREL and the future Digital Product Passport registry to avoid duplication of information requirements.
5. The proposal for the manufacturer's Authorized Representative to upload in EPREL a signed copy of their mandate, as this would establish an EU-level playing field for all players targeting EU-based consumers.

However, we believe that certain provisions of the proposal should be reconsidered, further refined, or clarified. In particular:

1. We advocate against the removal of the default rule to have a printed label accompanying each unit. The proposed request-based system would create excessive administrative burden, costs, logistical complexity and compliance risks for retailers, instead of simplifying our sector's obligations.
2. We support extending the 12-month period from the rescaling date during which retailers can sell products with the non-rescaled label until the exhaustion of existing stocks. This would reflect businesses' actual stock turnover cycles and help avoid unnecessary costs, administrative burdens, and potential waste caused by relabelling.
3. More flexibility should be provided regarding the display of the energy label online: We recommend removing the phrase "in proximity to the price" or replacing it with "clearly" or "in a prominent manner", that the energy label in the shopping basket remain optional and clarifying that a simplified/ nested label is sufficient.
4. We would welcome an explicit provision in the text promoting a realistic and proportionate approach by national authorities when conducting inspections, prioritising guidance, warnings and corrective measures over immediate penalties.
5. Regarding the EPREL, suppliers should be required to provide the Global Trade Item Number (GTIN), where available, and dealers should be notified of any changes made by suppliers to product information in EPREL.

Below we set out our key messages in a detailed way.

KEY MESSAGES

1. The removal of the default rule to have a printed label accompanying each unit when suppliers send the products to retailers would create excessive administrative burden, costs, logistical complexity and compliance risks for our sector

Requiring retailers to request and place energy labels themselves would create **additional administrative burdens, organizational workload, logistical complexity, operational costs and compliance risks for retailers, shifting all the responsibility to our sector. Removing the requirement to include printed labels in product packaging is not a digital modernization, but a shift of obligations, costs, and legal risks from manufacturers to retailers**. Liability risks for printing errors, administrative request overhead, and operational delays would remain with the local retailer. True simplification must guarantee that the labels required for display continue to arrive automatically with the goods, without creating additional administrative burden. Therefore, **compared to the current framework, such a change would not constitute simplification for retailers but would instead introduce additional complexity and administrative burdens, going against the EU's simplification objectives.**

First, requesting printed labels from suppliers would lead to additional administrative work for retailers. As the **legal obligation for retailers to display energy labels clearly and unambiguously at the point of sale for products physically on display in stores remains unchanged**, if goods arrive at the store or warehouse without an enclosed label in the future, an immediate operational bottleneck occurs: retailers can no longer unpack items and put them directly on display. Instead, they must first manually request a label for every display model. The retailer's core activity of selling goods is directly obstructed and becomes much more complex. **Retailers operating multiple stores and offering hundreds or thousands of different product models would have to submit countless individual requests to dozens of different manufacturers and brand owners for display units. Therefore, instead of reducing bureaucracy, this would create a significant administrative burden upon receipt of the goods.**

Second, the proposed request-based system would be **extremely burdensome and disproportionate for SMEs** that do not have the resources to request the labels each time.

Third, this proposal would lead to **delays in product displays,** as suppliers would have up to 5 working days to deliver the labels following receipt of a request.

Fourth, requesting labels could be associated with hidden or indirect costs imposed by the suppliers, even if the proposal introduces the request of labels free of charge. At the same time, it **would increase shipping costs and logistical complexity for both retailers and suppliers, as it would create separate, parallel distribution channels for products and labels.**

Fifth, requesting and placing labels in-store would make retailers responsible for the correct display of the energy label while having less direct control over its availability. Most critically, this procedure is highly error-prone, as labels being shipped separately from the product could open the door to wrong labels being placed on the products on display. This could create a mismatch between responsibility and control, as well as **additional risks of errors and potential fines for non-compliance if labels are not correctly displayed or if a label is missing or cannot be obtained promptly from the supplier**. At the same time, this proposal would require **additional staff training and manual work.**

Sixth, **requiring retailers to print and place labels in-store would impose substantial costs on our sector as we would need to invest in printing equipment and materials, and in training our staff. It would also create operational burdens and practical difficulties as our sector would need to ensure true-to-colour and true-to-scale speciality printing, as well as the correct display and maintenance of labels.** If a retailer prints the label from the database, they assume full legal responsibility for the exact graphical representation. Even minor printing flaws (e.g. a missing black frame, inaccurate colours, or slightly distorted graphics) can be flagged as formal non-compliance during market surveillance checks by authorities. The retailer thus incurs full liability for technical errors in their own printout. In addition, **differences in printing quality and label presentation across stores could result in inconsistent consumer information and undermine the uniformity of energy labelling across the market**. Finally, **SMEs particularly face significantly higher printing costs** per unit when printing labels themselves compared to large-scale manufacturers in mass production.

EuroCommerce supports the broader shift towards digitalisation. However, as highlighted in our previous positions (including our Omnibus IV response, our position on the Digital Product Passport and our position on the European Product Act), this transition should ensure proportionality and not come at the expense of the retail and wholesale sector. In particular, our members should not be required to print or store information that manufacturers provide only in digital form, nor change their operations in a way that would create additional administrative burden instead of simplifying their obligations.

We therefore believe that the final framework should clearly **preserve the current status quo instead of creating additional unnecessary administrative requirements for our sector. Simplification for one part of the value chain should not result in additional administrative and compliance burdens for another.**

2. The 12-month transition period to sell units with the non-rescaled label in the case of label rescaling is a positive step but should be extended until the exhaustion of existing stocks

We support the Commission's proposal to permit dealers to sell products from existing stock with the non-rescaled label for a 12-month period from the rescaling date. We particularly welcome that the proposed **12-month sell-through period would apply to all products irrespective of whether they have been discontinued or whether a specific provision is included in the relevant product-specific**

delegated act, as is currently the case under the existing framework. The proposal is a positive step compared with the current regime. **It provides a more realistic and proportionate transition period, reflecting retailers' actual stock turnover cycles and avoiding unnecessary costs, administrative burden, operational disruption, and waste, while still ensuring a smooth transition to the new labelling requirements.**

In this context, **we also support the removal of the 14-day deadline under the current Energy Labelling Framework Regulation requiring dealers to replace old labels with rescaled labels on products displayed in stores and online**. Eliminating this rigid requirement will provide retailers with the necessary flexibility to manage the transition as part of normal stock and inventory processes and will eliminate the burdensome obligation of relabelling stocks, without compromising the effectiveness or visibility of the energy label.

However, based on our experience, 12 months is not sufficient to sell existing stocks, given the slow turnover of products. **Therefore, we propose allowing existing stocks bearing the non-rescaled label to be exhausted**.

3. Display of the energy label physically in stores: we welcome the flexibility to place labels in proximity to the product and the possibility to display labels digitally as long as this remains optional, authorities should adopt a proportionate approach during inspections

First, **we welcome the flexibility introduced by the Commission's proposal, allowing energy labels for products physically on display to be placed in a visible manner in proximity to the product**. We support this non-prescriptive and non-restrictive approach, which gives retailers the flexibility to place energy labels in a manner that best suits our products and display arrangements, without risking damage to the product, its packaging or surfaces, or compromising its presentation.

In this context, we would also welcome an explicit provision in the legislative text promoting **a realistic and proportionate approach by national authorities when conducting inspections, prioritising guidance, warnings and corrective measures over immediate penalties**. This flexibility regarding the placement of energy labels should also be respected by national authorities when interpreting and enforcing retailers' obligations under the product-specific delegated acts.

Finally, we welcome the possibility to display energy labels digitally in a physical store. However, we highlight that this should remain an option and not an obligation, as digital screens remain costly, requiring significant investment in the screens themselves, the necessary infrastructure and colour display capabilities. Furthermore, at this stage, not all electronic shelf labels are capable of displaying the full range of colours used in energy labels. In such cases, the labels' visibility and thus the consumers' ability to make informed decisions could be undermined.

4. Display of the energy label online: more flexibility required: remove or replace the phrase "in proximity to the price", energy label in the shopping basket to be optional, clarification that a nested label is sufficient

Greater flexibility is needed for the display of energy labels in e-commerce. Online marketplaces face increasing display obligations under EU and national legislation, which require significant technical resources to implement and maintain. Obligations requiring the energy label to be displayed in a strict way, such as in proximity to the price of the product do not sufficiently take into account the different online interfaces, screen sizes, and device formats. Allowing online marketplaces more flexibility would enable them to display energy labels in a clearer and more effective way for consumers. Therefore, we suggest that **the proposal's requirement to display energy labels "in proximity to the price" on**

product detail pages, search result pages and shopping basket pages should be removed or replaced with more flexible language, such as displaying the label "clearly" or "in a prominent manner."

Furthermore, we recommend that the display of the energy label on the shopping basket page remain optional and that it be clarified that the display of simplified/ nested label in the shopping basket is sufficient. Requiring repeated full-label disclosures across product detail pages, search, basket and other touchpoints risks creating disclosure fatigue.

Finally, regarding the proposed obligation of dealers to include the label in invitations to purchase as (pre) contractual information, we would welcome **clarification that a simplified/ nested label format providing direct access to the complete label through nested display is sufficient.**

5. EPREL: Improvements suggested & Interconnection between the EPREL and the upcoming Digital Product Passport Registry required

We welcome the "once-only" principle and the closer alignment between EPREL and the future DPP system to avoid duplication of information requirements. EPREL and DPP should be interoperable, enabling data to be pulled from one system to the other via APIs or equivalent technical means, so that information is entered once and reused across both frameworks.

Furthermore, **suppliers should also be required to provide the Global Trade Item Number (GTIN), where available when registering a product in EPREL,** as this is an identifier widely used by various sectors and would enable automated matching between offers and energy labelling information at scale.

Finally, **retailers and online marketplaces should be notified of any changes made by suppliers to product information in EPREL** to facilitate timely compliance. For companies with the necessary technical capabilities, such notifications could be provided automatically via an API, eliminating the need for manual checks. EPREL should also expose links between old and new EPREL IDs, and between EPREL IDs, including in cases of rescaling, together with the rescaling date, effective date and any resulting change in energy class, and between EPREL IDs, GTINs and product model information, so that labels can be updated automatically. For other companies, notifications could be communicated through email alerts, newsletters or a dedicated EPREL webpage, clearly indicating the changes made and the applicable compliance deadlines. Where a change made by a supplier requires the retailer to update the label or the information provided to consumers, retailers should be given sufficient time to implement the change before they can be held responsible for any non-compliance.

6. Stronger accountability of non-EU manufacturers and authorised representatives

We welcome the Commission's proposal to require the authorised representative (AR) of a manufacturer not established in the Union to upload a signed copy of the mandate received from the manufacturer to EPREL. In our view, this would establish an EU level playing field for all players targeting EU-based consumers. We support that all products from non-EU manufacturers registered in EPREL and offered to EU consumers have either an EU based importer or an Authorised Representative fully responsible for product compliance at the level of the importer with an active mandate. **Where an authorised representative is appointed, online marketplaces facilitating the sale of these products to EU consumers should only be required to verify the existence of the AR's mandate in EPREL, without being obliged to assess its content.** This recommendation is aligned with our position paper on the Market Surveillance Regulation and our Compliance for All campaign, where we set out our recommendations regarding the roles and obligations of authorised representatives and online marketplaces under the forthcoming European Product Act.

--END—

Contact:
Maria Spatioti | Adviser Product Policy and Sustainability, spatioti@eurocommerce.eu

EuroCommerce is the principal European organisation representing the retail and wholesale sector. It embraces national associations in 28 countries and 5 million companies, including leading global players and many small businesses. Over a billion times a day, retailers and wholesalers distribute goods and provide an essential service to millions of businesses and individual customers. The sector generates 1 in 7 jobs, offering a varied career to 26 million Europeans, many of them young people. It also supports millions of further jobs throughout the supply chain, from small local suppliers to international businesses. EuroCommerce is the recognised European social partner for the retail and wholesale sector.