



Deliverable 7.2: Report on Policy Recommendations



This project has received funding from the European Union's Horizon 2020 research and innovation program under grant agreement No 847043. The information and views set out in this website are those of the authors and do not necessarily reflect the official opinion of the European Union. Neither the European Union institutions and bodies nor any person acting on their behalf may be held responsible for the use which may be made of the information contained therein.



DOCUMENT DESCRIPTION

DOCUMENT TITLE	Report on policy recommendations
DOCUMENT ID	D7.2
DOCUMENT VERSION	V1.0
DOCUMENT TYPE	Report
DISSEMINATION LEVEL	Public
DUE DATE	Month 30
SUBMISSION DATE	
AUTHOR	BEUC

HISTORY OF CHANGES

VERSION	DATE	CHANGE
1	29-03-2022	BEUC
2		
3		



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Executive summary

Since the first introduction of the new rescaled energy label in March 2021, the BELT partners have identified some key elements to keep in mind for future rescales and for energy labelling policy more generally:

- The energy label should be rescaled as soon as possible for all remaining appliances, to unleash the full energy efficiency potentials of this instrument. The cohabitation of the new and old labels on the market should be limited as highly likely to cause confusion among consumers and market operators.
- Contrary to what is envisaged in the Energy Labelling Framework Regulation, the “A” class of the new energy label has not been left empty for most of the rescaled appliances, except for televisions and monitors. The presence of “A” class products hinders technological progress, resulting in more frequent rescales. Furthermore, the absence of televisions and electronic displays in the top classes of the energy label risks weakening the clarity and effectiveness of the energy label for this product group.
- Besides the “A-to-G” energy efficiency scale, the energy label should continue to provide clear information about specific characteristics of a products that are relevant for consumers' choice, such as energy and water consumption, capacity, and noise emissions.
- The public interface of EPREL should be promptly made available to other interested stakeholders including consumers and consumer organisations, to enable further comparison and verification of products' information.
- The methodology to calculate the energy efficiency classes for washing machines in the new energy label does not sufficiently reflect the performance of all washing programs. This created a situation where consumers are faced with incomplete information on the efficiency potentials and consumption of their appliance.
- Strong enforcement action should be undertaken to ensure the prompt uptake of the new energy label, both online and in physical shops. The BELT Consortium assessed the uptake of the new energy labelling rules on the market and found that several online and physical shops still display the old energy label or no label at all.



- Along with the rescale of the energy label, member states should consider incentives to replace old appliances with very low efficiency ratings.
- The future developments in energy labelling policies should reflect the objectives of the 2020 Circular Economy Action Plan to establish a strong and coherent product policy framework that will make sustainable products, services and business models the norm.



Introduction

The rescale of the EU energy label

The EU Energy Labelling Regulation¹ and the correspondent Ecodesign measures² are two very important instruments that have successfully contributed to improving the energy efficiency of most electrical appliances. Besides concrete energy savings, Ecodesign and Energy Labelling have brought substantial financial savings to consumers. In 2016, BEUC estimated that consumers can save up to €332 thanks Ecodesign and around €450 if they only bought electrical appliances in the top class of the energy label.³

In 2019, the European Commission decided to update the energy label and remove the “A+” classes that had appeared on the label over time to reflect technological improvement. One of the reasons for the rescale was to improve the clarity of the energy label, which had become confusing for consumers, as most products models were over-populating the highest classes of the energy labels, leaving the lower ones empty. This classification gave consumers the wrong impressions that, when buying an “A+” product, they were opting for one of the most efficient on the market, while in fact it was an average product or even one of the least efficient ones. In addition, the overpopulation of the top classes did not encourage manufacturers to bring more efficient appliances on the market.

Since March 2021, consumers can rely on a simpler and clearer “A-to-G” scale energy label for several household appliances (washing machines and washer-driers, dishwashers, televisions and monitors, refrigerators, and freezer). The new rescaled label also displays information about energy consumption more clearly and contains new icons and features, such as a QR code giving access to an online database (called EPREL) where consumers can access further information on the selected product, such as, for a fridge, its dimensions, the type of compartments and their individual volume.

In the upcoming years, the energy label will also be rescaled for the remaining appliances, such as tumble dryers, cooking appliances, and vacuum cleaners.

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

² Directive 2009/125/EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for the setting of ecodesign requirements for energy-related products

³ <https://www.beuc.eu/publications/beuc-x-2016-062-how-much-can-consumers-save-thanks-to-ecodesign.pdf>



The BELT project

The decision to rescale the energy label and go back to the “A-to-G” scale has been an important one to unleash the energy efficiency potentials of this instrument, stimulate technological improvement, and improve clarity for consumers. The resulting changes to the energy labelling rules required to be accompanied and well communicated to consumers, producers, and public authorities, as well as rolled out among retailers.

The BELT project was created with the objective of facilitating the transition period to the new rescaled label, informing, and training all principal stakeholders and market actors, as well as stimulating consumers and manufacturers to respectively choose more energy efficient appliances and improve their products.

The BELT consortium is composed of representatives of national and European consumers organisations, retailers, manufacturers, and public authorities.⁴ Over the past thirty months, the BELT partners have contributed to making the transition process to the new rescaled label easier and more comprehensible for consumers and other relevant market actors, through targeted communication campaigns, training, and technical guidance materials.⁵

Since the beginning of the project, BELT partners have gathered very helpful evidence on the challenges and opportunities linked to the energy label rescale. These takeaways are useful in view of future policy choices and related communication and dissemination activities.

This Report builds on the BELT learnings and provides some policy recommendations for the upcoming revisions of other Energy Labelling Regulations and for the future of this tool in the context of the EU Green Deal.

Learnings and policy recommendations

The energy label is a trusted and well recognised tool for consumers when shopping for energy efficient household appliances. According to the 2019 Special Eurobarometer on Energy, the energy

⁴ The full list of partners is available on the project’s webpage: <https://www.belt-project.eu/>

⁵ The key activities and material are available on the project’s webpage: <https://www.belt-project.eu/news>



label is recognised by 93% of consumers and 79% considered it when buying energy efficient products.⁶

The energy label helps them comparing the efficiency potentials of the various options on the market, nudging them towards more efficient appliances. Thanks to the decision to rescale of the energy label, consumers no longer face the confusing “+” classes, which made it difficult to distinguish the most efficient products. Furthermore, manufacturers are encouraged to innovate and improve the energy efficiency and performance of their appliances, so to be able to label them as “A” products.

To ensure the successful transition to the new energy label, the changes had to be thoroughly communicated and explained to all relevant market actors. The BELT partners produced targeted communication material for each interested market actor, focusing on key messages and adapting the narrative based on the target group’s needs and expectations.

Throughout the duration of the project, partners identified best practices and challenges in the communication and dissemination process, as well as from a policy perspective. Based on these findings, this section provides policy recommendations for the successful future rescales of the energy label.

1. Timeline of future rescales

For the moment, the energy label has been rescaled for four household appliances⁷ and lighting products. The rescale for the remaining products (e.g., tumble dryers, vacuum cleaners, cooking appliances, heating/cooling appliances) has been delayed and the new energy label will probably be displayed for most of them after 2023.

These delays risk hindering the energy savings expected from the rescaled energy label, slowing down technological improvement and depriving consumers from further financial savings in their energy bills.

⁶ EU Special Eurobarometer 492 on energy, https://energy.ec.europa.eu/data-and-analysis/eurobarometer-energy_en

⁷ Fridges and freezers, washing machines and washer dryers, dishwashers, TVs and monitors.



Furthermore, the cohabitation of the new and the old energy label on the market for similar appliances may confuse consumers. As reported in Deliverable 5.3 on *Guidelines for improvements by market actors*, consumers are disoriented and unable to compare the efficiency potentials of products that perform analogous functions, for which the new energy label has not been introduced at the same time. This is the case of, for example, washer-dryers, which have the new energy label since March 2021, and tumble-dryer, which still display the old one.

A swift implementation of the new energy labelling rules and clear information about timelines for future rescales is also important for large private and public buyers. Green public procurement can have a significant impact on energy savings and encourage the production of better performing and more efficient products.

The energy label should therefore be rescaled for the remaining appliances as soon as possible and through a coherent approach, unleashing the full energy efficiency potentials of this instrument and avoiding confusions among consumers and market actors.

Once the top class is occupied by a certain percentage of appliances, the energy label should be rescaled.

BELT Policy Recommendations

- The rescaling of the energy label for the remaining consumer products should be promptly implemented and not further delayed, to unlock further energy efficiency savings and ensure consumers can benefit from more efficient appliances and financial savings.
- The cohabitation of the new and the old energy label on the market should be avoided, to limit confusion among consumers. The new label enables consumers to effectively compare the energy efficiency potentials of similar appliances.
- There should be increased transparency on the timeline of future rescales. This is particularly important for large private and public buyers, to ensure that they can purchase the best appliances in terms of energy efficiency and encourage their production.



2. Transition periods

The rescaled energy label for washing machines and washer-driers, dishwashers, TVs and monitors, refrigerators, and freezer began to be displayed online and in shops on 1 March 2021. For lighting sources, the new energy label was introduced on 1 September 2021.

According to the Energy Labelling Regulation, suppliers benefited from a 4-month transition period, during which products could be sold with both the new (rescaled) and the old energy label.⁸ This initial transition period was deemed necessary for manufacturers and suppliers to adapt to the new rules, considering the duration of shipping and storage of most electrical appliances. For the same reasons, similar transition periods also applied to old stocks of appliances, which could be sold with the old energy label for up to 18 months after the introduction of the new label.⁹ This created a situation where both the new and the old label were present on the market for the same appliances.

In October 2020, BEUC organised a dedicated BELT webinar, to address the situation from a communication perspective and to ensure the correct information were delivered to consumers during the transition periods. These messages were also shared in a newspiece published on BEUC's website, at the beginning of the transition phase.¹⁰

From the perspective of retailers, the presence of two different labels in the product packaging required additional organisational and economic efforts. From 1 November 2020, manufacturers were obliged to start shipping existing models of appliances with both energy labels. However, retailers could not display the new labels in shops, nor communicate them to consumers before 1 March 2021. This meant that consumers often received products with two different labels, without a clear explanation from retailers.

This situation should be considered and addressed in the future, to avoid generating confusion and distrust among consumers, and limit challenges faced by retailers and manufacturers.

⁸ Regulation (EU) 2017/1369, article 11

⁹ For household appliances a 9-month transition period applied, until 30 November 2021.

¹⁰ BEUC, "[New energy labelling rules kicking in on 1 November: what to expect?](#)", October 2020



BELT Policy Recommendations

- The length of the transition periods during the rescale of the energy label should be as short as possible and uniformised across products, to avoid confusion among consumers and market actors. In a 2021 study, the cohabitation of the old and the new label for the same appliance was found to lower the benefits of the rescaled label that, if shown alone, significantly increases valuation of top-rated products compared to showing the previous energy label alone.¹¹ These consumer aspects should be considered when developing future rescales.
- It is recommended not to foresee transition periods during which the two energy labels (old and new one) are provided simultaneously in the product packaging. Besides risking confusing consumers, the preparation of two labels requires an organisational and economic effort by manufacturers (e.g., double testing would also be needed).
- When establishing adequate transition periods, policymakers should also consider the presence of existing products in stock (especially for small retailers) and the risk of waste generation. For example, specific conditions should be introduced to clarify how to manage returned products that display the old energy label. Additional clarification should also be provided regarding how to deal with products in exhibition contexts, such as showrooms or kitchen studios, after the rescaling process.¹²

3. Energy efficiency scale

According to the Energy Labelling Framework Regulation, the top-class of the new energy label should remain empty to encourage technological progress, provide for regulatory stability, limit the frequency of rescaling and enable ever more efficient products to be developed and recognised.¹³

In November 2021, BELT partners performed an initial assessment of the market situation, with the objective of identifying the energy efficiency classes already available on the market for five household

¹¹ Faure C., Guetlein M., C., Schleich J., *Effects of rescaling the EU energy label on household preferences for top-rated appliances*, Energy Policy, 156, 2021

¹² More information can be found in Deliverable 5.3 on guidelines for improvements.

¹³ 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



appliances and inform consumers accordingly.¹⁴ The analysis showed that the “A” class was already available for most appliances, with the exception of TVs, for which the classes available were mainly “F” and “G” (see Figure 1 below).

Figure 1: Section of explanatory BELT flyer for consumers.¹⁵

WHAT CLASSES ARE AVAILABLE FOR EACH PRODUCT AT THE MOMENT?

This table reflects the market situation in November 2021 and could change with time and depending on the country.

	A	B	C	D	E	F	G
Washing machines	✓	✓	✓	✓	✓	✓	✓
Dishwashers	•	✓	✓	✓	✓	✓	✓
Fridges	•	✓	✓	✓	✓	✓	✓
TVs				•	•	✓	✓
Lighting sources	•	✓	✓	✓	✓	✓	✓

✓ Energy classes already available on the market
 ■ Energy classes not yet available on the market
 • Energy classes for which there is still limited availability

When developing new energy labelling rules, the European Commission should take account of the Energy Labelling Framework Regulation’s indication to keep the top-class empty, so to encourage technological progress and further energy efficiency gains.

Furthermore, the existing discrepancies among products should be avoided and clear information on the best available class for each appliance should be readily communicated to the public. The risk is weakening the clarity and effectiveness of the energy label, especially where consumers are only faced with options in the lower classes of the energy label.

BELT Policy Recommendations

- When determining the boundaries for each energy efficiency class on the energy label, the European Commission should take account of the Energy Labelling Framework Regulation’s indication to keep the top-class empty, so to encourage technological progress.
- To avoid confusion and ensure consumers and public/private buyers can effectively make use of the energy label to choose more efficient devices, discrepancies across products should be

¹⁴ This included an assessment of the information available in EPREL in November 2021 and checks of products sold through large online retailers in Europe.

¹⁵ https://www.beuc.eu/publications/beuc-x-2022-001_belt-what_is_the_eu_energy_label.pdf



avoided and information on the best-in-class option for each appliance should be readily available.

4. EPREL public interface

One of the features of the new energy label is the presence of a QR code, which allows consumers to access additional information about a product, such as its dimensions, the type of compartments in a fridge and their individual volume. This information is collected from manufacturers through the European Product Registry for Energy Labelling (EPREL) and can be accessed by scanning the QR code on the energy label.

In the future, consumers will be able to access the web public interface of the EPREL database, which would allow them to search, sort, and select products through the model identifier or the name of the supplier indicated on the energy label.

BELT Policy Recommendations

- The public interface of EPREL should soon become available, to allow consumers and interested stakeholders (such as consumer organisations) to verify products' information.
- The public interface of EPREL should be constructed in a consumer-centric way, avoiding the use of technical language and counterintuitive navigation options, which may not be as attractive to consumers as they are for experts.
- The public interface of EPREL is also a powerful tool for large public and private buyers. The interface should therefore be user-friendly and accessible to salespeople.

5. Compliance and enforcement

Compliance and enforcement of energy labelling rules is essential to ensure the effectiveness of this instrument and to maintain consumers' trust in the tool.

According to an analysis by the Spanish consumer organisation OCU, in December 2021, up to 45% of the surveyed retail shops in Spain still sold household appliances with the old energy label (despite



the obligation to sell them solely with the rescaled label applied from 1 December 2021).¹⁶ They observed a larger level of non-compliance in smaller local retail shops and online shops, while larger retailers appeared to be mostly compliant with the new energy labelling rules. A major finding was that TVs were sold in most cases without an energy label.

In February 2022, the Belgian consumer organisation Test-Achats reported that the energy label is often missing for TVs and computer screens sold in Belgium.¹⁷ This can be explained by the fact that many appliances in this category belong to a much lower energy class since the introduction of the new energy label, due to different calculation methods. According to their findings, most models on the market today appear with energy class F and G. One of the assumptions made is that retailers would rather not display the energy label when the energy efficiency score is low.

Similar findings were also recorded by the German consumer organisation Verbraucherzentrale Bundesverband, which is a member of BEUC.¹⁸ Through an online market check performed in September 2021, they found that the old energy label still appeared for many of the surveyed products in shop, while some models were sold without an energy label online.¹⁹

BELT Policy Recommendations

- Compliance with and enforcement of new energy labelling rules should be strengthened, both online and in physical shops. Non-compliant products should be removed from the market.
- It is recommended to provide additional information regarding sanctions to market actors, to incentivise compliance.
- Consumer organisations should have access to the public interface of the EPREL database as soon as possible, to be able to verify the information and assess the level of compliance with the new rules.

¹⁶ <https://www.ocu.org/vivienda-y-energia/equipamiento-hogar/noticias/etiqueta-energetica-en-tiendas>

¹⁷ <https://www.test-achats.be/hightech/televiseurs/news/labels-energetiques-televisions-ordinateurs-ecrans>

¹⁸ <https://www.vzbv.de/pressemitteilungen/neues-eu-energielabel-im-online-handel-zu-wenig-vorhanden>

¹⁹ *ibid*



6. Additional product characteristics

The energy label provides information on several other characteristics, besides a products' energy efficiency potentials. For example, the new energy label for washing machine and washer dryers displays information and icons related to energy consumption, water consumption, duration of one cycle, rated capacity, spin drying efficiency, and noise emissions (see figure 2 below).

These characteristics are important for consumers to choose products that better suit their needs. The calculator developed by the BELT project, allows consumers to calculate several environmental and economic impacts associated to appliances, depending on their size, capacity, use, and efficiency class.²⁰

Clear information about an appliance's energy consumption allows consumers to calculate running costs and take decisions accordingly. This information should continue to be prominently displayed on the energy label. An understandable indication of energy consumption (for household appliances) or battery endurance (e.g., for smartphones) and comprehensible pictograms are essential to the effectiveness of the energy label. These pictograms should be tested with consumers beforehand, to ensure they are useful and easy to understand.

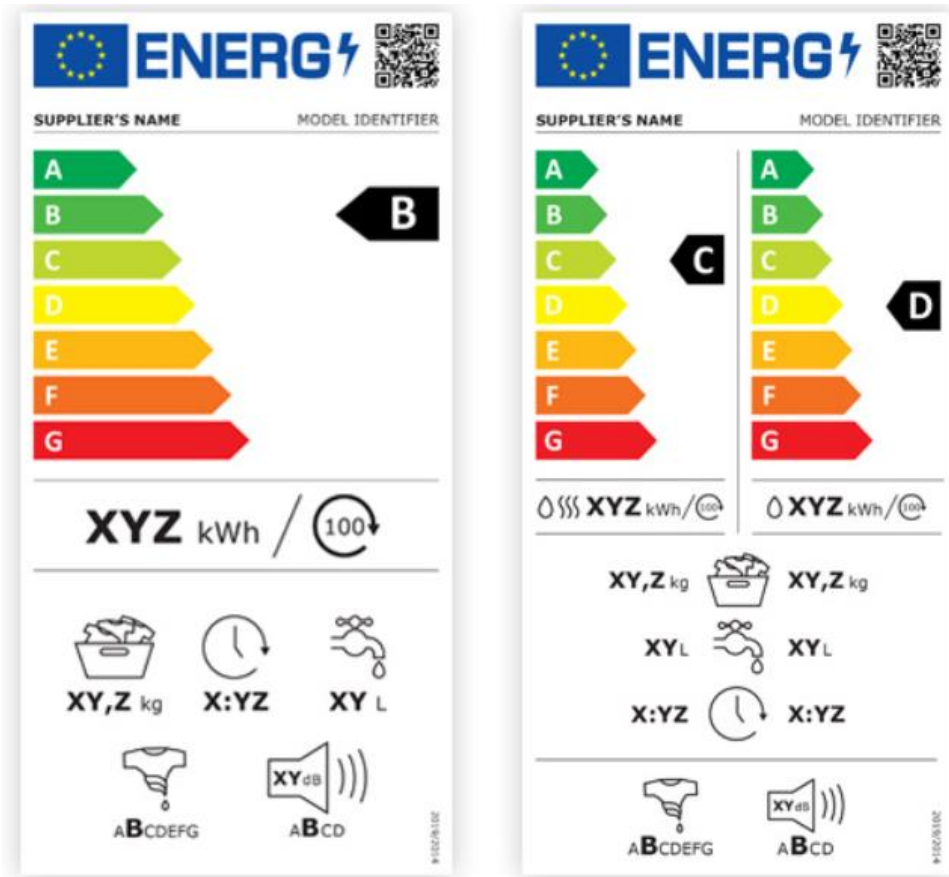
It is important that future energy labelling rules do not (unintentionally) promote bigger appliances consuming more energy, compared to smaller and less energy intensive ones. The energy label should not only inform consumers about the energy efficiency performance of their appliances, but also nudge them towards appliances that consume less energy in absolute terms.²¹

²⁰ <https://www.belt-project.eu/belt>

²¹ https://www.beuc.eu/publications/beuc-x-2015-065_mal_energy_label_revision_position_paper_final.pdf



Figure 2: The new energy label for washing machines and washer-dryers, displaying several characteristics of these products, including energy consumption for 100 cycles.



BELT Policy Recommendations

- The energy label should continue to provide clear information about specific characteristics of a products that are relevant for consumers' choice. The energy label and its pictograms should be tested with consumers beforehand, to ensure they are useful and easy to understand.

7. Calculating the energy efficiency of washing machines

With the new energy label, most of the models of refrigerators and dishwashers that we find in stores are no longer in the highest energy class but are redistributed in different classes, more easily



distinguishable for the user. This does not happen in the case of washing machines, for which all the main brands on the market already have one or more models in energy class “A”.

The reason is to be found in the evaluation based on a single program, the ECO 40-60 cycle. The energy efficiency classes in the new energy label for washing machines refer to the use of these appliances in ECO program, and not to the other existing washing programmes.²²

One of the negative aspects of the ECO 40-60 program is that it allows manufacturers to reduce washing temperature even far below 40 °C, to gain less consumption and obtain a higher energy efficiency class. Sometimes this lower temperatures can have consequently a poorer washing performance compared the Cotton program available on the same machine, which is indicated to wash the same load but is not limited in consumption to reach a more favourable energy efficiency class. Then consumer may change the program, increase the detergent, add the pre-wash, thus increasing both energy and water consumption to achieve a better washing quality.

The risk is that the savings and efforts of producers on class “A” models remain *facade* ones. The new energy label for washing machines indicates the energy and water consumption values of appliances based on a single program, without considering the differences in performance through other programs. In turn, consumers could be induced to buy a model in class “A” believing to consume less with any program of the machine.

This created a situation where consumers rely on the information provided by the energy label to choose a product, although they may make use of different washing programs which are not addressed by the energy label. Consumers are therefore faced with incomplete information on the efficiency potentials and consumption of their appliance.²³

To ensure that the new energy label effectively guides consumers towards more efficient choices, the methodology to determine energy efficiency should be adapted, increasing transparency on the performance of the most used washing programs.

²² <https://www.altroconsumo.it/elettrodomestici/lavatrici/speciali/lavaggi-eco>
<https://www.altroconsumo.it/elettrodomestici/lavatrici/speciali/etichetta-energetica-lavatrici-consumi>

²³ Altroconsumo, [Elettrodomestici: cambia l'etichetta, non il consumo](#), 2021



BELT Policy Recommendations

- For washing machines, the methodology to calculate their energy efficiency should be broadened, ensuring more transparency on the performance of all washing programs and avoid loopholes related to the ECO program.
- When rescaling the energy label for tumble dryers, policymakers should ensure it will be possible to compare the efficiency and performance of tumble dryers and washer dryers, as these are very similar products. The energy efficiency calculation method for tumble dryers should be comprehensive enough to reflect all drying programs.

8. Incentives to replace inefficient appliances

As highlighted in deliverable 5.3, some incentive schemes adopted by Member States in previous rescaling processes resulted to be effective to encourage consumers to purchase highly efficient products, replacing old products with more efficient ones. Incentives schemes can combine informational measures with financial or material incentives. Some examples of incentive schemes are competitions, prizes, rebate, direct payment, free appliance, micro loans, bonus/malus systems, ecopoint systems (where the purchaser of an efficient appliance receives points that can be used in exchange for other environmentally friendly products).

BELT Policy Recommendations

- It is recommended that Member States consider incentives to facilitate the replacement of old appliances with low energy efficiency, simultaneously with the period of change of the energy label.

What is next for energy labelling?

With Ecodesign measures, the energy label has brought significant environmental and consumer benefits.²⁴ It spurs competition in the market, while helping consumers identify the most energy

²⁴ ECOFYS, [Benefits of Ecodesign for EU households](#), 2016



efficient products on the market in an easy and comparable way, enabling significant savings in their electricity bills.

To unleash its full potential and achieve even larger energy savings, the energy label should be applied to more products, such as smartphones, computers, and small cooking appliances. Alongside, the demand for more sustainable products from a more comprehensive way is growing in Europe,²⁵ urging new policy initiatives to make sustainable choices on the market the norm. Consumer products should become more durable, repairable, upgradable, and safer by design, and clear and reliable information should be provided to consumers to help them make informed choices.

In the 2020 Circular Economy Action Plan²⁶, the European Commission announced several policy initiatives aimed at promoting more sustainable, durable, and repairable products, as well as protecting consumers against greenwashing. One of these flagship initiatives is the Sustainable Products Initiative, which is meant to revise the Ecodesign Directive and propose additional legislative and non-legislative measures to make products placed on the EU market more sustainable.²⁷

Future energy labelling schemes should reflect these policy developments and consider the possibility of addressing aspects beyond the energy use of products, for example information on products' lifetime, reliability, upgradability and repairability.²⁸ It is important that before introducing new information or icons on the energy label or on separate labels, these are previously tested with consumers to ensure they are understandable, and they fulfil their purpose. The energy label is a trusted instrument and should continue to assist consumers and public/private buyers to easily recognise the most energy efficient products.

²⁵ [2020 EU Eurobarometer](#)

²⁶ European Commission, Circular Economy Action Plan, 2020
https://ec.europa.eu/environment/strategy/circular-economy-action-plan_en

²⁷ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12567-Sustainable-products-initiative_en

²⁸ The European Commission is currently working on a new Energy Labelling regulation for smartphones and tablets, where aspects such as battery endurance, ingress protection, and fall reliability are included in the energy label.



BELT Policy recommendations

- The future developments in energy labelling policies should reflect the objectives of the Circular Economy Action Plan of 2020 to establish a strong and coherent product policy framework that will make sustainable products, services and business models the norm and transform consumption patterns to reduce waste.
- Alongside design improvements, more information should be provided to consumers regarding relevant sustainability aspects besides energy efficiency, including product lifetime, reliability, upgradability and repairability potentials. Any new icon, information item, or label should be tested with consumers beforehand to ensure it is easily understood.