

Submission to ESPR Label questionnaire from Ramboll

Feedback on the Ramboll Questionnaire for an ESPR Label under Article 16 of the ESPR Framework. APPLiA wishes to formally express profound concern regarding the consultation process and the methodology employed for establishing a label under the ESPR. We urge the study team and the EU Commission to re-evaluate their current approach to this critical matter.

Disclaimer

APPLiA's decision not to respond to the questionnaire: APPLiA has decided not to contribute to the questionnaire due to the subjective nature of its questions, which are open to diverse interpretations. The survey lacks clarity on the specific *scope, metrics, and parameters for products affected by the ESPR label, making it impossible to provide meaningful and consistent input.* Instead, we have chosen to outline our principles and concerns in a formal position paper, emphasising that a clear framework and well-defined metrics must be established before any labelling decisions can be made.

Key Concerns and Principles

Flawed approach: The EU Commission/study team's current approach is flawed as it prioritises label design over the definition of scope, key metrics, parameters considered, measurement methodologies, and compliance controls. Establishing a robust and measurable methodology is crucial before finalising the label's design. This is again a reason why we were not able to answer the questionnaire.

Reasons for a Label: The EU Commission/Study Team should clearly outline the rationale for establishing another label, especially when alternative digital solutions like the Digital Product Passport (DPP) and QR codes are already being developed under the ESPR. The Commission needs to specify the problems this label is intended to solve (e.g., providing pre-sale or post-sale information) and demonstrate why existing EU tools, such as the DPP and the Energy Label, are not sufficient.

Process & timeline: APPLiA understands the importance of this regulation and the need to move forward with its implementation. However, the current consultation timeline and methodology are not only insufficient but also contradict the Commission's stated commitment to fostering competitiveness and creating a robust, future-proof regulatory framework. The survey on the ESPR label, a critical commercial tool that will fundamentally alter marketing and competition within the EU, has been given a severely limited two-week window for feedback, ending on 15 September. This is simply not enough time for APPLiA to consolidate a response and for our members—a diverse group of companies of all sizes—to



properly analyse the proposals, collect internal feedback, and provide their considered, high-quality input.

Avoid a One-Size-Fits-All Label Layout/Size: We believe that a common label layout for all products under the scope of the ESPR is unfeasible and runs counter to the EU's agenda for simplification and digitalisation. Products such as appliances, furniture, and textiles have vastly different functions, sizes, and information requirements. It is impossible to define a single layout before knowing the specific information requirements for each product group. The layout of a label will always depend on the amount and type of information requirements that will be set. We urge policymakers to leave decisions on the layout and content of any future ESPR label to product-specific delegated acts that thoroughly assess the most appropriate requirements relevant to the overall sustainability of the product.

Prioritise Digitalisation & Existing Labels: The ESPR should prioritise digitalisation and the use of digital tools like EPREL, the Digital Product Passport (DPP) and QR codes. This hybrid approach offers a flexible way to provide detailed information to consumers without cluttering physical packaging. Adding a new physical label would not only increase costs but also risk consumer confusion and contradict efforts to minimise packaging, especially for products with small formats. Finally, it would be important to consider other existing labels and how they would be impacted by yet another label coming on the market.

Consumer Perspective is Key: For energy-related products, the Energy Label has proven to be an incredibly successful tool, mainly as it was developed based on consumer perspective, high consumer recognition and influence on purchasing decisions (as demonstrated by the Eurobarometer survey). We urge the Commission to acknowledge the importance played by consumers and to consider this when setting up labels.

Recommendations

Given the above, we urge the EU policymakers to:

- **Leave the decision on the layout and content of the ESPR label to the future product-specific delegated acts setting out ecodesign requirements, when the latter mandate a label.** Only by knowing the content of the information requirement and the applicable product group will it be possible to define a layout of a label.
- **Continue promoting and building on the Energy Label.** The European Energy Label stands as a testament to effective consumer information, with high recognition and a demonstrable impact on purchasing decisions. As confirmed by Eurobarometer data, this tool is highly trusted and successfully guides consumers towards more energy-efficient products. In light of this, we emphasise that any new labelling initiative should not undermine or replace the existing Energy Label.





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