

CCIA Europe's response to the European Commission's call for evidence

Achieving a simple and effective EU framework for energy-efficient products

March 2026

The Computer & Communications Industry Association (CCIA Europe) welcomes the opportunity to submit feedback to the European Commission's call for evidence on the forthcoming Energy-Efficient Products Omnibus, expected to be adopted in Q2 2026. While the legislative acts under review have largely succeeded in meeting their objectives, CCIA Europe sees the Omnibus as a crucial opportunity to further refine the regulatory framework. By doing so, the Commission can reduce administrative burdens on businesses and improve outcomes for consumers – all while preserving the core environmental goals.

I. Advancing digital and simplified labelling

As the Commission works to reduce regulatory and administrative burdens, while advancing the EU's climate objectives, digitalisation and simplification in labelling offer clear benefits for both businesses and citizens.

Recommendations:

1. Provide digital-by-default solutions for labelling
2. Avoid overwhelming consumers with information
3. Ensure consistency across legislative initiatives

II. Providing certainty for next-generation Ecodesign requirements

For businesses, certainty is what drives innovation and the development of solutions that benefit the environment and consumers. Clear timelines for future Ecodesign requirements are therefore essential to allow for informed decisions on production and investment.

Recommendations:

4. Make the most of the delay in the ESPR transitional provisions
5. Set clear timelines with ample implementation time for industry

III. Upholding established product-safety and market-surveillance frameworks

It is impossible to assess a framework's effectiveness or shortcomings while it still awaits proper enforcement. Premature measures would thus cause duplication, higher compliance burdens, and legal uncertainty – contrary to the Commission's simplification goals.

Recommendations:

6. Refrain from abrupt or drastic legislative changes
7. Support Member States' enforcement capabilities

Introduction

The Computer & Communications Industry Association (CCIA Europe) welcomes the opportunity to submit feedback to the European Commission's call for evidence on the forthcoming Energy-Efficient Products Omnibus, expected to be adopted in Q2 2026.

While the legislative acts under review have largely succeeded in meeting their objectives, CCIA Europe sees the Omnibus as a crucial opportunity to further refine the regulatory framework. By doing so, the Commission can reduce administrative burdens on businesses and improve outcomes for consumers – all while preserving the core environmental goals.

To that end, CCIA Europe's response puts forward seven recommendations for the Commission to strengthen the upcoming Energy-Efficient Products Omnibus, which are structured around three key objectives:

- I. Advancing digital and simplified labelling
- II. Providing certainty for next-generation Ecodesign requirements
- III. Upholding established product-safety and market-surveillance frameworks

I. Advancing digital and simplified labelling

As the Commission works to reduce regulatory and administrative burdens, while advancing the EU's climate objectives, digitalisation and simplification in labelling offer clear benefits for both businesses and citizens.

1. Provide digital-by-default solutions for labelling

CCIA Europe welcomes the recognition in the call for evidence that labelling is a key area where administrative and cumulative burdens can be reduced. The Association has consistently advocated for the digitalisation of product labels across various fora and through numerous written contributions.

Evidence from several studies shows that **replacing printed labels with a digital format and the electronic delivery of regulatory information significantly reduces waste and carbon emissions, while also improving accessibility**. Recent research indicates that e-labelling could save millions of litres of water annually¹ and eliminate costly packaging reprints, potentially lowering total EU compliance costs for labelling by nearly €120 million each year². Digital labelling could also simplify the process for SMEs when uploading information for their online offers and listings.

That is why CCIA Europe remains a steadfast proponent of a digital-by-default approach to product labelling and would welcome any forward-looking initiatives under the Energy-Efficient Products Omnibus that advance this goal, provided they align with other Commission workstreams currently underway.

¹ Mobile & Wireless Forum & E-Labelling Initiative, 'Why the European Union should adopt e-labelling', March 2022, available [here](#).

² Oxera Consulting, 'The economic impacts of Digital Product Passports in the EU', 24 March 2025, available [here](#).

Any digital labelling or database-related obligations must, however, respect manufacturers' need to protect commercially-sensitive information. Appropriate safeguards should be in place to prevent the intentional or inadvertent disclosure of product information prior to a product's official market launch.

Finally, the Omnibus provides a key opportunity to introduce a provision allowing manufacturers to provide not only the product information sheet – as already established under Article 3 of the Energy Labelling Regulation³ – but also the label itself in electronic form.

2. Avoid overwhelming consumers with information

When faced with excessive or poorly structured product information, European consumers often misinterpret labels and markings. Rather than supporting informed consumer choices, the proliferation of overlapping requirements – including the upcoming Ecodesign label, the Energy label, the CE marking, the EU Common Charger pictograms, and the WEEE 'wheelie bin' symbol – can lead consumers to ignore them altogether.

Lessons from other regulatory fields, such as cookie banners and mandatory terms and conditions, show that information overload tends to diminish rather than improve consumer awareness.

For these reasons, CCIA Europe believes that the growing **risk of information overload must be addressed by prioritising simplicity and intuitive design in labels**. In this respect, the Digital Product Passport (DPP) offers a viable medium- to long-term solution for housing detailed technical information, provided it remains aligned with businesses' operational needs.

While visual aids play an important role in guiding consumers, their impact can only be maximised when operators are able to integrate them seamlessly into their specific user interfaces, rather than being constrained by today's prescriptive legislative mandates regarding form, colour, or placement.

3. Ensure consistency across legislative initiatives

CCIA Europe acknowledges the Commission's broader efforts to simplify and digitalise labelling, particularly through the revision of the New Legislative Framework, Omnibus IV⁴, and the development of the Digital Product Passport (DPP). Yet, the DPP represents a long-term solution that may not fully materialise for key product categories like mobile phones and tablets before the year 2030.

CCIA Europe therefore welcomes the Commission's intention to make sure that the Energy-Efficient Products Omnibus is intended to bridge this critical gap and that the European Product Registry for Energy Labelling (EPREL) and the DPP will be aligned.

³ 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, available [here](#).

⁴ Proposal for a Directive of the European Parliament and of the Council amending Directives 2000/14/EC, 2011/65/EU, 2013/53/EU, 2014/29/EU, 2014/30/EU, 2014/31/EU, 2014/32/EU, 2014/33/EU, 2014/34/EU, 2014/35/EU, 2014/53/EU, 2014/68/EU and 2014/90/EU of the European Parliament and of the Council as regards digitalisation and common specifications, available [here](#).

Even though the Commission's commitment to simplification is clear, CCIA Europe would also like to **reiterate the need to address inconsistencies between these new initiatives and existing legislation early**. A glaring example concerns the Ecodesign for Sustainable Products Regulation (ESPR)⁵. Indeed, Article 16 of the ESPR does not explicitly provide for the possibility of digital labelling for the ESPR label. Surveys conducted by private consultancies on behalf of the Commission regarding general principles for the design of the ESPR label offered no option for digital formats.

This exclusion directly contradicts the Commission's stated objective to simplify and digitalise regulatory requirements. The Energy-Efficient Products Omnibus should explicitly clarify that digital labelling is permissible across all relevant product frameworks, including under the ESPR, to ensure horizontal consistency and legal certainty.

Finally, as the Commission seeks to ensure consistency within the Single Market, it should also aim to streamline international data requirements. Building on this internal alignment, the Commission could explore a partnership with the UK to interconnect EPREL with the UK energy labels database and work towards the mutual recognition of these labels. Since the data requirements are largely identical in both jurisdictions, such a linkage would create a single definitive destination for environmental data across Europe, significantly streamlining the process for economic operators active in both markets.

II. Providing certainty for next-generation Ecodesign requirements

For businesses, certainty is what drives innovation and the development of solutions that benefit the environment and consumers. Clear timelines for future Ecodesign requirements are therefore essential to allow for informed decisions on production and investment.

4. Make the most of the delay in ESPR transitional provisions

CCIA Europe welcomes the Commission's support for the postponement of the transitional provisions provided for in Article 79(1)(a)(i) of the Ecodesign for Sustainable Products Regulation (ESPR), whether adopted as part of the current discussions on Omnibus IV or, failing that, through the Energy-Efficient Product Omnibus.

While CCIA Europe fully supports the postponement, it is **critical to ensure that the extra time provided by this 'strategic window' is also going to be used effectively**. The Commission therefore must seize this opportunity to undertake all necessary preparatory steps – including technical studies, in-depth impact assessments, and stakeholder consultations – to make sure that the new requirements are feasible and easy to implement, in the spirit of reducing the administrative burden on companies. This is essential to ensure that eventual substituting requirements are comprehensive and grounded in market and technological realities.

⁵ Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC, available [here](#).

Furthermore, this postponement must be paired with business certainty. Stakeholders require a clear, binding timeline regarding the adoption of new rules. Only with such clarity can businesses proceed with the necessary R&D investments to ensure their products will be compliant when the new requirements eventually enter into force.

5. Set clear timelines with ample implementation time for industry

Digital innovation thrives when the legislative horizon is stable and compliance remains predictable. While CCIA Europe recognises that the European Commission has strived to provide clear timelines to stakeholders – despite facing resource constraints and a significant backlog – the Association maintains that the current lack of long-term planning certainty hinders the creation of a predictable environment in which businesses can invest with confidence.

Consequently, CCIA Europe **advocates for a more appropriate transition period regarding the entry into force of product-specific legislation of at least 24 months.** Experience has demonstrated that 18 months is insufficient for companies to initiate and complete R&D processes, let alone implement them across production lines. Ensuring a workable framework requires a default transition period of 24 months or more.

III. Upholding established product-safety and market-surveillance frameworks

It is impossible to assess a framework's effectiveness or shortcomings while it still awaits proper enforcement. Premature measures would thus cause duplication, higher compliance burdens, and legal uncertainty – contrary to the Commission's simplification goals.

6. Refrain from abrupt or drastic legislative changes

The Association acknowledges the Commission's identification of persistent non-compliance, particularly within the e-commerce sector, as a core issue in its call for evidence. CCIA Europe remains fully supportive of robust market-surveillance rules designed to ensure that non-compliant actors are effectively identified and held accountable. Yet, not all e-commerce platforms should be put in the same basket.

For these reasons, CCIA Europe **strongly cautions against modifying market-surveillance rules through an Omnibus at this stage.** The EU has recently established a comprehensive framework to modernise market surveillance and ensure a liable economic operator exists within the Union for non-EU sellers. This regulatory suite includes: the General Product Safety Regulation (GPSR)⁶, which only came into effect in December 2024; the Digital

⁶ Regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023 on general product safety, amending Regulation (EU) No 1025/2012 of the European Parliament and of the Council and Directive (EU) 2020/1828 of the European Parliament and the Council, and repealing Directive 2001/95/EC of the European Parliament and of the Council and Council Directive 87/357/EEC, available [here](#).

Services Act (DSA)⁷; and the Product Liability Directive (PLD)⁸, which is currently awaiting transposition into national law across most Member States.

As both businesses and national authorities are still in the process of adapting to these new requirements, and the effectiveness of these frameworks has yet to be fully evaluated, it would be highly premature to alter the established landscape. The Commission is already preparing a targeted revision of the Market Surveillance Regulation (MSR)⁹ to strengthen enforcement and ensure alignment with the aforementioned laws, amongst other goals. Simultaneously, co-legislators are debating a major EU Customs Reform¹⁰ that specifically addresses e-commerce challenges.

These initiatives all demonstrate that the necessary legislative tools already exist. Hence, the challenge lies not in a lack of regulation, but in the consistent enforcement of the rules already in force, which continues to lag behind.

7. Support Member States' enforcement capabilities

As extensively demonstrated by the Draghi report, the EU's current enforcement landscape is too fragmented and under-resourced. To help address these shortcomings, CCIA Europe has always been **supportive of a revision of the Consumer Protection Cooperation (CPC) Network**¹¹. This is why the Association was pleased to see the recent announcement in the European Commission's 2030 Consumer Agenda¹² that the CPC regulation will be revised to strengthen enforcement and ensure a level-playing field for businesses, shielding compliant traders and protecting consumers from market players who do not respect the rules.

Lastly, CCIA Europe expresses its support for the Commission's consideration of using new technologies (e.g. digital labelling, AI-supported checks, replicable quick-testing models, and joint enforcement activities between authorities and operators) to help customs and market-surveillance authorities in fulfilling their essential roles.

⁷ Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act), available [here](#).

⁸ Directive (EU) 2024/2853 of the European Parliament and of the Council of 23 October 2024 on liability for defective products and repealing Council Directive 85/374/EEC, available [here](#).

⁹ Regulation (EC) No 765/2008 of the European Parliament and of the Council of 9 July 2008 setting out the requirements for accreditation and market surveillance relating to the marketing of products and repealing Regulation (EEC) No 339/93, available [here](#).

¹⁰ Proposal for a Regulation of the European Parliament and of the Council establishing the Union Customs Code and the European Union Customs Authority, and repealing Regulation (EU) No 952/2013; Proposal for a Council Regulation amending Regulation (EEC) No 2658/87 as regards the introduction of a simplified tariff treatment for the distance sales of goods and Regulation (EC) No 1186/2009 as regards the elimination of the customs duty relief threshold; Proposal for a Council Directive amending Directive 2006/112/EC as regards VAT rules relating to taxable persons who facilitate distance sales of imported goods and the application of the special scheme for distance sales of goods imported from third territories or third countries and special arrangements for declaration and payment of import VAT; all available [here](#).

¹¹ Regulation (EU) 2017/2394 of the European Parliament and of the Council of 12 December 2017 on cooperation between national authorities responsible for the enforcement of consumer protection laws and repealing Regulation (EC) No 2006/2004, available [here](#).

¹² 2030 Consumer Agenda, available [here](#).

Conclusion

The Energy-Efficient Products Omnibus represents a vital opportunity to streamline and improve Europe's regulatory framework. Its primary goal must be to reduce administrative burdens for businesses and improve outcomes for consumers. This should be done while upholding core environmental objectives, leveraging digital solutions and streamlining consumer information to do so. Digitalisation must act as a tool for simplification, replacing outdated analogue requirements, rather than adding layers of new EU obligations.

Equally important is providing businesses with clear, actionable certainty: including predictable timelines, sufficiently long transition periods, and a stable overall legislative framework. To support a dynamic and safe Single Market, CCIA Europe strongly believes that the consistent and robust enforcement of recently established market-surveillance frameworks should take precedence over premature legislative changes.

An EU regulatory landscape that is predictable, effectively enforced, and innovation-friendly is essential for fostering competitiveness and ensuring a level playing field for compliant businesses.

About CCIA Europe

The Computer & Communications Industry Association (CCIA) is an international, not-for-profit association representing a broad cross section of computer, communications, and internet industry firms.

As an advocate for a thriving European digital economy, CCIA Europe has been actively contributing to EU policy making since 2009. CCIA's Brussels-based team seeks to improve understanding of our industry and share the tech sector's collective expertise, with a view to fostering balanced and well-informed policy making in Europe.

Visit ccianet.eu, x.com/CCIAeurope, or linkedin.com/showcase/cciaeurope to learn more.

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