

COM/2026/565 Proposal for a Regulation amending Regulation (EU) 2017/1369 and Regulation (EU) 2020/740 as regards simplification and better use of digital options for energy and tyre labelling.

28 September 2026

- 1. UKG states that some GB businesses supplying the NI market may face “additional packaging, labelling, product information, EPREL or fulfilment requirements”, which could “influence decisions on product availability” in NI. How many products / product types moving from GB to NI would be impacted by these new requirements?**

The UK Government does not at present have detailed numbers on individual types of products moving from GB to NI that would be affected. We do however understand the product groups in scope include:

- Cooking: Domestic ovens; range hoods.
- Cleaning and drying: Dishwashers; washing machines; washer dryers; tumble dryers.
- Refrigeration: Fridges and freezers; commercial refrigerators; professional refrigerated storage cabinets.
- Heating, cooling and ventilation: Air conditioners and comfort fans; local space heaters; ventilation units; solid fuel boilers; space heaters; water heaters.
- Electronic products: Electronic displays; smartphones and tablets.
- Light sources: Light sources.

The proposal does not substantively change the scope of existing energy and tyre labelling frameworks. Its effects will mainly arise through changes to administration, digitalisation and enforcement of these frameworks themselves.

- 2. UKG states that further industry engagement is planned to determine the extent of possible additional costs for businesses. When will the outcome of that engagement be known?**

The government continues to engage stakeholders on the EU's "Omnibus" legislative proposal to simplify and digitalise energy and tyre labelling. On 18 August 2026. The Department for the Economy (DfE) and the Department for Infrastructure (DfI) in Northern Ireland, working together with DESNZ launched a "call for comment" to gather evidence on impacts of these proposals in NI. No business concerns were raised.

The Government will continue to engage business on these issues. The Government will continue to engage businesses on this proposed regulation, its impacts across GB and NI markets, and any additional administrative or operational costs arising from separate requirements.

- 3. UKG states the proposal would provide “greater flexibility” in how energy labels are supplied with products, and that its digitalisation measures “will reduce packaging, minimise duplication and administrative burdens”. UKG also states that these measures could create “additional complexity” for businesses operating across both GB and NI due to “administrative divergence.” How – if at all - would this divergence impact the movement of products into NI from GB?**

The proposal is not expected to introduce significant divergence in the substantive energy labelling requirements applying to products. The principal impacts are likely to arise from administrative, digital and enforcement differences

Implementation of the additional flexibilities envisioned by the EU proposal in Northern Ireland – such as the extension of labelling rescaling period to 12 months, and removal of the requirement to supply a physical label is likely to result in administrative savings to businesses selling from GB to NI.

However, products placed on the GB market may continue to require a printed label and potentially paper product information, while businesses supplying Northern Ireland could make greater use of digital provision. This means that businesses supplying both markets may need to maintain separate packaging, documentation or fulfilment processes. This is not likely to have significant impacts on the movement of products moving from GB to NI, given the resulting overall greater flexibility of NI requirement.

GB manufacturers supplying Northern Ireland may also need to comply with strengthened Authorised Representative and EPREL requirements. These differences could increase the administrative burden associated with supplying Northern Ireland and could influence product availability at the margins, particularly where suppliers have a small NI market share. However, most changes are not presently expected to create tangible barriers to GB–NI trade.

- 4. If the proposed EU act was not applied in NI, how would this impact a) relevant businesses based in NI; b) movement of products between GB and NI (and vice versa); and c) movement of products between the EU and NI (and vice versa)?**

By non-application, the status quo would be continued in NI a) businesses would not benefit from the proposal’s administrative simplifications, including greater flexibility over the format in which labels accompany products, fully electronic product information sheets and the extended period for selling products carrying non-rescaled labels.

B) Non-application would reduce potential administrative divergence between GB and NI where GB retained its existing requirements. This would ensure the use of common packaging, documentation and fulfilment processes across the UK internal market. It would mean that obligations on installers across GB and NI remain the same.

c) Non-application of these proposals would likely affect the movement of products from EU to NI, reducing availability in NI.

5. What impact would be applying/not applying the proposed EU act have on consumers in NI?

Applying the proposal would preserve the existing policy objective of enabling customers and end-users to make informed purchasing decisions. Consumers would continue to have access to the necessary product information, although it could increasingly be supplied digitally. The proposal would not establish a fully digital-only label regime, and printed labels would remain available on request.

The extended rescaling period may also reduce disruption to the supply and sale of products during transitions between label scales. However, increased reliance on digital information could affect consumers who are less able or willing to access information electronically, although the continued requirement to supply printed labels on request is intended to mitigate this.

The available evidence does not currently allow the Government to quantify any effect on prices or product availability, but it is expected to be negligible to none. No responses from consumers or consumer organisations were received during the call for evidence of these proposals in NI.

6. UKG states that the proposed extended rescaling period will introduce flexibility for NI businesses and those operating across GB and NI. UKG also states that the different transitional timelines between GB and NI could potentially cause “confusion”. In your assessment, are the revised transition and rescaling periods a net positive or net negative for relevant businesses? Why?

The revised rescaling arrangements are expected to net be positive for relevant businesses, subject to some transitional confusion. The proposal would allow products carrying the non-rescaled label to continue to be marketed and sold for 12 months following rescaling, instead of the current 4 months. This would allow for additional flexibility for businesses operating across both GB and NI markets, providing more time to prepare and the new label. This should give suppliers and dealers more time to manage existing stock, update labels and adjust sales arrangements. It may also reduce the risk of disruption and temporary divergence during rescaling exercises.

The extension of the rescaling period, however, mean that different label formats would be allowed to be present simultaneously on the market for longer.

- 7. UKG states that “additional obligations for Authorised Representatives and installers operating in NI” and “enforcement responsibilities for NI market surveillance authorities” are “unlikely to result in significant disruption to existing GB-NI trade flows in the longer term.” What – if any – short term disruption are these obligations likely to cause? How long is any disruption likely to last?**

Any short-term disruption is most likely to arise from businesses and enforcement authorities familiarising themselves with the clarified requirements and updating their compliance processes.

For GB manufacturers supplying Northern Ireland, this may include checking or revising Authorised Representative mandates, ensuring that signed mandates are uploaded to EPREL, establishing processes for notifying changes and ensuring cooperation with market surveillance authorities. Installers newly affected by the clarification may need to update invitations to purchase so that the relevant energy label and product information are provided.

- 8. UKG states “businesses and enforcement authorities may require an implementation period to prepare for compliance and enforcement”. Are any such implementation periods provided for within the proposed EU act? If so, do you consider these to be adequate?**

The proposal includes a revised transition period for the rescaling of energy labels. Products bearing the non-rescaled label could continue to be marketed and sold for 12 months following rescaling. The Government’s initial assessment is that this would be beneficial, as it would give suppliers and dealers more time to align their arrangements and manage existing stock.

The initial assessment does not identify a separate general implementation period covering all the proposal’s provisions, including the new Authorised Representative and installer obligations. The adequacy of the implementation arrangements for those measures will therefore need to be considered once the final text and application dates are known.

- 9. UKG states that proposed amendments to the Tyre Labelling Regulation will mean that some tyre fitters could enter into its scope for the first time. How many tyre fitters would likely fall within scope? What would be the likely impact upon those businesses?**

The Government does not currently have evidence as to the number of tyre fitters that could fall within scope for the first time.

Where tyre fitters offer relevant products for sale, hire or hire-purchase as part of their commercial activity, the proposal could require them to include the relevant label in invitations to purchase and make the applicable product information available. The principal impacts are therefore expected to involve familiarisation, updating sales or marketing materials and ensuring that the relevant information is provided before purchase.

Further engagement with the tyre sector will be required to establish the number of businesses affected and the scale of any costs.

10. UKG states that the proposed EU act may lead to “possible cost-reductions for traders selling to NI” due to reduced paperwork and administrative savings. What level of cost savings are likely to arise? How – if at all – would this impact product availability / prices in NI?

The European Commission estimates that the package of measures could save businesses and market surveillance authorities across the EU up to €125 million annually over the next ten years. However, this is an EU-wide estimate and cannot be used to determine the savings that would accrue specifically to businesses selling into Northern Ireland, although many administrative burden reductions (such as those associated with printing costs) would be passed on when selling in NI market.

Potential savings could arise from removing the default requirement for a printed label to accompany each unit, moving product information sheets fully online, avoiding duplicate registration between EPREL and the future EU Digital Product Passport system, and simplifying rescaling transitions.

The Government does not currently have sufficient evidence on savings for individual traders or determine whether they would affect prices or product availability in Northern Ireland. Any effect is likely to depend on individual businesses’ operational models, market share and whether they supply both GB and NI.

11. UKG also states that there is a possibility that businesses operating across GB and NI might face “higher costs due to regulatory divergence and the need to comply with separate requirements.” Which specific elements of the proposal are likely to lead to higher costs for relevant businesses? How does this compare with the abovementioned possible cost-reductions?

The proposal establishes a duty for non-EU authorised representatives (ARs) to cooperate with MSAs and requires that a signed copy of the AR’s mandate is to be added to EPREL as a condition for registering products and that any changes in the scope of that mandate are notified to MSAs. For many UK exporters/manufacturers this is not completely new, but the duties become clearer and more enforceable. They will be legally required to include certain information in a mandate provided to ARs and visible to EU Market

Surveillance Authorities. The cost-reductions from other elements of the proposal are likely to outweigh this increase in burdens.

12. UKG states that officials have engaged selected stakeholders from its Ecodesign stakeholder Forums on the proposed EU act, and that further industry engagement is planned. How many businesses have been / will be consulted? Does this include both NI-based businesses and GB-based businesses supplying into NI?

On 18 August 2026 the Department for the Economy (DfE) and the Department for Infrastructure (DfI) in Northern Ireland, working together with DESNZ launched a "call for comment" on the EU's "Omnibus" legislative proposal to simplify and digitalise energy and tyre labelling. The call for comment targeted businesses operating or established in NI

DESNZ officials have undertaken initial engagement with over 10 selected stakeholders including major retailers and business representative organisations through existing forums and channels.

Engagement undertaken so far has not presented evidence of significant risks or concerns neither by NI-businesses or businesses selling from GB to NI or vice-versa. Further engagement should seek views from both NI-based businesses and GB-based businesses supplying products into Northern Ireland. This will be important in establishing the scale of GB–NI trade affected, the practical consequences of separate administrative requirements and the likely balance between cost savings and additional compliance burdens.