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COMMISSION STAFF WORKING DOCUMENT

EXECUTIVE SUMMARY OF THE IMPACT ASSESSMENT REPORT

Accompanying the document

**Proposal for a Regulation of the European Parliament and of the Council
amending Regulation (EU) 2017/1369 and Regulation (EU) 2020/740 as regards
simplification and better use of digital options for energy and tyre labelling**

{COM(2026) 565 final} - {SEC(2026) 565 final} - {SWD(2026) 565 final}

EXECUTIVE SUMMARY SHEET

Impact Assessment on the omnibus to simplify energy efficient product legislation

A. NEED FOR ACTION

What is the problem and why is it a problem at EU level?

Problem 1: Overly complicated obligations for suppliers and retailers

Four drivers underpin this problem: 1. Cumulative obligations for suppliers for labels and EPREL. 2. Lack of flexibility: One-size-fits-all rules for label delivery and display. For tyres, the framework lacks flexibility to adjust certain technical details 3. Complex transition rules from old to rescaled labels 4. 'Once only' principle not fully applied for EPREL data.

Problem 2: Persistent non-compliance

The problem has many drivers, including external factors. The IA addresses only aspects of non-compliance rooted in unclear legal duties and concepts.

The rules are fully harmonised today, hence only an EU-level amendment is feasible to maintain uniform application.

What should be achieved?

General objective: Simplify and improving the energy and tyre labelling framework without undermining its core purpose: i.e. enabling customers to choose more efficient products and reduce energy consumption.

Specific objective 1: Simplify rules for suppliers and retailers

Specific objective 2: Improve compliance through clarifications.

What is the value added of action at the EU level (subsidiarity)?

EU-level simplification provides a consistent legal baseline for enforcement authorities, cost reductions for businesses operating across the EU and improved EPREL usability.

B. SOLUTIONS

What are the various options to achieve the objectives? Is there a preferred option?

Two policy options were assessed (against a baseline of no legislative change):

- **Policy Option 1** (13 measures): Simplifies energy label rules; clarifies legal concepts, 'once only' principle for EPREL; wider empowerment for the Commission for tyre labelling, tyre testing reports in EPREL's compliance part, no more tyre label display for vehicle dealers
- **Policy Option 2** (15 measures, preferred): Includes all measures of Option 1 and in addition directly amends annexes of the tyre labelling regulation with full technical specifications for simplified/nested tyre label display and updates information requirements for tyres for immediate legal effect.

What are different stakeholders' views? Who supports which option?

- Suppliers/manufacturers: Support digital-only for label delivery and 'once-only' EPREL–DPP link. Tyre industry is wary of both policy options' requirements, save for the simplified label.

- Dealers (incl. SMEs): Oppose digital labels only and shift of label printing obligation, welcome extended transition periods for stock sell-through. Concerned about online marketplaces vs. other dealers.
- Market Surveillance Authorities (MSAs): Support measures that improve EPREL compliance. Oppose digital only for labels but see merits of removing the printed label by default.
- Consumer organisations and NGOs: Insist on continued printed label delivery and welcome improving compliance.

C. IMPACTS OF THE PREFERRED OPTION (POLICY OPTION 2)

What are the benefits?

- Administrative cost savings for suppliers: Up to EUR 83 million/year from removal of printed label default and up to EUR 66 million one-off from 'once only' for EPREL; EUR 2 million p.a. from simplified label transitions. Vehicle dealers EUR 40 million year.
- Savings for dealers: EUR 3 million per label transition cycle
- Savings for MSAs: EUR 3.7 million/year
- Compliance improvements
- Consumer/environmental benefits: Better tyre label/EPREL usability. Customers retain right to have label in display at point of sale.

What are the costs?

- Authorised representatives: EUR 10 million one-off to upload mandate copies into EPREL
- Tyre suppliers: EUR 9.6 million one-off where APIs are not used
- Online marketplaces: Up to EUR 2 million/year where APIs are not used
- Dealers: EUR 7 million/year additional cost for label printing at point of sale (but can request from supplier)

What are the impacts on SMEs and competitiveness?

Increased competitiveness due to lower compliance costs for suppliers and retailers. More SME dominated retail sector has right to request printed label from supplier. No significant trade/international impacts as labelling rules apply also to suppliers from abroad (but clearer rules for authorised representatives)

Will there be significant impacts on national budgets and administrations?

MSAs will benefit from reduced administrative costs. No need for transposition. Benchmarking report on ICSMS reporting.

Will there be other significant impacts?

Environmental impacts are insignificant compared to energy/GHG savings generated by the overall labelling policy. Reduced destroyed stock with old labels. Advances digital agenda.

Proportionality

The preferred option does not exceed what is necessary. Full digitalisation of label delivery was discarded. New obligations are targeted and evidence based.

D. FOLLOW UP

When will the policy be reviewed?

Continuous product-specific reviews and evaluations.