

Stop Double Regulation & Remove restrictions for providing spare parts

APPLiA is asking for the simplification of the two main regulations for home appliances, namely the ESPR (EU) 2024/1781 and the energy labelling framework regulation (EU) 2017/1369. First, we are asking to remove the double regulation of certain components and subassemblies in home appliances, which are already regulated by ecodesign and energy labelling legislation. Secondly, APPLiA requests to remove current restrictions on the market placement of spare parts. These parts are for repairing older appliances that complied with ecodesign legislation when they were originally sold. Here are our key recommendations on how to solve this through the Environmental Omnibus.

Q1: Why is this a problem?

The Ecodesign and Energy Labelling legislation is designed to ensure that specific appliance categories, as whole systems, achieve the highest possible energy efficiency. The responsibility for meeting these requirements falls on the producer, who must identify the optimal design and components for the complete product.

Regulating the energy efficiency of individual components—such as electric motors, industrial fans, and light sources—that are part of an already regulated appliance offers no added value. On the contrary, this double regulation creates an unnecessary administrative burden, increases costs, and limits the flexibility needed for innovative product design. These components are integral parts of the final appliance and are not generic, standalone items. Their function is strictly tied to the specific system they are designed for.

Drawing inspiration from the ecodesign legislation for electronic displays (Regulation 2019/2021, Article 1.2(g)), which exempts *"components or subassemblies of products covered by implementing measures adopted under Directive 2009/125/EC,"* we propose to apply a similar exemption also for other components. This would prevent double regulation under the Ecodesign and Ecodesign for Sustainable Products Regulation (ESPR) for industrial fans, motors, external power supplies, and light sources, as well as for the energy labelling of light sources and displays. These components are typically placed on the market only when integrated into home appliances or as spare parts for their repair. Since they are produced to the specifications of the appliance manufacturer, it is highly unlikely they would be used for other applications.

Furthermore, the existing legislation should be adapted to promote the repair and longevity of appliances. As ecodesign legislation becomes increasingly restrictive with each revision, spare parts that are not exempt risk becoming non-compliant with the latest requirements. This can lead to the unnecessary scrapping of parts intended for repairing older generations of appliances.. This is contrary to EU circular economy objectives.

The appliance's bill of materials, which is created before production of the appliance starts, specifies the parts to be used for production and also for repair. The use of parts that are in line with the bill of materials is critical for maintaining the correct function, performance,



and safety of the appliance over its lifespan. In addition, the requirement to energy label spare parts offers no added value for the consumer, as the objective when a product is broken is to find the correct part for a repair, not to compare energy efficiency. This administrative burden for spare parts should be removed.

Q2: In which legislation do we find this situation?

A: Currently, this approach applies to the following regulations:

Ecodesign:

- Ecodesign for light sources and separate control gears ([EU\) 2019/2020](#))
- Ecodesign for electric motors and variable speed drivers ([EU\) 2019/1781](#))
- Ecodesign for industrial fans (fans driven by motors with an electric input power between 125 W and 500 kW) ([EU\) 2024/1834](#))
- Ecodesign for electronic displays (EU) 2019/2021
- Ecodesign for external power supplies (EU) 2019/1782

Energy Labelling:

- Energy labelling for light sources ([EU\) 2019/2015](#))
- Energy labelling for electronic displays ([EU\) 2019/2013](#))

See the Annex at the end of this paper for further information.

Q3: How to solve this?

Ecodesign

Two complementary steps are required:

Amend the ESPR Framework ([EU\)2024/1781](#)) and set a deadline by which to amend the respective implementing acts. This would require an amendment to the ESPR Framework, as outlined below - Article 4, insert new points 5 and 6, increase existing points 5-7 by 2

Article 4
Empowerments to adopt delegated acts

[...]

NEW 5. In the delegated acts adopted pursuant to paragraph 1, the Commission shall, where applicable, avoid double regulation and prioritise ecodesign requirements for finished products over requirements placed on raw materials or components/subassemblies used in these products, also when placed on the market as spare parts. Such exemptions shall be placed in each delegated act for products with the potential to be integrated in other products.



NEW 6. Pursuant to article 4 point 5, the Commission shall review and amend the following regulations by July 2026: Ecodesign for light sources and separate control gears (EU) 2019/2020; Ecodesign for electric motors and variable speed drivers (EU) 2019/1781; Ecodesign for industrial fans (industrial fans driven by motors with an electric input power between 125 W and 500 kW) (EU) 2024/1834 in order to avoid double legislation.

[...]

Amend the Implementing Acts: In parallel, amend the implementing acts¹ mentioned above by including the following amendments:

Article 1
Scope

[...]

This regulation shall not apply to [OP- Please insert the name of the regulated product in this regulation] that are: [...]

(x) components or subassemblies for the manufacturing of products covered by implementing measures adopted under Directive 2009/125/EC or delegated measures adopted under (EU) 2024/1781.

(y) components or subassemblies placed on the market as spare parts for the repair of products covered by implementing measures adopted under Directives 2009/125/EC or 2005/32/EC or delegated measures adopted under (EU) 2024/1781.

¹ Ecodesign for light sources and separate control gears (EU) 2019/2020; Ecodesign for electric motors and variable speed drives (EU) 2019/1781; Ecodesign for industrial fans (fans driven by motors with an electric input power between 125 W and 500 kW) (EU) 2024/1834



Q3: How to solve this?

Energy Labelling

Two complementary steps are required:

Amend the Energy Labelling Framework [\(EU\)2017/1369](#): and set a deadline by which to amend the respective implementing acts. This would require an amendment to the Energy Labelling Framework Regulation, as outlined below - Article 16, insert new point 5, increase existing points 5-7 by 1

Article 16
Empowerments to adopt delegated acts

[...]

NEW 5. In the delegated acts adopted pursuant to Article 17, the Commission shall, where applicable, avoid double regulation and prioritise energy labelling requirements for finished products over requirements placed on raw materials or components/subassemblies used in these products, also when placed on the market as spare parts. Such exemptions shall be placed in each delegated act for products with the potential to be integrated in other products.

NEW 6. Pursuant to Article 16 point 5, the Commission shall review and amend the following regulations by July 2026: Energy Labelling for light sources (EU) 2019/2015; Energy Labelling for electronic displays (EU) 2019/2013.

[...]

Amend the Delegated Acts: In parallel, amend the delegated acts² mentioned above by including the following amendments:

Article 1
Scope

[...]

This regulation shall not apply to [OP- Please insert the name of the regulated product in this regulation] that are: [...]

(x) components or subassemblies for the manufacturing of products covered by delegated measures adopted under Regulation (EU) 2017/1369.

(y) component or subassemblies placed on the market as spare parts for the repair of products covered by delegated measures adopted under Regulation (EU) 2017/1369, or have been covered by delegated or implementing measures adopted under Directives 2010/30/EU or 92/75/EEC.

² Energy labelling for light sources (EU) 2019/2015; Energy labelling for electronic displays (EU) 2019/2013.



ANNEX

Visualisation of the current legislation and requirements that manufacturers of home appliances are facing today.

Product	Ecodesign		Energy Label	
	Integrated into product	Spare parts	Integrated into product	Spare parts
Industrial Fans (ED: (EU) 2024/1834)	Art. 1, Sect. 2, Points b, c, m, n provide product specific exemptions. We consider this approach inappropriate. Requires generic exemption.	Annex II, point a, b, c: Exemption for spare parts for product models placed on the market before 24 July 2026. We agree with this approach, but the timeline should be made longer.	N/A (no energy label)	N/A (no energy label)
Electric Motors and Variable Speed Drives (ED: (EU) 2019/1781)	Art. 2, Sect. 2 points h and i provides product specific exemptions for some motors. We consider this approach inappropriate. Requires generic exemption.	No exemption - needs to be created	N/A (no energy label)	N/A (no energy label)
Light Sources and Separate Control Gears (ED: (EU) 2019/2020, EL: (EU) 2019/2015)	Annex III, Sect. 3, points q and r provides product specific exemptions. We consider this approach inappropriate. Requires generic exemption.	No exemption - needs to be created	No exemption - exemption needs to be created	Annex IV, Sect 2, point b, provides a product specific exemption. We consider this approach inappropriate. Requires generic exemption.
Displays (ED: (EU) 2024/1834; EL: (EU) 2019/2013)	Art. 1, Sect. 2, Point g, is a generic approach to addressing double regulation.	No exemption - needs to be created	Art. 1, Sect. 2, Point g, is a generic approach to addressing double regulation.	No exemption - exemption needs to be created
External Power Supplies (ED: (EU) 2019/1782)	Art. 1, Sect 2, point g provides a product specific exemption. We consider this approach inappropriate. Requires generic exemption.	No exemption - needs to be created	N/A (no energy label)	N/A (no energy label)