

Working Document

**for a
Commission Implementing Regulation**

laying down operational details for the European Product Registry for Energy Labelling (EPREL)

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Editorial remark: definitions 3-9 are from the eIDAS regulation.

Whereas:	Possible provisions that may be part of a Regulation
	CHAPTER I SCOPE AND DEFINITIONS
<p>(1) In accordance with Article 12 of Regulation (EU) 2017/1369 the Commission put in place the ‘European Product Registry for Energy Labelling’ (EPREL) system to establish a product database. The EPREL system consists of a public website, providing access to the public part of the information, and of a compliance website, where both the public and the technical information is registered by suppliers and can be accessed by Member State Market surveillance authorities. The public part of the EPREL website, available since 1 April 2022, provides public with information about energy-related products covered by Delegated Regulations adopted pursuant to Regulation (EU) 2017/1369, Directive 2010/31/EU and Regulation (EU) 2020/740.</p> <p>(2) It is appropriate to set operational rules in order to enhance the authenticity, integrity and confidentiality of the information entered by suppliers in EPREL. In this respect, unambiguous identification of legal and natural persons, acting as suppliers, is essential to ensure both their identity and their establishment in the Union. It also improves the effectiveness of market surveillance activities against non-compliant products by ensuring that only economic operators who have been properly identified, and are established in the Union, can place products on the Union market, in order to make enforcement possible. Finally, proper and unambiguous identification of suppliers also enhances customers’ rights by providing them with accurate information about products and their suppliers.</p>	<p style="text-align: center;">Article 1</p> <p style="text-align: center;">Subject matter and scope</p> <p>This Regulation sets out certain operational details for the functioning of the product database established in accordance with Article 12 of Regulation (EU) 2017/1369 and detailed rules applying to suppliers placing on the Union market:</p> <ol style="list-style-type: none"> (1) energy-related products covered by delegated acts supplementing Regulation (EU) 2017/1369 and Directive 2010/30/EU setting a framework on energy labelling; (2) tyres covered by Regulation (EU) 2020/740 on the labelling of tyres with respect to fuel efficiency and other parameters. <p>Those operational details and rules relate to:</p> <ol style="list-style-type: none"> a) the verification process that allows legal and natural persons to become verified suppliers, to ensure confidentiality, integrity and authenticity of the information registered by them; b) information required to register models by verified suppliers; c) data exchange models and software release management.
	<p style="text-align: center;">Article 2</p> <p style="text-align: center;">Definitions</p> <p>For the purposes of this Regulation, the definitions in Article 2 of Regulation (EU) No 2017/1369 shall apply.</p> <p>The following definitions shall also apply:</p> <ol style="list-style-type: none"> (1) ‘<i>European Product Registry for Energy Labelling</i> (‘EPREL’) means the electronic software system for managing the product database established and maintained by the Commission in accordance with Article 12 of Regulation (EU) 2017/1369;’ (2) ‘<i>supplier verification process</i>’ means the process aiming at establishing the capacity of a natural or legal person to register models of products in the scope of

Regulation(EU) 2019/1369 as a supplier;

- (3) *'qualified electronic seal'* means an advanced electronic seal, which is created by a qualified electronic seal creation device, and that is based on a qualified certificate for electronic seal;
- (4) *'trust service provider'* means a natural or a legal person who provides one or more trust services
- (5) *'qualified trust service provider'* means a trust service provider who provides one or more qualified trust services and is granted the qualified status by the supervisory body;
- (6) *'authentication'* means an electronic process that enables the electronic identification of a natural or legal person, or the origin and integrity of data in electronic form to be confirmed
- (7) *'validation'* means the process of verifying and confirming that an electronic signature or a seal is valid;
- (8) *'validation data'* means data that is used to validate an electronic signature or an electronic seal.
- (9) *'qualified electronic signature'* means an advanced electronic signature that is created by a qualified electronic signature creation device, and which is based on a qualified certificate for electronic signatures;
- (10) *'public sector register number'* means the alphanumerical identity code assigned by a Member State's authority or someone acting on its behalf, to a natural or legal person;
- (11) *'public register identifier'* means the alphanumerical identity code assigned by a Member State's authority, or someone acting on its behalf, to the particular section or office of the Register assigning the public register number;
- (12) *'verified supplier'* means an EPREL supplier organisation that has successfully completed the electronic verification process in the EPREL system;
- (13) *'unverified supplier'* means a EPREL supplier organisation that has not yet successfully completed the electronic verification process in the EPREL system, including those not having renewed the qualified electronic seal within the required deadline;
- (14) *'EPREL supplier organisation'* means a natural or legal person in its capacity to act as a supplier for registering product models in the product database;
- (15) *'data exchange model'* means an abstract model used to define the data structure and semantics of the product data, by means of a markup language and which permits the

data import of the model's parameter values from a supplier's database to the product database;

- (16) *'EPREL compliance system'* means the system, accessible via the compliance website via user authentication, enabling suppliers to register both public and compliance data in the product database and also enabling Member State Authorities to perform their control activities;
- (17) *'EPREL Compliance website'* means the website providing access to the product database for compliance control purposes, requiring user registration and authentication, where only Member State Authorities and Commission staff have access to any public and technical information of registered product models and to the EPREL supplier organizations information;
- (18) *'EPREL public system'* means the system, freely accessible via the public website enabling visitors to consult the public data of any registered product model since its placement on the market.
- (19) *'EPREL registration website'* means the website providing access to the product database for model registration and modification purposes, requiring user registration and authentication, where each verified EPREL supplier organisation has access only to the public part and the compliance part of its own registered product models and to its EPREL supplier organization information;
- (20) *'EPREL production environment'* means the electronic system, the database and the website giving access to them where the real product data is registered by suppliers and can be verified by MSAs. Both the public and the compliance system have a 'production system';
- (21) *'EPREL acceptance environment'* means the electronic system, the database and the website giving access to them where the Commission makes available any new software version and or new data-model version for suppliers to test for a time sufficient to let suppliers implement any software modification before they register *any new model*. Both the public and the compliance system have an 'acceptance system';
- (22) *'Application Programming Interface (API)'* means a set of definitions and protocols for building and integrating application software to share data;
- (23) *'Business-Register-ID'* means the identifier associated to a Member State's national public sector body attributing public registration numbers to legal on natural persons performing a professional activity, such as business or trade. In most of Member States a single registry manages this activity;
- (24) *'Business-Registration-Number'* means the specific alphanumeric code attributed by a Business Register, as attributed by a national public sector body register to the legal or natural person performing a professional activity;

	<p>(25) ‘Global Trade Item Number’ (GTIN) means a unique and internationally recognised identifier that is assigned by the global standards body for item identification GS1 to unambiguously refer to a product and that is generally accompanied by its barcode indication.</p>
	<p>CHAPTER II VERIFICATION PROCESS FOR SUPPLIERS</p>
<p>(3) Because of the large number of legal entities registering models in EPREL (in the order of thousands), verification of the identity of legal entities and natural persons in line with relevant Union legislation and international standards should be done electronically. Evidence of their establishment in the Union should also be provided electronically</p>	<p style="text-align: center;">Article 3 Verification process for suppliers</p> <p>In order to register models in EPREL, suppliers shall successfully complete the verification process. The verification process aims to confirm the identity of the supplier and its establishment in the Union, by validation of an electronic seal or of an electronic signature.</p>
<p>(4) Practices, standards and legislation exist in order to electronically verify the identity of legal entities and natural persons. Moreover, proof of the establishment of legal entities in the Union should be provided by means of qualified electronic seals including the registration number as provided by a Member State’s public register and, (to the extent possible), the identifier for the particular section or office of the public register providing registration (Register Identification number). The information contained in the “legal person semantic identifier” is to be authenticated, via a qualified electronic seal provided by qualified trust services providers (‘QTSP’), pursuant to Regulation (EU) 910/2014 (eIDAS 1). Electronic signatures of natural persons representing legal entities should not be accepted as a way to successfully complete the electronic verification process because they do not provide evidence of establishment in a Member State of that supplier.</p>	<p style="text-align: center;">Article 4 Electronic verification of legal entities</p> <ol style="list-style-type: none"> 1. Suppliers that are legal entities shall submit evidence of their identity and of their establishment in the Union, by means of a qualified electronic seal, provided by a qualified trust service provider. 2. The qualified electronic seal shall contain the legal entity’s name exactly as registered in a Member State’s public sector register, including any space, punctuation or other special character(s). 3. The legal person ‘semantics identifier’, part of the qualified electronic seal, shall contain information using the following structure and order: <ol style="list-style-type: none"> a. three-character legal person identity type reference set to a value as in point 3 of this article; b. two letter ISO 3166 [2] country code, indicating the country of establishment; c. hyphen-sign ‘-’; d. identifier, according to country and identity type reference.

¹ Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC OJ L 257, 28.8.2014, p. 73–114.

	<p>The three character legal person identity type reference in point a. of paragraph 2, shall have one of the following defined values:</p> <ul style="list-style-type: none"> i. "VAT" for identification based on a national value added tax identification number. ii. "NTR" for identification based on an identifier from a national trade register. iii. "PSD" for identification based on national authorization number of a payment service provider under Payments Services Directive (EU) 2015/2366 [i.13]. This shall use the extended structure as defined in ETSI TS 119 495 [3], clause 5.2.1. iv. "LEI" for a global Legal Entity Identifier as specified in ISO 17442 [4]. The 2 character ISO 3166-1 [2] country code shall be set to 'XG'. v. Two characters according to local definition within the specified country and name registration authority, identifying a national scheme that is considered appropriate for national and European level, followed by the character ":" (colon). <p>4. When the three character legal person identity type reference in point a. of paragraph 3 is set to the value 'NTR', the 'identifier', as in point d. of paragraph 3, shall include the following content:</p> <ul style="list-style-type: none"> a. Business-Register-ID, for the particular section or office of the public register having attributed the public registration number to this particular legal person; and b. Business-Registration-Number, as attributed to the legal person by the national public sector body register in point a. above. <p>The syntax for indicating the 'identifier', as in point d. of paragraph 3 above, shall be the following:</p> <p style="text-align: center;">Business-Register ID • Business-Registration-Number</p> <p>Electronic signatures of the authorized representative of a supplier which is a legal entity shall not be accepted in the validation of the electronic verification process of that legal entity.</p>
<p>(5) Natural persons should be considered suppliers in EPREL only when registering models on their own behalf. Suppliers which are natural persons shall not undertake the electronic verification process, with a view to registering models for placing products on the market, on behalf of legal entities.</p> <p>In order to complete the electronic verification process, natural persons who perform an economic should provide information allowing their univocal identifying them. Natural persons should provide evidence of their establishment in the Union via their registration</p>	<p style="text-align: center;">Article 5</p> <p style="text-align: center;">Electronic verification of natural persons</p> <ol style="list-style-type: none"> 1. Natural persons shall submit evidence of their identity by means of a qualified electronic signature, provided by a qualified trust service provider. 2. The qualified electronic signature shall contain the natural person's name exactly as registered in the Member State's business or trade or professional register, including

in a Member State's business, trade register, or in a professional association register that enables them to exercise a profession.

- (6) The electronic signature includes a field that could be used to indicate a "national civic registration number" where the registration number in a professional register may be inserted. Such a value, however, "natural person semantic identifier" is entered by the QSTP based on a self-declaration and is not verified by the should be authenticated, via a qualified electronic signature provided by qualified trust services providers ('QTSP'former.), pursuant to Regulation (EU) 910/2014 (eIDAS ²An additional document, therefore, signed or sealed by the QSTP or by the competent public register authority, should confirm the truthfulness of the value).

any space, punctuation or other special character(s).

3. The natural person "semantics identifier" part of the qualified electronic seal signature, shall include the following information in the following order:
- a. three-character natural persons identity type reference;
 - b. two letter ISO 3166 [2] country code, indicating the country of establishment;
 - c. hyphen-sign '-' ; and
 - d. identifier (according to country and identity type reference).

The three-character natural persons identity type reference in point a above shall have one of the following defined values:

- i. "PAS" for identification based on passport number;
- ii. "IDC" for identification based on national identity card number;
- iii. "PNO" for identification based on (national) personal number (national civic registration number);
- iv. "TIN" Tax Identification Number according to the European Commission – Tax and Customs Union³; or
- v. Two characters according to local definition within the specified country and name registration authority, identifying a national scheme that is considered appropriate for national and European level, followed by the character ":" (colon).

4. When the three character natural person identity type reference in point a. of paragraph 3 is set to the value 'PNO', the 'identifier', as in point d. of paragraph 3, shall include the following content:

- a. Business-Register-ID, for the particular section or office of the public register having attributed the public registration number to this particular legal person; and
- b. Business-Registration-Number, as attributed to the legal person by the national public sector body register in point a. above.

The syntax for indicating the 'identifier', as in point d. of paragraph 3 above, shall be the following:

Business-Register ID • Business-Registration-Number

5. Natural persons shall also submit evidence of their establishment in the Union for carrying out their activity in one of the Member States, by means of the following additional information, in a document digitally signed or digitally sealed by the

³ https://ec.europa.eu/taxation_customs/tin/tinByCountry.html

	<p>competent authority or by the qualified trust service provider:</p> <ol style="list-style-type: none"> a. Business or Trade register number, as attributed to the natural person at national level; and b. Business or Trade register identifier, for the particular section or office of the public register which assigned the public register number to the natural person in question at national level.
<p>(7) From start of application, only suppliers having successfully completed the verification process in EPREL should be able to register new models and to perform any modification relating to existing ones.</p> <p>(8) An additional, but limited period of time, from the start of application, should permit qualified trust service providers (QSTPs) to adapt their procedures and their software, if necessary, to provide qualified electronic seals that include the information necessary to verify establishment in the EU. After that period, only qualified electronic seals containing the relevant information, i.e. the number of registration in a national business or trade register, should be accepted to complete the EPREL verification process.</p> <p>(9) An additional and later deadline should be set to allow any supplier that completed the verification, but with a seal not containing the number of registration in a national business or trade register, to renew the seal, after which they would become ‘unverified suppliers’.</p>	<p style="text-align: center;">Article 6</p> <p style="text-align: center;">Timeline to complete electronic verification</p> <p>Only suppliers having successfully completed the electronic verification process, as required under Article 3, may register models in EPREL. This applies to both natural persons and to legal entities.</p> <p>From [T2], for unverified suppliers that are legal entities, only a qualified electronic seal, as set out in Article 4, point 3.ii, shall be accepted as validation data.</p> <p>By [T3], verified suppliers that had previously been validated with an electronic seal other than that set out in Article 4, point 3.ii, shall renew their validation by providing a qualified electronic seal as set out in Article 4, point 3.ii.</p>
<p>(10) Access to EPREL public information via the QR code, scanned on a label of a product placed on the market has to be made possible also for suppliers which are not yet verified. However, information registered by unverified entities may be inappropriate and inconvenient and not associated to products really placed on the market. To compensate the lack of the requirement of “bona fide” source. for those models, only models which are actually found on the Union market should be publicly accessible. A sequential call via API may retrieve also models registered by unverified suppliers and not really placed on the market, thus this access modality should be inhibited.</p>	<p style="text-align: center;">Article 7</p> <p style="text-align: center;">Models registered by unverified suppliers</p> <p>The public EPREL information on models registered by unverified suppliers shall only be accessible via scanning the QR code on the label, when applicable, or by entering the tradename and model identifier or the GTIN number. When the model data is displayed, a text shall indicate that the model was registered by an unverified supplier. Those models shall be not retrievable via APIs.</p>
<p>(11) Suppliers might transfer the registration of models to a verified supplier which is to take over the responsibilities related to the placement on the market of products. This transfer may be justified by organisational changes such as merging, splitting or sale of all or parts of the supplier organisation, cessation of activities or other circumstances.</p>	<p style="text-align: center;">Article 8</p> <p style="text-align: center;">Transfer of models already placed on the market</p> <p>A supplier may transfer registered models already placed on the market to a verified supplier organisation that takes over, from the date indicated for the transfer, the obligations from the previous supplier in relation to those models.</p>

CHAPTER III	
OTHER OPERATIONAL RULES	
	Article 9
	Access to EPREL by market surveillance authorities
	National market surveillance authorities shall have access to the compliance part of EPREL via a single national administrator whose name and contact details have been communicated to the Commission and who shall be the only official contact point for the Commission. National market surveillance authorities may further delegate access rights under their own responsibility.
	Article 10
	Management of user supplier profiles and validation
(12)	<p>An individual should act, on behalf of the supplier organisation he or she is working for, to create the “EPREL supplier organisation” entity and manage the full verification process, before any model can be registered. For legal entities, that same individual may also manage the user profile creation and access rights for the same supplier. The provision of an electronic seal of the company involves the supplier organisation mandating the individual providing such seals.</p> <p>Each supplier shall be responsible for the management of the users’ access right to their own data, whether related to the supplier’s organisation, or to any registered model. At least, one user shall be appointed as the responsible for the supplier. For legal entities, the supplier responsible user may manage other users’ access rights for the same supplier organisation.</p> <p>The supplier shall be responsible for managing the electronic validation process, including maintaining its validity.</p>
	Article 11
	Parameters necessary to identify or differentiate product models
(13)	<p>It is appropriate to require suppliers, to enter information regarding the markets where they intend to place their products and the GTIN, usually visible on the product box as a barcode, as this could streamline the search of a product and the association to other information available online.</p>
(14)	<p>It is appropriate, additionally, to require suppliers to declare values for parameters which are necessary to correctly identify or distinguish different product models for different intended uses to the extent it facilitates, among other matters, consumers’ choice and the assessment of the products’ population per class on energy labels, particularly in view of public procurement. These parameters should not increase the burden on market</p> <ol style="list-style-type: none"> 1. For each registered model, suppliers may indicate the GTIN, where applicable. 2. The Commission may identify other parameters, in addition to those included in the product information sheet, which are necessary to correctly identify or differentiate product types and different intended use and may require suppliers to enter the relevant values in the database. 3. Any parameters which are not required in the product information sheet, shall not be part of the compliance assessment by market surveillance authorities.

surveillance activity and should be not part of the compliance assessment.

Article 12

Information required to complete the registration of product models and release of the information

1. The registration of a model by a supplier in EPREL shall be deemed completed only after all the following-parameter values have been entered and the relevant documents have been uploaded in EPREL:

- a) all values related to the parameters and documents as established under Regulation (EU) 2017/1369, Regulation (EU) 2020/740 or any delegated act applicable to the product;
- b) any mandatory parameter identified by the Commission which is considered necessary to correctly distinguish different products;
- c) the date of placement on the market of the particular model or, for tyres, the date of first manufacturing of that tyre type;

The EPREL registration system shall confirm the completeness of the registration.

The date and time of the completion of the model registration shall be determined based on Central European Time (CET) or Central European Summer Time (CEST), as applicable.

As from the date under point (c) above, a model is deemed placed on the market and the information entered by the supplier shall become accessible to market surveillance authorities and the public part shall become public.

The date of end of placement on the market of each specific model shall be entered in EPREL within thirty days after its occurrence.

(15) Automatic avoidance of redundant registration is necessary to avoid that the same model, when placed on the market by multiple suppliers, results in multiple identical entries, being unhelpful for the user searching in the public EPREL website. Moreover, redundant registrations, not properly managed, result in incorrect statistics, in terms of model population under each efficiency class.

Article 13

Product models placed on the market by multiple suppliers

The supplier that first registers a model in EPREL shall enter all required information in accordance with Article 12. A different supplier, placing the same product model in the same or in a different Member State, shall refer to that model registration, may inherit all the public information, or may enter different information if the previously entered information is incorrect. Mandatory technical documentation for the model, relevant for compliance, may not be inherited.

<p>(16) Dealers have obligations to display in a visible manner labels and to make product information sheets available to customers. Specific requirements in relation to the information to be provided in visual advertisements, technical promotional material, in distance selling and in telemarketing, including distance selling on the internet are also set on a product group specific basis. In order to facilitate compliance with these obligations, it is appropriate, to require suppliers to communicate to dealers and distributors, the EPREL registration number, permitting to electronically retrieve the correct label and the product information sheet which are available in all official languages in EPREL.</p> <p>(17) Both suppliers and dealers, or distributors, moreover, are required to cooperate with market surveillance authorities and take immediate action to remedy any case of non-compliance with the requirements set out the Regulation and the relevant delegated acts, which falls under their responsibility, at their own initiative. Moreover, the information relevant for consumers and dealers should be made publicly available in the public part of the product database EPREL. That information should be made available as open data so as to give mobile application developers and other comparison tools the opportunity to use it. Easy direct access to the public part of the product database is facilitated by user-oriented tools, such as a dynamic quick response code (QR code), included on the printed label. To make these services possible, the dealer, should verify the correctness of the label supplied with the product that has to be displayed so as to ensure that customer retrieve and compare the relevant models as registered in EPREL.</p>	<p style="text-align: center;">Article 14</p> <p style="text-align: center;">Accuracy of labels and PIS of products in display</p> <ol style="list-style-type: none"> 1. For any product in the scope of Energy Labelling Regulations, to be sold online or over the internet, the supplier [may/shall] communicate to the dealer or distributor the EPREL model registration number. 2. For any product displayed at points of sale, with a label in accordance with a delegated act under Regulation 2017/1369 or in accordance with Regulation 2020/740, the dealer [may/shall] verify that scanning the QR code on the label of the product in display, leads to the relevant registration in EPREL.
<p>(18) Suppliers may have automated systems to automatically upload many models registrations at once. A change in the data format or semantics involves a software development and testing activity for which a reasonable notice should be provided. In the case of a new Regulation, a reasonable time should be accorded to review the registered data before the start of application and consequent publication (that would hinder some correction types).</p>	<p style="text-align: center;">Article 15</p> <p style="text-align: center;">Data exchange model and software release management</p> <p>Suppliers shall register product models either by using the interactive graphical EPREL registration interface or by uploading the model data using the latest version of the data exchange model available on the EPREL website maintained by the Commission.</p> <p>Any modification to existing parameters in the data exchange model requiring modifications of the software used by suppliers, for exporting models data for registering them, shall be announced by the Commission and made available in the EPREL acceptance environment at least two months before the new data exchange model is deployed in the EPREL production environment. This advanced notice is not required if the change relates to non-mandatory parameters or to parameters not part of compliance obligations and it not does not involve a malfunction or error on the supplier's side.</p> <p>The obligation to upload information using the new data exchange model shall only apply to new model registration.</p>

Article 16

Maintenance operation, availability of the product database and data availability

Guidelines and instructions on how to use EPREL shall be made available.

A helpdesk to provide suppliers and market surveillance authorities technical support shall be offered by the Commission at least between 9:00 and 17:00 Central Europe Time.

Written exchanges between suppliers and the helpdesk shall be stored for at least one year and made available to market surveillance authorities, if requested.

The Commission may suspend the availability of the EPREL compliance system or EPREL public system as result of a malfunction or of a cyber-attack and keep the system inaccessible until a safe situation is re-established.

In case registration is prevented by temporary unavailability or malfunctioning of the database, the Commission shall record data and time of unavailability and keep the record of the unavailability and make it available to Member State Authorities and suppliers upon request for at least 5 years.

Suppliers shall not be held liable for any loss of information entered in EPREL resulting from causes independent of their will and responsibility.

Both the compliance and the public EPREL systems shall be accessible at all times, except during necessary and previously announced periods of maintenance activities, including deployment of new releases. The Commission shall issue an advance notice in that regard on the compliance website or on the public website, as applicable.

Suppliers that, in case of unavailability of the system, cannot complete the registration process before placing new models on the market, shall keep a record of their best efforts to complete the registration process in due time, or, in case of unavailability of the EPREL registration system, at the soonest opportunity. The Commission shall make the public parameter values, label and product information sheet of registered models available by the means of APIs. The Commission shall anyhow take any reasonable action to keep track of any massive data download from the database.

Article 17

Unlawful or inappropriate use of EPREL

Where the Commission identifies inappropriate or fraudulent activity by the users of an EPREL supplier organisation, it shall take the necessary measures, including, where appropriate, preventing any future access to EPREL for any associated individual user

account or informing national market surveillance authorities.

**CHAPTER IV
FINAL PROVISION**

**Article 18
Entry into force and application**

This Regulation shall enter into force on the twentieth day following that of its publication in the Official Journal of the European Union.

It shall apply from [T0..., e.g. 1 September 2023]

This Regulation shall be binding in its entirety and directly applicable in all Member States.

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