

New ecodesign and energy labelling requirements for smartphones and slate tablets

For the attention of manufacturers and importers (suppliers)

Effective Date: 20th June 2025

The Sustainable Energy Authority of Ireland (SEAI) is the Market Surveillance Authority for the enforcement of legislation relating to energy labelling and ecodesign of energy-related products in Ireland.

Ecodesign and energy labelling requirements apply to **smartphones, other mobile phones, cordless phones** and **slate tablets** placed on the European Union (EU) market from **20th June 2025**.

It is estimated that the new requirements will save almost 14 terawatt hours in energy consumption each year by 2030, saving one-third of the energy consumption of these products when compared to current projections¹. Energy labelling will help European consumers make more informed and sustainable purchasing choices.

This guide has been developed to help ensure manufacturers, importers, suppliers and authorised representatives (where relevant) are aware of their legal obligations. It does not provide comprehensive information regarding compliance with ecodesign and energy labelling requirements. Please refer directly to the regulations for full details of the requirements.

Scope

The Regulations apply to:

- Cordless phones, handheld mobile phones, and smartphones with a touch screen display with a viewable diagonal size of between 10.16 cm and 17.78 cm (4.0 in and 7.0 in);
- touchscreen tablets with a viewable diagonal size of between 17.78 cm and 44.20 cm (7.0 in and 17.4 in) with no physically attached keyboard.

The Regulations do not apply to smartphones for high security communication, or mobile phones and tablets with a flexible main display (other than a foldable display).

To understand your company's role(s) and responsibilities within the supply chain, please refer to the following links to European Commission webpages [for ecodesign](#), and [for energy labelling](#).

¹ https://energy-efficient-products.ec.europa.eu/product-list/smartphones-and-tablets_en#consumers-1.

Ecodesign

The ecodesign regulation setting the requirements of smartphones and slate tablets is [Regulation \(EU\) 2023/1670](#), adopted pursuant to [Directive 2009/125/EC](#), which sets a framework for ecodesign that applies to all energy-related products.

The main ecodesign requirements can be summarised under the following headings:

- Conformity Assessment
- Resource Efficiency Requirements:
 - Access to repair and maintenance information;
 - Spare parts and disassembly;
 - Design for reliability, marking and recycling;
- Information Requirements.

Conformity assessment

Manufacturers or importers of smartphones, other mobile phones, cordless phones and slate tablets should already be aware of the requirement to perform a conformity assessment of products placed on the EU market, as these products are already covered by other EU regulations, including, for example, the Radio Equipment Directive 2014/53/EU.

A conformity assessment of smartphones, other mobile phones, cordless phones and slate tablets with Ecodesign Directive 2009/125/EC and Regulation (EU) 2023/1670 must be undertaken for models placed on the EU market from 20th June 2025 onward.

Once the assessment has been completed, and the product can be demonstrated to comply with all relevant requirements of the Regulation, manufacturers or importers must issue a Declaration of Conformity, including a reference to Regulation (EU) 2023/1670 and the standards used to demonstrate compliance.

Additional details on the conformity assessment procedure, product markings, declaration of conformity and other general obligations for manufacturers and importers of energy-related products can be found in [Directive 2009/125/EC](#), and Article 4 of [Regulation \(EU\) 2019/1020](#).

Resource efficiency

The Regulation sets the required availability of specific spare parts to professional repairers and end-users, including, for example:

Professional Repairers	Professional Repairers and End Users
<ul style="list-style-type: none"> • Front-facing and rear-facing camera assembly • Connectors and ports • Button • Main microphone and speaker • Hinge and folding mechanism (if applicable) 	<ul style="list-style-type: none"> • Battery • Back cover or assembly • Protective foil for foldable displays • Display assembly • Charger • SIM and memory card tray (if applicable)

The full list of spare parts required for each product type is detailed in the Regulation.

The spare parts are required to be made available from the 20th June 2025, or from one month after the date of first placement of the product on the EU market, and until at least seven years after the date of end of placement on the market.

Access to repair and maintenance information

Manufacturers and importers must provide access to repair and maintenance information to professional repairers and outline the process for accessing such information on a free-access website.

Registered professional repairers must have access to repair and maintenance information which shall at least include:

- The product identification;
- A disassembly map or exploded view;
- Wiring and connection diagrams;
- Electronic board diagrams;
- A list of necessary repair and test equipment;
- Technical manual with stepwise instructions for repair;
- Diagnostic fault and error information;
- Component and diagnosis information;
- Instructions for software and firmware (including reset software);
- Information on how to access data records of device-reported failure incidents stored (where applicable);
- Information on how to access professional repair, webpages, addresses and contact details of registered professional repairers.

Repair instructions and maintenance information are required to be made available from the 20th June 2025, or from one month after the date of first placement of the product on the EU market, and until at least seven years after the date of the end of placement on the market.

Spare parts and disassembly requirements

The Regulation sets the maximum delivery time for spare parts and requires manufacturers and importers to display information on the price (in Euro and ex-VAT) of spare parts listed on their free access website. It also sets requirements around the ease of replacing the display assembly and battery for professional repairers and end-users.

Design for reliability, marking of plastic components, recyclability requirements

The Regulation also sets minimum requirements for product resistance to being dropped, scratch resistance, water and dust protection, battery endurance and power management, and operating system updates, as well as requirements to aid in the appropriate recycling of components.

Information requirements

The information below must be provided in the product's technical documentation and made publicly available on the manufacturer's or importer's free-access website.

- Removable memory cards compatibility
- Weight range of specified materials
- Recyclability rate (R_{cyc}) and percentage of recycled content
- Ingress Protection (IP) rating
- Minimum number of battery charge cycles

In addition, the below battery maintenance information must be provided in the user manual and on the free access website, including:

- Factors which impact battery lifetime, for example, high temperature, sub-optimal charging patterns, and features which may extend battery lifetime and how to activate them, such as, smart charging;
- Effects of turning off Wi-Fi and Bluetooth on power consumption.

Energy labelling

The energy labelling regulation setting the requirements of smartphones and slate tablets for suppliers (manufacturers, importers) and dealers (retailers) is [Delegated Regulation \(EU\) 2023/1669](#). It supplements [Regulation \(EU\) 2017/1369](#), which sets a framework for energy labelling that applies to all energy-related products.

The main energy labelling requirements can be summarised under the following headings:

- EU Energy Label
- Product Information Sheet
- Technical Documentation
- EPREL Registration
- Energy labelling in Online sales and Advertising

EU energy label

Each smartphone or slate tablet must be supplied with a printed label in the format as set out in Annex III of the Regulation (see figure 1).

Please note: The supply of UK energy labels is not permitted in the European Union.

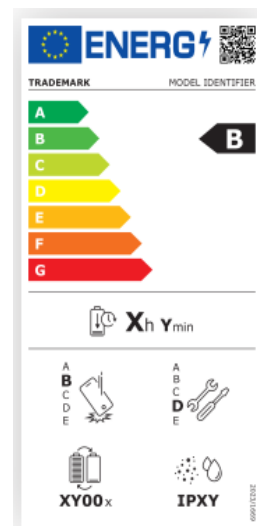


Figure 1 – the energy label for smartphones & slate tablets

Product information sheet

The Product Information Sheet is a standardised document containing additional information relating to the product, in printed or electronic form.

For each smartphone and slate tablet model, the electronic product information sheet must be made available to dealers (retailers). In addition, where specifically requested by a dealer, suppliers must make available the product information sheet in printed form.

Technical documentation

Manufacturers and importers must provide the information outlined in Annex VI of the Regulation in the technical documentation and upload it to the EPREL database (see details below). Technical documentation should be supported by details of the measurements, calculations, test conditions, standards used and the transitional methods in Annex IIIa of Regulation 2023/1670 and Annex IVa of Regulation (EU) 2023/1669).

Energy labelling in online sales and advertising

In visual advertisements, for example, newspaper, leaflet and social media advertising, and technical promotional material, the energy efficiency class and the range of energy efficiency classes available on the label must be shown. This must take the form of an arrow containing the letter of the energy efficiency class and the range of energy efficiency classes for the product.

Resources to help ensure compliance with the applicable energy labelling requirements are available on the [SEAI website](#).

EPREL

EPREL stands for the European Product Registry for Energy Labelling. It is a database managed by the European Union that contains information about energy-labelled products sold on the EU market and ensures products meet EU energy labelling regulations. EPREL was established under Regulation (EU) 2017/1369 as part of the EU's efforts to provide consumers with important energy efficiency information and to facilitate market surveillance activities.

Manufacturers and importers are legally required to register any energy-labelled products on EPREL before placing them on the EU market.

The EPREL platform is divided into two main sections: the **Public Access** and **Compliance Portal**. Each serves different purposes and is accessible to different audiences.

The **Public Access** section of EPREL open to the general public and is designed for consumers to allow them to view information about energy-labelled products. It contains information about the energy efficiency, performance, and other relevant information found displayed on energy labels.

Consumers can search for products and compare products, helping them make informed and sustainable purchasing decisions.



The **Compliance Portal** is intended for use by suppliers (manufacturers and importers) and Market Surveillance Authorities using a secure login. Unlike the Public Access section, this part of EPREL is not open to the general public. It contains more detailed technical documentation and information about the product that manufacturers and importers are required to upload when registering their products.

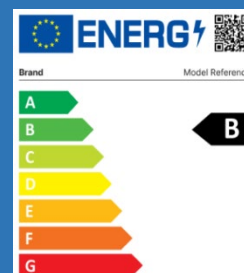
It requires the upload of technical documentation demonstrating that the product complies with energy labelling requirements, and the appointing of a compliance contact by the supplier.



A wide range of product types are already required to be registered on EPREL, including:

- Electronic displays
- Light sources
- Washing machines and dryers
- Domestic ovens
- Range hoods
- Refrigeration
- Solar devices
- Space heating, cooling and ventilation
- Water heating and hot water storage tanks
- Tyres
- Water heating and hot water storage tanks

Did you know that scanning the QR code on the energy label will take you to the product page on the Public Access part of EPREL?



From the **20th June 2025**, manufacturers and importers of smartphones and slate tablets within the scope of Delegated Regulation (EU) 2023/1669, are required to register these products on the EPREL database **before the product is first made available** on the EU market.

How to Enter Products into the Database

Manufacturers and importers (or the authorised representative) first need to create an 'EU LOGIN' account, before registering their organisation and obtaining a 'verification seal' in EPREL. Once this is complete, products can be registered on the platform.

For more information on these steps, follow the guide [here](#).

Additional information

While the MSA provides guidance to help ensure economic operators are aware of their obligations, it is the responsibility of economic operators to ensure they comply with their requirements. Failure to comply with EU ecodesign or energy labelling obligations is considered an offence in Irish law (S.I. 669 of 2022 and S.I. 671 of 2022), and the MSA has enforcement powers to address instances of non-compliance. Therefore, your workforce must be aware of these changes.

This notice provides a non-exhaustive list of the requirements and has been issued for information purposes only. For the full extent of the requirements, please refer to the regulations.

For further information, please contact MSA@seai.ie.