



Guide to manufacturers and importers on the necessary content of technical documentation to provide to market surveillance authorities

Are you a manufacturer or an importer of energy-related products?

As manufacturer¹ or importer you are obliged to document that your products comply with the requirements laid down in the EU Regulations on ecodesign and energy labelling. The purpose of this guide is to assist you in documenting the compliance of your products. These guides present the technical documentation that you have to provide if the market surveillance authorities ask for it. There are however other information requirements and requirements on web-information that you always need to fulfil according to the regulations.



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Legal requirements

Energy-related products are often regulated by energy labelling requirements or ecodesign requirements or in some cases both. In Table 1 on page 2 you will find a list of the products that today are covered by ecodesign and/or energy labelling requirement. Before you place an energy-related product on the EU/EEA market,² you shall produce a technical documentation showing that your product complies with the regulations.

Technical documentation

The technical documentation³ must be sufficient to show evidence that declared values and other information given for the product are correct and that minimum requirements from the ecodesign regulations are met. The documents must be supplied within 10 days after receiving the request from the authorities.

Documentation requirements

The requirements for the specific product category are described in each product regulation. The number of parameters to be documented varies from product category to product category.

You will find a detailed description of the necessary content of the technical documentation for each of the categories in

the product specific guidelines prepared for most of the product categories on the next page.

Please note that values declared on an energy label or in the product fiche must be documented without use of any additions or tolerances to actual test results. The tolerances mentioned in the verification procedure of the regulations are not to be used by the manufacturer to obtain a more favourable declaration of a product.

The following documents are not relevant as part of the technical documentation according to ecodesign and energy labelling:

Reports and certificates on RoHS, EMC, LVD, ISO 9001 or similar quality systems Certificates from 3rd parties stating compliance of your product is not sufficient documentation in a market surveillance activity.

The user manual is in general not part of the technical documentation either. However some regulations have requirements regarding the content of the user manual. In these cases it is relevant to include the user manual or a copy of the pages that include the requested information in the technical documentation.

Energy-related products

are products that use energy, or that do not use energy but have an indirect impact on energy consumption, such as water tapping devices, building insulation products, windows, etc.

¹ The term “supplier” is used in the energy labelling directive and regulations. A manufacturer can appoint an authorised representative to act on his behalf, in which case the responsible is the authorised representative.

² European Economic Area (EEA, the 28 Member States of the EU and European Free Trade Association (EFTA) countries Iceland, Norway, Liechtenstein).

³ See article 5 (b) of DIRECTIVE 2010/30/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 May 2010 on the indication by labelling and standard product information of the consumption of energy and other resources by energy-related products.

See annex IV(2) of Directive 2009/125/EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for the setting of ecodesign requirements for energy-related products (Framework Directive on ecodesign).

Product category	Ecodesign requirements	Energy Labelling
Air conditioners and comfort fans (comfort fans only covered by ecodesign requirements)	X	X
Computers and computer servers	X	
Directional lamps, LED and related equipment	X	X
Electrical lamps and luminaires	X	X
Electric motors	X	
Electric water heaters and heat pump water heaters	X	X
External power supplies*	X	
Fans driven by motors	X	
Flourescent lamps	X	X
Gas- or oil-fired boiler space heaters, boiler combination heaters and cogeneration space heaters	X	X
Glandless standalone circulators and glandless circulators integrated in products	X	
Heat pumps and electric boilers including combination heaters	X	X
Hot water storage tanks	X	X
Household dishwashers	X	X
Household hobs	X	
Household ovens	X	X
Household range hoods	X	X
Household refrigerating appliances	X	X
Household tumble driers	X	X
Household washing machines	X	X
Non-directional household lamps (including LED)	X	X
Packages of products for space heating		X
Packages of water heater and solar device		X
Professional refrigeration	X	X
Simple set-top boxes	X	
Space heaters - electricity/gas/fluent	X	X
Space heaters - soild fuel	X	X
Solid fuel boilers	X	X
Standby and off-mode power consumption*	X	
Televisions	X	X
Transformers	X	
Vacuum cleaner	X	X
Ventilation units	X	X
Water pumps	X	

New regulations are regularly implemented on more product categories.

*The requirements on external power supplies and standby and off-mode electric power consumption concern electrical and electronic household and office equipment.

This guide presents the contents of the Regulations and is addressed to manufacturers, importers and others interested.

The guide is not a substitution for the Regulations, and in any case of doubt, the Regulations are applicable.

This guide is not legally binding as a binding interpretation can only be made by the EU court.

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