

**EXPLANATORY MEMORANDUM FOR EUROPEAN UNION LEGISLATION/DOCUMENTS
WITHIN THE SCOPE OF THE UK/EU WITHDRAWAL AGREEMENT AND THE WINDSOR
FRAMEWORK**

C(2025) 3986

COMMISSION DELEGATED REGULATION (EU) .../... of 1.7.2025 amending Commission Delegated Regulation (EU) 2023/2534 on household tumble dryers regarding information on repairability and clarifying some aspects of the measurement and calculation methods, the product information sheet, the technical documentation and the verification procedure.

Submitted by Department for Energy Security and Net Zero, 01 September 2025

SUBJECT MATTER

1. On the 1 July 2025, the EU adopted C(2025)3986 to amend Commission Delegated Regulation (EU) 2023/2534, regarding information on repairability and clarifying some aspects of the measurement and calculation methods, the product information sheet, the technical documentation and the verification procedure relating to household tumble dryers.
2. It amends Commission Delegated Regulation (EU) 2023/2534 to include requirements about repairability on energy labels and supplementary information documents. In order to facilitate its dual access to both the UK Internal Market and EU Single Market, Northern Ireland continues to apply EU rules on ecodesign and energy labelling, as per the terms of the Windsor Framework. The amendments made by C(2025) 3986 accordingly also cover Northern Ireland, as well as the EU.
 - From the date that Commission Delegated Regulation C(2025) 3986 enters into force (this date is awaited), suppliers may voluntarily provide the new label, product information sheet, and technical documentation with the repairability information, instead of the new label, product information sheet, and technical documentation without the repairability information. Dealers must display at the point-of-sale whichever version (with or without repairability information) is supplied.
 - From 1 January 2027, providing repairability information becomes mandatory for suppliers. Dealers must display the label provided by the supplier in accordance with the regulations. Dealers may continue to display labels without repairability information for products placed on the market before that date, depending on the information that was provided by the supplier.

- The repairability index is classed from A (most repairable) to E (least repairable).
- Tests for compliance with repairability requirements must be performed on units belonging to the same model, and not equivalent models whose characteristics won't be suitable for comparison. The post-implementation review of Commission Delegated Regulation (EU) 2023/2534 must assess whether the heat pump component should be added to the list of spare parts to be taken into consideration in the calculation of the repairability index.
- The method of calculating average final moisture content of laundry levels is removed to avoid excessive energy consumption and damage to textiles. Instead, the method in harmonised standards should be used.

SCRUTINY HISTORY

3. Commission Delegated Regulation (EU) 2023/2534 revoked and replaced Commission Delegated Regulation (EU) No 392/2012 on 1 July 2025. The UK Government published an EM detailing Commission Delegated Regulation (EU) 2023/2534 in 2024. This can be found [here](#). That EM was held under scrutiny by the House of Lords Windsor Framework Sub-Committee and will be reviewed by the House of Lords Northern Ireland Scrutiny Committee.
4. Previous relevant documents submitted for scrutiny include:
 - C(2024)1732: Ecodesign requirements for local space heaters and separate related controls and repealing regulation (EU) 2015/1188
 - C(23)7671: Ecodesign requirements for household tumble dryers: EM submitted 9 February 2024.
 - C(23)3538: Ecodesign requirements for smartphones, mobile phones other than smartphones, cordless phones and slate tablets: EM submitted 14 December 2023
 - C(23)2448: Ecodesign requirements for off mode, standby mode, and networked standby energy consumption of electrical and electrical household and office equipment: EM submitted 22 May 2023.
 - COM(2022)144: Proposal for a Regulation of the EP and Council establishing a framework for setting ecodesign requirements for sustainable products and repealing Directive 2009/125/EC: EM submitted 18 July 2022.

MINISTERIAL RESPONSIBILITY

5. The Secretary of State for Energy Security and Net Zero has overall responsibility for existing ecodesign and energy labelling Regulations.

INTEREST OF THE DEVOLVED GOVERNMENTS

6. Ecodesign and Energy Labelling are not devolved matters under the devolution settlements in Scotland, Wales and Northern Ireland. We have shared this EM with the Devolved Governments.
7. Regulation (EU) 2017/1369 of the European Parliament and of the Council of 4 July 2017 setting a framework for energy labelling and repealing Directive 2010/30/EU is also listed in Annex 2 to the Windsor Framework.

LEGAL AND PROCEDURAL ISSUES

8. Regulation (EU) 2017/1369 empowers the European Commission to adopt delegated acts as regards the labelling or re-scaling of the labelling of product groups representing significant potential for energy savings and, where relevant, other resources.
9. Commission Delegated Regulation (EU) 2023/2534 is a delegated act made under Article 16 of Regulation (EU) 2017/1369 and is dated 13 July 2023. The majority of its provisions apply from 1 July 2025.

POLICY AND LEGAL IMPLICATIONS

10. Commission Delegated Regulation (EU) 2023/2534 applies in NI in accordance with the Windsor Framework. Products meeting these EU rules on the NI market will have access to the GB market by virtue of the United Kingdom Internal Markets Act 2020.
11. The Government is committed to increasing the environmental performance of energy-related products through greater energy efficiency and resource efficiency. Energy labelling helps consumers choose the most efficient products while encouraging manufacturers to improve sustainability.
12. In order to maintain its unique dual market access to both the UK internal market and the EU market, EU ecodesign and energy labelling law applies in NI, in accordance with the Windsor Framework.
13. Whilst suppliers placing tumble dryers on the EU and NI market will need to ensure that their products meet these requirements, most manufacturers

outside of the EU and NI will likely choose to comply with these rules to continue supply such products Europe-wide.


14. The Ecodesign for Energy-Related Products and Energy Information (Amendment) (Northern Ireland) Regulations 2025 introduced provisions to ensure Commission Delegated Regulation (EU) 2023/2534, including as amended by C(2025) 3986, can be properly enforced in Northern Ireland.

CONSULTATION

15. As part of the EU Ecodesign and Energy Labelling Working Plan 2022-2024, the Commission was required to review household tumble dryers before the end of 2025. The Commission carried out the review and analysed the technical, environmental and economic aspects of household tumble dryers as well as real-life user behaviour. The review was carried out in close cooperation with stakeholders and interested parties from the Union and third countries. The results of the review were made public and presented to the Consultation Forum.
16. The Government is looking to adopt comparable ecodesign and energy labelling standards in GB, including the amendments made by C(2025) 3986, and, thus has consulted on this matter. The [consultation](#) on raising standards for GB ecodesign and energy labelling requirements for household tumble dryers in line with the EU approach was published on 17 July 2025 and closed on 14 August 2025.
17. The consultation included questions to test the suggested new repairability requirements (mirroring C(2025) 3986) with industry. Officials have also incorporated the amendments introduced by C(2025) 3986 into the draft SI which was published alongside this consultation.

FINANCIAL IMPLICATIONS

18. Via an inclusion of a repairability index, consumers may be encouraged to seek product repairs more often – this in turn may also provide a boost to SMEs in the repair and maintenance sector.

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Minister for Energy Consumers

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