

REGIONAL CONFERENCE ON ENERGY LABELLING

22 October 2025
Tashkent, Uzbekistan

Enforcement of energy labelling in e-commerce

Ivars Jornins
Consumer Rights Protection Centre of Latvia



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E-commerce controls (Energy labelling)

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Legislative framework

Internal

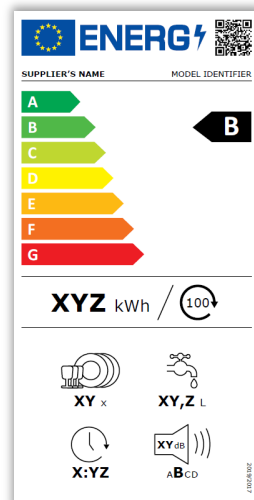
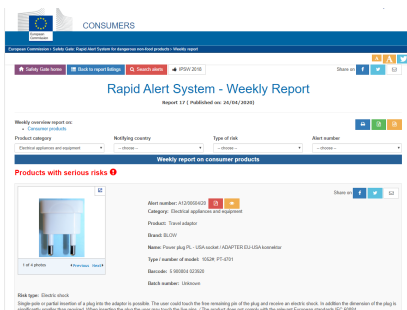
- Procedure for planning, organizing and carrying out market surveillance and metrological and dangerous equipment surveillance (steps to take, deadlines for specific tasks,.....)
- E-lab procedures (assistance if needed, for example no economic operator indicated in the e-shop)
- Guidance on e-shops control (how/when to organize e-control)
- Methodology on e-shop checks (how to record violation, responsible economic operators, IP address, searching tools,)



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E-commerce inspection types

- Safety gate (RAPEX) products
- Crucial information about the product (project)
- Online platforms with traders from the third countries (project)
- Energy labelling





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E-commerce inspections – Safety gate (Rapex)

- ✓ Weekly control of the unsafe or non-compliant products
- ✓ If product is found
 - EO`s are informed
 - corrective measures are requested

European Commission > Safety Gate: the rapid alert system for dangerous non-food products

CONSUMER SAFETY

Safety Gate: the rapid alert system for dangerous non-food products

Related documents

Weekly reports

Search all notifications

Tips for buying safe products online

International Product Safety Week

EU Product Safety Award

Effective recalls

Button Battery Safety

CASP

The Safety Gate rapid alert system enables quick exchange of information between EU/EEA member states, the UK and the European Commission about dangerous non-food products posing a risk to health and safety of consumers.

0:00 / 1:43

E-commerce inspections – Safety gate (Rapex)

In 2021, Safety gate (RAPEX) products were found in 37 cases. The biggest number of models were found within electrical appliances and toys.

In 2022, Safety gate (RAPEX) products were found in 52 cases. The biggest number of models were found within electrical appliances, machinery products and toys.

In 2022 we have started testing WebCrawler SAFE for searching the products online.





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E-commerce inspections

Crucial information about the product

In 2019, CRPC implemented a research project regarding provision of crucial information about the product in online stores.

39 online stores and 708 product models were reviewed in 5 sectors: toys, electrical appliances, appliances with gaseous fuel, machinery and construction products.

Crucial information:

- Manufacturer
- Identification
- Information necessary for safe exploitation (age warnings, technical information, intended use)



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E-commerce inspections

Crucial information about the product

In total, the following information was missing:

- On intended use, characteristics, warnings – 57 % of all models
- On manufacturer – 19 %
- Identification – 7 %





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E-commerce inspections Online platforms with traders from the third countries

In 2021, CRPC inspected products in the popular online platforms with traders from the third countries.

Since offers are directed at the EU consumer, EU requirements on consumer protection and product safety and compliance apply.

Platforms:

wish

amazon

AliExpress

ebay

.J JOOM



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E-commerce inspections

Online platforms with traders from the third countries

Controls on:

- Available information on the trader
- Information on the product
- Terms and conditions
- Price indication and delivery terms
- Compliance and safety of the offered products

62 samples ordered, 52 delivered

(AliExpress did not deliver 6 of 18 ordered products)



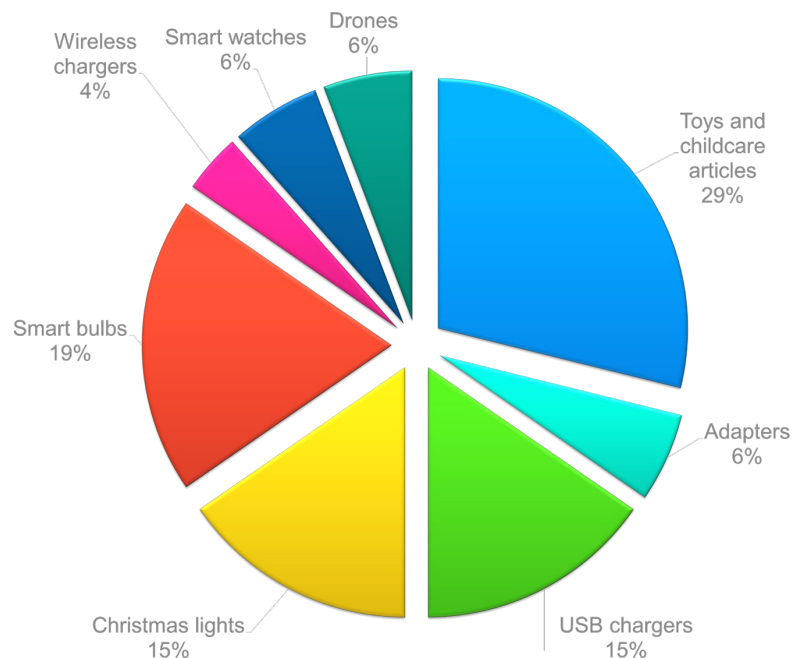
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E-commerce inspections

Online platforms with traders from the third countries

Inspections:

- Administrative controls
- Testing
- Information on the platform when offering the product





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E-commerce inspections

Online platforms with traders from the third countries

- High level of unsafe and non-compliant products – 75 % (all electrical appliances, radio equipment and drones were non-compliant)
- Serious and high risk non-compliances – 33 %
- Missing manuals – 58 %
- Missing identification of responsible economic operator – 73 %
- No energy labels on light bulbs



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E-commerce inspections

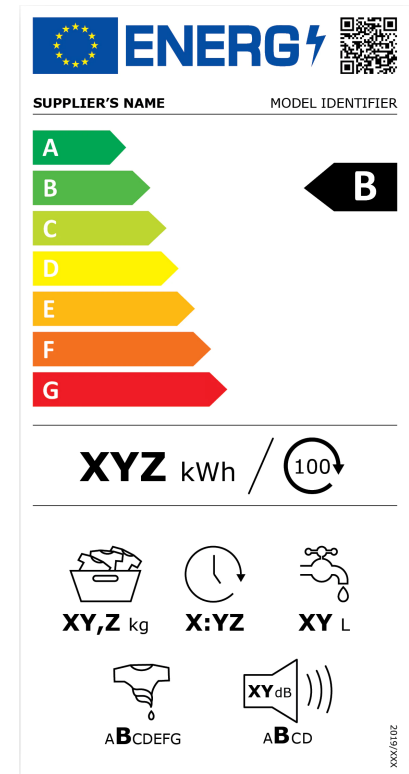
Energy labelling

In 2018, CRPC started energy labelling inspections in online stores

Started with four of the most popular product groups: refrigerators, dishwashers, washing machines and TVs

Very limited knowledge of requirements

In 2020, we translated and published information material on online energy labelling





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E-commerce inspections

Energy labelling

2018 - 2020		2021		2022	
Inspections	112	Inspections	65	Inspections	50
Products checked	1234	Products checked	668	Products checked	490
Non-conformities	1182	Non-conformities	647	Non-conformities	427
Non-compliances	96 %	Non-compliances	97 %	Non-compliances	87 %

In 2021 and 2022 mostly repeated inspections – list of online stores that have to be checked again



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E-commerce inspections

Displaying of Energy labelling

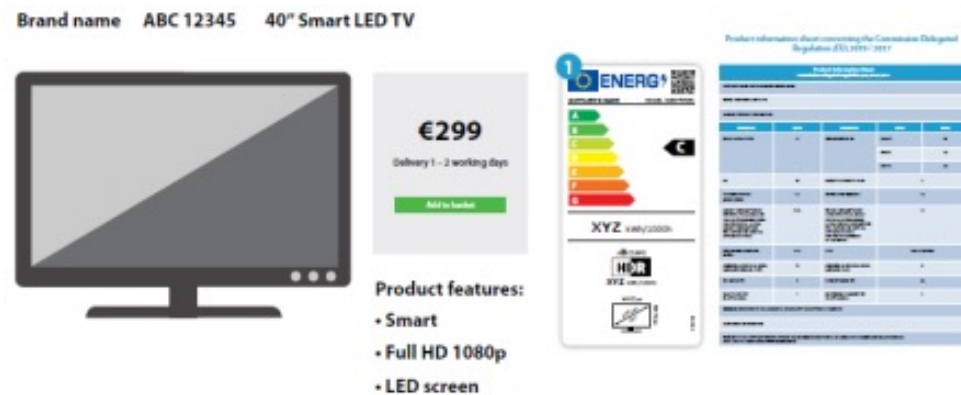
Displaying the energy label in e-commerce shops

Energy label and product information sheet should be clearly legible and displayed «close» to the price

Front size must be greater or equal to the price

Arrow colour must correspond to the energy efficiency class

Scale A – G for revised Regulations





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E-commerce inspections

Displaying of Energy labelling

Displaying the energy label in e-commerce shops

Energy label information can be displayed in 2 ways:

- Fully displaying the energy label and product information sheet
- Nested display - energy label and product information sheet link

If using the nested visualization, the energy label should appear after the first click.
Product information sheet link takes you to the sheet with one click

Brand name ABC 12345 40" Smart LED TV



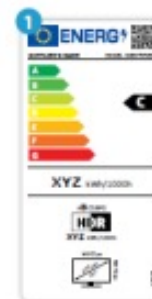
€299

Delivery 1 - 2 working days

[Add to basket](#)

Product features:

- Smart
- Full HD 1080p
- LED screen



Product information sheet according to the Commission Delegated Regulation (EU) 2019/2017

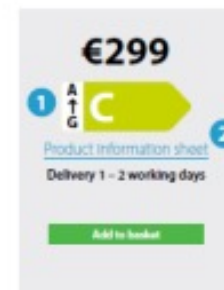
Energy efficiency class			
Class	Energy efficiency class	Energy efficiency class	Energy efficiency class
A	A	A	A
B	B	B	B
C	C	C	C
D	D	D	D
E	E	E	E
F	F	F	F
G	G	G	G

Brand name ABC 12345 40" Smart LED TV



Product features:

- Smart
- Full HD 1080p
- LED screen





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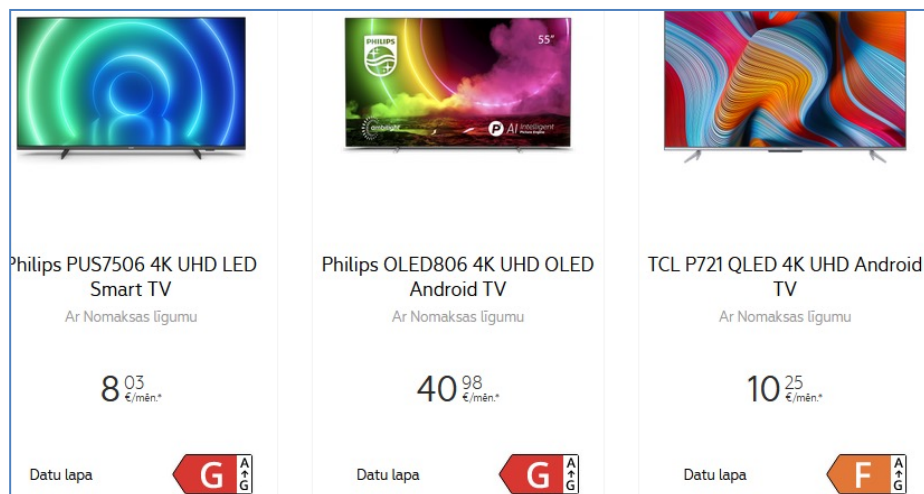
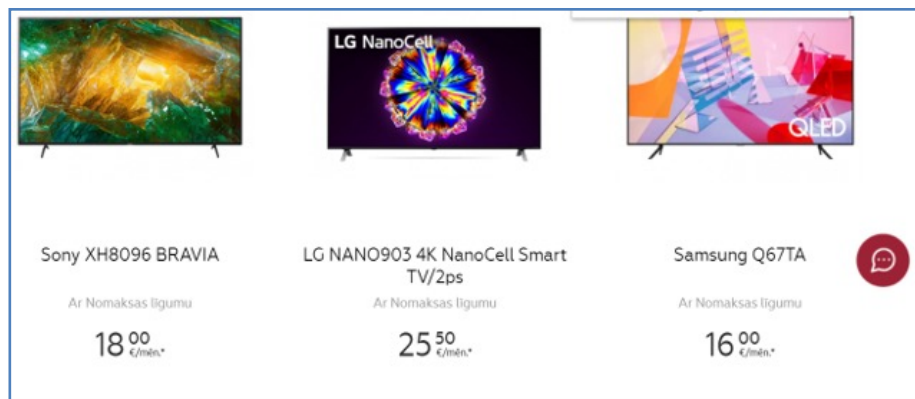
E-commerce inspections

Displaying of Energy labelling

Displaying the energy label in e-commerce shops

Energy label/product fiche should be provided in:

- Product page
- Product group page
- shopping basket





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E-commerce inspections

Energy labelling

Main goal is to achieve compliance with the main energy labelling requirements

- Energy label
- Product fiche/product information sheet
- Close to the price
- In product group page and in the product's page





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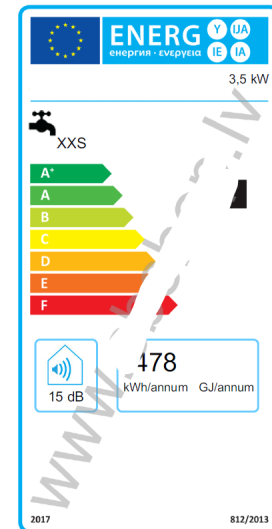
E-commerce inspections

Energy labelling

Main non-compliances

Energy label and/or product information sheet:

- Is not shown at all or
- Is not shown in the right way:
 - not included in the product category overview
 - not close to the price
 - information included only in the description or in the pictures of the product
 - old energy label and/or icon
 - energy label arrow does not contain an energy label (nested display)
 - product fiche link leads to general EC page on energy labelling requirements





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Energy labelling

Actions of dealers:

- To submit deadline for eliminating non-compliances (and often extend it)
- To close down the website (or take away the possibility to buy products and turn it into online catalogue)
- To change ownership of the website
- To close down their economic activity
- To withdraw the inspected product groups from the online store
- To make the online store compliant



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Energy labelling

Actions of CRPC

- To inspect the online shops:
 - If new online store discovered
 - If it is included in the list of repeated inspections (struggles with compliance)
 - If a specific product group is targeted
- Principle «Consult first» – to inform about the non-compliances, to educate about requirements
- To set or accept a deadline for eliminating non-compliances
- To issue fines if the deadlines are not met
- To include the online store in the list of repeated inspections, if necessary





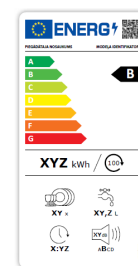
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E-commerce inspections

Energy labelling

Main challenges:

- Suppliers of online stores do not provide the necessary information
- Concept «close to the price»
- Understanding of requirements – new and old arrows, product fiche as a standard document vs. list of technical specifications etc



Product fiche template				
Product name: XYZ				
Product description				
Parameter	Value	Parameter	Value	Parameter
Energy consumption class	A	Energy consumption class	A	Energy consumption class
Energy consumption class	A	Energy consumption class	A	Energy consumption class
Energy consumption class	A	Energy consumption class	A	Energy consumption class
Energy consumption class	A	Energy consumption class	A	Energy consumption class
Energy consumption class	A	Energy consumption class	A	Energy consumption class
Energy consumption class	A	Energy consumption class	A	Energy consumption class
Energy consumption class	A	Energy consumption class	A	Energy consumption class
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E-commerce inspections

Energy labelling

Transitioning from the most popular product groups to all product groups subject to the energy labelling regulations

Within EEPLIANT3, inspections on air conditioners, ventilation units, tumble dryers, water heaters. Non-compliances in 98 %

In 2022 and 2023 lighting products and local space heaters were inspected separately





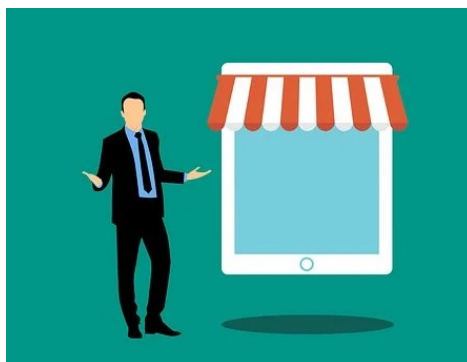
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E-commerce inspections

Energy labelling

At CRPC, the process of online energy labelling inspections is not computerized

All activities are performed by the inspector responsible for the case





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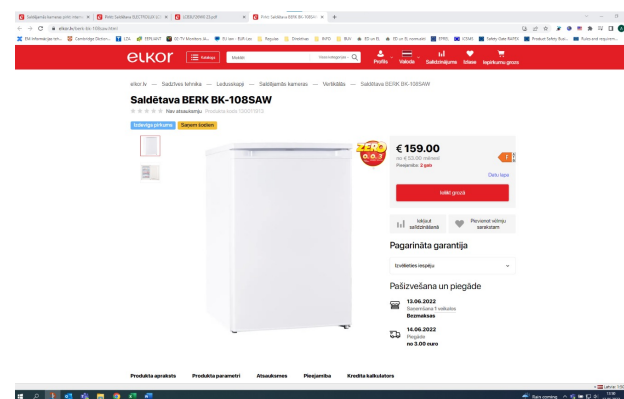
E-commerce inspections

Energy labelling

The process:

- An inspector opens up a new case in CRPC inner system Uzraugs and takes out a number for an inspection report
- Inspector starts a new inspection form on the basis of online inspection template
- Inspector selects products in the online shop from the designated product categories and makes screenshots of the product pages and product group pages

The screenshot shows a web form for creating a new inspection case. The form includes fields for 'Numurs' (Number), 'Datums' (Date) set to 05.08.2022, 'Atbildīgā persona' (Responsible person) set to Laura Reble, 'Sastādītā persona' (Compiled person), 'Pārbaudes pamats' (Basis for inspection), 'Uzņēmums' (Company), 'Uzņēmuma statuss' (Company status), 'Galvenā preču grupa' (Main product group), and 'Piezīmes' (Remarks). There are also sections for 'Atbrašanas vieta' (Departure location) and 'Vizīta' (Visit), each with a large text area. At the bottom, there are fields for 'Kontroles datums' (Control date), 'Palīdzības datums' (Assistance date), and 'Vadītāja kontrole' (Inspector's control) with a 'Izveidot' (Create) button.





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E-commerce inspections

Energy labelling

The process:

- The inspector performs the inspection itself. Main criteria:
 - Is energy label and product fiche available?
 - Close to the price on all pages?
 - Displayed correctly?

Brand name ABC 12345 40" Smart LED TV



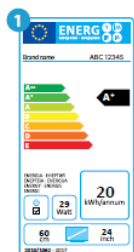
€299

Delivery 1 - 2 working days

[Add to basket](#)

Product features:

- Smart
- Full HD 1080p
- LED screen



Product fiche pursuant to Delegated Regulation (EU) No. 660/2013	
Parameter	Value
UPPER CASE CHARACTER	RECEIVED
Model name	ABC 12345
Energy efficiency class	A+
Technical specifications	40" LED
Power consumption	20 kWh/year
Standby power consumption	0.5 W
Annual energy consumption	20 kWh/year
Energy consumption per hour	2.4 kWh/h
Energy consumption per minute	0.4 kWh/min
Energy consumption per second	0.006 kWh/s
Energy consumption per day	48 kWh/day
Energy consumption per week	336 kWh/week
Energy consumption per month	1440 kWh/month
Energy consumption per year	17280 kWh/year

Brand name ABC 12345 40" Smart LED TV



Product features:

- Smart
- Full HD 1080p
- LED screen

€299

1 A+ 2

[Product fiche](#)

Delivery 1 - 2 working days

[Add to basket](#)



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E-commerce inspections

Energy labelling

The inspector fills in the online inspections template with model names, links to the products and discovered non-compliances, as well as the time and date of inspection (screenshots are made to record the violations)

Interakcija vietnē: <https://vvi.gov.lv>
Pārbaudes laiks: 12.05.2022. 16:19-16:48

LEDUSSKAPJI

Energomarkējums un datu lapa		Produktu grupas lapa ¹	Samsung	Hisense	Beko
Energomarkējums		Ir	Ir	Ir	Ir
Ja energomarkējuma attēls:	Vai ir tuvu cenai?	-	-	-	-
	Vai ir skaidri redzams un salasāms?	-	-	-	-
Ja izmantota ligzdotā vizualizācija:	Vai piktogramma ir tuvu cenai?	Jā	Jā	Jā	Jā
	Vai piktogrammas burtu izmērs atbilst cenas izmēram?	Jā	Jā	Jā	Jā
	Vai piktogrammas krāsa atbilst produkta energoefektivitātes klasei?	Jā	Jā	Jā	Jā
	Vai parādās pilns energomarkējums, ja peli uzvirza uz piktogrammas/tai uzklikšķina/pieskaras?	Nē	Nē	Nē	Nē
Vai energomarkējuma piktogramma ir pareiza pēc formas un saturā?		Jā	Jā	Jā	Jā
Vai energomarkējums ir pareizs pēc formas un saturā?		Jā	Jā	Jā	Jā
Vai energomarkējumā iekļautais QR kods satur saiti uz informāciju par šo precī EPREL datubāzē?		Jā	Jā	Jā	Jā
Datu lapa (ražojuma speciālā zīme)		Ir	Ir	Ir	Ir
Ja pilna ražojuma datu lapa:	Vai ir tuvu cenai?	-	-	-	-
	Vai ir skaidri redzama un salasāma?	-	-	-	-
Ja ir saite uz ražojuma datu lapu:	Vai saite salasāmi norāda "Datu lapa" ("Informācijas lapa" vai "Speciālā zīme")?	Jā	Jā	Jā	Jā
	Vai parādās ražojuma datu lapa, ja peli uzvirza uz piktogrammas/tai uzklikšķina/pieskaras?	Nē	Nē	Nē	Nē
Vai datu lapā ir visa nepieciešamā informācija?		Nē	Nē	Nē	Nē
Vai datu lapa atbilst energomarkējumam?		Nē	Nē	Nē	Nē

¹ <https://vvi.gov.lv>
² <https://vvi.gov.lv>
³ <https://vvi.gov.lv>
⁴ <https://vvi.gov.lv>



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E-commerce inspections

Energy labelling

The process:

- The inspector prepares an inspection act with the main information about the inspection (economic operator, name of the shop, basis for the inspection, references to normative acts, time and date, overall conclusion, identification of inspector) and signs it
- Information about the inspected models and main non-compliances is registered in the inner system

Struktūrvienības Plāni Uzņēmumi Lietas Apsekojumi Muļķas lietas Nelaiemes gadījumi Konsultācijas Atskaites

Numurs: BUD-222

Sastādīšanas datums: [redacted]

Sastādītāji: Dana Grinberga [redacted]

Akta veids: [redacted]

Uzņēmums: [redacted]

Uzņēmuma statuss: Izplūstājs

Objekts: Īrniekja vietne [redacted]

Pārbaudes veids:

- ☐ A
- ☒ B
- ☐ C

Pārbaudes mērķis:

- ☐ Projekts
- ☐ Apsekojums
- ☐ Cits
- ☐ Tirgus uzraudzība
- ☐ Saņemta informācija
- ☐ RAPEX
- ☒ Atkārtotā pārbaude
- ☐ Sūdzība
- ☐ Reģionālās pārbaudes
- ☐ Internetaikalu pārbaudes
- ☐ Epidemioloģisko prasību pārbaudes
- ☐ Anulēts

Saistītas preces:

- ☒ Toshiba 32LA3B63DG (televizori)
- ☒ Philips 32PHS5505/12 (televizori)
- ☒ LG 28TN515S (televizori)
- ☒ Bosch SMV4HAX48E (trauku mazgājamās mašīnas)
- ☒ AEG FFB2700PM (trauku mazgājamās mašīnas)
- ☒ Beko DIN36430 (trauku mazgājamās mašīnas)
- ☒ AEG L7FEE68S (veļas mazgājamās mašīnas)
- ☒ Electrolux EW6S406BI (veļas mazgājamās mašīnas)
- ☒ Indesit BTW S60300 EUIN (veļas mazgājamās mašīnas)
- ☒ Bosch KGN33NWEB (ledusskapis)
- ☒ Hotpoint Ariston HAFC9 TT43SX O3 (ledusskapis)
- ☒ Beko CSA270K30XPN (ledusskapis)

[Saglabāt]

[Uz lietu](#)



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E-commerce inspections

Energy labelling

The process:

- The inspector prepares a letter to the owner of the online store. The letter includes:
 - all the discovered non-compliances
 - information about the respective normative acts
 - information about CRPC webpage where guidelines about the online labelling can be found
 - request to provide information on possible deadline for elimination of non-compliances

The letter is electronically signed by the CRPC director and sent to the economic operator's e-mail address.



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E-commerce inspections

Energy labelling

The process:

- Within 2 weeks economic operator has to provide an answer

If the economic operator:

- Provides sensible deadline (3 to 6 months, 6 months if that is the first time/can justify it), we accept it
- Provides a very long deadline, we shorten it to three to six months
- Does not provide an answer within 2 weeks, we call/send a postal letter to the official legal address

CRPC also provides consultations on the energy labelling requirements (in person/by phone/by e-mail/through MS Teams)



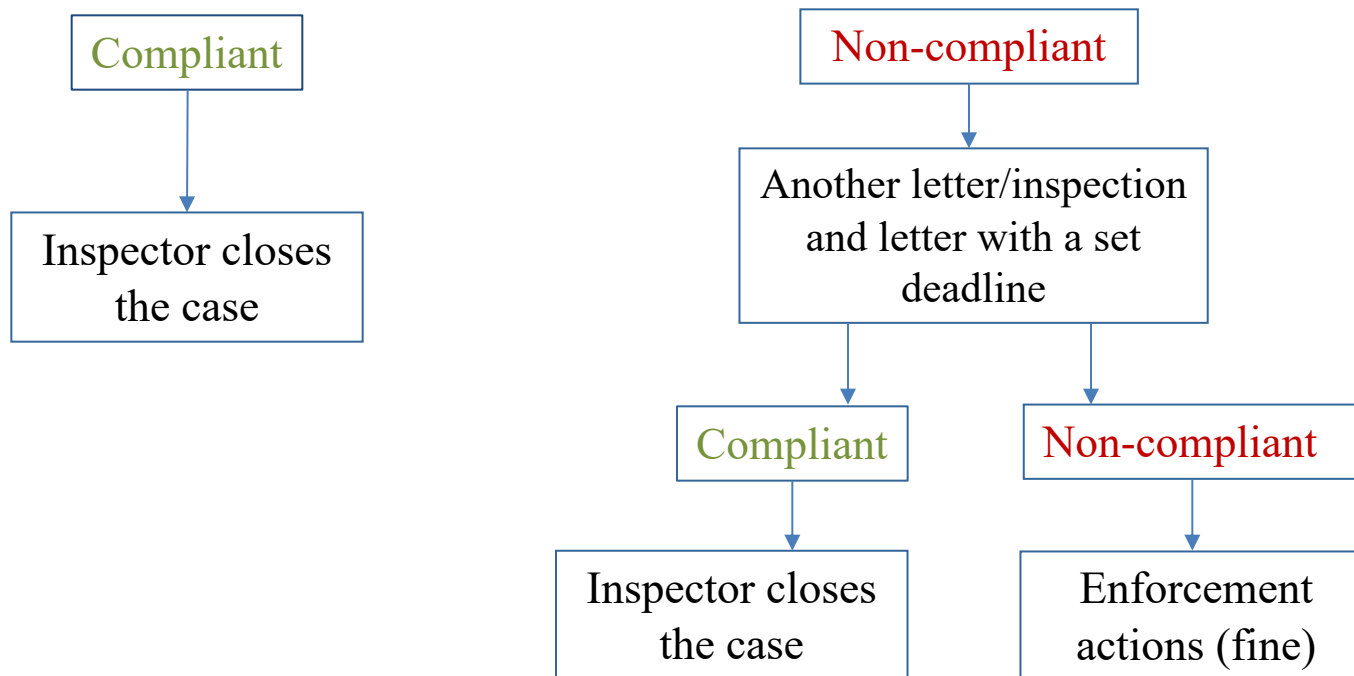
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E-commerce inspections

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The process:

- When the deadline comes, the inspector makes an inspection of the online store





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Challenges in e-commerce field

- ✓ Responsible economic operators located outside our jurisdiction
- ✓ Knowledge and skills of employees (e-investigation, collection and storage of evidence)
- ✓ Products provided on-line not always are available
- ✓ Control of the corrective measures
- ✓ Monitoring of the shops (non-compliant products can appear in other shops)
- ✓ Digital tools



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Thank you for your attention!

