



European Product Registry for Energy Labelling (EPREL)

GUIDELINE

User profile creation, organisation creation and
supplier verification process

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DOCUMENT HISTORY

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1.03	7 February 2022	Sections "Create your organization", "Electronic Sealing" and "Verifying the organisation" have been updated with the new electronic verification requirements and accepted formats for qualified electronic seals.
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1.07	31 October 2022	Improvements added to the Manage Organisation section

DISCLAIMER

The services of the European Commission have provided this guidance to enhance general understanding of the practicalities of the process related to registration of products in EPREL, by suppliers. This information is of a general nature only and is not intended to address the specific circumstances of any particular individual or entity. The goal is to keep this information timely and accurate. If errors are brought to our attention, corrections will be made. However, the Commission accepts no responsibility or liability whatsoever with regard to the information on this guidance.

Please refer to the version of this document available in the [developers Wiki](#)¹ for the latest update of this document.

¹ (Access requires prior registration for an EU Login)
<https://webgate.ec.europa.eu/fpfis/wikis/display/EPREL/EPREL+User+Manuals>

GLOSSARY OF TERMS

Before you start, read the Glossary section in order to better understand the terms and acronyms used in this manual.

TERM / ACRONYM	DEFINITION
Admin / Supplier Admin	(Associated to an EU Login profile) is the user with the highest privileges and able to invite other users in their Organisation (other Admins, Users or Readers).
Authorized Representative	A natural or legal person established in the Union, the EEA or Northern Ireland, who has received a written mandate from the manufacturer to act on its behalf in relation to specified tasks.
Compliance interface	The Interface of the EPREL Compliance site, which can be accessed and used by Market Surveillance Authorities (MSAs), to perform their compliance control duties, such as view registered products, sort, select, download technical information, look for equivalent products, etc.
Registration interface	The Interface of the EPREL Compliance site, which can be accessed and used by Suppliers to register product models in compliance with the framework Regulation.
Compliance site	The Database and its management system hosted in a secured environment, which can be accessed via the Registration interface or the Compliance interface, upon user authentication.
Consumer / Customer	A natural or legal person who buys, hires or receives a product for own use whether or not acting for purposes which are outside its trade, business, craft or profession;
Dealer	A retailer or other natural or legal person who offers for sale, hire, or hire purchase, or displays products to customers or installers in the course of a commercial activity, whether or not in return for payment.
Distance Selling	The offer for sale, hire or hire purchase by mail order, catalogue, internet, and telemarketing or by any other method by which the potential customer cannot be expected to see the product displayed.
Energy Efficiency	The ratio of output of performance, service, goods or energy to input of energy.
Organisation	(Associated to EPREL) the Organisation created by the Supplier Admin in EPREL. Can be a Legal Entity or a Natural Person.
Registration Number	(Associated to EPREL) the internal registration number assigned by EPREL when a product record is created. This identifier number is also used in creating the QR Code URL, which when scanned, will redirect consumers to the product details page from the Public Site.
EU Login	The European Commission 2 factor authentication system (2FA, formerly known as ECAS) and user account. It represents the gateway for accessing a wide range of platforms and web services managed by the European Commission. The EU Login is an internal account univocally associated to an email address and is protected by a password.
Importer	A legal or natural person established in the Union, the EEA or Northern Ireland, who places on the market a product from a manufacturer

	established in a third country.
Label	A graphic diagram, either in printed or electronic form, including a closed scale using only letters from A to G, each letter representing a class and each class corresponding to energy savings, in seven different colours from dark green to red, in order to inform customers about energy efficiency and energy consumption; it includes rescaled labels and labels with fewer classes and colors in accordance with Article 11(10) and (11).
Making a product available on the market	The supply of a product for distribution or use on the Union market in the course of a commercial activity, whether in return for payment or free of charge.
Manufacturer	A natural or legal person who manufactures a product or has a product designed or manufactured, and markets that product under its name or trademark.
Model	A version of a product of which all units share the same technical characteristics relevant for the label and the product information sheet and the same model identifier attributed by the manufacturer or by another economic operator acting as supplier of the product.
Model Identifier	The code, usually alphanumeric, which distinguishes a specific product model from other models with the same trade mark or the same supplier's name.
MSA Admin	Similar to Supplier Admin, the top user for each Member State Authority for each Member State. MSA Admin can invite trusted MSAs of the same country to create their own MSA user account.
Placing on the Market	The first making available of a product on the Union, EEA or Northern Ireland market.
Product Database	A collection of data concerning products, which is arranged in a systematic manner.
Product Group	A group of products which have the same main functionality.
Product Information Sheet	A standard document containing information relating to a product. EPREL generates it in all EU languages from the data entered by the supplier in PDF format (to be visualized, downloaded or printed)
Product/Energy Related Product	A good or system with an impact on energy consumption during use, which is placed on the market or put into service. This refers also to parts with an impact on energy consumption during use which are placed on the market or put into service for customers and that are intended to be incorporated into products.
Public API	Application Programming Interface and represents an alternative communication solution, for automated interaction between computer applications. APIs are available to retailers/dealers or other parties to download any public data on product models available in the Public Site. Only whitelisted parties (using a whitelisted access token) can integrate and use the Public API for massive downloads.
Public Site	The database and its management system and user interface, freely available for consultation, search, selection or other services, including via application programming interfaces (API). In the Public Site users can also browse the registered product data or download the Product Information Sheet (Product Fiche), as well as the Energy Label.
QR Code	Is a matrix barcode pictogram, integrated in the energy label of products in

	<p>the scope of Regulations new or reviewed after entry into force of the framework Labelling Regulation 2017/1369. The QR Code can be generated by Suppliers from the EPREL Platform, when registering a product model.</p> <p>When scanned on a printed label, the QR Code is intended to redirect consumers to the product details page from the Public Site.</p>
Reader / Supplier Reader	(Associated to an EU Login profile) is the user having only permissions to view products registered by the Organisation they belong.
Rescaled Label	A label for a particular product group that has undergone rescaling. After the entry into force of the framework Regulation (EU) 2017/1369, labels with energy classes above A (i.e. A+, A++, A+++) are progressively rescaled into A to G energy classes in a newly designed label also including a QR code.
Rescaling	Means an exercise, involving the review of a Regulation, to reclassify labels with classes above A into labels with the range A to G. The rescaling may involve a simple remapping or, more frequently, the use of a different formula for calculating the energy efficiency index, making, consequently, the A class in a rescaled label not comparable to any class in the label before the rescaling.
Supplier	Means a manufacturer established in the Union, EEA or Northern Ireland, the authorized representative of a manufacturer who is not established in the Union, EEA or Northern Ireland, or an importer, who places a product on the Union market.
Technical Documentation	Means documentation deemed sufficient to enable market surveillance authorities to assess the compliance of a product, including a check of accuracy of the label and the product information sheet. It may, include test reports, measurements or analogous technical evidence.
User / Supplier User	(Associated to an EU Login profile of a supplier) is the user having needed permissions to register product models. While Users can see information at Organisation level (general information, trademarks, contacts, users and verification state), they cannot edit them.

NOTATIONAL CONVENTIONS

- Terms marked with the *italic* font (example: “*EU Login*”) are explained in the Glossary of Terms section.
- Terms in uppercase and bold (example: **VERIFIED**) represent concepts, statuses or buttons that you will find inside the EPREL Platform, with the exact same name.
- Text displayed in blue frames may be useful for a quicker reading but not crucial for understanding.
- Text displayed in yellow frames is important to read and remember.

INTRODUCTION

This manual is intended to guide suppliers of energy related products, in the scope of the Energy Labelling Regulation (EU) 2017/1369 and of the Tyre Labelling Regulation (EU) 2020/740, in the preliminary steps required before starting registering product models in EPREL, i.e. :

- (a) the User Profile creation
- (b) the Organisation Profile creation
- (c) the Organisation Electronic Verification.

The steps illustrated in this guideline are mandatory and represent a pre-requisite step before starting your product registration process, as required by the regulations above mentioned.

TIP for a fast consultation

If you have already created your Organisation profile and possibly also registered models in EPREL, you may directly go to the [Verification section](#). Describing the new requirement for Suppliers, starting with 2022.

A specific section on [eSignature](#), may be useful to Suppliers that need to learn more on how to acquire and use an electronic seal.

LEGISLATIVE CONTEXT

One of the most well-known, successful and longstanding energy policy tools to save energy and money for consumers is the **EU Energy Label for products**.

Even though the policy framework exists since 1994², it was reviewed for the first time in 2010³, with the last update being made in 2017⁴, through [Regulation \(EU\) 2017/1369 setting a framework for energy labelling](#) (hereafter referred to as “the framework Regulation”). On the basis of the framework Regulation, the Commission adopts specific labelling requirements for specific product groups via delegated Regulations.

The Suppliers’ obligation for registering products has been introduced by the framework Regulation, which updates the energy efficiency labelling requirements for energy-related products placed on the Market. Apart from this, the Regulation also updated the energy labelling format. The Regulation review from 2010 allowed the extension of the energy scale beyond the letter A, introducing new classes (A+, A++ and A+++). Because of the technological progress an increasing number of models started populating and crowding the top classes. The consequent impossibility of the really most efficiency models to outstand, suggested a review of the scaling allowing further extensions/pluses was not

² [Council Directive 92/75/EEC](#) of 22 September 1992 on the indication by labelling and standard product information of the consumption of energy and other resources by household appliances.

³ [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

⁴ [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

considered feasible, thus future reviews of labels will rescale the existing labels from A+++ to D into A to G⁵.

This framework Regulation requires the creation of a “*product database*”. More specifically:

- **Article 4** (“Obligations of suppliers in relation to the product database”) from the Regulation **sets the obligation on suppliers to register any new product model**, in the scope of the framework Regulation, **before placing it on the Market**.
- **Article 12** (“*Product database*”) from the Regulation, mandates the European Commission to build and manage such an online database, for *energy labelled products*⁶.

⁵ a “rescaling” is foreseen when too many models would be populating A and B classes, as from Article 11 of the Regulation.

⁶ Article 12, *Product database*

Annex 1: List of product groups required to be registered in EPREL contains the list of the product groups in the scope of the energy labelling framework legislation and its delegated acts, or other legislation setting the specific details on the data to be registered.

The product *database* has 3 ‘main’ intended functions, as explicitly stated in the Regulation:

1. Enabling the **registration by Suppliers**, of *product models placed on the Union market, as required by the legislation*
2. Facilitating the **access, by national Market Surveillance Authorities**, to the technical documentation necessary for compliance control
3. Allowing *consumers* an easy **public online access** to key product efficiency information, including the *energy label*.

Additionally, the platform associated to the database (EPREL, see next) facilitates:

- *Suppliers*, with the option to generate *Labels* and Product Information Sheets (or Product Fiches) in all EU languages. The platform also provides a tool to generate a QR Code, leading to the model data in the database.
- *Dealers* and distributors, in the provision of the electronic versions of the Labels and “Product Information Sheets” (or “Product Fiches” according to the wording in the repealed Directive). Both, Brick & Mortar shops or online e-commerce stores, can download these documents either from the *Public Site*, or via specific *Application Programming Interfaces (APIs)*.
- *Public administrations, procurers* and *policy makers*, in decision taking about tendering procedures, providing incentives, devising fiscal measures and the-like.

WHAT IS EPREL?

As of 1 January 2019, *Suppliers* (manufacturers, importers or authorized representatives) need to register their product models, which require an energy label, in the **European Product Registry for Energy Labelling (EPREL)**, before placing on the EU/EEA market the first product of a model in the scope of the Labelling legislation.

EPREL represents the platform that *Suppliers* must use for registering their product models.

The database includes publicly accessible information (part of which is reflected in the Energy Label and the remaining in the Product Information Sheet⁷ (or Product Fiche⁸) and technical information, accessible only to Member State Market Surveillance Authorities (MSAs) for their compliance control duties (Figure 1)

EPREL offers various options for Suppliers to register product models:

- (a) Interactively, through EPREL interface – by manually entering each required field, one-by-one
- (b) Interactively, through EPREL interface - by registering product models at scale, through ZIP Files upload (containing XMLs with data of multiple models)
- (c) Via System-to-system communication (e-Delivery) – by automatically registering product models at scale, through a direct integration with the European Commission e-Delivery component.

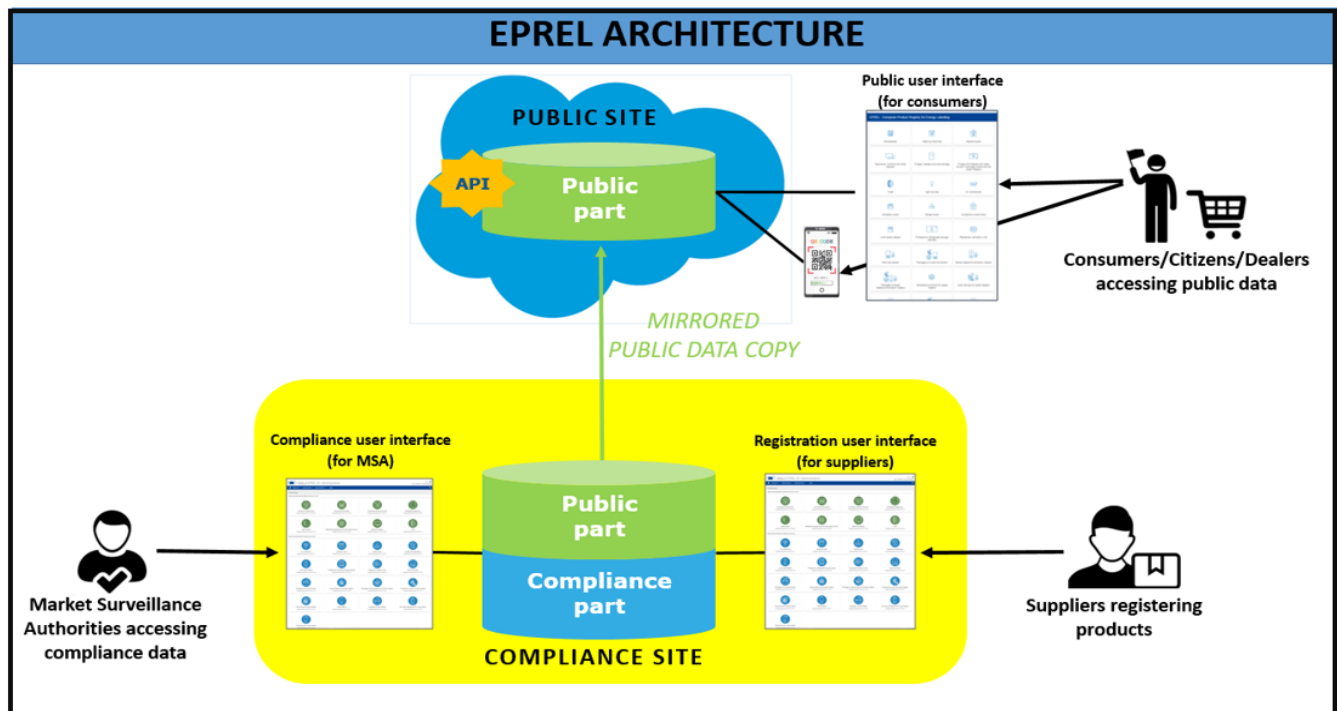


Figure 1: EPREL Architecture (Public + Compliance Site)

⁷ Product Information Sheet is the term used in Regulations supplementing Regulation (EU) 2017/1369.

⁸ Product Fiche is the term used in Regulations supplementing Directive 2010/30/EU.

GETTING STARTED

EPREL is hosted by the European Commission. To access it, you first need to create an EU Login account. When entering the EPREL platform for the first time, by directly accessing the EPREL URL, you are asked to create your EPREL Organisation. Once you have created your Organisation, you automatically become a *Supplier Admin* and can start inviting other users, to perform the product registration work in your Organisation workspace. You can also receive an email invitation from your Supplier Admin, to join your EPREL Organisation.

More in detail, here are the steps on how to get started as a *Supplier Admin*:

1. create an [EU Login account](#)⁹:
2. [log into EPREL](#)¹⁰: when you first log into EPREL, without having been invited by an existing user, you automatically become the *Supplier Administrator (Admin/Supplier Admin)* of an EPREL Organisation whose profile you are requested to create (you may later delegate this role to another Supplier Admin).
3. **Create your EPREL Organization**: In this phase you are asked to indicate if the *Organisation* you are creating is a **Legal Entity or Natural Person**: this **refers to the legal nature of the Supplier Organisation for which you are going to register product models**, and not to the individual user registering models in EPREL, on behalf of the supplier organization.
4. **Create your EPREL Trademarks**: Supplier Admins are the only users entitled to create the trademarks (brands) to be used in the registration of models. It is mandatory to define at least one trademark, in order to start registering product models.
You can add trademarks at any moment, later in the process: later, when registering models, you can select the appropriate trademark from a dropdown list of trademarks already defined.
5. **Invite Members to your Organisation**: *Supplier Admins* can invite additional users to become *Supplier Admins*, *Supplier Users* and *Supplier Readers* of the *Organisation* and manage models registrations. An Organisation can have multiple *Supplier Admins*, all having rights to edit the Organisation profile.
6. **Get your EPREL Organisation verified**: this is required to ensure that your organisation is entitled to act as Supplier, in respect to the obligations deriving from the Regulation and that you, as *Supplier Admin*, are enabled to register models on behalf of your organisation. Before you register any model, your organisation needs to be a “verified” supplier¹¹.
7. **Start registering products** – once you have reached this step, you are all set and ready to start registering product models for your organisation. Usually product registration is performed by *Supplier Users*, but the *Supplier Admin* can also do it¹².

Here are some overview steps on how to get started, as a *User* or *Reader*, when you receive an email invitation from your Supplier Administrator:

⁹ <https://webgate.ec.europa.eu/cas/login?loginRequestId=ECAS>

¹⁰ <https://webgate.ec.europa.eu/fpfis/wikis/display/EPREL>

¹¹ Exclusively during a transitional period from the start of the new verification procedure, suppliers are entitled to continue registering models. No model will be publicly visible for search, anyhow, until successful completion of the verification process.

¹² E.g. in a small organisation or to perform massive data uploads, or to register only a few models, a single user can normally perform all tasks.

1. **Access EPREL and create an EU Login account:** you can access EPREL either through the invitation link you received over email, or by directly entering the [EPREL URL](#)¹³ in your browser, and start creating your EU Login account. Once you do that, you will be assigned to your Organisation with the role given by your Administrator.
2. **Start registering products:** if the Supplier Admin attributed to you a role of *Supplier User*, once you reach this step, you are all set and ready to start registering your product models.
3. **Browse products:** you may be invited as *Supplier Reader*, to perform tasks other than registering/modify models. In such a case you cannot enter new models or modify content.

- If you are a returning user and want to register product models, you can access EPREL from here: <https://energy-label.ec.europa.eu>
- If you are new and want to get around, test and play with EPREL, a sand-box ACCEPTANCE environment is available for testing purposes: <https://energy-label.acceptance.ec.europa.eu>

Please consider that the ACCEPTANCE environment is just for testing. The *Organisation* and models that you create and publish in this environment are never migrated to the PRODUCTION environment. Registered models may be deleted, from time to time, for maintenance needs. If you never created an *Organisation* in the ACCEPTANCE environment, but only in the PRODUCTION one, then you need anyhow to create the Organisation profile in ACCEPTANCE (as the two environments are totally separated, although models from the PRODUCTION environment may be copied in ACCEPTANCE).

CREATE AN EU LOGIN ACCOUNT

EU Login is the European Commission authentication system. It represents the gateway for accessing all applications and systems built by the European Commission requiring an account.

When you first access the EPREL application, either directly or through the invitation link received from your *Supplier Admin*, you first need to create an *EU Login* account.

The screenshot shows a web form titled "Create an account". At the top left, there is a link "Help for external users". The form contains the following elements:

- Input field for "First name"
- Input field for "Last name"
- Input field for "E-mail"
- Input field for "Confirm e-mail"
- A dropdown menu for "E-mail language" with "English (en)" selected.
- A checkbox with the text: "By checking this box, you acknowledge that you have read and understood the [privacy statement](#)".
- Two buttons at the bottom: "Create an account" (in blue) and "Cancel" (in grey).


Figure 2: Creation of EU Login account

¹³ <https://energy-label.ec.europa.eu/compliance>

Steps to follow:

1. Go to EPREL Product Registration link and create your Account.

Click on the EPREL Product Registration link that you have received in your invitation email (you can also copy the link directly in your browser). You will next be directed to the EU Login registration page, where you need to create your own EU Login account (Figure 2). It is advisable to use an email address from your organisation’s domain, as this email is used to notify you when changes are made at the *organisation* profile level.

 As you will further receive an email with more instructions, make sure you choose the email language you are most comfortable with, in order to easily follow the next steps.

2. Create your Password and complete registration

After creating your *EU Login* account, you receive an email from the EU Login Authentication Service with a link to create your password (Figure 3).

Once your password is created, you will get a success confirmation and will be automatically redirected to EPREL Platform. Please [click here](#) for more information on how to create your *EU Login* account.

3. Next time in EPREL

To access the EPREL platform, you need to authenticate yourself every time by using your EU Login credentials.

Once authenticated, you are automatically directed to the EPREL homepage.

For security reasons, your EU Login authentication session expires after a few minutes of inactivity.

Therefore, when you are inside the EPREL Platform, you might need to refresh the page¹⁴ from time to time, in order for your session to be updated.

4. Logging out

To log out of the EPREL Platform, you can simply click on the **EXIT** icon from the top right corner of the main menu (see Figure 4).

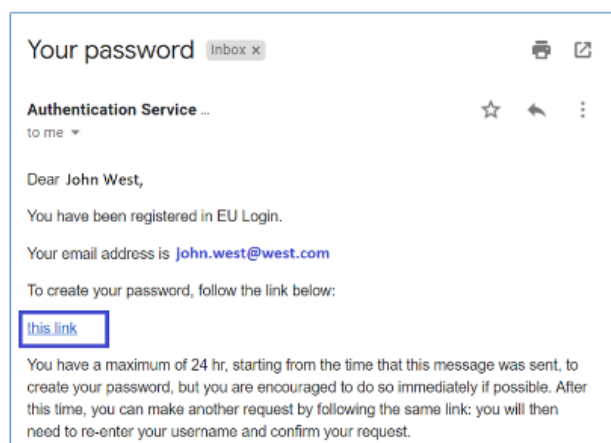


Figure 3: Create your password

¹⁴ E.g. reload the web page or, on a MS Windows computer, press F5.

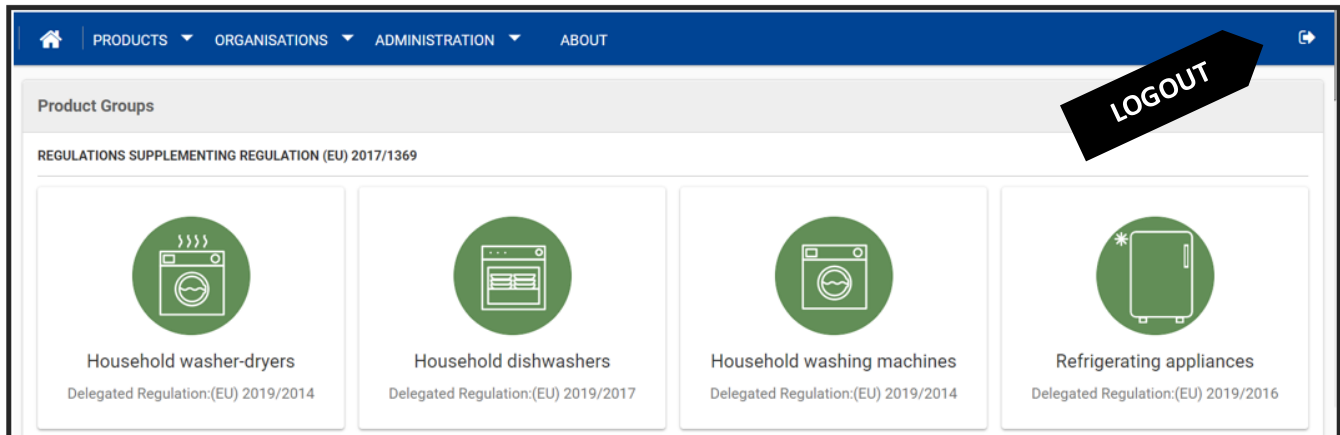


Figure 4: Logout from EPREL

CREATE YOUR ORGANISATION IN EPREL

The *EPREL Organisation* in this context is the entity (legal or natural person) acting as *Supplier* which is placing a product on the Market. The organisation can be either a *Manufacturer*, an *Importer*, or an *Authorised Representative of a third country manufacturer*.

- **Supplier Type:**

- **Manufacturer:** any natural or legal person established in the Union, EEA or Northern Ireland, who is responsible for designing or manufacturing a product and that places it on the EU market under his own name or trademark. A manufacturer is responsible for directly registering in the database each different model of the products placed on the EU market.
- **Importer:** a natural or legal person established in the Union, EEA or Northern Ireland who places a product from a third country manufacturer on the EU market. Its obligations build on the obligations of the manufacturer. An importer shall register in the database all product models imported on the EU market, if in the scope of the labelling legislation (see Annex 1) “before placing those products”.
- **Authorized Representative:** a natural or legal person established in the Union, EEA or Northern Ireland, who is appointed by a third country manufacturer (not established itself in the EU, EEA or Northern Ireland), to act on its behalf by registering in the database each different model of products placed on Market. The authorized representative is a legal or natural person independent from the manufacturer.

The same *Supplier* can have multiple roles, e.g. can act as *Manufacturer* for own-produced products and as *Importer* or as *Authorised Representative* for other products.

Tip: If your Organisation has already been created by one *Supplier Admin*, you should contact your EPREL representative, to invite you to join the existing *Organisation*. Creating duplicated organisations in EPREL is inadvisable.

The *Supplier Admins* are the only users with permissions to create and edit their *EPREL Organisation*. All other roles, anyhow, are able to view the organisation details.

In EPREL, the Organisation also represents the workspace where all users from the same Organisation can register product models in order to place them on the Market, for compliance purposes. As foreseen by the framework Regulation, these product models should also be visible to *retail / trading players* and *consumers*, which should have also access to the *Energy Label* and to the *Product Information Sheet*. Therefore, *Supplier Admins* must get their [Organisation verified](#), in order to make the registered product models publicly visible.

To efficiently manage and control your *EPREL Organisation*, we recommend you to create more than one *Supplier Admin*¹⁵. All other users, responsible with managing product models, should be assigned the *Supplier User* or *Supplier Reader* roles.

- When you first create your EPREL Organisation, you become the Supplier Admin of your Organisation
- Multiple Supplier Admins can further be invited, to collectively manage the Organisation workspace
- Even though you might be using your individual account when creating your EPREL Organisation, you must indicate the legal or natural nature of the Organisation entity for which you are registering models, not the nature of your individual profile.

First time in EPREL?

If you have accessed the EPREL Platform directly (through the [EPREL URL](#)), without receiving an invitation from a counterpart *Supplier Admin*, you will first be asked to create your new *EPREL Organisation* (Figure 5).

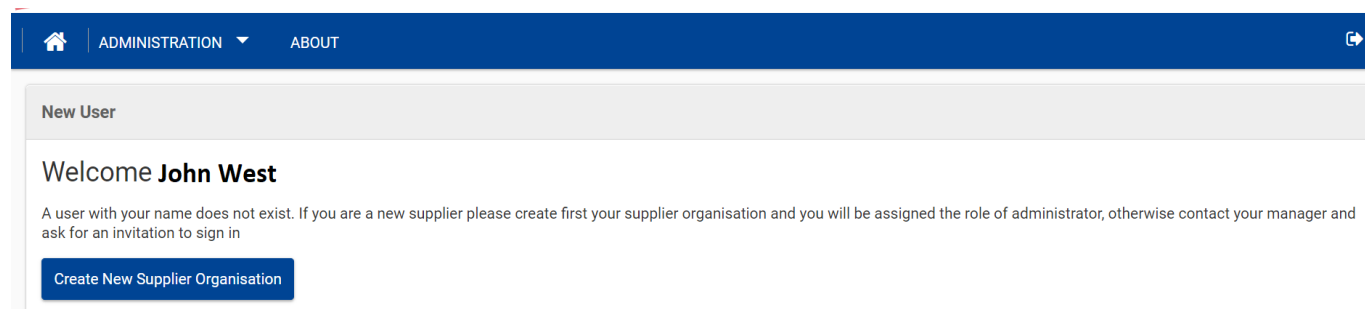


Figure 5: Start creating your EPREL organisation

When creating your *EPREL Organisation*, you first need to fill in the **GENERAL INFORMATION** section.

- After you fill in the *General Information* section and save your data, your *Organisation* is created with the status **UNVERIFIED**. Next, you need to go through the [Supplier Verification process](#).
- Information from this section are used for the verification process and also shared with the Market Surveillance Authorities.
- Only once the Organisation is **VERIFIED**, your registered and published products become publicly available.

¹⁵ E.g., if the person owner of the associated EU Login account quits the organisation without having attributed Supplier admin rights to another user, you may need to ask the intervention of the helpdesk.

As mentioned, you may act simultaneously as manufacturer, importer or authorised representative: when registering product models, the role is indicated at the level of each specific product model. You can set a specific role “by default”.

You need to define also the *Type of Organisation*, that refers to the legal nature (legal person vs. natural person) **of the organisation** for which you are registering product models.

Type of Organisation:

1. **Legal entity** (Figure 6): If you are a Legal Person, the following information is required:

Organisation Name (mandatory): represents the legal name of your organisation

Trading Name (optional): represents the commercial name of your organisation, the name used for advertising and sales purpose (if different from the legal name)

Country of Registration (mandatory): represents the country where the Organisation is registered as a legal entity. It determines the law governing the entity

Business Register Number (mandatory): also known as company number or registration number, represents the identification code/number provided upon registering your organisation in the Business Registration Institute/Authority of your Member State. This number may be also visible in the [Business Register Interconnection System \(BRIS\)](#)¹⁶.

Business Register ID (mandatory): it is an alphabetical or numerical id assigned at national level. Some Member States have a single body (e.g. the Chamber of Commerce) entitled to register companies, others have more than one. If you do not know the Business Register ID, you may quickly find it by looking for your organisation in the [Business Register Interconnection System \(BRIS\)](#)¹⁷.

VAT (optional): known also as “VAT registration number”, it represents the unique number that identifies a taxable person (business) or non-taxable legal entity that is registered for VAT. When

Figure 6 - General Information section for legal entities

¹⁶ At the date of writing, the BRIS website only lists “limited responsibility companies”. If your organisation is of this type, you will not find it in BRIS

¹⁷ If your organisation is not a “limited responsibility companies”, you cannot find it in BRIS, however you may possibly find the Business Register ID as it is very likely (for most of EU countries) that your “chamber of commerce” or similar is the same of limited responsibility companies.

registering your VAT in EPREL, please recall that it always starts with a 2-letter country code, followed by a numeric identifier (e.g. FR123456).

Other Legal Identification (optional): any other identification i.e. any other fiscal identification issued to EU/EEA or Northern Ireland entities by a public authority.

Website (optional): the address of your organisation website.

Address (mandatory): legal address of the organisation in the EU, the EEA or Northern Ireland: street, street number, postal code, city, province, municipality and country.

Electronic Verification Information:

- **Identity type reference:** this represents one of the 5 possible types of indicators used in qualified electronic seals to univocally identify an organisation¹⁸. The preferred identity type reference is “NTR” (National Trade Register” but in a transitional period any of the 5 possible types is accepted. At the end of the transitional period, only the NTR may be accepted and companies having used a different one may be requested to update their seal.
- **Organisation Identifier:** represents the alphanumeric value of the “organisationIdentifier” metadata from the supplier’s qualified seal. This field is not mandatory when creating the organisation, but needs to be filled in before starting the electronic verification process. If the fields Business Register Number and Business Register ID have been correctly filled above, you will find the full value proposed here. Please look at the next section for more details.

2. **Natural person** (Figure 7): entity acting as an individual. If you are a natural person, the following information is required:

First and Last Name: (*mandatory*) represents the *Name and Surname* of the *natural person registering the products and assuming the responsibility as a supplier in front of Market Surveillance authorities for the products it registers under its EPREL “organisation”*

Trading Name: (*optional*) represents the commercial name under which the product is commercialised, i.e the name used for advertising and sales purpose (if different from the first and last name)

Country of Registration: (*mandatory*) represents the country where the natural person is established.

VAT (*optional*): the “Value Added Tax registration number” represents the unique number that identifies a taxable natural person (business) or non-taxable natural person that is registered for VAT. When registering your VAT in EPREL, please recall that it always starts with a 2-letter country code, followed by a numeric identifier (e.g. FR123456).

Other Legal Identification (*optional*): any other identification

Website (*optional*): the address of your organisation website

Address (*mandatory*): legal address of the natural person in the EU, the EEA or Northern Ireland: street, street number, postal code, city, province, municipality and country.

¹⁸ See point 5.1.4 – Legal person semantics identifier of standard EN 319 412 - V1.4.2, https://www.etsi.org/deliver/etsi_en/319400_319499/31941201/01.04.02_20/en_31941201v010402a.pdf

Important Notes:

- Even though you might be using your individual EU Login account, when creating your EPREL Organisation, you associated your account to the organisation entity who is placing the products on the market, **as this is the entity for which you are registering models. EPREL accounts are not accounts for personal use, so make the difference between individual profile, as user of the account, and the entity responsible for placing products on the market, who is registering the products.**
- After creating your EPREL organisation, you can edit it at any time.

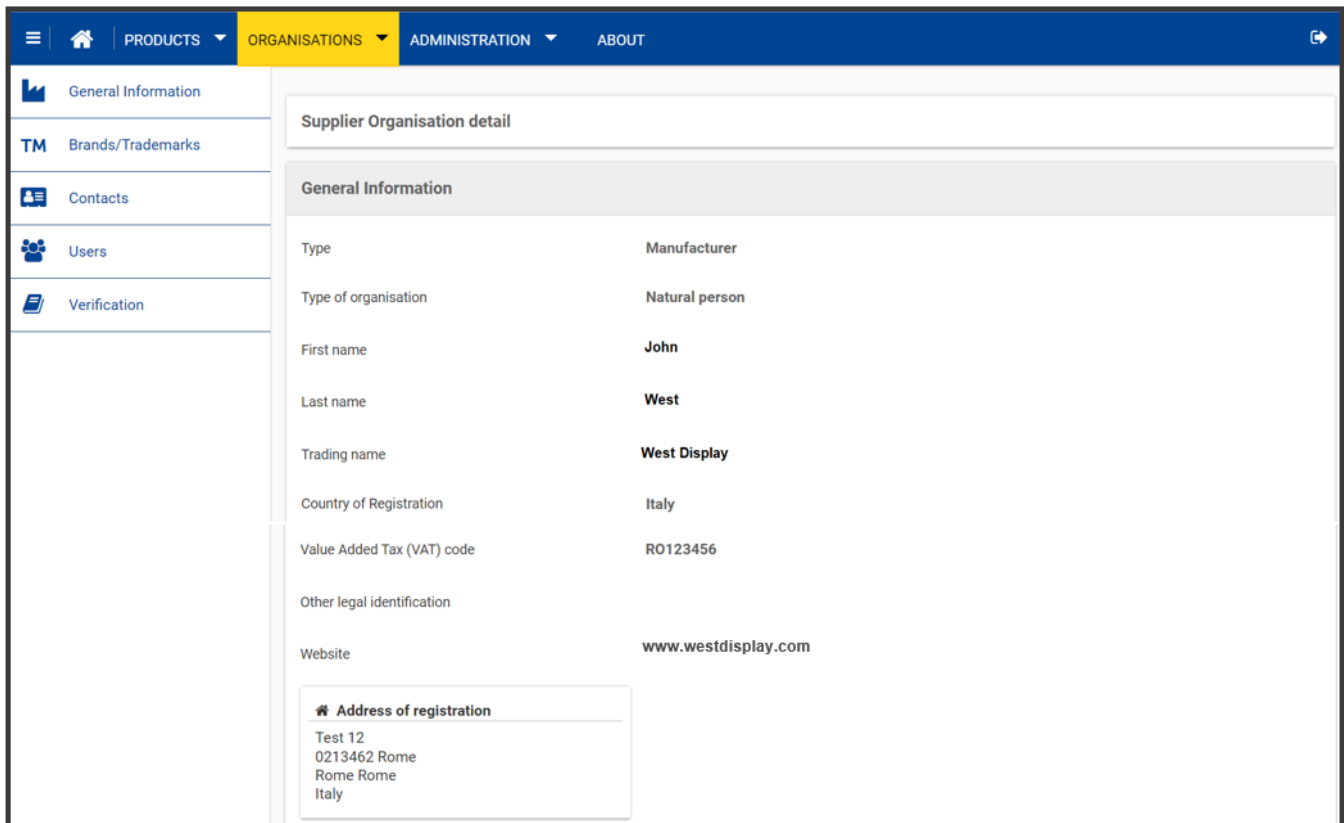


Figure 7: General Information section for Natural Persons

ELECTRONIC SEALING AND SIGNING

The electronic sealing or signing allows for the full digitalization of business processes that enhance security, reduce operational costs and cut carbon footprint.

You may skip this section if you are confident with the concepts of electronic signatures and electronic seals.

Since 1 July 2016, electronic signatures in the EU are governed by the [Electronic Identification and Trust Services \(eIDAS\) Regulation](#). **eIDAS** provides a predictable regulatory environment directly applicable to all EU Member States to enable secure and seamless electronic interactions between businesses, citizens and public authorities. To read more on eSignature, please visit the [European Commission website](#).

ELECTRONIC SEALS

An electronic seal is used to ensure origin and integrity in validation of a document/transaction when the actor is a **legal person**.

Qualified certificates for electronic seals are provided by Qualified Trust Service Providers (QTSPs), which have been audited as such and granted a qualified status by a national competent authority, as reflected in the [Trusted List](#) (the actual content of these trusted lists is managed and published by each Member State).

ELECTRONIC SIGNATURES

An electronic signature is used to ensure origin and integrity in validation of a document/transaction when the actor is a **natural person**.

Any attempt to change even a dot or to modify hidden text in the document results in invalidation of the electronic signature.

NOTE: Any attempt to change anything in the document results in invalidation of the electronic seal! The PDF downloaded from EPREL and to be sealed has already a seal put by the Commission, so any editing results in invalidation of the document.

SIMPLE, ADVANCED, QUALIFIED ELECTRONIC SEAL OR SIGNATURE

According to the eIDAS Regulation:

- **Simple electronic signatures** are weaker than handwritten signatures on paper. E.g., a name at the end of an email.
- **Advanced electronic signatures**, based on cryptography, ensure integrity of the signed document and signature. However, anyone can create his/her own personal certificate authority. Therefore, an advanced electronic signature doesn't provide any assurance on who signed the document.
- **Qualified electronic signatures** provide a guarantee that the authenticity of the signatory (the person named in the signing certificate created the signature). This qualified level introduces

quality assurance, backed with supervised conformity checks and accreditation processes. A few examples below:

- We can be reasonably sure that a “qualified certificate” issued to a natural person, whose identity matches with the one stated on the certificate.
- The qualified trust service provider is responsible for the issuance of the qualified signing certificates and the verification of the data.
- The technical mean to create the signature is under the control of the signatory.
- etc.

WHY ARE QUALIFIED ELECTRONIC SEALS USED IN EPREL?

Qualified certificates for electronic seals are issued by a Qualified Certificate Authority (CA), as an electronic attestation that links electronic seal validation data to a legal or a natural person, and confirms its identity.

The *EU Login* being only a 2-factor authentication system, EPREL needs to verify:

- The real existence and identity of the EPREL organisation, acting as supplier;
- The establishment in the EU/EEA or Northern Ireland territory of the organisation (for compliance enforcement needs)
- The entitlement of the *Supplier Admin* to act on behalf of the organization for the purpose of registering models in EPREL.

In other terms, to respect the basic security principle of authenticity, *i.e. the guarantee that information is genuine and from bona fide sources*, EPREL delegates the verification of the identity and of the basic requirement of being established in the EU, the EEA or Northern Ireland, to qualified third parties, such as the Certification Authorities.

Certification Authorities act according to requirements laid down in the eIDAS Regulation, to provide, for instance, guarantees regarding the identity of the creator of the seal. An employee managing to get sealed the *Verification file*, as produced by EPREL is deemed a trusted employee with direct or indirect but controlled access to the seal. A *Supplier Admin*, acting as natural person, is deemed to be the person he/she declares to be and signing the *Verification File* as self-declaration.

CAVEAT: Make sure your seal is QUALIFIED and not just ‘advanced’ from ‘qualified service providers’!

IMPORTANT NOTE: EPREL requires a Qualified Electronic Seal issued by a Qualified Service Provider.

The qualified electronic seal should comply with the ETSI EN 319 412-1 standard. See Annex 3 for a more detailed description of ETSI formats and examples of ETSI-compliant seals containing the EUID information.

For more information, read the [Important Notes – before you start sealing the Verification PDF](#).

HOW TO SEAL A DOCUMENT?

How to seal a document can vary but generally the service provider offers a service where the customer uploads the document to be sealed, performs the sealing and downloads it. Hardware tools are possible as well.

Please address to you service provider to get specific information on how to perform the operation.

LIST OF TRUSTED PROVIDERS

The Member States of the European Union and European Economic Area published a trusted list of Qualified Service Provides, in accordance with the eIDAS Regulation.

To view the list of all Trusted Providers, across all Member States, [click here](#)¹⁹. More in detail, providers of qualified seals are [listed here](#)²⁰.

QUALIFIED ESEALS COSTS

In a free market, prices can greatly vary, depending on the “packages” of services offered, usually including tens or hundreds of eSeals and related services and assistance. While some providers might even offer the service for free, usually for a limited time, the cost can start from a few tens of euro, to a thousand euro. In case of enterprises, the cost is influenced by the number of users and volume of certificates, varying from few hundreds to more.

¹⁹ <https://esignature.ec.europa.eu/efda/tl-browse>

²⁰ <https://esignature.ec.europa.eu/efda/tl-browser/#/screen/search/type/2>

VERIFYING THE ORGANISATION

The Supplier Verification Process, is aiming to ensure that the information published is genuine and from bona fide sources.

IMPORTANT NOTE: The electronic verification process is available, so far, only for legal entity organisations. For natural persons an electronic verification process is not yet in place, and thus cannot get verified and have models available for search in the public website, at least in an initial phase.

The verification process is necessary to ensure that only eligible legal entity *Suppliers* can register products in the EPREL Platform, avoiding that only *Suppliers* entitled to operate on the EU/EEA and Northern Ireland market can exhibit the mandatory energy labelling. The verification process is also necessary to avoid that *Suppliers* may impersonate another and malevolently register data of a competitor, e.g. with the intent of causing reputational damage. Finally, the verification is also used to confirm that the EU Login user profile associated to *Supplier Admin* is also entitled to register models on behalf of the organisation.

The EPREL platform offers, since February 2022, a fully digitalized verification process (electronic verification) where legal entity *Suppliers* can get swiftly verified, by relying on qualified electronic seals. If your organisation does not have a qualified electronic seal, please read carefully the next sections, detailing how to purchase and use a Qualified Electronic Seal.

Key notes before you start the verification process:

Before you start the Verification process, go to your EPREL organisation *profile* and make sure all your Organisation data is correct.

- If your organisation is a **legal entity**, your **Business Register Number**, **Business Register ID** and **Organisation Identifier** must be already filled in your Organisation settings. These fields are used to issue your Verification PDF document that needs to be electronically sealed and further verify if the qualified seal used belongs to your organisation.
- The verification process is not available, at the date of writing, for natural persons. Please consider that the legal or natural nature is referring to the supplier organisation which is placing a product on the Union, EEA or Northern Ireland market, and not to the individual user registering models in EPREL, on behalf of the supplier organisation. Unless the organisation you are representing is really a natural person, please change the organisation type in the General Information section, by selecting the “legal person” type.
- New and existing Organisations are initially set as **UNVERIFIED**, therefore needing to pass verification (as mentioned, only product models from **VERIFIED** suppliers become available for searches in the *Public Site*).
- If you created your *EPREL Organisation* before the verification process was introduced, you still need to get verified. Please consider that all your previously published models might not be available for search in the *Public Site*, until your *Organisation* becomes **VERIFIED**. Citizen and retailers can still access your products by directly scanning the *QR Code* or searching by the *EPREL ID*. MSA Authorities can anyhow access any product in published state, from the date indicated as of placing on the market.
- After the transitional period ends (transitional period during which organisations are encouraged to get verified), all **UNVERIFIED** organisation will no longer be able to register models in EPREL.
- **If your Organisation doesn't have a seal you should contact your service provider. A list of service providers offering qualified electronic seals is also available [here](#).**
- After the transitional period, **UNVERIFIED** suppliers will no longer be able to register new models in EPREL. All suppliers will be alerted, in due time.

The Electronic Verification requires legal entities to own a qualified [electronic seal](#) with the Organisation's metadata, as defined in EPREL – please read carefully the [Important Notes](#), before you seal the Verification File.

To start the Verification process, go to: **ORGANISATION > VERIFICATION** section, and start the electronic verification process. You can stop and restart the process at any time. In the next sub-sections we describe more in detail how this process works.

ELECTRONIC VERIFICATION FOR LEGAL ENTITY ORGANISATIONS

The electronic verification is a fast verification method, where legal entity Suppliers receive a verification resolution in a matter of minutes from the moment the Verification PDF is uploaded. To pass the verification, suppliers need to provide an electronically sealed document (*Verification File*), stating their organisation's identity. Verification is a simple 3-steps process (each step being detailed below):



For transparency reasons, and in order to make sure your organisation's electronic seal contains the proper data (metadata), in the following high level flow the detailed steps behind the verification process are presented.

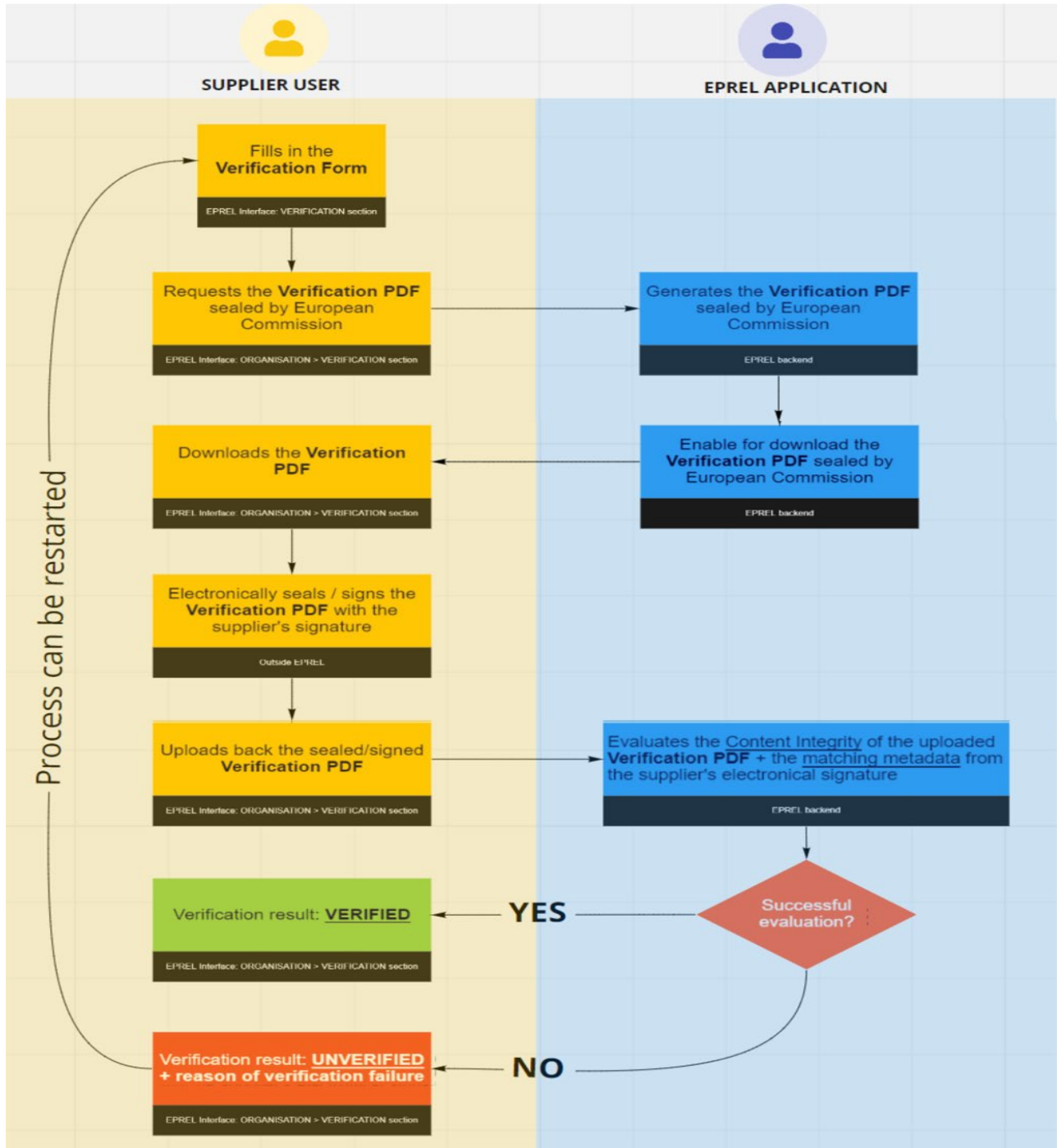


Figure 8: High level flow

Now let's take this one-by-one:

Step 1 – Request & Download the Verification File

To start the Verification Process, Suppliers need to go to **ORGANISATION > VERIFICATION** and click on **ELECTRONIC VERIFICATION** button (Figure 9)

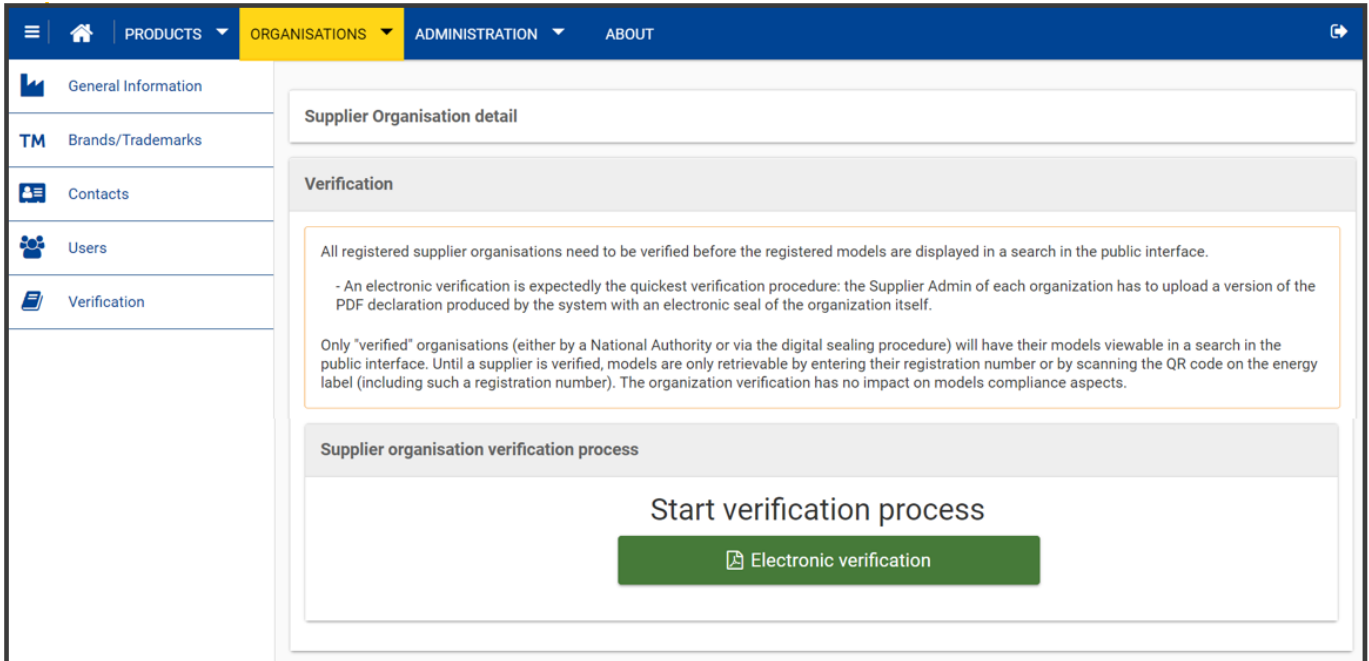


Figure 9: Start the Electronic Verification process

Once this is done, you will be automatically directed to the section where you can **REQUEST VERIFICATION FILE** (Figure 10).

In this step, you need to select in which language you prefer to receive the Verification File, and also provide the name and email address of the person from your Organisation, legally entitled to electronically seal the Verification Form.

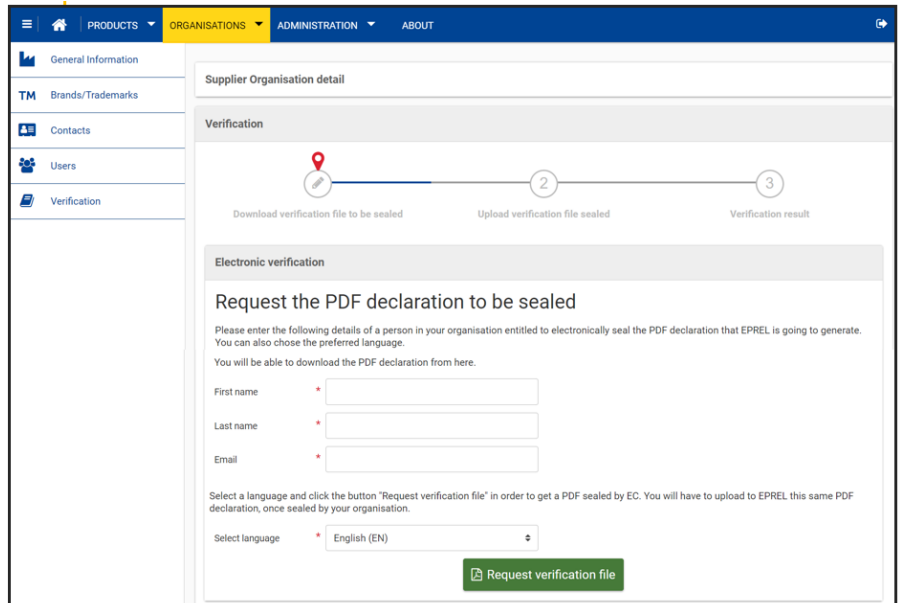


Figure 10: Request Verification File

! IMPORTANT: If you are representing a Legal Entity Organisation, make sure you have already filled in your EPREL Organisation setting, the **Business Register Number**, **Business Register ID** and **Organisation Identifier**. Without this information, EPREL will not issue the Verification File.

Make sure the data you introduce in this section is correct, as it will be used to generate the Verification File sealed by the European Commission.

To ease the process, EPREL automatically creates the Verification File with your *EPREL Organisation* data.

Once you request the Verification File, EPREL will start building the document in a PDF format, which will be already sealed by European Commission.

This process can take up to several minutes. During this time EPREL confirms that the request for generating the Verification File is in progress (Figure 11).

You can now download the Verification File (Figure 12).

This file contains your Organisation identification data and is sealed by the European Commission. Please review it carefully before sealing. In case your data is not correct, you can restart the process anytime.

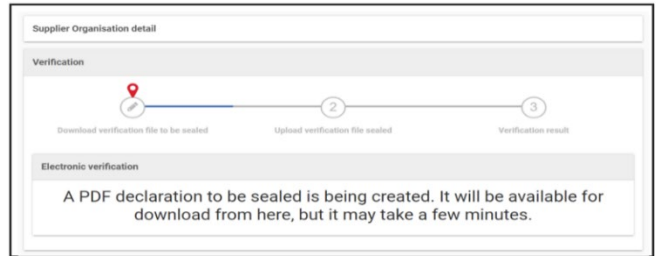


Figure 11: Verification File in progress

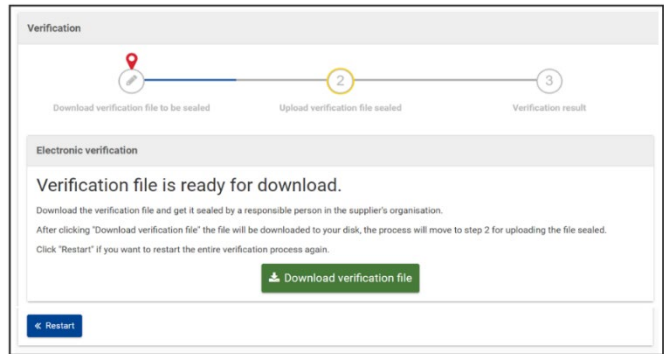


Figure 12: Verification File available for download

As Supplier Admin, you may not have direct access/use of the seal available to your organisation. Please make the necessary arrangements inside your organisation to have the qualified seal in the correct format, and have the Verification File sealed by the competent/entitled employee.

Important notes - before sealing the Verification File

Before you seal the Verification PDF, you need to make sure that the Business Register Number, Business Register ID and Organisation Identifier are correctly filled in.

The Organisation Identifier field from EPREL should be filled in with the exact same value as the `organisationIdentifier` metadata from your qualified electronic seal.

As part of the verification process, EPREL will check:

1. If the organisation identifier, organisation name and country from EPREL matches the corresponding metadata from your qualified certificate.
2. For organisations established in Northern Ireland (organisations with country code “GB”, “XI” or “UK”), EPREL also verifies the postal code.

Business Registration Number

This is an alphanumerical code attributed to the supplier by a national trade/business registrar (such as a chamber of commerce).

If you do not recall your Registration Number, you may quickly find it by checking the [Business Register Interconnection System \(BRIS\)](#):

Step 1: Access the BRIS link

Step 2: Search your company by name and introduce the country

Step 3: once you have found your organisation in the BRIS system, the Business Registration Number is the second attribute, as shown in Figure 13.



Figure 13 - Business Registration Number from BRIS

Based on [ETSI EN 319 412-1](#) (paragraph 5.1.5) standard, this code should be included in the “organisationIdentifier” attribute for NTR (National Trade Register) qualified seals.

Business Register ID

Code assigned by a Member State authority, or someone acting on its behalf, to the trade/business registrar (a single registrar exists in most Member States, but few have several of them) that attributes the Business Register Numbers to each legal entity asking registration.

If you do not know the Business Register ID, you may quickly find it by checking the [Business Register Interconnection System \(BRIS\)](#):

Step 1: Access the BRIS link



Figure 14 - Business Registration ID from BRIS

Step 2: Search your company by name and introduce the country

Step 3: once you have found your organisation in the BRIS system, the Business Registration Number is the fourth attribute, as shown in Figure 14.

Please note that the concatenation of “country code”, “Business register ID” and “Registration number” is the unique identifier for the purpose of communication between registers or EUID (European Unique Identifier) as from Commission Implementing Regulation (EU) 2021/1042²¹.

Based on [ETSI EN 319 412-1](#) (paragraph 5.1.5) standard, this code should be also included in the “organisationIdentifier” attribute for NTR (National Trade Register) qualified seals.

Organisation Identifier

EPREL helps proposing an Organisation Identifier based on the [ETSI EN 319 412-1](#) (paragraph 5.1.5) standard. (Figure 15).

- If the “NTR” Identity Type Reference is selected, EPREL will propose an organisation identifier based on the Country of Residence, Business Register Number and Business Register ID, according to the syntax as in Regulation (EU) 2021/1042,
- If the “VAT” Identity Type Reference is selected, EPREL will propose an organisation identifier composed of the Country of Residence and VAT identifier number.

If the organisation identifier recommended by EPREL doesn't match with the one from your seal, do not use it. Instead, introduce the exact organisation identifier value from your qualified seal.

ELECTRONIC VERIFICATION ?

Identity Type Reference ?

NTR - identifier from a national trade register (recommended option) ▾

EPREL proposed organisation identifier

NTRIT-ITABC.123456 **USE**

Organisation identifier ?

NTRIT-ITABC.123456

All the above information is used in the Electronic Verification process
Please make sure all fields match exactly their correspondent values from your qualified seal metadata
Any modification of the above fields (except for Identity Type Reference) will automatically restart the verification process and set your organisation back to Unverified. Further, you will need to restart the verification, by using a seal that matches the new values.

Figure 15 - Electronic Verification section from general Information

²¹ https://eur-lex.europa.eu/eli/reg_impl/2021/1042/oj

If you do not recall the value of the Organisation Identifier from your seal, you can simply check it by following these steps:

Step 1 – open a PDF signed with your organisation seal, with a program/application where you can check your certificate properties.

Step 2 – click on the seal logo from a signed document and further on your signature properties.

Step 3 – once you opened the signature properties, you need to see the metadata of your certificate, by clicking on “Show Signer’s Certificate”, (Figure 16)

Step 4 – In the details tab of your certificate, click the “Subject” metadata. In this object, you can see the attribute `organisationIdentifier` (can have different names, depending on your seal application), with the value assigned by the provider issuing the certificate.

Take the `organisationIdentifier` value from your certificate and input it in EPREL, in the Organisation Identifier field from your organisation settings.

The above steps may vary depending on the program/application you use for verifying your certificate properties. If you cannot find the “`organisationIdentifier`” attribute, please ask help from your service provider.

If you do not have a qualified electronic certificate, please contact your Certified Authorities (CA).

A [list of Qualified Trusted Providers is updated on the Commission website.](#)

You may check in the section above, the difference between [electronic seals and electronic signatures](#), as well as the difference between simple, advanced and qualified certificates.

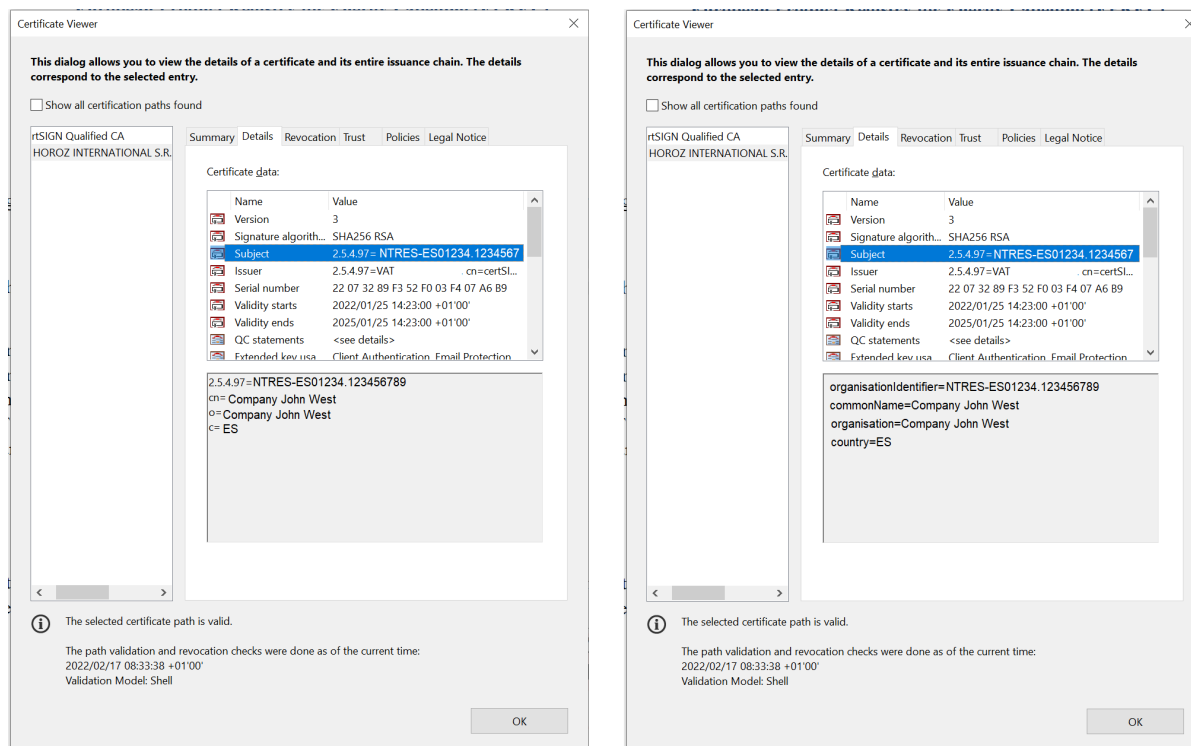


Figure 16: How to see the value of the `organisationIdentifier` in your seal.

After you have seal the PDF, you can move on to the next step.

Step 2 - Upload the Signed Verification File

Once you have uploaded the sealed Verification PDF, you will receive the verification resolution in a few moments. In case of unsuccessful verification, EPREL provides also a reason, explaining why the verification failed.

This reason will help you correct the attributes/metadata used for generating the *Verification File* or for sealing, and restart the verification process.

Step 3 - Check Verification Result

If your verification is successful, you will get this resolution in the EPREL *Verification* section (Figure 17), and will be also notified through email.

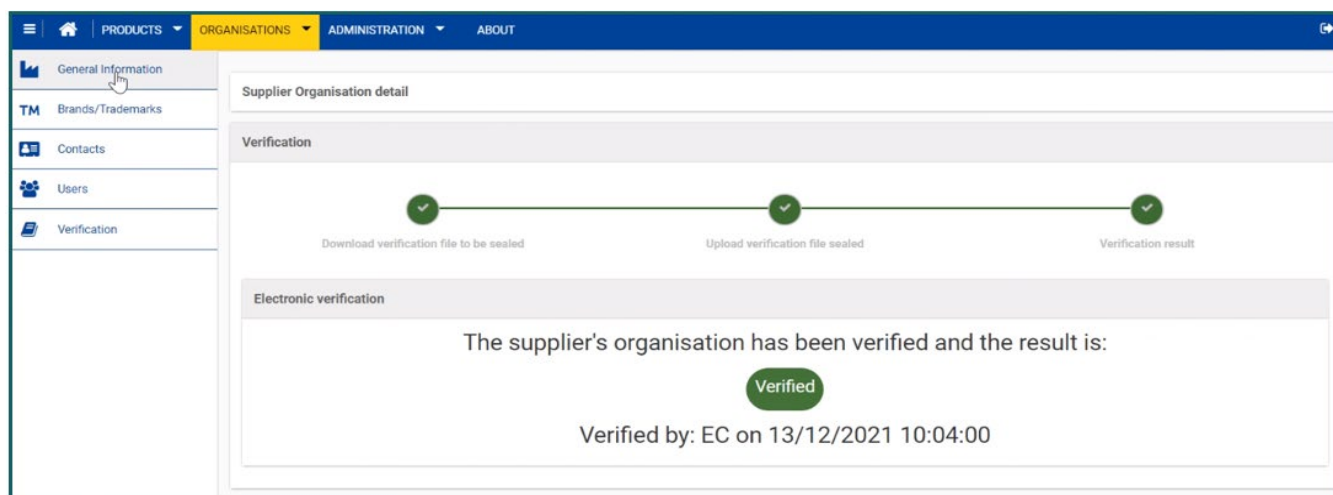


Figure 17: Successful Verification

Now that your organisation is verified, all your published models will become available for searches in the Public Site, within the following day.

In case you get a negative resolution (Figure 18), please read carefully the [List of Rejection Reasons](#) and once corrected, restart the process.

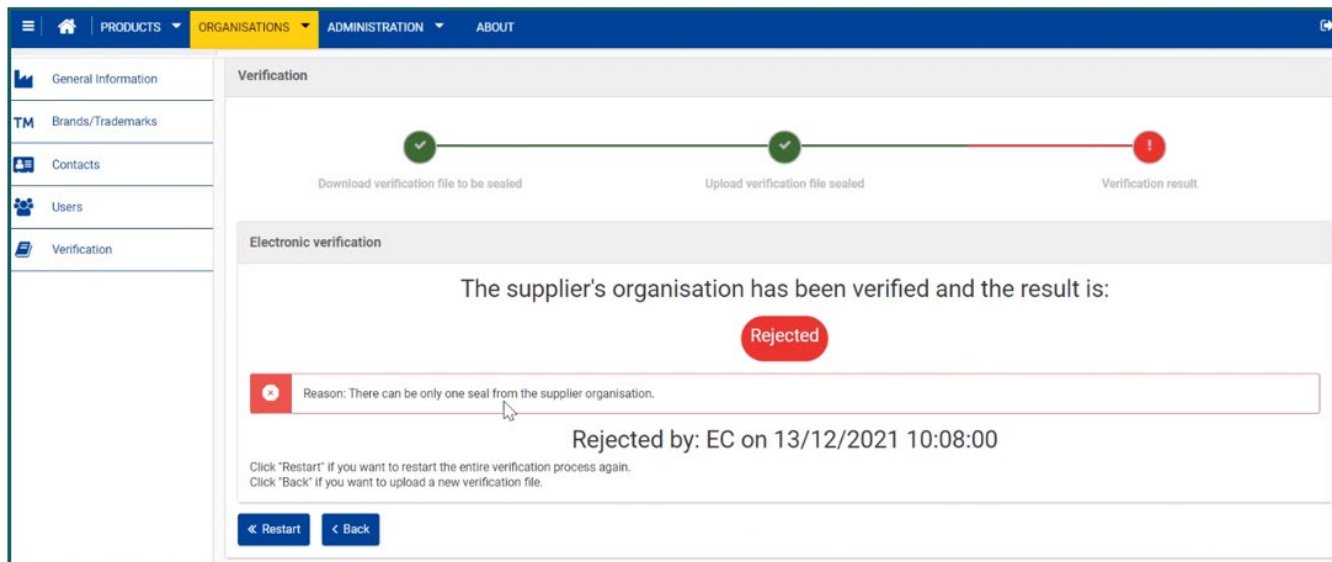


Figure 18: Unsuccessful Verification

List of Rejection Reasons

The verification may fail due to various reasons (listed here below), all being related to the values of the Organisation details from the Verification File or the values of the metadata fields from your electronic Certificate.

Therefore, you can consider the below **list of main rejection reasons as a check list to use when reviewing the Verification File before sealing it**. In case you notice some criteria are not met, we recommend you to correct the data and restart the verification process, by requesting a new *Verification File*. This process can be restarted as many times as needed, no severe limit imposed by the system.

Here are a few reasons why the verification is rejected:

1. “Country Code not matching”

This situation happens if the Country from the Verification File PDF doesn’t match the corresponding country code value from the:

“In this case the following error message will be displayed: “Country code in seal does not match the one from supplier's organisation”.

2. “Postal Code not matching”

This situation happens if the Postal Code from the Verification File PDF doesn’t match the corresponding postal code value from the “postalCode” certificate/seal metadata. In this case the following error message will be displayed: “Postal code in seal does not match the one from supplier's organisation”.

3. “Organisation Identifier not matching”

This situation happens if the organisation identifier from your EPREL organisation doesn't match the corresponding organisation identifier value from your certificate/seal metadata. In this case the following error message will be displayed: "Organisation identifier in seal does not match the one from supplier's organisation".

4. **"2 seals are required"**

This situation happens if you have uploaded back in EPREL the PDF document without your organisation seal, or you have removed the EPREL seal which is automatically applied on the PDF document you initially download.

5. **"Invalid certificate"**

This situation happens if your certificate is expired or no longer valid.

TAKEAWAYS

Please have them in mind when you start your EPREL Organisation verification.

- EPREL Electronic Verification works only with Qualified Certificates. If you do not have a qualified certificate, please acquire one from a Qualified Trusted Provider.
- The verification process is triggered and managed by *Supplier Admins* only. They will be notified via email, at each step in the process. Verification status is also available in the **VERIFICATION** section, in EPREL platform.
- Organisations need to get **VERIFIED** in order to have their registered models available for search in the *Public Site*, to consumers and retailers/dealers.
- Published product models from **UNVERIFIED** suppliers will no longer be available when searching in the *Public Site*, but can be accessed when scanning the product's label *QR Code*, or when searching in *Public Site* through the *EPREL ID*. Also, they will be available in the *Compliance Site*, for product compliance checks.
- Before sealing the Verification File, we recommend you pass through the check-list of rejection reasons, and make sure you are ready to go.
- Verification process can be re-run as many times as needed. EPREL is not putting a limit to this process.
- Once your Organisation is **VERIFIED**, all the registered published models will become available for search in the *Public Site* in max. 24hrs. If the Organization fails verification, it will remain **UNVERIFIED** and the verification process can be restarted anytime.
- **The option to edit organisation data is now available for Supplier Admins. Have in mind that if your organisation is already VERIFIED and you need to modify important identification data (like organisation name, address, etc), your organisation will become UNVERIFIED. In this case, you will need to start again the verification process, with a qualified electronic seal that contain the data for your new organisation.**

ANNEX 1: LIST OF PRODUCT GROUPS REQUIRED TO BE REGISTERED IN EPREL

#	Product group	Regulation (EU)
1	Local space heaters	2015/1186
2	Range hoods	65/2014
3	Domestic ovens	
4	Professional refrigerated storage cabinets	2015/1094
5	Residential ventilation units	1254/2014
6	Solid fuel boilers	2015/1187
7	Packages of a solid fuel boiler, supplementary heaters, temperature controls and solar devices	
8	Air conditioners	626/2011
9	Household tumble driers	392/2012
10	Water heaters	812/2013
11	Packages of water heater and solar device	
12	Solar devices	
13	Hot water storage tanks	
14	Space heaters/Combination heaters	811/2013
15	Solar device	
16	Temperature control	
17	Packages of space heater, temperature control and solar device/Packages of combination heater, temperature control and solar device	
18	Electronic displays (televisions, computer monitors, signage displays and o.)	2019/2013
19	Household washer-driers	2019/2014
20	Household washing machines	
21	Light sources	2019/2015
22	Refrigerating appliances (kitchen refrigerators, wine storage, minibars, freezers, chest storage)	2019/2016
23	Household dishwashers	2019/2017
24	Refrigerating appliances with direct sales function (commercial fridges and freezers, beverage coolers and ice cream freezers)	2019/2018
25	Tyres (C1, C2 and C3 tyres for use on roads)	2020/740

ANNEX 2: FAQs

- 1 As an UNVERIFIED supplier, can I still register products in EPREL?
- 2 As an UNVERIFIED supplier, am I still compliant with the Product Legal Framework Regulations?
- 3 Will public access to EPREL show products from UNVERIFIED Suppliers?
- 4 Is there an official list of “Qualified Trust Service Providers”?
- 5 Which is the cost of an electronic seal?
- 6 What should I enter in EPREL before starting the verification process?
- 7 Where can I find my Business registration number and ID?
- 8 When scanning a QR code on a label in a shop I get a warning message, “not verified yet”. Why?
- 9 I uploaded my sealed verification file, but the result I get is “rejected”

(1) As an UNVERIFIED supplier, can I still register products in EPREL?

Exclusively for a transitional period, from the introduction of the verification process, any existing legal Supplier can continue registering products in EPREL.

Products from UNVERIFIED Suppliers are still published (from the “date of placement on the market”) in the Compliance Site, remaining visible only to MSAs. These products are also accessible when scanning the QR Code on a label or, in E-Commerce applications, by calling the API to download the labels and Product Information Sheet (or Product Fiche) but with a banner indicating that the model is registered by a still unverified supplier.

Published products from UNVERIFIED Suppliers do not “appear” in the Public Site as result of a search/selection.

(2) As an UNVERIFIED supplier, am I still compliant with the Product Legal Framework Regulations?

The legislation in force sets an obligation on suppliers for registering models and during a transitional period no obligation of verification is set.

Anyhow, a legislative act is going to set a number of obligations, namely in terms of verification and type of seal (e.g. including the business registration number for legal entities, etc).

From the end of the transitional period, no activity on models will be possible by suppliers still unverified at that date.

(3) Will public access to EPREL show products from UNVERIFIED Suppliers?

EPREL is freely accessible since 1 April and only shows models registered by suppliers that successfully completed the verification process.

Public access to EPREL is not only intended as tool for any citizen, to facilitate a purchase choice, but as tool for public administrations in tenders and or subventions where the condition set is “products in the highest significantly populated class (e.g. Art. 7.3 of Regulation (EU) 2017/1369, Green Taxonomy, energy efficiency obligations schemes as from Directive (EU) 2018/2002, etc.).

Although published products from UNVERIFIED Suppliers remain accessible by scanning the QR Code, or similar, a competitive advantage may be missed in respect to models fully accessible.

(4) Is there an official list of “Qualified Trust Service Providers”?

A list of trust service providers is available. Please consider that, although it may result practical to request the verification from a provider in the same country where the organisation is established, this is a free and open market, thus, in principle, your organisation may look for best conditions abroad.

(5) Which is the cost of an electronic seal?

The market of electronic seals is relatively new. Costs may range from a few euro, and from a seal with validity of weeks or months, to thousands of euro for a fully-featured service including hundreds of seals and years of validity. EPREL does not set specific requirements so far on the duration of validity, so if the need is really limited to the verification for EPREL you may look for the simplest and most efficient solution.

(6) What should I enter in EPREL before starting the verification process?

An improved interface (Figure) is now available in EPREL where the crucial data to enable the verification is in a yellow frame. The content of these fields has to perfectly match the data in your qualified electronic seal:

Organisation name: the text entered here has to “perfectly” match what in the field “cn” of the seal. Only the leading and ending spaces are dropped.

Country of registration: obviously, the country where the organisation is registered and that is included in the seal.

Business register number: ANY organisation is registered in the country where it is established (many organisations are registered in different countries as well)

Business Register ID: this is the identifier of the registrar (generally a Chamber of Commerce) that attributed your business register number. Although in most of Member States a single registrar exist, in some countries several may exist (e.g. France) but with still unique number, whilst in a few Member States both the Business register

Number and the ID are necessary for a univocal identification.

Identity type reference: the relevant ETSI standard includes 5 types of organisation identity, appealing in the pull-down menu: which one to select is an information you should ask to your Qualified Service Trust Provider (QSTP). Only during the transitional period EPREL accepts any the 5 types, but in future only the type NTR will be accepted.

Organisation identifier: here you have to copy the content of the attribute 2.5.4.97 “precisely” as indicated after the “=” sign (Figure 18).

If you do not know how your seal is constituted, please address yourself to your service provider to

Figure 19: The EPREL information to fill for an organisation

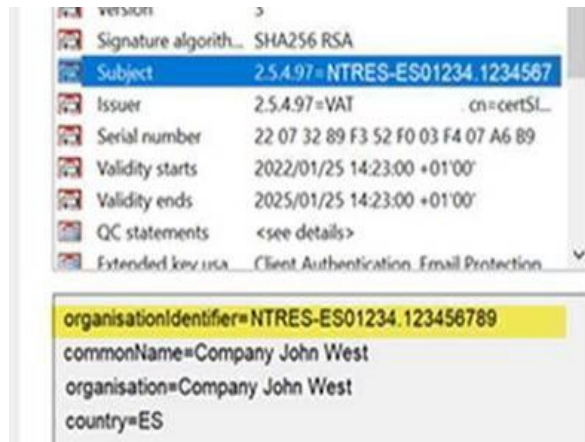


Figure 17: the “organization identifier” content included in a seal

of

know the content of this attribute. If the QSTP offers to choose any of the mentioned 5 types of `organisationIdentifier` attribute, please consider that the NTR is the preferred format and the only one accepted after the end of the transitional period. See Annex 3: ETSI format for legal person semantics for more details on the ETSI standard and content of the attribute.

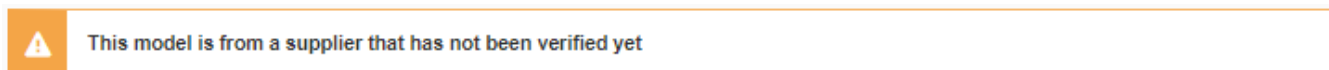
(7) Where can I find my Business registration number and ID?

Your organisation has to be registered in a national business/trade register, generally managed by the national “Chamber of Commerce and Industry”. Please check your documentation to find such number, but many organisations mention it even in official paper (e.g. in the header of the footer).

If your organisation is of type “limited liability”, you may easily find the information by consulting the [BRIS portal](#)²². Here you can verify, and for ANY company type, also the Business register identifier and the EUID.

A list of the Business/trade registers in EU countries is available as well from the [BRIS website](#)²³.

(8) When scanning a QR code on a label in a shop I get a warning message, “not verified yet”. Why?



The scanned product was registered in EPREL by a supplier that has not passed the identity verification process, yet. Until that, the model will not appear in a search in the public EPREL website and the alert box will also be shown. The verification process may be complex and take some weeks to be completed. After a while, however, would the alert still appear, it may also be due to impossibility for the supplier of getting the verification, e.g. because not regularly established in the EU/EEA as required by the legislation in force.

(9) I uploaded my sealed verification file, but the result I get is “rejected”

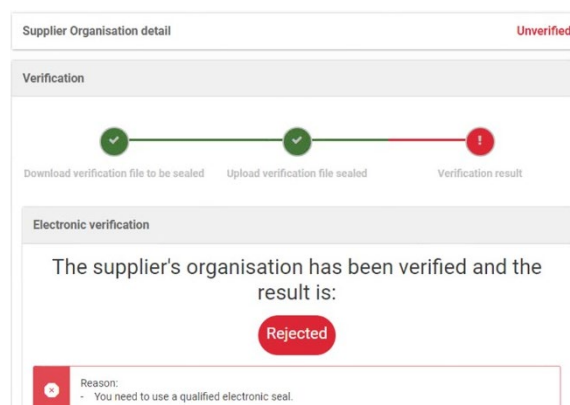
Your service provided is not a “qualified” one or the seal it provided is not qualified.

Please request the seal to a QSTP a [trust service type](#)²⁴.

Of the different services offered by qualified trust services, you should request a “Qualified certificate for electronic seal”. A list is available from the “[EU Trust Services Dashboard](#)”²⁵

The Seal has to be compliant with the eIDAS legislation.

Other common reason for rejection is that the uploaded document is not sealed with a “Qualified seal” but e.g. with an “electronic signature”.



²² https://e-justice.europa.eu/489/EN/business_registers_search_for_a_company_in_the_eu?

²³ https://e-justice.europa.eu/106/EN/business_registers_in_eu_countries?

²⁴ <https://esignature.ec.europa.eu/efda/tl-browser/#/screen/home>

²⁵ <https://esignature.ec.europa.eu/efda/tl-browser/#/screen/search/type/1>

ANNEX 3: ETSI FORMAT FOR LEGAL PERSON SEMANTICS

Standard ETSI EN 319 412-1 V1.4.4 (2021-05) describes in paragraph 5.1.4 the semantics for the `organizationIdentifier` attribute as follows:

“When the legal person semantics identifier is included, any present `organizationIdentifier` attribute in the subject field shall contain information using the following structure in the presented order:

- 3-character legal person identity type reference;
- character ISO 3166-1 [2] country code;
- hyphen-minus "-" (0x2D (ASCII), U+002D (UTF-8)); and
- identifier (according to country and identity type reference).

The three initial characters shall have one of the following defined values:

- 1) "VAT" for identification based on a national value added tax identification number.
- 2) "NTR" for identification based on an identifier from a **national trade register**.
- 3) "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.
- 4) "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'.
- 5) 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).

Other initial character sequences are reserved for future amendments of the present document.”

In a transitional period, all formats currently compliant to the ETSI standard will be accepted, however, for the purposes of supplier verification in EPREL, the **Business/Trade Register** is largely the most appropriate and desired indicator, thus the preferred format would be with the *NTR* qualifier and, as national register, the EUID from [Regulation \(EU\) 2021/1042](#)²⁶.

Examples for some different Member States with different variants of the EUID as part of the “identifier”:

```
NTRAT-ATBRA.012345-000
NTRBE-BEKBOBCE.0123.456.789
NTRCZ-CZVROR.12345678
NTRDE-DED3310V.HRB12345
NTRRES-ES01234.123456789
NTRFR-FR3102.123456789
NTRHU-HUOCCSZ.01-02-123456
NTRIT-ITRI.01234567890
NTRLU-LURCSL.B12345
```

²⁶ The [Business Registers Interconnection System \(BRIS\)](#) provides an example of the use of this syntax and matches the entries from the national registrars.

NTRNL-~~NLNHR~~.01234567

NTRRO-~~ROONRC~~.J40/01234/5678

This content is in accordance with the required content of qualified certificates as from [Annex I, point \(b\) of Regulation \(EU\) No 910/2014](#).

From the end of a transitional phase, only seals including the EUID information may be accepted.