

Ilze Juhansone
Secretary General
European Commission
Rue de la Loi 200/ Wetstraat 200
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Brussels, 15 July 2021

Subject: Working together to ensure a smart transition towards digital product information to consumers

Dear Secretary General

The undersigned cross sectorial organisations would like to draw your attention to the opportunities that digital means can bring, notably regarding product information requirements, to the benefit of businesses and citizens across the European Union, and the need for further action and leadership from the European Commission.

Increasing regulatory requirements and consumer demand for more information drives product information content online. While it is necessary for some information to remain on the physical fixture (packaging, label, leaflet etc), digitalisation can be a relevant and sustainable way to ensure information is up to date, legible and understandable. Digital tools can engage and inform consumers in an innovative, effective and efficient way thus creating a culture of better-informed EU citizens, which is key to achieving the objectives of both the green and digital transformations. In addition, digital consumer information can support sustainability objectives by reducing packaging and packaging waste.

The European Commission has recognised that digital means should play a role in providing mandatory as well as voluntary information to consumers¹, as evidenced at first in the European Green Deal which notes that “Europe must leverage the potential of the digital transformation, which is a key enabler for reaching the Green Deal objectives” and will “look at exploring new ways to give consumers better information, including by digital means”. This was further reinforced in various Commission initiatives including the Communication from the Commission “Shaping Europe's digital future”, the “New EU Consumer Agenda” which aims at empowering European consumers to play an active role in the green and digital transitions and last but not least, in the “New Industrial Strategy for a globally competitive, green and digital Europe”.

In line with this overall policy, using digital means in some circumstances to provide mandatory as well as voluntary product information is envisaged in ongoing legislative initiatives from the European Commission in sectors such as wine, batteries and detergents. Furthermore, various sectors push digital consumer information ahead without a legal obligation in the belief that digital consumer information is the way to ensure consumers are provided with the information they seek in a reliable, transparent and effective way.

¹ "Mandatory product information": For the purposes of this letter, product information that the relevant business operator is legally required to provide to the consumer.

We very much welcome these developments but remain concerned that this is not the case across the full spectrum of new EU legislative proposals and policy initiatives, nor ongoing revisions of EU legislation. We would like to emphasise the importance of a consistent and harmonised approach from the European Commission, in order to ensure a coherent and comprehensive regulatory framework between sectorial legislation and to avoid creating confusion amongst consumers.

Therefore, we strongly believe that the European Commission should adopt a coordinated approach to allow for digital means to provide product information and to adapt the relevant EU regulatory framework accordingly, taking into account the Commission's better regulation principles and practices. At the same time, to maximise the benefits of digital product information for both businesses and consumers, it has to be ensured that small enterprises are enabled to implement these digital means and vulnerable consumers are supported in their role in the digital transition.

As a first step to a coordinated and inclusive approach on digital information, we would like to invite the European Commission to establish a formal dialogue with stakeholders, such as a dedicated European Stakeholders Forum for Digital Consumer Information, with a view to developing a roadmap for the possible dematerialisation of some product information and as a means for stakeholders to exchange best practices.

We hope that you will consider supporting this proposal as a way to ensure greater consistency in EU legislation and alignment with the Commission's political priorities. The signatories of this letter look forward to your response and remain available to discuss the above points with you at any time.

Yours sincerely,

The undersigned associations

CC'

Roberto Viola – Director-General DG CONNECT

Kerstin Jorna – Director-General DG GROW

Salla Saastamoinen – Acting Director-General DG JUST

Sandra Gallina – Director-General DG SANTE



AIM - European Brands Association



A.I.S.E - International Association for Soaps, Detergents and Maintenance Products



CEEV - Comité Européen des Entreprises Vins



CEVI - European Confederation of Independent Winegrowers



COSMED - L'Association des PME de la filière Cosmétique



Cosmetics Europe – The Personal Care Association



EFOW - European Federation of Origin Wines



ERPA - European Cosmetic Responsible Person Association



ETRC - European Travel Retail Confederation



EuroCommerce - The organisation of Europe's retail and wholesale sector



FEDAS - European Federation of Sporting Goods Retailer



FEICA - Association of the European Adhesive & Sealant Industry



Federation of the European
Sporting Goods Industry

FESI - Federation of the European Sporting goods
Industry



FoodDrinkEurope - The Organisation of Europe's Food &
Drink Industry



IFRA - International Fragrance Association



Independent Retail Europe - European association for
groups of independent retailers in the food and non-
food sectors



NATRUE - The International Natural and Organic
Cosmetics Association



Serving Europe - Branded Food and Beverage Service
Chains Association



SMEUnited - European Association of Craft, Small and
Medium-sized Enterprises



spiritsEUROPE - The organisation of Europe's producers
of spirits drinks



TIE - Toy Industries of Europe