



Mrs. Alexandra NIKOLAKOPOULOU
Head of Unit Food information and composition, food waste (SANTE.DDG2.E.1)
Directorate-General for Health and Food Safety
European Commission
B – 1049 Brussels

11 March 2020

Subject: ETRC Contribution to Roadmap on the Farm to Fork Strategy

Dear Mrs. Nikolakopoulou,

ETRC, the European Travel Retail Confederation, welcomes the opportunity to give feedback on the European Commission's Farm to Fork Strategy roadmap.

ETRC would like to highlight the potential that the Farm to Fork Strategy can have for consumers and businesses, working alongside another EU Priority; achieving a Europe Fit for the Digital Age.

In the recently published European Green Deal, the European Commission announced that it will *"look at exploring new ways to give consumers better information, including by digital means"*, thus clearly recognising that digitalisation can help deliver a clean and circular economy. This was recently reinforced in the Communication from the European Commission *"Shaping Europe's digital future"*, in which the Commission announces its ambition to deliver on a new Consumer Agenda by the end of this year, *"which will empower consumers to make informed choices and play an active role in the digital transformation"*.

ETRC would like to invite the European Commission to consider digital means as a legally recognised option to provide mandatory product information, potentially reducing packaging waste, and adapt the relevant regulatory framework as part of the Farm to Fork Strategy.

One means to achieve this is by enacting **article 12 of the Food Information to Consumers Regulation (Reg. 1069/2011)**, which states that *"In order to ensure that consumers benefit from other means of provision of mandatory food information better adapted for certain mandatory particulars, and provided that the same level of information as by means of the package or the label is ensured, the Commission, taking into account evidence of uniform consumer understanding and of the wide use of these means by consumers, may establish, by means of delegated acts in accordance with Article 51, criteria subject to which certain mandatory particulars may be expressed by means other than on the package or on the label."*



ETRC fully supports the principle that consumers should have access to relevant and meaningful information on the products they wish to purchase and consume. We believe digital means offer a great opportunity to effectively communicate product information to consumers via means other than the label, packaging or leaflet, while ensuring compliance with regulations.

That is why ETRC has been working for many years to find a pragmatic solution to providing consumers with product information in a way that meets both the requirements of the regulators and the specificities of our unique consumer, the international traveller, particularly in the context of the FIC Regulation and the further opportunity to reduce packaging.

After considering a number of options, in 2018 ETRC contracted for a pilot project to explore the feasibility of creating a multilingual digital platform for information to consumers in duty free and travel retail, across three core categories: Beauty, Alcohol and Confectionery. As part of this pilot project, ETRC conducted a series of passenger interviews, in accordance with ISO 9241 methodology, which took place at Hamburg Airport in December 2018 to collect crucial users' feedback on the pilot platform.

Building on this first success, the **ETRC Digital Labelling platform** has now moved into its second phase involving a one-year project with 20+ suppliers with the objective to build a fully functional platform, whereby product information will be accessible in multiple languages via a barcode on the packaging scanned via a smartphone or in-store scanners, ensuring that the information is available to all consumers at any time. In-store tests will be conducted next Autumn to collect consumer feedback.

Ultimately, the acceptance by EU and national policymakers for such a solution will be crucial to our efforts in the next stages of the project. Therefore, ETRC very much welcome the current work of the Commission looking towards the possibility to enact legislation to formally allow for product information to be provided by means other than on the package or on the label to better inform consumers in the digital age.

Finally, we would like to call your attention to a **joint letter co-signed by ETRC along with 21 other European trade associations on March 3**, inviting the European Commission to *"investigate where opportunities exist for digital means as a legally recognised option to provide mandatory product information and adapt the relevant EU regulatory framework including general product and consumer legislations, as well as sector specific legislations if such opportunities provide benefits to consumers and businesses of all sizes"*.

We believe our project and similar initiatives provide an opportunity to implement ground-breaking solutions for the digital age, almost 10 years after the adoption of the "FIC Regulation" which foresaw that "Food information rules should be able to adapt to a rapidly changing social, economic and technological environment" (recital 51).



ETRC looks forward to working together with the Commission on this matter and stands ready to share experience and position by contributing in events your services may organise. I personally remain available for questions at any stages of the process.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Julie Lassaigne', is positioned above the typed name.

Julie Lassaigne
Secretary General
ETRC

Attachments:

1. ETRC leaflet *Informing consumers in the duty-free and travel retail channel in the digital age*, July 2018 – [Link](#)
2. Industry Joint Letter *Mandatory product information and digital means*, March 3, 2020 – [Link](#)

About the European Travel Retail Confederation (ETRC)

The European Travel Retail Confederation (ETRC) is an industry association for the duty free and travel retail industry in Europe, serving the industry and its members to help create the right environment to allow the industry to achieve its potential and protect it when challenges arise.

ETRC is composed of national and regional affiliated trade associations representing over 200 European companies, Tax Free World Association (TFWA) representing 520 brand companies, and direct corporate membership from individual companies working in the duty free and travel retail trade across Europe and beyond. The European Travel Retail Confederation's operations are directed by its Supervisory and Managing Boards and carried out by a full-time secretariat. For more information about the organisation, please visit our website – www.etr.org
