



**Ms Margrethe Vestager**, Executive Vice-President of the European Commission for 'A Europe fit for the Digital Age'

**Mr Frans Timmermans**, Executive Vice-President of the European Commission for the 'European Green Deal'

**Mr Thierry Breton**, European Commissioner for Internal Market

**Ms Stella Kyriakides**, European Commissioner for Health and Food Safety

**Mr Didier Reynders**, European Commissioner for Justice

**Mr Virginijus Sinkevičius**, European Commissioner for Environment, Ocean and Fisheries

**Mr Janusz Wojciechowski**, European Commissioner for Agriculture

Brussels, 27 March 2023

**Subject: Industry alliance calls for digital solutions for product information that work for all**

Dear Executive Vice-Presidents,  
Dear Commissioners,

The undersigned associations, representing a large number of consumer-facing economic operators, would like to reiterate their request to the European Commission for a coordinated approach on product information by digital means; that would work for all, consumers and economic operators alike, including SMEs.

As acknowledged by the European Commission, the leverage of digital transformation is a key enabler for reaching the Green Deal objectives and it can help improve the availability of product information

in the EU<sup>1</sup>. Digital solutions for labelling and product information at EU level can indeed help to reduce packaging waste, offer the possibility to provide more detailed and tailored information to consumers and decrease production costs and incentivise innovation. Any digital solution should also address how to implement digital labelling for specifically micro and small enterprises producing small or personalized/individual batches. We thus encourage the European Commission to explore together with stakeholders, a coherent and systematic way forward to allow digital labelling solutions in EU legislation across all product sectors.

We recognize that not all consumers are proficient users of digital tools or may not have access to those tools in certain situations, hence we agree that essential basic information should always remain on-pack. However, as consumers are growing increasingly adept at using digital tools we see opportunities to discuss sector by sector on a voluntary basis the dematerialisation of other relevant mandatory information. Digital Product Information can raise challenges on the ground for consumers and business operators alike, which should be discussed with all parties involved. It is essential to maintain the roles and responsibilities of all business operators concerned – from manufacturing to the point of sale – in order to ensure proper and well-functioning digital solutions for labelling. There must be clarity throughout the supply and value chain regarding the responsibilities of each business operator to ensure legal certainty and avoid duplication.

It will also be crucial to prevent the unnecessary proliferation of digital labels for different types of information in different legal texts. Currently a number of EU legislations and initiatives are being reviewed (such as the Toy Safety Directive, the New Legislative Framework, the Food Information for Consumers Regulation, the Textile Regulation, etc). Those revisions open up new opportunities for introducing digital consumer information, just like the recently published proposal for a Regulation on Packaging and Packaging Waste<sup>2</sup> and Regulation (EU 2021/2117)<sup>3</sup>. As such, an integrated system like the Digital Product Passport could be explored for other relevant mandatory information provided it is developed in a harmonised way and allows integrating different information into a single data carrier. Legislation must be future proof and should not preclude the technical nature of digital means (e.g. QR code, watermark, bar codes).

Market fragmentation due to existing or, in the absence of a proposal at EU level, future diverging national approaches must be avoided to not additionally burdening cross border trade. There are national examples, where certain mandatory information is integrated in the same data carrier together with the mandatory communication. We urge the addressed Commission's Directorates to adopt a coordinated and European approach when considering digital solutions for product information.

Therefore, we invite the Commission to:

- Ensure a general coordinated approach to digital labelling in order to avoid the fragmentation of the Single Market that may stem from sectoral (and national) legislation.
- Ensure all legislative initiatives that concern labelling provide a consistent, non-conflicting and compatible framework with regard to digital labelling and are future-proof for the use of digital means;

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<sup>1</sup> Various Commission initiatives including the Communication on *"Shaping Europe's digital future"*, the *"New EU Consumer Agenda"*, the *"New Industrial Strategy for a globally competitive, green and digital Europe"*, and the *"Farm to Fork Strategy"* and the *"Sustainable Product Initiative"*

<sup>2</sup> Proposal for a Regulation on Packaging and Packaging Waste: recital 48 and article 11.2.

<sup>3</sup> REGULATION (EU) 2021/2117 renders mandatory from 8 December 2023 the communication of wine and aromatised wine products list of ingredients and nutrition declaration and authorises, under certain conditions the information to be provided on-line.

- Explore and address the challenges and opportunities for consumers and economic operators of a legally coherent approach across all sectors to provide certain product information through digital means;
- It is essential to maintain the roles and responsibilities of all business operators concerned – from manufacturing to the point of sale;
- Explore innovative solutions that are simple, easy, cost-efficient, and practical to implement for all economic operators.

We hope that you will support this proposal to ensure greater consistency in EU legislation and improve the accessibility of product information to consumers. The signatories of this letter look forward to your response and remain at your disposal to discuss the above points with you.

Sincerely,

The undersigned associations

[AIM](#) (Association des Industries de Marque) is the European Brands Association, which represents manufacturers of branded consumer goods in Europe on key issues that affect their ability to design, distribute and market their brands.

[A.I.S.E.](#), the International Association for Soaps, Detergents and Maintenance Products, has been the voice of the industry to European regulators for more than 70 years. Membership consists of 29 national associations across Europe, 17 corporate members and 15 value chain partners. Through this extensive network, A.I.S.E. represents over 900 companies supplying household and professional cleaning products and services across Europe. The industry is a substantial contributor to the European economy with an annual market value of €39.8 billion, directly employing 95 000 people and an additional 360 000 people throughout the value chain. A.I.S.E. has a long history in leading voluntary industry initiatives that focus on sustainable design, manufacturing and consumption, product safety and safe and sustainable use of products by consumers and professional customers.

The [Comité Européen des Entreprises Vins](#) (CEEV) represents the wine companies in the industry and trade in the European Union: still wines, aromatised wines, sparkling wines, liqueur wines and other vine products. It brings together 25 national organisations from 13 EU Member States, plus Switzerland, the United Kingdom and Ukraine, as well as a consortium of 4 leading European wine companies. Its members produce and market the vast majority of quality European wines, with and without a geographical indication, and account for over 90% of European wine exports.

The [European Confederation of Independents Winegrowers](#) (CEVI) is the only organization representing and defending the interests of independent winegrowers at European level. CEVI counts today 12 000 members from 12 different States. Independent winegrowers are entrepreneurs at the head of a micro/small enterprise, often a family business. They make everything from the vineyard to the glass meaning that they produce and sell their wines directly to the consumer.

[COSMED](#) is the French cosmetic association for SMEs, a non-profit seeking association with more than 1000 members, in France and Europe.

The [European Branded Clothing Alliance](#) (EBCA) is a coalition of leading global retail apparel and footwear companies that represent over 60 iconic brands. The alliance promotes an open and ambitious EU trade agenda that supports sustainable development and works to ensure market access and liberalisation, as well as respect for rules-based trade. These pillars support a more predictable business environment for a leading EU industry sector that contributes to jobs, economic growth, and RDI. Via their global value chains, EBCA members also contribute to jobs and sustainable development in sourcing and production countries for apparel and footwear.

[Ecommerce Europe](#) is the sole voice of the European Digital Commerce sector. As a result of joining forces with EMOTA, Ecommerce Europe now represents, via its national associations, more than 150,000 companies selling goods and services online to consumers in Europe. Ecommerce Europe acts at European level to help legislators create a better framework for online merchants, so that their sales can grow further.

EFOW, the [European Federation of Origin Wines](#) is the Brussels-based organisation representing PDO and PGI wines towards European institutions. As the voice of origin wines, our mission is to protect and promote the GI concept in all policy areas.

[ERPA](#) is the European cosmetics Responsible Person Association. The vision of the association is to promote high standards of services and professionalism among the European Responsible Persons with the final aim of encouraging safe cosmetic products on the European market. As such, ERPA gathers under the same roof the main compliance operators – Responsible Persons, Safety Assessors, REACh Only Representatives, Laboratories, GMP auditors and other associations. By bringing these professionals together, we strive to create a positive round table open for discussing, developing and promoting the fundamental aspects of having only safe cosmetic products on the European market. Under the ERPA platform, we aim at creating working guidelines of the Responsible Person profession, in view of clarifying the roles and obligations entailed by this profession as well as the roles and obligations of all the other compliance operators in this industry.

The [European Travel Retail Confederation](#) (ETRC) is the industry association representing the duty free and travel retail industry in Europe. ETRC is composed of national and regional affiliated trade associations and direct corporate membership from over 40 individual companies (retailers and suppliers) working in the duty free and travel retail trade across Europe and beyond. For more information about the organisation, please visit our website.

[EuroCommerce](#) is the principal European organisation representing the retail and wholesale sector. It embraces national associations in 27 countries and 5 million companies, both leading global players and many small businesses. Retail and wholesale is the link between producers and consumers. Over a billion times a day, retailers and wholesalers distribute goods and provide an essential service to millions of businesses and individual customers. The sector generates 1 in 7 jobs, offering a varied career to 26 million Europeans, many of them young people. It also supports millions of further jobs throughout the supply chain, from small local suppliers to international businesses. EuroCommerce is the recognised European social partner for the retail and wholesale sector.

Founded in 1960 FESI, the [Federation of the European Sporting Goods Industry](#), is the unique pre-competitive platform representing the interests of the sporting goods industry in Europe, advancing its members' priorities and promoting initiatives that benefit the sector, EU citizens and the society as a whole. FESI represents the interests of approximately 1.800 sporting goods manufacturers

(85% of the European market) through its National Sporting Goods Industry Federations and its directly affiliated member companies. 70-75% of FESI's membership is made up of Small and Medium Sized Enterprises. In total, the European Sporting Goods Industry employs over 700.000 EU citizens and has an annual turnover of some 81 billion euro.

[FoodDrinkEurope](#) is the organization of Europe's food and drink industry, one of the largest manufacturing sectors in Europe, a leading employer (4.6 million employees) and a key contributor to the economy (representing about 294,000 companies, 99% SMEs, and a turnover of €1.1 trillion).

[Independent Retail Europe](#) is the European association that acts as an umbrella organisation for groups of independent retailers in the food and non-food sectors. Our members are groups of independent retailers, associations representing them as well as wider service organizations built to support independent retailers. Independent Retail Europe represents 23 groups and their 403.900 independent retailers, who manage more than 759.000 sales outlets, with a combined retail turnover of more than 1,314 billion euros and generating a combined wholesale turnover of 484 billion euros. This represents a total employment of more than 6.620.000 persons.

[NATRUE aisbl](#), the International Natural and Organic Cosmetics Association, was created in 2007 by the pioneers and largest producers of natural and organic cosmetics in Europe to protect and promote natural and organic cosmetics to the benefit of consumers worldwide.

[SMEunited](#), formerly known as UEAPME, is the association of crafts and SMEs in Europe with around 70 member organisations from over 30 European countries. SMEunited is a recognised employers' organisation and European Social Partner and acts on behalf of crafts and SMEs in the European Social Dialogue and EBKA in discussions with the EU institutions. We represent national cross-sectoral Craft and SME federations, European SME branch organisations and associate members. We speak on behalf of the 22,5 million SMEs in Europe which employ almost 82,4 million people. We are a non-profit seeking and non-partisan organisation. For more information, please visit our website and our Twitter and LinkedIn accounts.

[Toy Industries of Europe](#) (TIE) is the voice of the reputable European toy manufactures. Our mission is to promote the right of every child to play safely and securely and to promote fair practices and fair legislation, allowing responsible toy companies to continue to grow. TIE's membership includes 19 international toy manufacturers, eight European national toy associations, who represent their local manufactures, and eight affiliate members.