

Brussels, 18 October 2018

SUBJECT: electronic labelling in Europe

Dear Kristian,

in view of the upcoming communication on the (Digital) Single Market we had the pleasure to meet your colleagues Marika Lautso-Mousnier and Kamila Kloc from Vice-Presidents Katainen and Ansip cabinets. During the exchange we highlighted among others several key issues for the single market for products and it was agreed to discuss these with you during a meeting at your earliest convenience (see enclosed presentation).

One long-standing issue when considering the progress of the Single Market is the introduction of electronic labelling ("e-labelling") in the EU. When answering to Andrejs Mamikins, MEP on 10 September 2018 Commissioner Bienkowska rightly pointed out that electronic labelling could reduce costs for manufacturers and that she would look into the introduction of electronic labelling when evidence becomes available that it may be beneficial and practically feasible for all parties affected.

It just happened so that on 21 June 2018 two studies were published by Valdani Vicari & Associati (VVA) looking first into e-labelling schemes outside Europe, in particular in the USA, Singapore and Australia¹ and providing a cost-benefit analysis of the introduction of e-labelling in the EU, including a survey of Market Surveillance authorities and industry². The available data confirms today's significant burden for industry, as the study estimates that e-labelling in Europe would reduce the cost of indicating compliance by as much as 14 per cent – or €112m per year – in the ICT sector alone. For further information please consult the annexed key findings and the studies themselves.

e-labelling has been around for almost two decades and 56 per cent of the global economy has adopted it. This makes Europe the last major economy demanding exclusively physical labels while the USA, Australia, Singapore, China, India, Japan, New Zealand, even Ghana or Malaysia – to name just a few countries – have all successfully adopted e-labelling. Standardisation has also progressed significantly which means manufacturers are increasingly able to use existing and internationally recognised e-labelling solutions.

The economic case for e-labelling is strong and other regions in the world have demonstrated the feasibility and benefits of electronic labelling. e-labelling is thus a truly low-hanging, digital fruit³ and we have repeatedly highlighted this to the European Commission. Therefore, we would like to discuss with you concretely how to move towards electronic labelling as a valid alternative to fixed labels as soon as possible.

Yours sincerely,

Copy sent to: Carsten Bermig, Marika Lautso-Mousnier, cabinet VP Katainen and Kamila Kloc, VP Ansip.

¹http://www.digitaleurope.org/DesktopModules/Bring2mind/DMX/Download.aspx?Command=Core_Download&EntryId=2695&language=en-US&PortalId=0&TabId=353

²http://www.digitaleurope.org/DesktopModules/Bring2mind/DMX/Download.aspx?Command=Core_Download&EntryId=2694&language=en-US&PortalId=0&TabId=353#

³https://www.theparliamentmagazine.eu/articles/partner_article/digital-europe/e-labelling-low-hanging-fruit

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