

From: BERMIG Carsten (CAB-BIENKOWSKA)
Sent: 24 May 2017 12:20
To: CAB BIENKOWSKA ARCHIVES; WEGENER Ulrike (CAB-BIENKOWSKA)
Subject: FW: Follow Up to Amazon Meeting

From: [REDACTED] [[mailto:\[REDACTED\]@amazon.lu](mailto:[REDACTED]@amazon.lu)]
Sent: Wednesday, May 24, 2017 8:58 AM
To: BERMIG Carsten (CAB-BIENKOWSKA)
Cc: [REDACTED]
Subject: Follow Up to Amazon Meeting

Dear Mr. Bermig,

Thank you for taking the time to meet with us to discuss the critically important topic of product safety.

As discussed during the meeting, Amazon is firmly committed to supporting the advancement of the Commission's product safety efforts, through exploring the development of a risk-based framework encompassing all industry actors. We look forward to continued dialogue and cooperation in this area.

Without jeopardizing our shared commitment to the protection of customer safety, health and the environment, it is important to recognize that technical rules developed at national levels may create unnecessary obstacles to inter-EU trade. Following on our discussion, we would like to briefly highlight three primary areas of concern.

- Safety Instructions in Local Language: Customers should be able to access safety instructions in the expected language. With the growth of online-commerce, however, the Commission should explore alternative means of facilitating access to such information in a convenient format. This includes providing safety instructions online rather than in paper format (particularly, in the context of an online purchase), and encouraging manufacturers to provide safety instructions in centralized repositories in all relevant EU languages. Where safety language is not available in local language, the Commission should permit disclosure of the available languages at time of sale so as to further distribution efforts to those speaking the relevant language (for instance, residents of Brussels should be allowed to purchase an English language product clearly marketed as such).
- Member State Notifications/Registrations: A wide variety of products are currently subject to various notification/registration obligations differentially applied at Member State level (this includes many foodstuffs, biocides, pesticides and simple medical devices). Absent the language considerations discussed above, it is unclear why separate Member State mechanisms are needed to protect concerns related to health and human safety or the environment. The Commission should look to reduce or centralize such processes so as to increase selection for customers particularly with respect to everyday items.

- Member State Excise Duties and Environmental Registrations and Fees: A wide variety of goods are subject to Member State level duties and fees. These duties and fees significantly increase administrative costs (including for SMEs), contrary to the principles of the Common Market. With respect to those obligations stemming from the EU Directives (WEEE/Packaging/Batteries), the lack of an EU-wide reimbursement scheme often leads to demands for double payment when goods are sourced and sold in different Member States. In addition to obligations stemming from the EU Directives, Member States impose additional fees on specified goods (not only in traditional areas of applicability such as Beer, Wine and Spirits but also for instance, furniture and paper). Such requirements/registrations should be harmonized at an EU level to prevent undue barriers to pan-EU participation for distributors.

Please let us know if you would like any further detail on any of these issues.



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