



A CALL FOR A DIGITAL TRANSITION FOR CONSUMER INFORMATION

BY THE DIGITAL CONSUMER INFORMATION ALLIANCE

September 2024

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

Our coalition calls policymakers' attention to the urgent need for a harmonized, consistent, and forward-looking approach to consumer information through digital means. The current absence of an overarching legal framework presents challenges for businesses, as inconsistencies persist between existing sets of EU rules and also with some national legislations that either permit e-labelling or mandate physical labels, thus hindering the seamless adoption of digital alternatives and the further development of technological innovations. The vast majority of EU consumers have rapid and easy access to the internet¹, further supporting the feasibility and effectiveness of transitioning to e-labelling.

As such forward looking legislation is crucial for our sectors, we would like to emphasize the importance of addressing these shortcomings, as a matter of priority in the coming legislative term in a consistent, committed and pragmatic manner. While essential basic information should always remain on-pack, embracing the provision of product information by digital means aligns with the digital age and would bring a wide range of benefits to economic operators and consumers alike:

- ✓ **Environmental impact:** E-labelling can significantly reduce waste associated with traditional physical labels and strengthen circularity, aligning with the EU's commitment to sustainability.
- ✓ **Agility and swift updates:** Digital labelling enables economic operators to swiftly update information and allows to quickly adapt information to consumers.
- ✓ **User-friendly approach:** E-labels provide user-friendly experiences for consumers enabling them to access comprehensive information conveniently, in multiple languages and adapted to specific needs.
- ✓ **Preservation of the Single Market:** Harmonized rules will ensure legal certainty, transparency and coherence across the Member States and help avoid market barriers.
- ✓ **Competitiveness and innovation:** A harmonized framework could open the space for innovations and new technologies and further unlock the global competitiveness of EU industries.
- ✓ **Enhanced traceability:** Digital labels, through the development of tools like the Digital Product Passport, can have the potential to enhance traceability and help the fight against counterfeiting.

Market demand for transparency of different product information and consumer protection in the digital age must be met with a harmonized approach for digital labelling that works for all, to avoid the proliferation of different digital solutions in multiple legislations. Harmonized rules will not only foster cohesion and innovation but also align with the aspirations of a forward-looking, progressive and sustainable European Union.

Our Alliance sees opportunities to discuss at sectorial level, on a voluntary basis, possibilities to dematerialize other relevant mandatory information, while respecting the roles and corresponding responsibilities of all business operators as laid down in the EU product acquis – from manufacturing to point of sale.

¹ 82% of European households have internet access and 96% of Europeans to a mobile phone. - Eurobarometer "E-Communications in the Single Market" – June 2021



We call upon the newly elected (or re-elected) Members of the European Parliament and the next European Commission to support:

- The development of a harmonized legislative framework that integrates digital labelling as a reliable and environmentally conscious alternative to physical labelling. Such a framework should be future-proof and not preclude the technical nature of digital means.

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AIM - European Brands Association



CEEV - Comité Européen des Entreprises Vins



CEVI - European Confederation of Independent Winegrowers



COSMED - L'Association des PME de la filière Cosmétique



Cosmetics Europe



Ecommerce Europe



EFOW - European Federation of Origin Wines



ERPA - European Cosmetics Responsible Person Association



ETRC - European Travel Retail Confederation



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

F · E · D · A · S

FEDAS - European Federation of Sporting Goods Retailer



FEICA - Association of the European Adhesive & Sealant Industry



FESI - Federation of the European Sporting goods Industry



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



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



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



TIE - Toy Industries of Europe