

8 April 2022

Mr. Thierry Breton, Commissioner for Internal Market, Industry, Entrepreneurship and SMEs
European Commission
Charlemagne Building
Rue de la Loi 170
1040 Brussels
Belgium

By Email

Joint Industry Open Letter for the Introduction of E-labelling

Dear Commissioner Breton,

We call on the European Commission to come forward with proposals to introduce electronic labelling in the EU.

Currently, product compliance in Europe is based on the use of printed labels and information. It requires manufacturers to have the compliance and regulatory marks such as the CE mark printed on the product and packaging as well as for additional safety information to be provided on paper and with the product, either as separate statements or included within user manuals.

In contrast, electronic labelling (e-labelling) is the digital depiction of logos, marks and labels that show that a device complies with the relevant national requirements for a given country.

For devices with in-built screens or devices that can be connected to screens, markings such as the CE mark can be provided in the software of the device and made easily retrievable via the screen. A QR code could equally be used to direct users and authorities to the required or relevant information.

Calculations show that in Europe, the equivalent of 48 million sheets of A4 paper could be removed every year from smartphone packaging alone, saving an estimated 480 million litres of water and over 1000 tonnes of CO₂ emissions from the switch to e-labelling.

Currently, 21 countries around the world have replaced traditional labelling requirements with the option to use electronic labelling for mobile phones and other ICT equipment, such as tablets, wearables and laptops. These 21 countries represent around 60% of consumer electronic sales revenue worldwide and include the EU's major trading partners such as the United States, China, Japan, South Korea and Taiwan.

E-labelling has been found to have no real impact on market surveillance authorities but does benefit consumers as information can be made more accessible and remains available throughout the lifetime of the device.

The potential benefits of e-labelling are not limited to ICT equipment and unlocking the potential of digitally providing labels, marks and other types of information could benefit every industry that is currently faced with printed and physical information requirements. Electronic labelling should

become a viable alternative option to indicate compliance for the broadest possible range of products.

The European Commission is currently considering the continued appropriateness of the requirement for physical markings in the evaluation of the New Legislative Framework (NLF). The moment is now to seriously consider the potential of unlocking the benefits of e-labelling, by accepting that visible, legible and indelible markings can include markings provided in digital format.

We call on the European Commission to help us in rendering European products and labels more environmentally responsible, accessible and more easily tradable, by providing written confirmation that visible, legible and indelible markings can also be provided in digital format. If the Commission continues with a revision of the NLF, then this should include an amendment enabling digital information provision in Europe.

We stand ready to work with European policy-makers, governments, the business community, and civil society to develop a policy solution that releases digital capabilities and provides a more responsible and sustainable labelling solution.

Yours sincerely



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