



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

Brussels, March 3, 2020

Subject: Mandatory product information¹ and digital means

Dear Executive Vice-Presidents,

Dear Commissioners,

The undersigned organisations representing a broad number of consumer-facing industry sectors, supported by retailers, would like to draw your attention to the opportunities that digitalisation can bring to the European Union (EU), notably regarding mandatory product information, for the joint benefit of citizens and businesses across the EU, and call for further action and leadership from the European Commission to make Europe fit for the digital age.

¹ "Mandatory consumer information": For the purposes of this letter, product information that the relevant business operator is legally required to provide to the consumer.

The European Commission announced in the European Green Deal that it will *“look at exploring new ways to give consumers better information, including by digital means”*, thus clearly recognising that digitalisation can help deliver a clean and circular economy. This was recently reinforced in the Communication from the European Commission *“Shaping Europe's digital future”*, in which the Commission announces its ambition to deliver on a new Consumer Agenda by the end of this year, *“which will empower consumers to make informed choices and play an active role in the digital transformation”*.

We very much welcome this approach and would invite the European Commission to initiate a thorough reflection on the many possibilities that digital means can offer. Digital provision of information has the potential to communicate more efficiently and in a personalized way information to consumers; but also, reduce packaging waste and shipping costs and help the free movement of goods in the EU Single Market.

We encourage the European Commission to build on existing European initiatives and adopt a harmonised approach at EU level to avoid the fragmentation of sectorial and/or national legislations which would create confusion amongst consumers, as well as impede competitiveness of EU businesses.

This approach should ensure that all enterprises – be they micro, small, medium-sized or large – are able to use and benefit from digital technologies, and that digital information provided to consumers such as via mobile applications, is accurate, reliable, fair and complies with relevant EU legislative frameworks.

With this in mind, we would encourage the European Commission to:

- 1) Establish a dedicated European Stakeholders Forum for Digital Consumer Information to facilitate the regular exchange of views and best practices and the development of guiding principles for the digitalisation of consumer and product information;**
- 2) Investigate where opportunities exist for digital means as a legally recognised option to provide mandatory product information and adapt the relevant EU regulatory framework including general product and consumer legislations, as well as sector specific legislations if such opportunities provide benefits to consumers and businesses of all sizes;**
- 3) Ensure that all enterprises, regardless of their size, can use and benefit from digital information technologies across the EU;**
- 4) Consider further guidance to ensure that consumer information delivered through digital means, including from third parties, abide by harmonised principles including accuracy, transparency, reliability and fairness, to better inform consumers and build trust among consumers and businesses.**

We hope that the European Commission will consider these points as a priority for its new mandate. The signatories of this letter look forward to your response and to discussing these points with you at any time.

Sincerely,

Michelle Gibbons Director General AIM	Susanne Zänker Director General AISE	Ignacio Sánchez Recarte Secretary General CEEV	Jan van der Meulen Managing Director CEPE	Thomas Montagne President CEVI
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Jean-Marc Giroux President COSMED	John Chave Director General Cosmetics Europe	Marlene ten Ham Secretary General Ecommerce Europe	John Herbert General Secretary EDRA	Bernard Farges President EFOW
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Gideon Elkayam Chairman ERPA	Julie Lassaigne Secretary General ETRC	Christian Verschueren Director General EuroCommerce	Michael Nendwich Executive President FEDAS	Philip Bruce Secretary General FEICA
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Jérôme Pero Secretary General FESI	Mella Frewen Director General FoodDrinkEurope	Charles Laroche Regional Director IFRA Europe	Else Groen Director General Independent Retail Europe	Mark Smith Director General NATRUE AISBL
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Véronique Willems Secretary General SMEunited	Ulrich Adam Director General spiritsEurope
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Cc to:

Mr Roberto Viola, Director General of DG CNECT (Communications Networks, Content and Technology)

Mr Gwenole Cozigou, Acting Director General of DG GROW (Internal Market, Industry, Entrepreneurship and SMEs)

Ms Anne Bucher, Director General of DG SANTE (Health and Food Safety)

Ms Salla Saastamoinen, Acting Director General of DG JUST (Justice and Consumers)

Mr Daniel Calleja Crespo, Director General of DG ENV (Environment)