



For a digitalised EU Single Market

30 years after the establishment of the EU Single Market, Europe urgently needs a new approach to product information requirements.

Our organisations, representing a cross-section of European industry, from manufacturers and retailers, are calling for the Commission to deliver on its promise for digitisation and simplification now, and allow for the digital delivery of regulatory information as a complement or, where appropriate, as an alternative to physical requirements, unlocking significant environmental, operational and financial benefits for companies in the EU market.

Every day, products are placed on the EU market accompanied by extensive printed regulatory information, including manuals, safety leaflets and other documentation. Where the same information can be made readily accessible digitally, requiring it to be provided in physical form can create unnecessary environmental, operational and financial costs. At the same time, people across Europe overwhelmingly rely on devices and digital tools to access accurate, accessible and up-to-date information.

For companies operating across the Single Market, predictable, coherent product rules are essential. Yet today, paper-based information obligations and diverging national language requirements create unnecessary barriers, increasing costs and complicate compliance, without delivering added consumer value. They also generate significant environmental impact.

Instead, digitisation offers a practical, inclusive, immediate and consumer-friendly solution to delivery of regulatory information to consumers and market surveillance authorities. Allowing information to be delivered digitally by manufacturers would align EU rules with how Europeans already access information, while supporting businesses and accelerating the EU's decarbonisation and competitiveness agendas.

With the revision of the New Legislative Framework (NLF), EU institutions have an opportunity to allow for digitisation across all product legislation, yielding significant environmental,

consumer and operational benefits, and ensuring alignment with emerging instruments such as the Digital Product Passport (DPP).

In line with its Single Market Strategy, the European Commission should take this opportunity to simplify operation for companies in the EU market in a cost-effective way that supports collective environmental goals.

1. Digitisation enhances accessibility, supports multilingual needs and reduces market fragmentation

When printed documentation of consumer products includes text, this text must generally be translated into all EU national languages. For companies selling [or marketing] products across Europe, this results in country-specific versions for the same product. Each new language version requires different packaging, documentation and labelling - increasing costs, complicating supply chains and creating waste when managing stock across borders, as content needs to be updated. Digital information resolves this challenge. A single EU-wide packaging supply can be used while consumers access fully localised information via a QR code or other data carrier. This reduces operational complexity, supports SMEs, limits waste and enables businesses to respond more dynamically to market conditions.

Digitisation also expands accessibility. Features such as text-to-speech, zoom, adjustable contrast or font size cannot be replicated in print. Digital formats allow consumers with visual impairments or other accessibility needs to receive information on an equal basis and in the language of their choice - immediately and reliably.

For many categories - from electronics to household appliances - accessing product information through digital means is now standard behaviour. Other regulated sectors, such as wine and spirits, have already moved to digital ingredient and nutrition labelling, demonstrating strong consumer acceptance and smooth implementation across the Single Market.

Once the NLF framework is updated to allow for digitisation, this should be reflected in sector-specific legislation to ensure a consistent, harmonised approach. The necessary amendments should also be reflected in relevant harmonized standards and conformity assessment procedures.

2. Digitisation reduces environmental impact and supports circularity

Current rules require companies to provide printed documentation with no proof that it is read and understood by consumers. Producing, translating and transporting these materials consumes paper, ink and energy and generates avoidable waste. When regulatory information requirements change, entire batches of packaging may need to be reprinted or withdrawn and disposed of - despite the product itself remaining fully compliant.

Digital delivery eliminates unnecessary printing, reduces resource consumption along the supply chain and enables faster, targeted updates. It also ensures information remains available throughout the product's lifecycle - including during repair, reuse, refurbishment or resale - when original printed materials are often lost. This aligns directly with the EU's objectives under the Green Deal, the Circular Economy Action Plan and the forthcoming DPP.

3. Digitisation lowers administrative burden and improves regulatory compliance

Fragmented language requirements and differing national interpretations force suppliers to maintain country-specific products, with multiple packaging versions and manuals for identical products. This is particularly burdensome for SMEs and contradicts the EU's competitiveness objective of reducing administrative burden by 25-35%.

Digital information can be updated swiftly and consistently across all markets. This reduces the need to repackage products and ensures that consumers and market surveillance authorities always have access to the latest version of required information.

To unlock these benefits for EU consumers, businesses and regulators, we call for an ambitious and coherent digitisation approach in the proposal for a revision of the NLF: one that fully embraces digital information as a practical, safe and accessible communication tool, avoids adding new print-heavy obligations, and ensures that digital solutions can be used consistently across product sectors. This will give consumers clearer, more accessible and up-to-date information, while reducing unnecessary waste.

Ahead of the phased roll-out of product-specific DPP requirements, allowing digital provision of information on a voluntary basis would deliver near-term benefits and help businesses and authorities build capacity and practical experience to support DPP implementation.

The adoption of the European Product Act is a timely opportunity to turn the EU's commitment to simplification and digitisation into a practical, cross-sector solution. We therefore call on the Commission to provide a clear legal basis for the digital delivery of regulatory information across product legislation, while allowing manufacturers to retain flexibility where physical information remains necessary.

Signatories (in alphabetical order):

AGMPM – Association of Greek Manufacturers of Packaging & Materials:

<https://www.aipia.info/>

AIM – European Brands Association: <https://aim.be/>

AmChamEU: <https://www.amchameu.eu/>

Applia – Home Appliance Europe: <https://www.applia-europe.eu/>

CCIA Europe – Computer & Communications Industry Association:

<https://ccianet.org/>

CEFACD – European Committee of Manufacturers of Domestic Heating and Cooking Appliances: <https://www.cefacd.com/>

Cosmetics Europe: <https://cosmeticseurope.eu/>

EBCA – European Branded Clothing Association: <https://ebca-europe.org/>

ECCIA – European Cultural and Creative Industries Alliance: <https://www.eccia.eu/>

EFIC – European Furniture Industries Confederation: <https://www.efic.eu/>

EFA – European Fashion Alliance: <https://www.europeanfashionalliance.org/>

EHIA – European Infrared Heating Alliance: <https://eiha-infrared.com/>

EPEE – European Partnership for Energy and the Environment:

<https://epeeglobal.org/>

EuACA – European Artists' Colours Association: <https://www.artists-colours.org/>

Europen – The European Organisation for Packaging and the Environment:

<https://www.euopen-packaging.eu/>

FESI – Federation of the European Sporting Goods Industry: <https://fesi-sport.org/>

GEC – Global Electronics Council: <https://globalelectronicscouncil.org/>

ITI – Information Technology Industry Council: <https://www.itic.org/>

JBCE – Japan Business Council in Europe: <https://www.jbce.org/en/>

Lighting Europe: <https://www.lightingeurope.org/>

Spirits Europe: <https://spirits.eu/>