CONCRETE RECOMMENDATIONS FOR A DIGITAL TRANSITION FOR CONSUMER INFORMATION

BY THE DIGITAL CONSUMER INFORMATION ALLIANCE

September 2026

We, the undersigned associations, represent a large number of consumer-facing economic operators and would like to reiterate our 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. The approach should ensure that each economic operator's role, as laid down in the EU acquis, is respected throughout the supply chain. 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 and upcoming sets of EU rules as well as with some national legislations that either permit e-labelling or mandate physical labels. These discrepancies hinder the seamless adoption of digital alternatives and the further development of technological innovations.

Digital information, including QR codes, is also to the benefit of the consumer, allowing them to get more extensive information, in their own language, and in a more accessible format. The vast majority of EU consumers have rapid and easy access to the internet[1], further supporting the feasibility and effectiveness of transitioning to e-labelling. Additionally, Member States are also more interested in digital solutions, as reflected in the Council conclusions of 19 March 2026, calling on the European Commission to facilitate the free movement of goods and address the "fragmented product labelling and packaging requirements, including through digital solutions"[2].

In view of the ambition to harmonize labelling rules under the 2025 Communication for the Single Market Strategy and the upcoming adoption of several EU legislations such as the European Product Act (including the New Legislative Framework Revision) or the secondary legislation under the Ecodesign for Sustainable Products Regulation (ESPR) and the Packaging and Packaging Waste Regulation (PPWR), we urge the European Commission to concretize principles around the digital labelling of products. Such principles should take into account the following:

- ✓ **One Product, One EU Data Carrier**: As different pieces of legislation introduce different types of information that can be communicated digitally for the same product (e.g. from the ESPR label, the Battery Regulation, the PPWR, the revision of the Textile Labelling Regulation), or for a product and also its components, we request that all such information be centralized in one data carrier.
- ✓ **Ensure Interoperability:** To support seamless integration and automation with existing systems, interoperability must be ensured. To this end, digital product data should be structured and machine-readable, and the architecture should be API-based to enable access to up-to-date and authenticated information.

[1] 85% of European households have internet access and 97% of Europeans have access to a mobile phone. Eurobarometer - e-Communications and Digital Single Market – January 2026" – June 2021. https://europa.eu/eurobarometer/surveys/detail/3175.

[2] Council conclusions, 19 March 2026, paragraph 32, point f (link).

- ✓ **Technological Neutrality:** To secure a futureproof framework for digital product information, this framework should support technological neutrality, avoiding the prescription of specific technologies (e.g. QR codes, RFID, NFC, apps) and instead allowing businesses to choose solutions that best fit their size, resources, and operational capacities. This flexibility is essential to prevent disproportionate compliance costs, reduce dependency on specific providers or infrastructures, and foster innovation.
- ✓ **Avoid Redundant Statements Around Data Carriers:** Digital consumer information is self-explanatory and sufficient to guide and explain consumers which type of information they can expect. Therefore, redundant statements around data carriers[3] should be avoided.
- ✓ **Digital Labels Facilitating Translations & Language Neutrality**: A persistent barrier to trade within the Single Market is the requirement to translate label elements into multiple languages, including information mandated only by national legislation in specific Member States. This is especially burdensome in Member States with multiple official languages. In such cases, digital labelling should be allowed to facilitate the hosting of the official languages required by one Member State. Additionally, to avoid unnecessary translations, any additional information requirements or labels on products should be communicated in a language neutral way avoiding explicit colour requirements vs operator flexibility to choose.
- ✓ **Digitalise Certain Mandatory Product Information, to be defined sector by sector**: As information requirements increase for products across legislations while packaging is being reduced, it is necessary to allow for and define the information that can be digitalised and not duplicated on the packaging, and/or physical labels.[4]
- ✓ **Proportionality & Sufficient Transition Periods**: Additional information requirements for products, especially those introducing requirements for Digital Product Passports, should be proportionate, introduced in a phased manner, and first consider the maturity of (international) supply chains to collect such information. Equally important is that data requirements are known well in advance and that transition periods and sell off periods are long enough to ensure successful implementation and to avoid unnecessary product destruction. It is also important that the Commission offers support via guidance and/or capacity building early enough in the implementation phase, to ensure uniform compliance.
- ✓ **Avoid Diverging National Approaches:** The past years have seen an increasing fragmentation of labelling rules across the EU, due to unjustified/harmful national initiatives (through various TRIS notifications) which can create confusion for consumers, is burdensome for business and creates unnecessary inefficiencies and waste, therefore acting as a detriment to the Single Market. A consistent EU framework on digital labelling would help alleviate the fragmentation of rules on labelling.

Forward looking legislation is crucial for our sectors, and we would like to emphasize the importance of addressing these shortcomings, as a matter of priority in this legislative term in a consistent, committed and pragmatic manner. While a defined minimum set of mandatory information should always remain on the product or its packaging, embracing the provision of product information by digital means aligns with the

[3] Examples: Omnibus IV proposal (requesting to mark products with indications on how to access/request instructions which have been digitalised) and the Detergents Regulation ('Please scan for more comprehensive information on the product').

[4] In the Batteries Regulation, there is a big amount of non-essential information that could be kept only on the digital label and would be of no additional value on the product. For example: Place of manufacture, Date of manufacture (month and year), Weight, Chemistry, Usable extinguishing agent, Critical raw materials present (>0.1% by weight), Hazardous substances present (other than mercury, cadmium, lead).

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 current roles and corresponding responsibilities of all business operators as laid down in the EU product acquis – from manufacturing to point of sale.

We call upon the 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.

* * * * *

AIM - European Brands Association

Applia – Home Appliance Europe

CEEV - Comité Européen des Entreprises Vins

CEVI - European Confederation of Independent Winegrowers

DIGITAL
CONSUMER INFORMATION ALLIANCE

CCIA Europe - Computer & Communications Industry Association

COSMED - L'Association des PME de la filière Cosmétique

Cosmetics Europe

Detergents Europe

EBCA - European Branded Clothing Association

Ecommerce Europe

EFOW - European Federation of Origin Wines

ERPA - European Cosmetics Responsible Person Association

ESF – European Safety Federation

ETRC - European Travel Retail Confederation

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

DIGITAL
CONSUMER INFORMATION ALLIANCE

European Artists Colours Association

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

Serving Europe - Branded Food and Beverage Service Chains Association

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