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CEC's comments on the mandatory labelling of origin in the
Consumer Product Safety Regulation proposal

The European Confederation of Footwear Industry welcomes the requirement of mandatory labelling of origin in all products commercialised in Europe, as introduced by article 7 of the Consumer Product Safety Commission Regulation proposal. Such information will provide relevant added value to European market surveillance authorities as well as to consumers while promoting our industry, at a negligible cost and insignificant administrative charges other than those already existing for the product identification.

As mentioned in Recital 21 of this Regulation proposal, "*the indication of origin supplements the basic traceability…*", and "*helps to identify the actual place of manufacture in all those cases where the manufacturer cannot be contacted or its given address is different from the actual place of manufacture.*" Such marking on the products improves its traceability and helps market surveillance authorities to easily verify whether the origin indications are genuine within their fight against counterfeiting, as well as to track down the producer of the non-compliant product. At the external borders, the origin marking can be found in the technical documentation accompanying the shipment, but such documentation does not reach the consumer, nor the consumer keeps the packaging for ever, and therefore it is relevant that the marking is done, whenever possible, in the product.

But article 7 represents as well a very important step in the reinforcement of the European consumers' safety and rights. In the last decade there has been a growing demand by consumers to have as much as possible information on a product, including where the goods have been manufactured, before deciding which one to buy in accordance with their values or factors that they consider relevant (price, quality, brand, origin, sustainability of materials, or other). Consumers are well aware of the high quality of European products, and the standards they have to comply with, and they want to have the possibility of identifying them. We all know that European products are more expensive than third country products because of the higher wage rates and certain standards to respect, but we often find inflated prices of cheap and low-quality products manufactured in third countries in the EU market, which consumers may buy believing on their compliance of certain standards.

European companies may also decide to manufacture in third countries. In such cases the labelling of a third country origin will not impact negatively on their sales, because their brand reputation will endorse the quality, safety and guarantee of their products. However the added value of the European companies who have chosen a local production strategy will be rewarded by the mandatory labelling of origin in products, making them more competitive towards counterfeiting.

Finally within the European Year of Citizen 2013, we would like to emphasize that it is, not only consumers' but also a citizen's right to be informed. Citizens are more and more aware of the global economy, and the generalised economic difficulties in Europe. They also know the non- respect of labor and environmental standards in some non-EU countries. In a democratic Europe, citizens must have the opportunity to help their regional/ national economies by supporting SMEs production and jobs in Europe through their personal lives when purchasing products.

Against this background, CEC thanks the Commission once more for the introduction of the mandatory labelling of origin in products. All actors (consumers, companies and market surveillance authorities) will have a more transparent internal market, while the European manufacturing industry will be reinforced in support for more jobs and growth in Europe.

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