



ORIGIN MARKING

A TOOL FOR STRENGTHENING PRODUCT SAFETY THROUGH TRANSPARENCY AND TRACEABILITY TO THE BENEFIT OF CONSUMERS AND INDUSTRY IN EUROPE

Key messages:

- 1. Origin marking would help consumers to recognise the level of product safety**
- 2. Indication of origin is key to improve transparency of consumer products to the benefit of consumers**
- 3. More transparency supports traceability**
- 4. Origin Marking is a key measure to foster the level-playing field at international level**
- 5. Benefits to the consumer outweigh by far any additional costs for enterprises applying the indication of origin and reduces the volume for administrative corrective action**

On 13 February 2013, the European Commission proposed a legislative package comprising a draft regulation on consumer product safety (COM(2013)0078) that includes a key provision on mandatory origin marking (Article 7).

Our associations strongly believe that introducing a mandatory indication of origin on consumer products prevents consumers' safety concerns through sound transparency, and it will improve traceability and product safety to the benefit of consumers, industry and of the European economy as a whole.

We therefore welcome the proposal of the European Commission to introduce this provision in the draft regulation on consumer product safety, and we call upon the European Parliament and the Council to swiftly adopt Article 7 on origin marking. Such labelling is a simple measure that provides multiple benefits:

1. Origin marking would help consumers to recognise the level of product safety

The indication of origin informs consumers and helps them recognising the health & safety and social & environmental standards applied. Consumers' knowledge will engage companies in adopting positive behaviors and in increasing standards. Indeed, safety is not only about companies respecting standards, but also about consumers being aware.



In addition to that, it will facilitate market surveillance authorities in their controls and in adopting prompt and effective risk prevention countermeasures in case of safety issues (e.g. recalls).

2. Indication of origin is key to improve transparency of consumer products

Article 7 represents a very important step in the reinforcement of the European consumers' freedom of choice. As stated by the rapporteur, MEP Christel Schaldemose, in her draft report: *"the indication of origin of the product would make it easier for consumers to access information about the product chain, thereby increasing their level of awareness"* and *"their confidence towards the Single Market"*¹. In the last decade there has been a growing demand by consumers to increase and improve information on a product, including where the goods have been manufactured, before deciding which one to buy. Indeed, according to a 2010 Eurobarometer's survey, a significant percentage of consumers make their buying decisions on the basis of the origin of products.

Transparency with regard to the country where the product has been made provides additional information to the consumer upon which to base her/his purchasing decisions without revealing sensitive business information about individual suppliers. Consumers are therefore empowered to act preventively on possible safety concerns.

Indeed, the more transparency on the production chain is provided "on the shelves", the more consumers can exert their influence on the securitisation of products and orientating supply chains towards higher degrees of standards and rules.

3. More transparency supports traceability

As stated by the European Commission, the indication of origin on all consumer goods circulating within the EU will *"facilitate the task of market surveillance authorities in tracing the product back to the actual place of manufacture and enable contacts with the authorities of the countries of origin ... for appropriate follow up actions"*².

In most cases the sole indication of the manufacturer's address as required by current legislation has proved to be insufficient or misleading in the individuation of the actual producer, and the manufacturer's registered address did not always correspond with the place of manufacture.

More transparency facilitates traceability controls for preventing safety issues for consumers, also by likely reducing the amount of corrective actions to be engaged.

4. Origin Marking is a key measure to foster a level-playing field

As highlighted by the rapporteur, mandatory origin marking on consumer products would be fully compatible with the rules of the WTO as it would cover *"all non-food products on the*

¹ See amendment 31 of the rapporteur's draft proposal ([PE 513.309](#)).

² See recital 21 of the proposed regulation on consumer product safety [COM\(2013\)0078](#).



territory of the Union, whether imported or not”³, thereby excluding any risk of discrimination.

Furthermore, mandatory origin marking schemes are widespread outside the EU. They exist in markets such as the USA, Japan and China. Manufacturers active in those markets already comply with strict mandatory origin marking requirements. Its introduction at EU level would simply put European companies and consumers on an equal footing vis-à-vis their foreign counterparts.

5. Benefits to the consumers outweigh by far any potential costs and administrative burden, and reduces the volume of administrative corrective action

Benefits to the consumers outweigh by far any potential costs or administrative burden that could possibly fall on manufacturers.

The administrative burden for companies is widely overestimated. Origin is identified according to non-preferential rules, well known by manufacturers and importers, and no additional research needs to be done.

The mandatory origin marking refers to the finished product, and not to its parts. Consumers need to know the origin of the product destined for consumption and where possible the most relevant safety aspect of its composition. If required, the indication of the origin of the product will guide enforcement authorities to identify swiftly the unsafe parts of the finished consumer product. In this respect, the definition of consumer goods should be further clarified.

In addition, the introduction of an EU-wide origin marking scheme in Article 7 will reduce fragmentation in the internal market. In fact, a variety of labelling initiatives are already being promoted in several EU countries and indelible origin marking is already applied in several sectors.

For all these reasons, our associations kindly urge you to support the introduction of a mandatory origin marking provision within the proposed regulation on consumer product safety, and to adopt it without delay.

Signatories

CEC – The European Confederation of the Footwear Industry

CERAME UNIE – The European Ceramic Industry Association

COLIBI – European Bicycle Industry

COTANCE – European Leather Industry

EFIC – European Furniture Industries Confederation

EUROCOTON - European Federation of Cotton and Allied Textiles

European luxury goods and creative industries organizations (Circulo Fortuny, Fondazione Altgamma, Meisterkreis)

³ See amendment 32 of the rapporteur’s draft proposal.