18 November 2026

Statement on the Draft European Product Act

The undersigned associations expressly support the European Commission's objective of modernising and simplifying European product law and adapting it to an increasingly digital economy. Safe, high-quality products on the European market are our shared goal. Achieving this does not always require more regulation, but above all effective and consistent enforcement, particularly in view of the growing competitive pressure from products originating in third countries, especially uncontrolled direct imports by consumers. European manufacturers are already under considerable cost and competitive pressure while having to comply with an ever-growing number of information, documentation and labelling requirements, some of which are changed shortly before the relevant deadlines, or even after they have passed. Additional bureaucratic requirements increase costs, tie up resources and weaken precisely those companies that responsibly comply with European rules. New regulation should therefore reduce administrative burdens and make consistent use of the opportunities offered by digitalisation. Against this background, we are highly critical of Article 12(11) of the leaked draft European Product Act.

Our member companies already have to comply with an ever-growing number of information, documentation and labelling obligations. These arise cumulatively, among other things, from general product safety law, sector-specific product legislation, packaging law, ecodesign and circular-economy legislation, as well as other legal acts. At the same time, the European Union rightly seeks to minimise packaging and to make product information increasingly available in digital form.

We therefore propose a horizontal European principle:

ONE PRODUCT. ONE DIGITAL ACCESS POINT.

1. Article 12(11) Is the Wrong Approach

Under the provision envisaged in the leaked draft, complete instructions for use, essential safety information and other public-interest information would have to be provided in paper form or displayed on the product. Such a horizontal provision would substantially expand the physical information burden and partially reverse the digitalisation already established in other EU legal acts.

We do not question that warnings, pictograms and information required for the immediate safe use of a product must continue to be physically available. For non-safety-related information, however, there is no convincing reason to make paper the statutory default medium, particularly since consumers are unlikely to read and retain such information.

A. The Physical Space Available for Information Is Limited

The volume of mandatory information on products, packaging and accompanying documents continues to increase. The General Product Safety Regulation already requires, among other things, product identification, manufacturer details including postal and email addresses and, where necessary, clear instructions and safety information in a language that can be easily understood by consumers (Article 9(5) to (7) of Regulation (EU) 2023/988 - GPSR). Additional requirements arise from sector-specific legislation. For construction products, for example, the Construction Products Regulation requires general product information, instructions for use and safety information, while at the same time establishing a Digital Product Passport for construction products (Article 22(6) and (7) and Articles 75 to 77 of Regulation (EU) 2024/3110). For materials and articles intended to come into contact with food, Article 15 of Regulation (EC) No 1935/2004 establishes specific labelling requirements.

This creates a regulatory puzzle for manufacturers: which information must appear on the product, which on the packaging, which in an insert and which may be made available digitally? More text does not automatically mean better consumer information. On the contrary, the accumulation of mandatory information can make key safety information less visible.

B. Multilingual Requirements Exacerbate the Problem

Products distributed throughout Europe often require information in several languages. The GPSR requires instructions and safety information to be provided in a language that can be easily understood by consumers, as determined by the Member State concerned (Article 9(7) of Regulation (EU) 2023/988). For small products and limited packaging surfaces, this quickly results in barely legible blocks of text or extensive inserts. For basic products that are normally sold without packaging, an obligation to provide information can even create a need for packaging, which in turn triggers further obligations.

Digital information, by contrast, can be displayed in the appropriate language, searched, filtered and updated. This improves usability and prevents essential notices from being lost in multilingual full versions.

C. The PPWR Already Promotes Less Packaging and Shared Data Carriers

The Packaging and Packaging Waste Regulation establishes two principles that are central to product information. First, from 1 January 2030, manufacturers or importers must ensure that packaging is designed so that its weight and volume are reduced to the minimum necessary to ensure its functionality (Article 10(1) of Regulation (EU) 2025/40 - PPWR). The EU cannot require smaller, more resource-efficient packaging on the one hand while continuously increasing, or at least not reducing, the amount of information that must be physically displayed on the other.

Second, markings on packaging should not be duplicated. Where information on the packaged product is accessible digitally via a data carrier under other Union law, it should be possible to access both product and packaging information through the same data carrier. Where a Digital Product Passport exists, it should also be used for relevant information under the PPWR (recital 70 PPWR). The PPWR also expressly recognises digital solutions. Certain manufacturer details may, for example, be provided on the packaging or via a QR code or another data carrier (Article 15(6) PPWR).

D. The Digital Product Passport Is the Regulatory Blueprint

With the Ecodesign for Sustainable Products Regulation, the Union has already created the basis for an interoperable digital product infrastructure. Data in the Digital Product Passport must be based on open standards and developed in an interoperable format. Where appropriate, the data must be machine-readable, structured and searchable, and transferable through an open interoperable data exchange network without vendor lock-in (Article 10(1)(d) of Regulation (EU) 2024/1781 - ESPR). The ESPR expressly allows data to be included in the Digital Product Passport where this is required or permitted by other Union law (Article 10(2) ESPR). A legal interface for consolidating information from different legal acts therefore already exists.

Access is also designed on a differentiated basis: authorised actors receive free and easy access to the DPP in accordance with their respective access rights (Article 11(b) ESPR). This leads to the following conclusion for a common digital access point: non-confidential mandatory information intended for consumers should, as a rule, be publicly available free of charge. Graduated access rights may apply to sensitive, technical or authority-specific data.

Recital 28 ESPR also supports the necessary distinction: information requirements may generally be fulfilled digitally, while essential information concerning health, safety and the rights of end users should remain physically available. This principle should be continued horizontally.

E. Construction Products Demonstrate How Consolidation Can Work

The Construction Products Regulation further develops the DPP approach on a sector-specific basis. The Digital Product Passport for construction products may include, among other things, the declaration of performance and conformity, general product information, instructions for use, safety information, certain technical documentation and documents required under other Union law applicable to the product (Article 76(2) of Regulation (EU) 2024/3110). Open standards and interoperable formats also apply here; where appropriate, the data should be machine-readable, structured and searchable (Article 77(1)(d) of Regulation (EU) 2024/3110). Article 77(2) also allows information to be included where required or permitted by other EU legislation.

From its date of application on 20 January 2027, the Machinery Regulation likewise allows documentation to be provided exclusively in digital, paperless form. According to Guide 2.3 of April 2024, this option may already be used today. Machinery law thus also confirms the approach of providing documentation digitally as a rule.

The direction is correct: instead of creating a new label and a new data silo for each legal act, mandatory information should be consolidated and made interoperable.

F. Omnibus IV: The Commission Has Already Chosen the Right Path

With the Omnibus IV package of 21 May 2025, the European Commission presented proposals to digitalise various information and documentation obligations under harmonised product legislation (COM(2025) 503 final and COM(2025) 504 final). The proposals follow the 'digital by default' principle and are intended in particular to remove outdated paper requirements. The Commission has therefore already set a regulatory direction that the European Product Act should follow consistently.

For the product legislation concerned, Omnibus IV provides that manufacturers may generally supply instructions for use digitally. For products intended for consumers, or reasonably likely to be used by consumers, essential safety information required for safe use should continue to be provided in paper form or displayed on the product. In addition, access to the digital instructions should be indicated on the product, its packaging or an accompanying document. Electronic instructions should be printable, downloadable and storable; end users should be able to request a free paper copy (in particular the explanatory memorandum and recital 8, as well as the respective amending provisions in COM(2025) 504 final; in parallel COM(2025) 503 final).

Omnibus IV also digitalises further evidence, including EU declarations of conformity and electronic communication with market-surveillance authorities. Where a Digital Product Passport is already required for a product, relevant information should be capable of being stored there.

The Omnibus IV approach therefore reflects precisely the necessary distinction: safety information remains physical, while complete instructions and other product information may be provided digitally. A horizontal requirement to provide all information on paper in the European Product Act would run counter to this development.

G. Our Proposal: One Product. One Digital Access Point.

We propose that the European Product Act establish a horizontal principle for the digital provision of product information. It should be based on five principles:

1. Safety first. Information required for the immediate safe use of a product must remain physically available and accessible without an electronic barrier.
2. Digital by default. For legally required product information that is not directly safety-related, electronic provision should generally be sufficient.
3. One product, one access point. A QR code or another standardised digital data carrier should be usable as a common access point for information required under different EU legal acts.
4. DPP first. Where a Digital Product Passport exists for a product, it should be the central digital access point for legally required product information.
5. Enter once, use many times. Manufacturers should record the same information only once and then be able to use it for different regulatory purposes, user groups and output channels.

H. Article 12(11) Requires Amendment

Article 12(11) should be revised so that instructions for use may generally be provided electronically. Mandatory physical provision should be limited to information required for the immediate safe use of the product and not already provided elsewhere. For interchangeable accessory tools, for example, the relevant safety notices are generally already covered by the operating instructions for the machine and need not be repeated with every individual tool.

Non-safety-related 'other public interest-related information' must not be subject to a blanket paper requirement; it must be possible to make such information available digitally. A QR code or another standardised digital data carrier should be usable as a common access point for obligations arising from different EU legal acts. Where a Digital Product Passport exists for the product, the provision should expressly designate it as the central access point.

2. Relieve Compliant Companies and Strengthen Enforcement Against Non-Compliant Providers

In addition to addressing Article 12(11), the European Product Act should impose fewer additional obligations on companies that are already compliant and established within the EU. Instead, it should allocate responsibilities throughout the regulatory chain in a manner that enables effective enforcement against non-compliant providers. In our view, this includes:

- a verified, reliable and liable economic operator in the EU for every product originating in a third country and offered on the Union market;
- stronger responsibility and liability for online platforms;
- data- and risk-based cooperation between customs authorities and market-surveillance authorities;
- a mandatory ex ante SME reality check before new horizontal product requirements are introduced, for example through an SME Lab and a Think Small First Gate;
- sufficient lead times and complete guidance before the relevant date of application;
- binding cut-off dates and standardised templates;
- robust protection of trade secrets.

3. Conclusion

With the ESPR and the Digital Product Passport, the PPWR, the Construction Products Regulation and Omnibus IV, the European Union has already created essential building blocks for a digital and interoperable product-information system. The European Product Act should coherently bring these elements together instead of creating new horizontal paper obligations through Article 12(11): only safety-related information should remain physically available; complete instructions and other mandatory information unrelated to safety should, as a rule, be capable of being provided digitally through a common access point.

Requiring ever more information in ever more languages on ever smaller packaging serves neither consumer information nor sustainability. The better solution is a common, standardised and easily accessible digital access point.

About the Associations

Herstellerverband Haus & Garten e.V.

Herstellerverband Haus & Garten e.V. represents the interests of leading manufacturers of construction, DIY and garden products at national and European level. Its member companies develop and distribute products for private and professional users in Germany and throughout the European single market. The association advocates a high level of product safety, high-quality products and competitive framework conditions.

Industrieverband Schneid- und Haushaltswaren e.V.

Industrieverband Schneid- und Haushaltswaren e.V. (IVSH) is the voice of the German-speaking cutlery and housewares industry at national and European level. Its member companies develop, manufacture and distribute products for private and professional users that are used in everyday life billions of times. IVSH advocates competitive framework conditions and practical regulation that appropriately takes account of the interests of small and medium-sized enterprises.

Europaeischer Verband lifestyle e.V.

Europaeischer Verband lifestyle e.V. is an independent industry association. Its members are owner-managed medium-sized companies in the lifestyle sector, with products in the areas of gifting, living and cooking.

Fachverband Werkzeugindustrie e.V.

Fachverband Werkzeugindustrie e.V. represents German manufacturers of hand tools, machine tools, including accessory tools for power tools, construction fastening technology and complementary products such as tool cases.

Verband Deutscher Schleifmittelwerke e.V.

Verband Deutscher Schleifmittelwerke e.V. (VDS) represents the German abrasives industry in technical, economic, environmental and regulatory matters. Founded in Berlin in 1917, VDS is now Europe's largest national association representing the abrasives industry. Its member companies manufacture all types of abrasive tools: bonded abrasives, coated abrasives and diamond/CBN abrasive tools.