E-Labeling for ICT Products - A Perspective from Viet Nam

Submitted by: Viet Nam
E-labeling for ICT products - A perspective from Vietnam

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1. Snapshot of Vietnam ICT market
2. Overview of E-label
3. Vietnam's legal framework regarding to the E-label
4. Toward implementing electronic labels in Vietnam
5. Proposal
1. Snapshot of Vietnam ICT market

2. Overview of E-label

3. Vietnam's legal framework regarding to the E-label

4. Toward implementing electronic labels in Vietnam

5. Proposal
Snapshot of Vietnam ICT market

USD billion

Import
- Phone and accessories: 4.8 (2016), 6.2 (2017)
- Electronic devices, computer and accessories: 12.6 (2016), 16.2 (2017)

Export
- Phone and accessories: 17 (2016), 20.1 (2017)

Source: Vietnam General Statistics Office

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Snapshot of Vietnam’s ICT market

Export ~ 16 mil. units

- Samsung 75%
- Nokia 19%
- LG 5%
- Other 1%

Import ~ 1.5 mil. units

- Oppo 33%
- Iphone 11%
- Sony 5%
- Masstel 13%
- Samsung 20%
- Other 18%

Source: Vietnam General Statistics Office

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Snapshot of Vietnam ICT market

Mobile subscriptions

Source: vnta.gov.vn
Overview of E-label

Why is e-labeling:
- ICT devices are increasingly compact, integrated so there is less and less space for printing or stamping products labels and increasing the complexity of displaying these labels on products
- Increasingly more information the manufacturer wants to display on their products label
- Physical labels can be damaged by blurring, tearing, etc.
Overview of E-label

Depending on the product design, the certification mark shall be displayed on the product either through e-Labelling in electronic form or surface-labelling …

Source: SIRIM QAS Malaysia, Self Labelling Program, 2015

- Electronic compliance labelling may be implemented by displaying the compliance label on the equipment’s built-in display screen or in the equipment softcopy instruction manual.

- The licensee must provide clear instructions on how consumers may locate the electronic compliance label for their own verification.

Source: IMDA-Singapore, Requirements for telecom equipment labels and advertisements, 2016

- Regulatory Compliance Mark can be displayed in the e-label
- E-labelling is only permitted if the product has a built-in display
- The supplier must ensure that the documentation that accompanies the device when it is supplied to the user sets out a method for displaying the compliance label.


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Overview of E-label

- **Apply to:**
  Device which have an *integral (non-removable) display screen* and are currently subject to *certification* or *Declaration of Conformity* requirements

- **Information to be displayed:**
  Registration number (terminal equipment devices) or certification number (radio equipment), the *Conformity logo* (if applicable) and other informations must be provided on the surface of the product

- **Access to e-label:**
  - Without requiring special access codes or permissions and can access in no more than 3 steps in a device’s menu.
  - Not require special accessories or supplemental plug-ins (a SIM card) to access e-label.
  - Give user instructions on how to access the e-label.

Overview of E-label

Some characteristics of E-label:
✓ Replace the certificate mark and other information
✓ Apply to device which have an integrated display screen
✓ Manufacturers must have a simple way and a clear guideline how to access the electronic label
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Regulators in ICT products

National Assembly → Law → Decree → Circular

GOVERNMENT
Ministry of Information and Communications

VNTA
Viet Nam Telecommunications Authority
Regulators in ICT products

Ministry of Information and Communication (MIC)

VNTA
Viet Nam Telecommunications Authority

×3
Conformity assessment bodies (CAB)

质量问题部

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Overall management of ICT products

Overview of products quality control before put on the market

VNTA

- Conformity assessment
- Import licensing
- Declaration of Conformity

Domestic manufacturers → Testing laboratories → VNTA → Labelling → Market

Foreign manufacturers → Importer → MRA testing laboratories → VNTA → Custom clearance → Labelling

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Types of ICT products label

- Regulation conformity mark
- Import license
- Market

Labels:
- Domestic manufacturer
- Goods label
- Import license

ICT

- Name of goods
- Name and address of importer, producer
- Origin of goods
- Year of manufacture
- Specifications
- Warnings
- Instructions for use and for storage
Goods labels

Legal documents:
- Law on product and goods quality (2007)
- Decree no. 43/2017/ND-CP on goods labels guiding Law on product and goods quality 2007

Regulations:
- Label: manuscript, printed copy, drawing, photocopy of words, pictures, images that is stuck, printed, attached to the goods or packaging of goods
- Labeling: presenting essential information on a label about its contents to enable:
  - Consumers to identify the goods, selection, consume and use
  - Advertise the goods
  - Regulatory agencies to inspection and supervision
Goods labels

Mandatory information shown on the label

General goods label
- Name of goods
- Name, address of importer/manufacturer
- Origin of goods

ICT goods label
- Year of manufacture
- Specifications
- Warnings
- Instructions for use and storage
Regulation conformity mark

Legal documents:
✓ Law on product and goods quality 2007 and Decree No.132/2008/ND-CP guiding this Law
✓ Law on Telecommunications (2009) and Decree No.25/2011/ND-CP guiding this Law
✓ Circular No.05/2014/TT-BTTTT of MIC promulgates the list of ICT products and goods liable to cause unsafeness under the management responsibilities of the MIC
✓ Circular No.30/2011/TT-BTTTT of MIC providing for regulation conformity certification and declaration for ICT products and goods
Regulation conformity mark

ICT products are divided into two groups

1. Certification & Declaration of conformity
2. Declaration of conformity

- Testing and assessment to relevant technical regulation
- Regulation conformity certificate
- Declaration of conformity
  → VNTA issue the Notice of receiving the declaration of conformity

Regulation conformity mark
Regulation conformity mark

**Certification & Declaration of conformity**

- Terminal devices (mobile phone, xDSL terminal device …)
- Radio devices:
  - Radio transmitter, transceiver (f: 9 kHz ÷ 400 GHz, P max ≥ 60 mW)
  - Radar devices
  - Radio navigation devices
  - Short range devices
  - Microwave devices
- Amplifying devices in cabled distribution systems for television signal

**Declaration of conformity**

- ICT devices not have radio transmit function:
  - Desktop computer, router, hub, switch…
  - Set Top Box using for DVB-S, DVB-S2, DVB-T2
  - Optical transmission devices…
ICT goods import license

Legal document:
Circular No.18/2014/TT-BTTTT providing on grant of licenses to import radio transmitters and transceivers
ICT goods import license

List of ICT goods subject to import licensing
- Radio transmitter, transceiver (f: 9 kHz ÷ 400 GHz, transmit power ≥ 60 mW)
- Microwave devices

Records for licensing
- The application form
- Documents proving the legal status (Business certificate, establishment license, investment license)
- ID/passport copy
- Technical regulation conformity certificate
- Device technical documents
- Commercial invoice & contract
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Toward implementing E-label in Vietnam

### Goods label
- **Law on product and goods quality (2007)**
- **Decree no. 43/2017/ND-CP on goods labels**

### Technical regulation conformity mark
- **Law on Telecommunications (2009)**
- **Decree No.25/2011/ND-CP guiding Law on Telecommunications**
- **Circular No. 05/2014/TT-BTTTT promulgates the list of potentially unsafe ICT products and goods under management of the MIC**
- **Circular No. 30/2011/TT-BTTTT providing regulation conformity certification and declaration for ICT products and goods**
Toward implementing electronic labels in Vietnam

After allowing for demonstration of technical regulation conformity marks and the goods label in e-label, no longer need to labeling by print or affix onto the goods as before, shorten the time to put the goods to market.
## Proposal

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<th>Requirement</th>
<th>United States</th>
<th>Canada</th>
<th>Malaysia</th>
<th>Singapore</th>
<th>Japan</th>
<th>Australia</th>
<th>New Zealand</th>
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<tbody>
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<td>Product ID size</td>
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</table>

N/A Not required but must provide E-label access instructions to the user

Required legible and visible to the unaided eye

**Conformity mark**

**Product ID**
Option 1: Accept the difference among the economies of the regulation on number of steps to access the E-label. Apply physical labels when meet these situations.

Option 2: Apply uniformity across economies about the regulation on maximum 3 steps to access E-label.