



**Asia-Pacific
Economic Cooperation**

2013/SOM1/MAG/10
Agenda Item: 9(iv)

Marks/Labels on ICT Products: e-Labeling and Other Considerations

Purpose: Consideration
Submitted by: United States



43rd Market Access Group Meeting
Jakarta, Indonesia
31 January 2013

Marks/Labels on ICT Products: e-Labeling and other Considerations

Presentation before
APEC Market Access Group

January 2013

Scope of Discussion

This presentation covers marks and labels for regulatory compliance purposes:

- Government agency marks and labels
- Certification body marks and labels to demonstrate compliance with regulation

It does NOT cover marks and labels for:

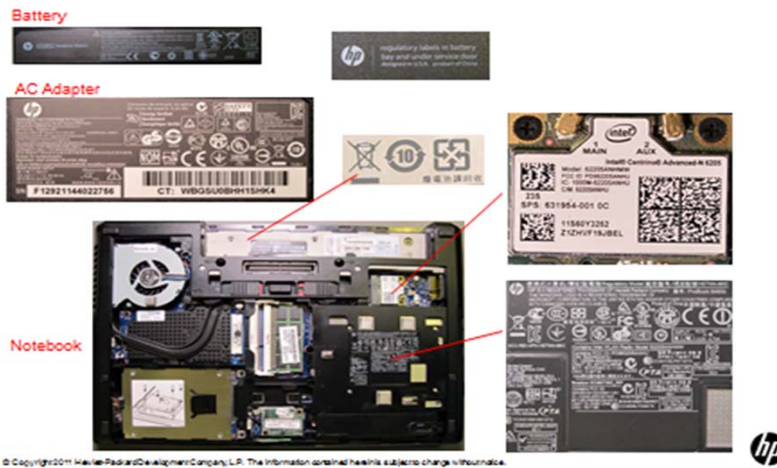
- User warning statements
- Voluntary requirements
- Compliance with licensing agreements

Slide 1

A1 **Require any boilerplate on ITI?**
Author, 1/18/2013

A Growing Problem

Marks and Labels on a Notebook



A Growing Problem

From a global perspective:

- Assume an average of four marks and labels per product for EMC, Safety, Energy, Environmental
- For 100 economies = 400 marks and labels on a product destined for global markets

From any individual regulator perspective:

- Responsible to carry out and enforce rules according to economies' laws, some which mandate information on the product
- Not responsible for global "clutter" issue

A Growing Problem

SITUATION

- Many mandatory product marks and labels today
- More marks and labels expected (e.g., for green requirements)
- More required information on labels (e.g., for energy efficiency)
- Some information is duplicative

CHALLENGE

- Limited product surface for marks and labels
- Aesthetic concerns

IMPACT

- Government surveillance is not well served
- Customers ignore the clutter
- Manufacturers increasingly difficult to comply if trend continues

Solutions to Consider

- **Simplify.** Delete nonessential information to support a regulatory purpose
- **Develop new ideas** and new approaches that will serve us for the next 20 or more years
- **Allow flexibility** for information to be in the product manual, packaging, company website, or e-labeling
- **Establish “Good Regulatory Practice”** on marks and labels and guidance for regulators worldwide

APEC Role?

- Possible APEC initiative to establish good regulatory practice on marks and labels:
 - Could provide general guidance on what information is appropriate for product, packaging, company website, etc.
 - Could provide guidelines for **e-labeling**
 - Could develop an annex guidance per topic (e.g. safety, EMC, Green)

First Steps

- Agree there is a problem
- Explore solutions that fulfill regulatory objectives: A2
 - ✓ Support inspection/surveillance
 - ✓ Provide customer access to helpful information
 - ✓ Provide import compliance information
 - ✓ Keep regulatory presence
- Should add no barriers or cost

Slide 8

A2 See slide notes for examples of regulatory objectives
Author, 1/18/2013

Electronic Labeling (e-Labeling)

- For devices with an integral display
- A temporary label (e.g., transparent foil) for users before purchase
- Product documentation/manual will have more compliance information, regulatory website address, and note how to view labels on display.

Electronic Labeling (e-Labeling)

One Example

Screen transparency
(Temporary. Can be removed
by consumer)



+

e-labeling on demand
(Permanent. Always user
accessible)



Electronic Labeling (e-Labeling)

- Challenges:
 - Requires government and industry cooperation
 - There is no global governing body
- Already in use (iPhone)
- Current e-labeling proposals by industry in United States and Europe for FCC / EC consideration

Benefits

- Manufacturers have a manageable approach
- Customers are more likely to find relevant information
- Government surveillance is better served

Next Steps

- **Industry seeks feedback on e-labeling and broader proposal to address product marks/labels**

- What are your comments / questions?
- Do you support APEC / MAG further consideration?

(for example, a future workshop with industry participation at MAG3, possibly inviting SCSC members)

THANK YOU