



POSITION PAPER

February 2016

On the “Made In” concept in the proposal for a Regulation on Consumer Product Safety

European Federation of Jewellery (EFJ) was created in November 2013 to promote the European jewellery sector in the European Union. The EFJ gathers national professional organizations from different Member States notably Belgium, France, Italy, Spain and Portugal and represents manufacturers (be it large or small artisanal ones) as well as traders and retailers.

Context

There is today no obligation at EU level regarding the marking of non-food products imported in the EU (apart from the origin indication on custom declaration information). The CE marking only signals that all essential requirements have been fulfilled when the product was manufactured. The CE marking is not a mark of origin, as it does not indicate that the product was manufactured in the European Union. Consequently, a product affixed with the CE marking may have been produced anywhere in the world.

In order to guarantee better protection of European consumers and to improve products tracing systems in Europe, the European Commission has proposed the introduction of an obligatory indication of origin on non-food consumer products, the “made in EU/Member States” principle, in its proposal for a Regulation on Consumer Product Safety (article 7).

On this important issue, the EFJ:

- **Supports the Commission’s proposal to introduce an origin marking obligation**
- **Welcomes the position of Rapporteur Christel SCHALDEMOSE and the Parliament** (plenary vote on April 15), who further endorse this principle by voting compulsory “made in” label as a tool for better traceability, supply chain transparency and products safety

Origin marking to reinforce products safety and European business excellence

Taking into account the craftsmanship character of our sector as well as the skills and expertise that have been gained over centuries, the European Federation of Jewellery strongly supports the introduction of a “made in” obligation.

The EFJ therefore welcomes the approach taken by the Parliament to support the dispositions proposed in Article 7 of the draft Regulation:

Indication of the origin

1. *Manufacturers and importers shall ensure that products bear an indication of the country of origin of the product or, where the size or nature of the product does not allow it, that indication is to be provided on the packaging or in a document accompanying the product.*
2. *For the purpose of determination of the country of origin within the meaning of paragraph 1, non-preferential origin rules set out in Articles 23 to 25 of Council Regulation (EEC) No 2913/92 establishing a Community Customs Code¹ shall apply.*
3. *Where the country of origin determined in accordance with paragraph 2 is a Member State of the Union, manufacturers and importers may refer to the Union or to a particular Member State.*

The EFJ concurs with the Parliament (and the European Commission) that the “Made In” concept will be of great benefits for the European manufacturers, importers and consumers for the following reasons:

⇒ *Better products information*

- Consumers are more and more concerned about information on the goods they purchase as their awareness about products standards and characteristics is increasing. This knowledge allows them to make **conscious** and **responsible** choices. Multiple statistics (eg. Eurobarometre) shows that an important number of customers care about the country of origin of their purchases. The “Made in” information will thus better meet their expectations.

⇒ *Improved safety and better traceability of products*

- As mentioned in the European Commission proposal “*the indication of origin supplements the basic traceability requirements*”. In consequence, it will help market surveillance authorities to better track questionable products (*reaffirmed by the Rapporteur in the explanatory statement of her draft report*)

- ⇒ *Adequate response to international trade practices and reduction of supplementary administrative burdens*
 - Countries such as the US, Canada or Japan have already introduced origin marking obligations in their respective legislations. European exporting companies have to adapt to these dispositions and mark their products which represents additional cost for European actors. Obligatory origin marking will thus standardize export procedures and facilitate international trade.

- ⇒ *Employment growth especially among SMEs*
 - By reducing a gap between European and international trade procedures, the European companies will enhance their competitiveness as export players thereby strengthening their production levels and of course inducing direct employment growth in Europe.

- ⇒ *Better promotion of the EU and of the Member States*
 - EU/Member State origin marking should be an excellent tool for the promotion European savoir-faire, of European standards (both ethical and environmental) and companies' behaviors. At the same time it will protect European/national/local craft, heritage and creativity.

- ⇒ *Reinforcement and harmonization of EU custom code*
 - With a use of "made in" concept, the EU custom legislation should be combined/reinforced with market surveillance and customer protection.

Conclusion

Considering all the above, the EFJ would like to request a strong support vis-à-vis this concept in the Council, as it represents an unquestionable chance for European companies, including small and medium sized firms, to develop its European and international activity.