



Best Practices for Electronic Labeling

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Best Practices for Electronic Labeling

What is E-Labeling?

Electronic labeling (e-labeling) is an alternative, voluntary way for manufacturers to communicate compliance information that has typically been displayed with a physical label that is stamped, attached, or etched on a product. E-labeling allows this compliance information to be created electronically and displayed on a screen.

Why Use E-Labeling: General Benefits

E-labeling can provide benefits to manufacturers, regulators, and consumers alike. For manufacturers, e-labeling offers a voluntary alternative to traditional etching to display compliance information, which is especially helpful as products continue to decrease in size, but also reduces production cost, enables product design innovation, and benefits the environment by reducing the waste created in the process of producing and updating physical labels. For consumers, e-labeling allows for easy access to information and also allows for more information to be displayed than on a physical label. For economies, e-labeling allows new products to reach the market sooner, ensures that regulators and/or competent authorities have access to up-to-date compliance information, and can help block counterfeit products from the market.

E-Labeling Policy Development Stages

What stage is your economy in according to the e-labeling policy development guide?

Status quo	Develop	Pilot	Finalize / Implement	Improve/Build Consensus
Using physical labeling to demonstrate conformity	Build out initial e-labeling guideline and prepare for pilot and/or implementation	Roll out limited, voluntary pilot and analyze results of initial policy	Incorporate results of analysis and stakeholder feedback; educate stakeholders of changes	With domestic policy in place, work to align e-labeling approaches internationally

Top Actions at Each Stage of E-Labeling Policy Development

Status quo	Develop	Pilot	Finalize / Implement	Improve/Build Consensus
<ul style="list-style-type: none"> ✓ Initial benchmark of other economies' e-labeling approaches ✓ Benchmark of relevant international standards ✓ Undertake domestic legal authority review 	<ul style="list-style-type: none"> ✓ Design e-labeling policy consistent with the scope, display, and requirements best practices below ✓ Adopt only the minimum requirements necessary to achieve goals ✓ Engage with stakeholders 	<ul style="list-style-type: none"> ✓ Roll out voluntary pilot, if necessary ✓ Engage with stakeholders throughout and following optional pilot phase 	<ul style="list-style-type: none"> ✓ Take into account customs requirements for importation of products that use e-labeling ✓ Consider undertaking an educational campaign to promote policy 	<ul style="list-style-type: none"> ✓ Periodically benchmark other economies' e-labeling policies ✓ Track and participate in development of relevant international standards; incorporate as appropriate ✓ Conduct market surveillance and review policy regularly

E-Labeling Best Practices

Scope – what products will be included?	
Action	Benefits
<ul style="list-style-type: none"> ✓ Determine the products that will be covered under the e-labeling policy <ul style="list-style-type: none"> ○ Should cover: <ul style="list-style-type: none"> ▪ Products with an integrated display screen ▪ Products which do not have integrated display screens, but can operate in conjunction with devices that have an integrated display screen (modular devices included) 	<ul style="list-style-type: none"> - This scope covers the most commonly used ICT and consumer electronic devices
<ul style="list-style-type: none"> ✓ Economies should consider allowing the use of e-labeling for other products in the future 	<ul style="list-style-type: none"> - E-labeling approach could streamline trade of additional products
<ul style="list-style-type: none"> ✓ Determine the information eligible to be shown with an e-label <ul style="list-style-type: none"> ○ In addition to a label demonstrating compliance with EMC requirements, economies should consider including safety and other required regulatory markings on the e-label 	<ul style="list-style-type: none"> - Allowing additional information to be displayed with an e-labeling can reduce packaging waste and make it easier for consumers to find information

Display – how will information/markings be displayed? What content should be displayed?

Action	Benefits
<ul style="list-style-type: none"> ✓ Compliance information and markings to be displayed on product's integrated display screen 	<ul style="list-style-type: none"> - Allows easy-to-access display of labeling on many popular ICT and consumer electronic products
<ul style="list-style-type: none"> ✓ Regulators and/or competent authorities can also consider allowing information to be available via a machine readable code (such as a QR code) or via website 	<ul style="list-style-type: none"> - Allows e-labeling to be used for an expanded range of products - Easier to display additional information beyond regulatory requirements, such as product and safety information
<ul style="list-style-type: none"> ✓ Require the following display elements: <ul style="list-style-type: none"> ○ The e-label should display at least the same information as is required on the physical compliance label ○ To the extent possible, the e-label content should not duplicate the information displayed on the product packaging 	<ul style="list-style-type: none"> - Ensures that even on a different type of label, the necessary compliance information is displayed

Requirements – what requirements should be included in e-labeling policy?

Action	Benefits
Design an e-labeling policy with the following requirements:	
<ul style="list-style-type: none"> ✓ Policy is voluntary 	<ul style="list-style-type: none"> - Does not create unnecessary burden for manufacturers
<ul style="list-style-type: none"> ✓ User is able to access compliance information in 3 steps or less 	<ul style="list-style-type: none"> - Easier consumer and regulator access to compliance information
<ul style="list-style-type: none"> ✓ Includes a provision directing the manufacturer to provide clear instructions for how to access the e-label 	<ul style="list-style-type: none"> - Easier consumer and regulator access to compliance information
<ul style="list-style-type: none"> ✓ No special requirements or passcodes are required to access the e-label 	<ul style="list-style-type: none"> - Maintains security and reliability of compliance information
<ul style="list-style-type: none"> ✓ Label cannot be modified by a third-party 	<ul style="list-style-type: none"> - Maintains security and reliability of compliance information

Process – how to best formulate the policy

Action	Benefits
✓ Benchmark with other economies	- Allows for consistency in e-labeling approaches
✓ Take into account applicable international standards, where they exist	- Ensures that regulators and/or competent authorities have the power to issue requirements
✓ Undertake domestic legal authority review	- Increases buy-in; allows for an industry-driven approach
✓ Engage with stakeholders (i.e. consumer and trade associations, regulators/customs authorities, manufacturers) through a public consultation process	- Avoid overregulation, which can set out onerous compliance requirements and create unintentional barriers to trade
✓ Adopt only the minimal requirements necessary to achieve goals	- Determine whether economy has capacity to effectively allow for and implement e-labeling
✓ Evaluate an economy's relevant technological capabilities (i.e. smartphone penetration)	

Implementation

Action	Benefits
✓ Conduct market surveillance and review policy regularly	- Ensures that policy remains effective and relevant
✓ Take into account customs requirements for importation of products that use e-labeling	- Ensures policy continuously complies with at-the-border requirements
✓ Consider undertaking an educational campaign to promote policy	- Raises awareness of e-labeling, instructs manufacturers on how to comply

Notes

This document can be used by regulators and/or competent authorities in all sectors.

This best practices document was developed through the workshop associated with the project *Facilitating Trade in Information and Communications Technology Products Through Encouragement of Electronic Labeling Best Practices*, undertaken under the Subcommittee of Standards and Conformance (SCSC). The workshop was held in August 2017 in Ho Chi Minh City, Viet Nam. The workshop brought together regulators, industry representatives, and representatives from APEC economies to share their experiences developing an electronic labeling policy, discuss the benefits of an e-labeling policy (for both industry and economies), and come to a consensus on best practices. The presentations can be accessed [here](#).