

Print media value chain
Position Paper
Print media and the proposed General Product Safety Regulation
January 2022

The print media value chain represents publishers, printers, paper and envelope manufacturers, direct mail operators and advertisers. We aim at providing European decision makers with an understanding of the sector's values and the role it plays in culture, society and the economy.

The products of the print media value chain, including books, newspapers, magazines, advertising, envelopes etc..., significantly contribute to a democratic and knowledge-based society. They are a key conveyor of information, education and culture in Europe.

The print media value chain has at heart the safety of all European citizens and wants to ensure that their products do not represent any hazard for readers and users.

The proposed Regulation introduces new and strict obligations to economic operators, which will represent a significant additional administrative and financial burden, in particular to SMEs.

Scope

The approach proposed by the European Commission whereby the legislation would apply to all products that are not subject to a specific legislation does not distinguish between product types and does not take into account the nature of a product and its ordinary use.

The lack of assessment of the nature of certain products will penalise sectors that are characterised by **intrinsically safe products**. This is the case of print media, like books, magazines or newspapers.

Specific types of risks are already covered by harmonised legislation. For example, children's books fall under the scope of the Toy Safety Directive (2009/48/EC). As they are subject to a specific legislation, children's books are excluded from the scope of this proposed Regulation and are subject to the safety criteria that toys must meet before being placed on the European market.

The products that our value chain represents include all forms of publications printed on paper. They are categorised in Chapter 49 of the Combined Nomenclature¹.

Proportionate measures

Currently, producers are required to ensure that a product is safe on the basis of any applicable national or European standards. "Where such risks are not immediately obvious without adequate warnings", they must provide consumers with relevant safety information through "measures commensurate with the characteristics of the products which they supply". As a matter of fact, **print media do not constitute products potentially generating risks**.

Under the Commission's proposal, the new obligations no longer refer to the risks related to each product, nor to commensurate measures. The new requirements will therefore represent **a significant new administrative and financial burden** for print media publishers and printers, both sectors being mainly composed of SMEs. Given the intrinsically safe nature of print media, the new obligations will create **disproportionate** burden to print media producers and provide **no benefit for the final consumers**.

¹ Chapter 49 of the Combined Nomenclature cover "printed books, newspapers, pictures and other products of the printing industry; manuscripts, typescripts and plans"
https://ec.europa.eu/taxation_customs/business/calculation-customs-duties/customs-tariff/combined-nomenclature_en

The proportionality principle should be respected so as not to impose the same requirements to products that do not carry the same safety risks, or better that, as a matter of fact, do not present any risks.

With a view to support a proportionate approach in the proposed General Product Safety Regulation, we call for print media to be considered intrinsically safe products and therefore support amendment 58 of the Rapporteur's Draft Report to limit the additional burden on companies of our sector.

Amendment 58

Proposal for a regulation

Article 8 – paragraph 4 – subparagraph 1 – introductory part

Text proposed by the Commission

Manufacturers shall draw up technical documentation of the product. The technical documentation shall contain, as appropriate:

Amendment

Manufacturers shall draw up technical documentation of the product. The technical documentation shall contain ***at least a general description of the product and its essential properties relevant for assessing the product's safety.***

Where deemed appropriate with regard to the risks presented by a product as appropriate, a technical documentation shall contain:

Signatories:

CEPI – Confederation of European paper industries

FEDMA – Federation of European data and marketing

FEP – Federation of European publishers

FEPE – Federation of envelopes, light packaging, and e-commerce packaging in Europe

INTERGRAF – European federation for print and digital communication