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Union of Industrial and Employers' Confederations of Europe  
Union des Confédérations de l'Industrie et des Employeurs d'Europe

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Mr Jacques Santer  
President of the  
European Commission  
BREY 12/100  
rue de la Loi, 200  
B-1049 Bruxelles

ZT/JPC/MH/22.5/16/1

2 March 1998

Dear Sir,

UNICE's attention has recently been drawn to the possible implications for industry of implementation of Council Directive 80/181 amended by Directive 89/617, on the approximation of the laws of the Member States relating to units of measurement.

This directive, which should come into effect on 1 January 2000, requires that all products sold in the EU be labelled in metric units of measurement only. This would in effect indirectly prohibit dual labelling and therefore the use of imperial in addition to metric units of measurement.

UNICE notes that if this Directive comes into effect as scheduled on 1 January 2000, the EU will be the only market in the world to prohibit use of a supplementary indication of measurement. EU and US industry are concerned about this development which would seriously hamper EU/US trade, since the US requires packaging and labels on consumer goods to include imperial as well as metric units of measurement.

Firms would no longer be able to produce one package for both the EU and US markets, and will have to create separate packaging and labelling, as well as separate warehousing and inventory systems. Both European and US industry would be severely affected. The financial burden would be especially heavy on SMEs which, although increasingly involved in international trade, are far less informed and prepared to make the necessary adjustments. This might result in some SMEs having to curtail transatlantic exports altogether.

UNICE is also concerned about the exact scope of the directive, the wording of which is not entirely clear. UNICE understands that some sectors/products would be exempted from application of the directive. UNICE urges the European Commission to clarify exactly which sectors/products would be exempted and on what grounds.

In the light of the above considerations, UNICE is convinced that implementation of this Directive will impose unnecessary costs on manufacturers, suppliers and indirectly on consumers, both in the EU and the US. UNICE therefore pleads for postponement of entry into force of this directive, and for the following actions to be taken :

- (a) the carrying out of a thorough cost-benefit analysis and impact assessment of this measure, with particular emphasis on its effects on employment and on SME's.
- (b) discussions to be pursued with US authorities with a view to solving the problems of measurement and labelling in a way that is not harmful to transatlantic trade.

Yours sincerely,

Zygmunt Tyszkiewicz  
Secretary General