



To: Members of the European Parliament

3 March 2014

Dear Member of the European Parliament,

We are writing to you in view of the European Parliament's plenary vote on the Product Safety and Market Surveillance Package, scheduled to take place in April II. As this dossier remains blocked in the Council a vote in plenary would confirm the European Parliament's position in first reading before the European elections.

BUSINESSEUROPE supports the objective of improving the legal framework on product safety and strengthening market surveillance. We want safe products on the market but the measures to achieve this must be effective and proportionate.

BUSINESSEUROPE is concerned about the overall direction that the package is heading in. The lack of a clear borderline between the Consumer Product Safety Regulation and harmonised sectoral legislation remains problematic. In addition, many of the proposals risk complicating the legislation. This would result in extra costs for companies and weaken the competitiveness of European business without even achieving the intended goal of safer products on the market.

In these complex economic times unnecessary regulatory burdens such as the proposal for an 'EU Safety Tested' marking must be avoided at all costs if we want to boost growth and job creation. In this context, amendments made by the European Parliament that depart significantly from the Commission's original draft proposal should be evidence-based and be subject to objective high-quality impact assessments early in the process, i.e. before voting in committee, whilst assuring effective stakeholder involvement.

On the proposal for a mandatory indication of origin on the product, the views of the EU business community diverge. Most BUSINESSEUROPE members see no added value in making the marking mandatory as it will not in itself lead to more product safety or better traceability, but will involve time-consuming procedures and thus lead to higher costs for manufacturers and importers.

Some BUSINESSEUROPE members support the proposal for consumer products to bear a mandatory indication of the country of origin, believing that it would supplement basic traceability requirements.



With regard to market surveillance, BUSINESSEUROPE believes that a more determined effort is needed to help keep non-compliant products off the market. However, the subject of penalties should be tackled with caution. These must be dissuasive and proportionate.

Given the complexity of the current discussions on this package and the general lack of progress with the Council, we urge you not to rush in the decisions that you take on this important file. We do have legislation in place that governs the safety of products. Whilst this legislation does need improving, BUSINESSEUROPE believes that quality over speed should prevail.

Yours sincerely,

Markus J. Beyrer