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Moving from paper-based to digital product documentation

DIGITALEUROPE welcomes the EU's initiative to give manufacturers the option to provide product documentation digitally. This transition is essential to reduce regulatory burden, advance environmental objectives and align EU product legislation with the digital age.

At this stage, it is crucial not to conflate moving to paperless documentation with the implementation of the Digital Product Passport (DPP), as doing so may delay modernising EU product legislation and impede achievable savings in the near term.

Recommendations

- ▶ Provide legal certainty for digital formats by revising the Blue Guide and related guidance to explicitly allow digital documentation across all applicable legislation.¹
- ▶ Use an omnibus proposal to harmonise EU product legislation to ensure that all Member States accept digital documentation as a valid and preferred alternative to paper. This should cover declarations of conformity, instructions for use and other required technical documentation.
- ▶ Do not make implementation of the DPP a precondition for digital documentation. The move to digital documentation can and should proceed independently of the development of the more comprehensive DPP system and should be technology neutral.
- ▶ In cases where the DPP is mandated, allow it to include digital instructions and declarations of conformity, but do not extend DPP obligations to other product categories solely to facilitate the digital delivery of such documents.

¹ 2022/C 247/01. See suggested amendment below.

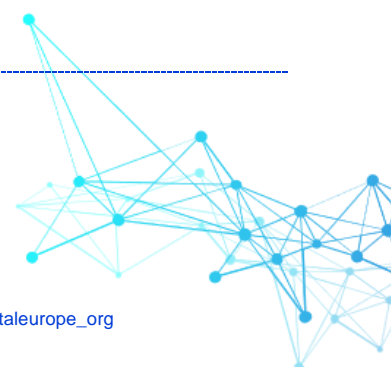




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Costs and benefits of digital documentation

Each year, companies are required to produce billions of pages of paper documentation to accompany their products. Most of this material goes unread and is immediately discarded by end users, creating unnecessary environmental and financial burdens across the entire value chain – printing, transportation, storage, packaging, energy and water usage, and waste collection and recycling.

The cost of producing paper documentation varies widely depending on the product, legal requirements and supply chain factors such as the number of languages required for the documentation. As a result, the cost ranges from a few cents (for high-volume consumer electronics) to several euros per unit. This means that switching to digital documentation could save individual manufacturers anywhere from hundreds of thousands to tens of millions of euros annually, depending on their product characteristics and operations.

Beyond cost savings and environmental benefits, digital product information offers numerous advantages for end users: always up-to-date, easy access to multiple languages and formats, barrier-free presentation, searchability and support of more user-friendly formats such as videos, animations, apps or AI-powered assistants.

Fully digitising declarations of conformity, instructions for use, safety information, and other technical documentation would enable companies to streamline internal processes, improve information access for market surveillance authorities and reduce single market barriers. It eliminates the printing and handling costs, simplifies updates to compliance documents (especially important for fast-moving consumer goods), and enhances traceability of documentation throughout the supply chain. Digital documentation would also allow faster alignment with national requirements, making it easier to bring products to more markets simultaneously and offer consumers across the EU access to a broader choice of goods. Digital documentation would also be a precondition for simplifying and automating compliance checks, reducing the burden on companies and national authorities.

Need for legal clarity and harmonisation


Despite these clear advantages, many manufacturers feel constrained by legal uncertainty. Current EU product legislation often refers to information that must accompany the product, a requirement that is still frequently interpreted to mean paper format. Guidance such as the Blue Guide reinforces this interpretation, and authorities across Member States have taken inconsistent positions regarding the acceptability of digital alternatives.²

This has led companies to maintain paper documentation – even where more sustainable and user-friendly digital formats are available – simply to avoid potential liability or market access issues.

Way forward

Whilst the DPP may eventually offer cost savings by hosting digital instructions and declarations of conformity, it is important to distinguish this long-term objective from more immediate, achievable steps like digitising documentation through targeted amendments to New Legislative Framework (NLF) legislation.

² See chapter 3.1, point 4, footnote 114, 2022/C 247/01.



In the short term, moving towards voluntary paperless documentation, independent of full DPP deployment, would already reduce business and environmental costs. This approach would respond to immediate simplification objectives and allow producers to rely on their existing digital repositories. It would also enable coverage of more product categories than are currently covered by the DPP framework and allow manufacturers to build readiness to switch to digital documentation and labelling incrementally.

DIGITALEUROPE calls for adjusting the Blue Guide as an immediate non-legislative action, followed by an omnibus proposal aligning the wording of NLF legislation to add the option for economic actors to move to full digital documentation. The language of the amendment can be inspired by Art. 10(7) Machinery Regulation.³ Key examples of product legislation to adapt are:

- ▶▶ The Radio Equipment Directive;⁴
- ▶▶ The Low Voltage Directive;⁵
- ▶▶ The delegated act on unmanned aircraft systems and on third-country operators of unmanned aircraft systems;⁶
- ▶▶ The Batteries Regulation;⁷
- ▶▶ The Machinery Regulation;⁸ and
- ▶▶ The Ecodesign Regulation.⁹

FOR MORE INFORMATION, PLEASE CONTACT:

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³ Regulation (EU) 2023/1230. Suggested amendments can be found in the Annex.

⁴ Directive 2014/53/EU.

⁵ Directive 2014/35/EU.

⁶ Commission Delegated Regulation (EU) 2019/945.

⁷ Regulation (EU) 2023/1542.

⁸ Regulation (EU) 2023/1230.

⁹ Regulation (EU) 2024/1781.


ANNEX

Recommendation for an immediate adjustment of the Blue Guide

Chapter 3.1, point 4, footnote 114	
Current text	New text
<p>Unless otherwise specified in specific legislation, whilst the safety information needs to be provided on paper, it is not required that all the set of instructions is also provided on paper but they can also be on electronic or other data storage format or even a website. Where this is the case, the full set of instructions must remain accessible for a reasonable period after the product was placed on the market depending on the intended use of the product. However, a paper version should always be available free of charge for the consumers who request it. The manufacturer must take account of the intended use and end users of the product when deciding the specific format for the instructions and safety information.</p>	<p>Unless otherwise specified in specific legislation, whilst the safety information needs to be provided on paper, It is not required that all the set of instructions and safety information is are also provided on paper but they can also be on electronic or other data storage format or even a website. Where this is the case, the full set of instructions and safety information must remain accessible for a reasonable period after the product was placed on the market depending on the intended use of the product. However, a paper version should always be available free of charge for the consumers who request expressly desires it at the moment of purchase. The manufacturer must take account of the intended use and end users of the product when deciding the specific format for the instructions and safety information.</p>

Recommendation for standard language to harmonise product-related legislation

Based on the example of Art. 10(7) Machinery Regulation	
Current text	New standard text
<p>Manufacturers shall ensure that the machinery or related products are accompanied by the instructions for use and the information set out in Annex III. The instructions may be provided in a digital format. Such instructions and information shall clearly describe the product model to which they correspond.</p> <p>When the instructions for use are provided in digital format, the manufacturer shall:</p> <p>(a) mark on the machinery or related product, or, where that is not possible, on its packaging or in an accompanying document, how to access the digital instructions;</p> <p>(b) present them in a format that makes it possible for the user to print and download the instructions for use and save them on an electronic device so that he or she can access them at all times, in particular during a</p>	<p>Manufacturers shall ensure that the [product groups in scope] are accompanied by instructions for use [and any further required information]. The instructions may be provided in a digital format. Such instructions and information shall clearly describe the product model to which they correspond.</p> <p>When the instructions for use are provided in digital format, the manufacturer shall:</p> <p>(a) mark on the [products in scope], or, where that is not possible, on its packaging or in an accompanying document, how to access the digital instructions;</p> <p>(b) present them in a format that makes it possible for the user to print and download the instructions for use and save them on an electronic device so that he or she can access them at all times, in particular during a breakdown of the machinery or related</p>



breakdown of the machinery or related product; this requirement also applies where the instructions for use are embedded in the software of the machinery or related product;

(c) make them accessible online during the expected lifetime of the machinery or related product and for at least 10 years after the placing on the market of the machinery or related product.

However, at the request of the user at the time of the purchase, the manufacturer shall provide the instructions for use in paper format free of charge within one month.

In the case of machinery or a related product intended for non-professional users or that can, under reasonably foreseeable conditions, be used by non-professional users, even if not intended for them, the manufacturer shall provide, in paper format, the safety information that is essential for putting the machinery or related product into service and for using it in a safe way.

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(c) make them accessible online during the expected lifetime of the **[product group in scope]** and for at least 10 years after the placing on the market of the machinery or related product.

~~However, at the request of the user at the time of the purchase, the manufacturer shall provide the instructions for use in paper format free of charge within one month.~~

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About DIGITALEUROPE

DIGITALEUROPE is the leading trade association representing digitally transforming industries in Europe. We stand for a regulatory environment that enables European businesses and citizens to prosper from digital technologies. We wish Europe to grow, attract and sustain the world's best digital talents and technology companies. Together with our members, we shape the industry policy positions on all relevant legislative matters and contribute to the development and implementation of relevant EU policies. Our membership represents over 45,000 businesses who operate and invest in Europe. It includes corporations which are global leaders in their field of activity, as well as national trade associations from across Europe.