

UEAPME¹ comments on the workshop improving consumer information for online digital products

UEAPME always welcomes measures to improve clarity and transparency. As the Consumer Rights Directive is quite complex, many SMEs will have problems to comply with all the information requirements. UEAPME believes that the model for online digital products could improve clarity and transparency for both traders and consumers. It could be very useful for SMEs if the following points are integrated.

1) The model needs to be voluntary.

It must be at the trader's discretion whether it will be used or not. A legal obligation will be opposed by UEAPME.

2) The model must be translated in all official EU languages.

If you want to reach companies all over Europe, especially SMEs, the model needs to be available in the native languages. Leaving it up to the trader to translate the model will either result in not using the model at all or in many different translations all over Europe. Both of these options would not make the purchase of online digital products across border more convenient.

3) The model needs to provide legal certainty

Companies who use the model need to be on the "safe side". Ideally the model provides icons for **all** the information requirements under the Consumer Rights Directive. As this model contains only some of the legally required information, the trader still needs to research the remaining information requirements, which means that he/she still has the same amount of work no matter if the model is used or not. The benefits of such a model would be minimal.

4) Compatible

The icons designed by the Commission need to be compatible with the current software. The icons for "internet connection" and "geographical restrictions" also need to be checked as they might be too similar, especially on smaller devices.

5) Needs to come very soon

If the model for digital products should provide a real benefit for the traders, it needs to come **very soon**. Companies, if they have not already done so, will soon start modifying their homepages to comply with the Consumer Rights Directive. If the model is already "up and running" at the time most companies change their homepages, then the likelihood of including it together with all the other changes is much higher than if the model were to come out months after the homepages have already been modified. Especially, SMEs do not have the financial means and manpower to continuously modify their homepages.

Brussels, January 2014

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¹ UEAPME subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is [55820581197-35](https://ec.europa.eu/transparency/initiative/representatives/55820581197-35).