

Omnibus on small-mid caps and paper reduction: APPLiA's proposal of a digital manuals

APPLiA, representing home appliance manufacturers in Europe, proposes digital manuals as a more sustainable and economically sound alternative to the millions of pages of paper that end up being thrown away. In light of the upcoming Omnibus proposal on small-mid caps and paper reduction, we would like to take this opportunity to share our insights on paper-based accompanying product information such as user and safety manuals and to advocate for the use of the digital by default information to reduce costs and paper waste.

User and Safety Manuals: An opportunity to reduce paper use

Under the current interpretation of EU product legislation, manufacturers are required to include printed materials, such as safety instructions and user manuals, with each product. Many of these instructions are thrown away which creates unnecessary paper waste while costing European home appliance manufacturers tens of millions of euros to produce and deliver the paper manuals. Having in mind that all the information on use and safety could be easily found online which users could access via QR code or directly on companies website. That would result in an estimate of savings for the home appliance industry in ranges between **€43,185,740** and **€170,500,000**.

Below is a summary of our findings:

Minimum Estimate:

- Average manual size: 75 pages
- Average cost per manual: €0.248
- Estimated units sold in 2024: 174,136,052
- **Estimated total cost: €43,185,740**

More Realistic Scenario (4 Languages):

- Manuals are often printed in **multiple languages** due to legal and logistical requirements (e.g., in Belgium). Assuming **4 languages**, the cost per manual rises to **€1**.
- This leads to an estimated **total cost of €170 million** for the EU market.

Top-Down Estimate Based on Industry Feedback:

- One company reported €16 million in printed material costs:
 - 60% for **Major Domestic Appliances (MDA)** = €10 million
 - 40% for **Small Domestic Appliances (SDA)** = €6 million



- With estimated market shares of **20% for MDA** and **5% for SDA**, we extrapolate an **EU-wide cost of around €170 million**, aligning with the above scenario.

Moreover, member data shows that **1 in 5 visitors** to product detail pages download digital manuals. Since **all APPLiA members already provide digital manuals**, a regulatory shift to allow **digital-only manuals and safety documentation** would unlock **full cost savings** for the industry **without compromising consumer access**.

The example above illustrates how digitalising user manuals provides significant savings for business and reduces the environmental impact of paper. As the relevant information is **already available online** the shift could be achieved with little to no additional cost for producers, as digital solutions are already in place. It would also allow policymakers to leverage existing databases and companies' websites **without the need** to develop new tools such as the DPP for this purpose. Customers would still be able to request paper based instruction on the point of sale.

We therefore propose the following amendment to allow digital information to be provided as an alternative to paper-based documentation under the Low Voltage Directive, the Radio Equipment Directive, and the General Product Safety Directive.

Specifically, the following modification could be made:

- **Low Voltage Directive 2014/35/EU**, Article 6, paragraph 7;
- **General Product Safety Directive 2001/95/EC**, Article 9, paragraph 7;
- **Radio Equipment Directive (RED) 2014/53/EU**, Article 10, paragraph 8.

*Manufacturers ~~shall ensure that (product group) is accompanied by instructions and safety information~~ shall provide a machine-readable code where the **instructions and safety information can be accessed** in a language which can be easily understood by consumers and other end-users, as determined by the Member State concerned. Such instructions and safety information, as well as any labelling, shall be clear, understandable and intelligible. **Accompanied information can be provided in a paper formation upon explicit consumer request.***

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