

From: Colum Joyce  
Digital Economy consultant  
Author : EU Commissioned studies: Consumer 2020 study : 2010 (published),

1) The draft report is refreshingly comprehensive and future scoped.

There are some suggestions I would make that may assist the final version:

A. The following elements could usefully be included:

- a. The role of **online sale of food products** and addressing the absence (today) of information related to the product characteristics, health warnings, content or other legally pre-purchase required information for physical store sale. Products online have a graphic, price, weight and other such sales related information. Label and other information is not provided.
- b. **Online label graphics and certification logos should be “served”** (dynamically generated) and have all supporting information provided if clicked upon. This ensures that monitoring of “label use” is dynamic and reportable in virtual real time.  
The associated data / support information is also usable through the use of bar codes, scans, photo recognition, QR, tags, RFID etc .
- c. **The use of Loyalty schemes** as a conduit for the transfer of environmental information to consumers. There is an opportunity for retailers to enhance the value of their loyalty schemes to provide points, information, and detailed environmental information as part of loyalty scheme communication and accounting.
- d. **Data and information** should be clearly disassociated and divorced from the channels of communication and mechanisms of presentation. It should be an open, independent entity and resource for any stakeholder or interested group to use.
- e. **The design of the information** that needs to be provided. The core design characteristics of data supplied by multiple (often competing) stakeholders are that it should be certified, compatible, comparable, calculable and open. This ensures the consumer can be provided with a “360” view of their purchases, they can be cross compared, historically reported and drive third party app and comparison capability development.
- f. **The role of formal education** is not addressed. The ability to influence the next generation of digital native consumers early in their lives will be essential. Industry sponsored reintroduction of home economics to school could be considered.
- g. The **use of change alerts** to consumers should be looked at. The ability to **appropriately and truthfully** pre inform consumers prior to shop entry of positive changes in products can be a powerful consumer influencer and a marketing upside for supply chain stakeholders.

- B. Data must as a core requirement, be open: The availability of the data sets related to labels should be available openly for third party use in developing apps and support / comparison tools for consumers.
- C. APPS are developed independently of the supplier of data, service or product. They are access and presentation mechanisms that are fundamentally different to fixed web sites. Consumer behavior is different when using apps.
- D. Consumers are rapidly moving from fixed based web site use for information to apps based information and service access. This challenges manufacturers or any supply chain stakeholders ability to ensure information or data is available to an Apps audience UNLESS the data is open and available for third party use.
- E. All certification processes must have “minimum” standards set for the channels to be serviced in order to be certified. Physical labels alone are inadequate in an increasingly online world with fragmenting channels of information access and flow.
- F. Provision of open data should be considered as a core element of certification.
- G. Certification labels and processes must be capable of cross border comparability to ensure the availability of similar and equivalent information for domestic and cross border physical and virtual consumers in the Digital single market.
- H. Data and information provided digitally must be presented in ways that ensure disabled consumers are not disadvantaged or placed in danger by being excluded.

Hope that helps

Regards

Colum Joyce  
Brussels  
Tel: 0477 215 215  
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