



# ANEC Key Messages on the Revision of the New Legislative Framework (NLF) from a consumer point of view

## Summary

ANEC supports the revision of the New Legislative Framework (NLF) to ensure it remains fit for purpose in light of digitalisation, e-commerce, and circular economy objectives. Reforms should strengthen consumer protection, market surveillance, and trust in compliance systems, while avoiding new barriers to accessibility or enforcement.

ANEC considers that a revised NLF, supported by well-designed digital compliance tools such as the Digital Product Passport (DPP), can improve consumer protection, enforcement, and trust- provided that digitalisation complements and not replaces key consumer information on paper and on the product. This approach can strengthen accessibility, transparency, and accountability rather than replace essential safeguards.

1

### Digital product compliance information & Digital Product Passports (DPP)

Digital product compliance information can bring value to consumers but it must complement – not replace – essential paper-based consumer information.

Safety warnings and instructions critical to safe use must always be provided in printed form, alongside any digital version, for all consumers.

Enforcement actions such as recalls or withdrawals, should also be immediately visible to consumers through the digital tool.



2

### Market surveillance and e-commerce

Each day, a multitude of non-compliant products enter the EU through online platforms. The NLF must address the overflow of non-compliant products entering the Single Market through e-commerce. Market surveillance and customs authorities must have full access to comprehensive and robust digital compliance information for these products.





3

### CE marking

CE marking shall be displayed through digital product compliance information and no longer physically on products or packaging.

CE marking is meant for compliance authorities rather than for consumers. Market surveillance must verify that CE-marked products genuinely comply with legal requirements.

### Circular economy and refurbished products

4



The NLF must adapt to the circular economy with appropriate definitions and provisions for conformity assessment.

Conformity assessment for refurbished products should follow a risk-based approach, based on post-refurbishment risks.

### Notified bodies and accreditation

5



Current rules for notified bodies are not robust enough. ANEC calls for stronger oversight, accountability, and competence of notified bodies across the EU.

More robust rules are needed for notified bodies, including mandatory accreditation. It is essential to strengthen the competences as well as establish mechanisms for further accountability.



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