

Labeling Policy

Policy Position

The Consumer Technology Association's (CTA) Labeling Policy advocates harmonized digital labeling practices on products for a global marketplace. CTA supports harmonized labeling initiatives and promotes **electronic labeling (e-labeling)** as the preferred method for conveying information to regulators and consumers, rather than relying on physical labels. E-labels allow manufacturers to update compliance information instantly and give consumers access to accurate, interactive, and timely data. It transforms labeling from static text into living information, supporting product transparency. E-labels can also improve accessibility for consumers with disabilities through features like text-to-speech, adjustable font sizes, and multi-language support that physical labels cannot provide.

Labels need to evolve along with products to reflect the realities of the modern world – dynamic, data-rich, and instantly updatable. E-labeling improves consumer access to critical safety and compliance information compared to static physical labeling. Canada as well as countries across Asia, Europe, and South America already allow for e-labeling. At the same time, the population is becoming more digitally literate, with consumers increasingly accustomed to accessing product information online. This digital shift, driven by trends in consumer electronics, telecommunications, and digital services, supports a more favorable environment for the adoption of digital solutions in the technology sector.

In advocating for regulation that supports technological progress, enables the flow of products across regulatory jurisdictions and reduces costs, this policy builds on CTA's leadership in the regulatory space. Our prior efforts include support for the proposed federal E-LABEL Act, spearheading the U.S. Cyber Trust Mark, and decades of advocacy for regulations that modernize how consumers get information about the products they use and rely on.

Recommendation: CTA advocates that policymakers permit e-labeling as a tool that companies can use to communicate required regulatory information. Additionally, we encourage the use of existing standards or policy frameworks as a basis for regulatory labeling to create more harmonization between jurisdictional requirements.

Benefits of E-Labeling

- **Efficiency:** Digital interfaces eliminate space constraints, allowing comprehensive safety, privacy, regulatory, and sustainability information to be provided clearly and completely. Streamlined labeling reduces manufacturing complexities and operational costs.
- **Flexibility:** Easily updatable to reflect timely changing regulations across global jurisdictions. Enables manufacturers to provide updated safety information, recall notices and other compliance updates to consumers in real-time.
- **Environmental Sustainability:** Minimizes the use of paper, ink, and plastic, reduces packaging materials, eliminates label waste, and decreases carbon footprint from manufacturing and shipping. As information is updated, legacy packaging does not need to be updated.
- **Enhanced Consumer Experience:** Enables access to detailed, interactive information via devices consumers use every day.
- **Accessibility:** Expands inclusion through multi-language support, scalable text, as well as audio and video formats. Eliminates the risk of physical degradation or loss that can make paper-based information less usable.

Digital labels may appear as digital displays, QR codes, Near Field Communication (NFC) tags, digital displays, and Digital Product Passports (DPPs).

CTA opposes state-specific physical label mandates because they complicate packaging and product design, warehousing, and distribution of goods. They may also conflict with federal or global standards and create interstate commerce issues or trade barriers. Innovation thrives on coherence, not complexity.

Harmonization

Consumer technology devices are designed, sourced, and distributed for a global marketplace across thousands of jurisdictions. Harmonization of labeling requirements in the electronics industry is important because it reduces complexity, cost, and compliance risk in a highly globalized supply chain. Fragmented or inconsistent labeling requirements can be streamlined through e-labeling requirements and alignment with international standards bodies. Harmonized labeling is critical for the economy because it:

- Reduces compliance costs and operational inefficiencies, ultimately benefiting consumers through lower product costs
- Enables clearer, more consistent communication to consumers and regulators, improving transparency and reducing confusion
- Supports smaller manufacturers by minimizing regulatory burdens
- Prevents conflicts across jurisdictions or international standards
- Promotes free trade by removing barriers for the flow of goods across borders, promoting international cooperation
- Supports innovation and faster time to market by allowing manufacturers to focus resources on product development

Trade

Digital labeling is inherently global, with products crossing multiple jurisdictions. Any mandated digital labeling requirements must align with the World Trade Organization (WTO) [Technical Barriers to Trade \(TBT\) Agreement](#), notably Article 2, to ensure that regulations do not create unnecessary obstacles to international trade. Article 2 requires technical regulations to be prepared, adopted, and applied in a manner that treats imported and domestic products equally and mandates that such regulations are not more trade restrictive than necessary to achieve legitimate policy objectives, such as consumer protection, environmental sustainability, or public health.

Consumer Readiness

The public is already using digital labels and the devices used to read them. According to CTA's [2026 US Consumer Technology Ownership and Market Potential Study](#), 97 percent of consumers own a smartphone – the most common technology adoption across U.S. households. Since 2017, every major smartphone manufacturer has embedded QR code scanning capabilities. The COVID-19 pandemic promoted widespread adoption of QR codes as a universal interface for menus, payments, and product information. With consumers ready and the technology in place, the moment has arrived to advance digital labeling policy.

Digital Product Passports

Digital Product Passports (DPPs) may represent the next evolution of transparency and accountability, serving as compliance tools and enabling companies to meet jurisdictional requirements, promote consistency, reduce duplication of effort, and improve data quality across markets. They are standardized digital records that contain detailed information about a product's materials, components, repairability, recyclability, and sustainability. A DPP should function as a streamlined, singular compliance tool that regulatory frameworks harmonize around, rather than a proliferation of jurisdiction-specific systems that increase complexity and duplication.

- They serve as “digital twins” for physical products, traveling with the product throughout its lifecycle from manufacturing to disposal or reuse.
- Each product can be assigned a unique digital identifier, often linked via a QR code or NFC tag.
- Under the [EU Ecodesign for Sustainable Products Regulation \(ESPR\)](#), they will become mandatory for a wide range of products beginning in 2027, including batteries and information and communication technology products.

Physical Labels

Physical label refers to any marking that is printed on a product or product's packaging that communicates information to consumers that is not an electronic label. Where physical labeling remains necessary, enforcement should be based on a product's date of manufacture and not its date of sale. Once a product leaves the manufacturer's facility, it typically passes through complex global supply chains involving importers, distributors, and retailers, over whom the manufacturer has limited or no control. It is common for products, especially durable goods or long-shelf-life items, to remain in distribution channels or retail inventory for months or even years. Imposing retroactive labeling mandates creates regulatory and logistical burdens while leading to waste resources and undermining operational efficiency.

Conclusion

CTA urges policymakers to adopt digital labels as the primary compliance method for regulatory labeling requirements. Digital labeling isn't a small technical upgrade – it's a paradigm shift toward a regulatory technology with superior functionality: fast, flexible and global. Harmonized e-labeling supports innovation, sustainability, and global competitiveness—core values of the consumer technology industry. With global digital transformation accelerating, it is time for our labeling systems to reflect this reality.