



Mr Heinz Zourek
Director General, Enterprise and Industry
Mr Jonathan Faull
Director General, Internal Market and Services
European Commission
1049 Brussels

Brussels, Wednesday 26 January, 2011

Dear Mr Zourek, dear Mr Faull,

Cc: DG Enterprise and Industry: Costas Andropoulos, Luis-Filipe Girao, DG Environment: Karl Falkenberg, DG Information Society and Media: Robert Madelin, John Doyle

Collective Industry response to the Communication from the European Commission on ‘Reaping the Benefits of Electronic Invoicing for Europe’, COM(2010)712 final

A large group of stakeholders from the **paper, printing and postal** industry sectors and linked industries met on 11th January 2011, in Brussels, under the umbrella of the European Mailing Industry Platform (EMIP).

This open letter to the Commission represents the views of the following industry organisations, platforms and alliances: Confederation of European Paper Industries (**CEPI**), European E-commerce and Mail Order Trade Association (**EMOTA**), Federation of Direct and Interactive Marketing (**FEDMA**), European Envelope Manufacturers’ Association (**FEPE**), International Confederation for Printing and Allied Industries (**INTERGRAF**), **Paper Chain Forum, Postal Users’ Group**, European Association of public postal operators (**PostEurop**), **PrintCity, Print Power, Two Sides**.

We support the development of digital communication and we acknowledge that there are many potential economic benefits in terms of increased competitiveness, speed and ease of access. These are to be welcomed. We assert that there are also many good **social, economic and environmental** reasons for **retaining the use of paper** in multi-channel communication and that it need not conflict with but rather **complement** the European Commission’s Digital Agenda.

Consequently, it is important to ensure **a balanced perspective** on the specific topic of electronic invoicing and not to pursue a ‘digital only’ agenda in this regard. We are afraid that the European Commission’s communication of 2nd December 2010 does not take account of a number of important aspects which would be needed for such a balanced approach, for example:

Financial benefits

The cited financial savings from reducing administrative burdens and costs to companies and businesses do not appear to take into account to what extent the transfer of these burdens and costs are transferred to the recipients.

Convenience benefits

By only advocating the e-invoicing solution there is a danger of undermining choice and reducing fair competition in the market place. As the Commission rightly states in the Communication, consumers with limited or no access to the internet must not be left behind and consumers should always be allowed to ask for a paper invoice. Choice, based on accurate and balanced information, is important for all participants conducting economic activities (businesses and consumers).

Environmental benefits

There is a growing understanding of the considerable environmental impact of electronic media. However, the Commission should not have a one-sided look on studies. There are also studies on emission savings available which show different results than those quoted in the Communication. We would appreciate a well-balanced analysis.

We urge the European Commission to:

1. *Acknowledge and recognise:*

- The economic benefits derived from the paper, printing and postal industries;
- That these industry sectors themselves are drivers of economic growth and important means of communication and business development that are vital for a healthy society (recognised in other Commission initiatives such as in the Communication on integrated industrial policy – see COM(2010) 614);
- The sustainability of the graphic chain.

2. *Research and explore:*

- The sustainability of paper and print media and the comparative environmental performance of all media channels (including electronic media);
- The social and economic value from the many jobs and livelihoods which are wholly or partly dependent on the wider paper, printing and postal industries;
- The consumer (private and business) perspective, recognising freedom of choice and preference.

3. *Meet with us:*

- To discuss the e-invoicing initiative and the development of the Digital Agenda and benefits from the perspective of the wider industry stakeholders we represent.

We thank you for taking into account our comments and would very much appreciate the opportunity to discuss these issues with you.

We look forward to hearing from you at your earliest convenience.

Sincerely yours,



Teresa Presas
Teresa Presas
Managing Director



Susanne Czech
Susanne Czech
Secretary General



Ivan Vandermeersch
Ivan Vandermeersch
Secretary General



Robert Donderwinkel
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