

Marc Tarabella
Member of the European Parliament
European Parliament
Rue Wiertz, 60
B-1047 Brussels

20 September 2012

Dear Mr. Tarabella, Member of the European Parliament,

Object: **Proposal to make e-procurement and the use of e-media mandatory**

Our associations are part of the print value chain, including paper manufacturing, printing and mail.

We welcome the development of digital communication in which our industries are also users of electronic technologies and we acknowledge that there are many potential economic benefits in terms of increased competitiveness, speed and ease of access to information. We however assert that there are also many good social, economic and environmental benefits for retaining the use of paper and print media in a multi-channel communication and that it does not conflict with but rather complements e-media.

It is therefore important to ensure a balanced perspective on the specific topic of electronic procurement.

The proposal for a directive of the European Parliament and of the Council on public procurement¹ *“provides for the mandatory transmission of notices in electronic form, the mandatory electronic availability of the procurement documents and imposes the switch to fully electronic communication, in particular e-submission, in all procurement procedures within a transition period of two years.”*

Article 19, paragraph 7, even states that *“Member States shall ensure that, at the latest two years after the date provided for in Article 92(1), all procurement procedures under this Directive are performed using electronic means of communication, in particular e-submission, in accordance with the requirements of this Article.”*

We strongly believe that there are limitations to making the use of electronic means of communication “mandatory”. ICT and electronic media may be promoted, provided that national and local authorities, companies and citizens keep the freedom to choose between both options, based on accurate and balanced information.

In our opinion, the market is the best platform to determine how to meet the individual needs of the suppliers and customers. Equal treatment, in terms of policy, taxation and promotion, between e-media and print media is therefore essential. This is particularly true for companies in the case of public procurement - as well as invoicing - for which the use of e-media should not be mandatory but by choice.

We urge the European Parliament to respect fair competition principles and support the adoption of amendment 623, and thus refrain from making the use of electronic means of communication in the area of procurement mandatory.

¹ COM(2011) 896

We thank you for your kind consideration and remain at your disposal, should you wish to further discuss this issue.

Yours sincerely,



Teresa Presas
Managing Director



Dieter Weng
President



Lisa Kretschmann
Managing Director



Beatrice Klose
Secretary General

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- Alain Deckers, Head of Unit, E-procurement and economic analysis of procurement markets, DG Internal Market and Services, EU Commission
- Jean-Yves Muylle, Head of Unit, Retail Financial Services and consumer policy, DG Internal Market and Services, EU Commission
- Michel Catinat, Head of Unit, ICT for Competitiveness and Industrial Innovation, DG Enterprise & Industry, EU Commission