

Second Joint Statement on Digital Labelling: Requests from Industry

Introduction

Following the conclusion of Phase One of the Product Labelling Regulatory Review, industry stakeholders present this second joint statement on digital labelling for consideration. This review represents a pivotal opportunity to modernise labelling in New Zealand. To ensure digital labelling delivers benefits for all, we propose five key recommendations.

Response to Digital Labelling in the Review

We thank the Ministers for engaging with industry and incorporating digital labelling into the Terms of Reference (ToR) of the Review. Digital labelling offers significant benefits for consumers and businesses trading locally and exporting products. Alignment with international standards is essential to fully realise these advantages. We are pleased to see the government wants to move towards trials of digital labelling. What follows are key requirements the Government should consider for the successful adoption of digital labelling in New Zealand.

Key Recommendations

1. Government action is needed to establish a clear regulatory framework to enable digital labelling that benefits businesses and consumers
2. We recommend the use of globally recognised digital labelling standards to provide for supply chain interoperability
3. Phase any implementation recommendations to align with the industry's global transition timeline for digital labelling
4. Align New Zealand requirements with global best practices to avoid trade barriers
5. Provide education and capability-building initiatives to support adoption

Explanation of Recommendations

- **Regulatory Enablement:** Current regulations assume paper-based labelling. Clear government action is needed to provide certainty and encourage investment.
- **Global Standards:** Digital labelling is complementary to physical labelling rather than a replacement, and digital labels must clearly link to the physical product by using the product's globally unique identification number (eg, Global Trade Item Number). Global standards for digital labels (ISO/IEC 18975:2024) must be used to ensure interoperability, accuracy, and supply chain efficiency. Failure to adopt these could lead to confusion, increased costs, and disruption for industry and consumers.
- **Phased implementation:** Industry, led by the global Consumer Goods Forum and GS1, is working towards voluntary global implementation of next generation barcodes (QR codes that 'beep' at the point-of-sale and 'scan' with consumer's cell phones to provide product information) by the end of 2027 ("Sunrise 2027"). Aligning with this timeline will ensure preparedness and consistency for those opting to implement digital labelling.
- **Trade Alignment:** Digital labelling should complement physical labels and enable products to 'talk for themselves' in consumers' hands. Decisions on physical label content must reflect global trends to avoid trade barriers.
- **Education and Support:** A structured programme for regulators and industry is essential to ensure smooth implementation and maximise benefits. The programme must include disability communities, so that the benefits of digital labelling are accessible to all.

Signatories to the second joint statement on digital labelling



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