

# Position Paper

## General Product Safety Directive – review

19.08.2020

### Feedback on roadmap

For Bitkom and its members, the safety of the products placed on the market is the top priority. Therefore the General Product Safety Directive (GPSD) has a high priority for us and we appreciate the opportunity to provide feedback on the roadmap for its revision.

Since its enforcement the GPSD has made a significant contribution to the safety of consumer products. The provisions of the GPSD are technology-neutral and cover a wide range of products, especially those that are not within the scope of an EU harmonization directive.

Therefore, the GPSD supports innovative and emerging technologies like AI, IoT, and Robotics etc. All new innovations/interrelations not in scope of specific safety regulations are already covered by the GPSD and its safety net. An explicit reference to those technologies would inhibit innovation and would require frequent revisions.

GPSD and Market Surveillance Regulation (EU) 2019/1020 together allow a coordinated and effective execution of market surveillance and recalls, including online commerce and fulfillment center questions. For the purposes of effective market surveillance and enforcement, and of simplification for economic operators, only the provisions of the Market Surveillance Regulation should apply.

Considering all these aspects Bitkom sees no need for a comprehensive revision of the GPSD and prefers the improved implementation and enforcement of the existing legal framework suggested in Option 1. Further guidance and interpretation documents would support the implementation at national and EU level, especially for SMEs.

Bitkom represents more than 2,700 companies of the digital economy, including 2,000 direct members. Through IT- and communication services alone, our members generate a domestic annual turnover of 190 billion Euros, including 50 billion Euros in exports. The members of Bitkom employ more than 2 million people in Germany. Among these members are 1,000 small and medium-sized businesses, over 500 startups and almost all global players. They offer a wide range of software technologies, IT-services, and telecommunications or internet services, produce hardware and consumer electronics, operate in the digital media sector or are in other ways affiliated with the digital economy. 80 percent of the members' headquarters are located in Germany with an additional 8 percent both in the EU and the USA, as well as 4 percent in other regions of the world. Bitkom promotes the digital transformation of the German economy, as well as of German society at large, enabling citizens to benefit from digitalisation. A strong European digital policy and a fully integrated digital single market are at the heart of Bitkom's concerns, as well as establishing Germany as a key driver of digital change in Europe and globally.

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