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'Digital by default' or 'digital only' approaches in European legislation are not neutral

The European social partners in the printing and paper sectors and their members representing companies and workers are concerned about the promotion of **digital documents and communications by default,** moving us closer to a **digital only economy**.

As the digital transition is a key priority of the European Commission, it is referenced in every piece of European Union legislation. Even though we recognise the importance of the digital transition in a broad aspect, one unfortunate consequence is that, as a result, **many examples of EU legislation include references to the elimination of printed paper products** (for instance, in the context of industrial products, medical products, and other consumer information). Recent examples include the consultation on an implementing regulation regarding electronic instructions for use of medical devices in 2021[1], the revision of the machinery directive in 2022[2], and the revision of the EU general pharmaceutical legislation in 2022[3]. The 2022-23 fitness check on EU consumer law[4] also focuses on digital fairness but fails to consider that promoting digital communications can affect existing offline rights. These examples are all underpinned by the Commission's general approach to the digital transition, most recently presented in its declaration on European digital rights and principles[5], which repeatedly **fails to address that digital is not neutral and print is indispensable for an inclusive digital transition which respects the fundamental rights of access to information to everyone**. Print also positively contributes to inclusion and education – especially of the elderly and of people without access to digital means.

Paper and print are sustainable and circular

Employers and workers in the print and paper sector have observed among policymakers the spread of a **misconception that paper and print products are polluting and/or dispensable**. This has resulted in more and more legislative texts that promote digital as the best solution (to the detriment of printed paper). Digital is repeatedly presented as a completely clean technology, without any acknowledgement of its environmental footprint. Digital has a high direct energy consumption (using data centres and cooling systems, servers, networks and terminals), and creates electronic waste which is currently considered to be one of the fastest-growing waste streams in the EU[6]. Technology allows for the efficient access of

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[1] Consultation on implementing regulation regarding electronic instructions for use of medical devices, 2022
[2] Revision of Machinery Directive and Annex, 2022
[3] Consultation on the revision of the EU general pharmaceuticals legislation, 2022
[4] Digital fairness – fitness check on EU consumer law, 2022-23
[5] Declaration on European digital rights and principles, 2022
[6] European Commission Study on return schemes for EEE, 2022 and Waste from Electrical and Electronic Equipment

documents and information, but **the use of digital technologies is not environmentally neutral**.

The implication that paper is associated with pollution does not take into consideration the strong environmental credentials of paper. **The paper and print value chain is an example of the European circular economy**. Its raw materials grow in Europe (European forests grow by 1,500 football pitches every day[7]), paper is manufactured in Europe using primarily renewable energy, and printers serve businesses and citizens throughout the 27 EU member states and beyond. Printed paper **products are based on a renewable raw material** that is collected and recycled in Europe with a (growing) recycling rate of 71.4%[8]. These credentials should not be overlooked in policymaking – doing so perpetuates misleading stereotypes and is harmful to print without being based on science.

Printed communications promote inclusion and educational outcomes

The promotion of digital technologies to the detriment of printed paper also has significant social effects and **can contribute to exclusion, including those who may already face other disadvantages** – such as older people, persons with disabilities, people on limited incomes, people experiencing poverty, and the over 34% of people in Europe without basic digital skills[9] – many of whom rely on paper-based information and are numerous across every country in Europe. It also increases disparities among Member-states. EU policymakers work on many issues to promote inclusion. Simultaneously promoting legislation that will lead to the digitalisation of documents and communications by default undermines critical aspects of this work.

Moreover, various studies have demonstrated that **reading in print benefits reading performance**. The COST Action E-READ initiative[10] proved decisively (with a meta-study of 54 experiments including more than 170,000 participants) that comprehension is stronger when reading on paper than on a screen. It also showed that people are overconfident about their ability to read digitally, leading to more skimming and less concentration. The OECD's latest research on developing literacy skills in a digital world[11] supports this, demonstrating that **young people who read more in print enjoy reading more, read more often, and perform better in reading**. The OECD even found that reading digital texts more frequently had a *negative* association with reading performance, even when accounting for socioeconomic and gender differences.

Such clear findings need to be taken into account when drafting legislation. Policymakers should always consider that **indiscriminately promoting digital over print is not neutral and may even be actively harmful in some cases**. The progressive limitation of the use of paper creates wide-ranging social and economic risks.

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[7] Two Sides, 2020
[8] EPRC, 2021
[9] Digital Economy & Society Index (DESI), 2022
[10] COST Action E-READ, 2018
[11] OECD (2021), 21st-Century Readers: Developing Literacy Skills in a Digital World, PISA, OECD Publishing, Paris

The print and paper sector produce essential products

The unquestioning endorsement of a 'digital first' or 'digital only' approach has **tangible negative effects on the printed paper industry** – its ability to generate wealth and employment, and its role in promoting democracy, education, and inclusion. **The progressive deterioration of the paper and print market promoted or facilitated by policymakers puts at risk an industry that produces many essential products, as well as being vital for the dissemination of knowledge and the free exchange of ideas**.[12] In addition, the information value chain includes printers, publishers, bookshops, and distributors (among others), which are at the base of local economies and are mostly small and medium-sized businesses. The move towards digital gives even more power to large, mostly foreign owned, companies that dominate digital markets and act as gatekeepers to the ideas and knowledge that reach the population.

Recommendations

- **We call on EU policymakers to refrain from implementing a 'digital by default' or 'digital only' approach in European legislation.**

- **Print should always be considered at the same time as digital communications.**

- **EU legislation should take into account the ecological and recyclable value of paper products in the context of the current climate change crisis.**

- **EU legislation should take everything relevant into account, including (in particular) circularity, inclusion, and freedom of choice.**

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[12] European Parliament Draft Report on the Future of the European Book Sector, 2023/2053(INI)

UNI Europa graphical & packaging represent the workers in the graphic and packaging industry.

Intergraf is the European federation representing the printing industry.

industriAll represents European industrial workers.

Cepi is the Confederation of European Paper Industries.

FEPE is the federation for envelopes and for light and ecommerce packaging.