

Public consultation - Update for units of measurement directive

Subject : Consultation on Units of Measurement

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REF: Metric Only Labeling

To Whom It May Concern:

On behalf of the American Apparel & Footwear Association (AAFA) – the national trade association of the apparel and footwear industries, and their suppliers - I am writing to comment on the Commission Staff Working Document on units of measurement (Directive 80/181/EEC) that was published on 22 December 2006. Specifically, I am writing to comment as a stakeholder in response to the question:

Should the use of supplementary indications in Article 3 in Directive 80/181/EEC be able to continue?

At the outset, let me stress that the AAFA represents numerous textile, apparel, and footwear companies with substantial European interests.

Our members produce product in Europe for sale in the EU and for export. In addition, our members produce in the United States and around the world for export to the European Union. Quite simply, our members produce, market and sell their products worldwide. In this capacity, our members employ hundreds of thousands of European workers, support millions of Euros worth of investment in Europe, and sell product to hundreds of millions of European consumers.

We strongly support the indefinite extension of the period allowing supplementary markings on products on the EU market.

Discussion

As the staff working document points out, the United States has moved inexorably toward a system that recognizes metric labeling. However, at this point, the Federal government and several states still do not recognize metric-only labeling.

Given this situation, a proposal to create a metric only labeling standard would create a new trade barrier that would harm interests on both sides of the Atlantic. At a minimum, it would create a new mandate to separately

label items destined for the US or the EU markets. The increased costs of this additional burden would be borne by European, American, or other international interests who are working to market to EU and US markets.

This situation would lead to dual carton and product labeling, dual packaging, and dual catalogs and advertisement requirements. Products would have to be market specific. Currently, labels are applied with sizing for several markets. This would mean time and money in changing formats and changing data flows to ensure the right labels were put on the product.

Moreover, this situation could lead to dual inventories if companies are making "to stock" instead of making "to order." That could result in potential excess inventory, requiring more storage space and more Stock Keeping Units (SKU)s to manage. At a time when new technologies are permitting quicker response times, reducing inventory and storage needs, this would appear to be a step backward.

EU shippers would not be able to take returns from US customers, and vice versa, unless the product was relabeled to conform to the new market.

We would note further that many American consumers are not used to the European sizing for EU made clothing and shoes. Currently, those European products can be marketed successfully in the United States by including US sizing information alongside the EU sizing information. Were new labeling standards required to show only European sizing, American consumers might be less interested in making purchases. As one customer recently told us, "Men's suits from Italy have US42/EU52. I don't want to buy a size 52 suit."

Finally, the metric only standard, which would create a de facto dual labeling requirement, would seem to contradict the efforts undertaken by the United States and the EU to seek greater harmonization in apparel and footwear labeling in the World Trade Organization (WTO).

In conclusion, while we support greater harmonization in product labeling, we do not believe this is the way to accomplish that goal. We respectfully urge the Commission to extend indefinitely the ability to include supplemental units on EU labels.

Should you require additional information, please contact me at "slamar@apparelandfootwear.org" or via phone at 703-797-9041.

Thank you for your time and attention.

Sincerely,