



Federation of the European
Sporting Goods Industry

FESI response to the *EC Call for
evidence*

Product legislation – ensuring futureproof rules (revision of the New Legislative Framework - NLF)

August 2025

Founded in 1960 FESI, the Federation of the European Sporting Goods Industry, is the unique pre-competitive platform representing the interests of the sporting goods industry in Europe, advancing its members' priorities and promoting initiatives that benefit the sector, EU citizens and the society as a whole. FESI represents the interests of approximately 1.800 sporting goods manufacturers (85% of the European market) through its National Sporting Goods Industry Federations and its directly affiliated member companies. 70-75% of FESI's membership is made up of Small and Medium Sized Enterprises. In total, the European Sporting Goods Industry employs over 700.000 EU citizens and has an annual turnover of some 81 billion euros.

The Federation of the European Sporting Goods Industry (FESI) strongly welcomes the revision of the New Legislative Framework (NLF) as an opportunity to align product legislation with the EU's digital and circular transitions, reduce unnecessary regulatory burden, and improve coherence across multiple product laws. FESI's key priorities in this process are to recognise digital provision of information as fully viable alternative to physical formats, to set up a single digital entry point per product, and to harmonise requirements across the acquis for a simpler and more effective system.

(a) Digital by default

Digital-by-default provision of product information should be embedded in the NLF. Instructions, Declarations of Conformity, manufacturer identity, product composition and (ecodesign) requirements, and other non-essential safety information should be allowed in durable digital formats, provided accessibility and durability are ensured. Physical provision should be reserved in principle only for information strictly necessary for immediate user safety.

(b) technology-neutral entry point

A single, technology-neutral entry point per product should be mandated to avoid multiple QR codes or portals under different laws. Where a Digital Product Passport (DPP) exists, it should serve as this access point. This would ensure interoperability, reduce duplication, and make information easier to access for consumers, authorities, and supply chain actors.

(c) Clear allocation of obligation under EU Laws

Clear allocation of obligations across EU laws is essential. The NLF should set common rules for how information is presented and accessed, while leaving sustainability and circularity product requirements to the Ecodesign for Sustainable Product Regulation (ESPR), substantiation of claims and labels to Green Claims Directive (GCD) chemical risk management to REACH, and product safety to the General Product Safety Regulation (GPSR). This approach will prevent duplication and inconsistencies in sectoral laws such as the Textile Labelling Regulation (TLR).

(d) Harmonised symbols and language requirements

Language and symbol requirements should be harmonised at EU level to avoid fragmented national demands that create extra cost and complexity. Symbols or codes should remain voluntary, with explanations available digitally. This will enable shorter physical labels and better use of space for safety-critical content.

(e) Modernised conformity assessment

Conformity assessment should be modernised through risk-based routes, re-usable modular documentation so that unchanged technical file components do not need to be re-submitted, and digital-by-default submissions to notified bodies. Oversight of notified bodies should be strengthened with clear performance metrics (such as turnaround times, consistency of interpretations, and digital processing rates) to ensure quality, speed, and cost-efficiency, which is critical for sectors like sporting goods with seasonal product cycles.

(f) Harmonised Standards

Harmonised standards play a critical role in ensuring presumption of conformity and supporting a coherent product legislation framework. The NLF should provide for a faster and more predictable citation process in the Official Journal, with clear timelines, adequate resources for standardisation work, and timely assessments by HAS consultants. Stronger coordination with CEN/CENELEC and alignment with international standards should be promoted to avoid duplication and delays. A pragmatic transition regime should allow manufacturers to rely on the latest editions without legal uncertainty.

(g) Market surveillance adapted to digitalisation and circularity

Market surveillance must be adapted to the digital and circular economy. Authorities should have secure access to compliance evidence via the product's single-entry point/DPP, enabling faster and more consistent enforcement across Member States. The NLF should also clarify obligations and liability for refurbishers and remanufacturers to ensure safe reuse without creating disproportionate re-certification burdens.

(h) Workable for SMEs

Implementation must be SME-friendly. The transition to digital information should be supported by standardised data templates, and phased timelines that avoid any period where both paper and digital formats are required in parallel. Any remaining physical-only obligations should be subject to review and sunset unless justified by evidence.

(i) Conclusion

By adopting these measures through a targeted legislative revision of the NLF, the EU can strengthen digital integration, modernise conformity assessment, align definitions, and improve the functioning and oversight of notified bodies. Together, these steps would significantly reduce administrative burdens, cut environmental impact, improve consumer access to information throughout a product's life, and enhance enforcement effectiveness - all while maintaining high safety and compliance standards and ensuring a coherent, future-proof product legislation framework.

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