

CECIP Position on Revising NAWID Annex I No. 14: Indications, Printing, and Electronic Recording

CECIP strongly supports revising NAWID Annex I No. 14 to explicitly allow electronic receipts in a standardized format, with printed receipts available upon customer request. This change reflects digitalization trends, reduces resource consumption, aligns with EU sustainability goals, and harmonizes practices across member states. The fact that BMW E initiated this discussion, supported by other member states, demonstrates that the current wording leads to problematic interpretations—another clear indicator that a revision of the NAWID is necessary.

10th December 2025

Context

Annex I of Directive 2014/31/EU (NAWID) sets essential requirements for measuring instruments, including price-computing instruments.

Currently, No. 14 (4th paragraph) states:

“Price-computing instruments may perform functions other than per-article weighing and price computation only if all indications related to all transactions are printed clearly and unambiguously and are conveniently arranged on a ticket or label for the customer.”

This wording reflects traditional practices but does not fully align with digitalization trends or sustainability objectives. Divergent interpretations—particularly regarding electronic receipts—have led to legal uncertainty and even litigation in some member states (e.g., Germany). CECIP believes this is a strong indicator that a revision is required to ensure clarity, harmonization, and future-proof regulation.

Comparison Table

Version	Text
Original (NAWID Annex I No. 14, 4th para)	<i>Price-computing instruments may perform functions other than per-article weighing and price computation only if all indications related to all transactions are printed clearly and unambiguously and are conveniently arranged on a ticket or label for the customer.</i>
BMWE Proposal	<i>Price-computing instruments may perform functions other than per-article weighing and price computation only if all indications related</i>

Version	Text
	<i>to all transactions are printed clearly and unambiguously and are conveniently arranged on a ticket or label for the customer or on the customer's request be made available electronically in a standardized data format. National legislation may require a printed ticket for fiscal reasons.</i>
CECIP Proposal	<i>Price-computing instruments may perform functions other than per-article weighing and price computation only if all indications related to all transactions are made available to the customer clearly and unambiguously, either electronically in a standardized data format or on the customer's request printed on a ticket or label.</i>

Rationale

- Digitalization and Customer Convenience
Allowing electronic availability supports modern retail practices and consumer expectations for digital receipts and data access.
- Resource Efficiency and Circularity
Reducing unnecessary paper consumption contributes to EU Green Deal objectives, lowers environmental impact, and supports circular economy principles. Paper tickets should only be printed upon customer request.
- Interoperability and Harmonization
A standardized electronic format at EU level ensures compatibility across member states, prevents fragmentation, and facilitates integration with fiscal and retail systems.

Benefits

- Regulatory Clarity: Harmonized approach avoids national divergences and supports the Single Market.
- Legal Certainty
Clear rules reduce litigation risk and ensure consistent enforcement across the EU.
- Environmental Impact: Less paper waste, reduced resource consumption, and alignment with sustainability targets.
- Economic Efficiency: Lower operational costs for businesses and improved customer experience.