

Contract Number 235542

## **RACE networkRFID**

FP7 Thematic Network  
ICT-PSP: a European concerted effort on RFID

### **D5.1.3.1 - Call for ideas - or - D5.1.3.2 - Compilation of existing signs and their conditions of use**

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<b>Dissemination Level</b>		
<b>PU</b>	Public	<b>PU</b>
<b>PP</b>	Restricted to other programme participants (including the Commission Services)	
<b>RE</b>	Restricted to a group specified by the consortium (including the Commission Services)	
<b>CO</b>	Confidential, only for members of the consortium (including the Commission Services)	

# TABLE of CONTENTS

<i>Introduction</i>	3
<i>Progress</i>	4
<i>Deliverables</i>	5
1. <i>Introduction</i>	5
2. <i>Work Package 5 - D5.3.1 &amp; 2 Process</i>	7
3. <i>Key Terminology</i>	7
4. <i>Clarification of the Recommendation - Reader operators</i>	8
5. <i>Clarification of the Recommendation - RFID Tagged Products in Retail</i>	14
6. <i>WP5 Recommendation</i>	20
<i>Planned Activities to M36</i>	21

## Introduction

The common European (RFID) sign as identified in the RFID Recommendation, 2009 is expected to play a significant role in building public confidence in RFID through raising awareness of the presence of RFID. The RFID Recommendation provides clear general guidance as to what needs to be implemented and, where.

WP5 delivered a valued report entitled D5.1.2 – Requirements for RFID Sign on the 28<sup>th</sup> February 2010. This was a summary of WP5 discussion about existing emblems, logos and signs associated with RFID and what was required in general terms to fulfil the objective of public notification through different approaches including the use of a common European sign.

WP5 under D5.1.3.1 and 2 has focused upon detailing general voluntary rules for how the common European sign should be used. This contribution supports the EC's initiative to develop a guidelines for use document allowing those not involved in the Recommendation process to have a reasonably detailed reference as to how they may implement the common European sign efficiently.

<b>Deliverable number: D5.2.1</b>							
<b>Deliverable title: Stakeholder meeting “awareness initiatives”</b>							
Dissemination level (i): C				Nature of the Deliverable (ii): E			
Month of Delivery: M24							
Participant no. contributing to the deliverable	6	2	4	5	7	8	9
Participant short name	IF RFID	GS1	FILRFID/ CNRfid	ETSI	IBERLOG	AIM	AIDC
Participant no. contributing to the deliverable	11	12	13	18	25	21	22
Participant short name	ELTRUN- AUEB	RFID SEC	ISMB	VTT	INTER NET	SINTEF	RFID NORDIC
Deliverable description and objectives to be achieved (iii): Facilitate stakeholder exchange about existing awareness initiatives and necessary elements of a public campaign on RFID. A short report presenting the main outcomes of the meeting will be produced.							
Role of the different participants in the production of the deliverable (iv): Organisations that have conducted public campaigns such as e.g. RFID Platform Nederland are expected to share their experiences.							

## Progress

There are two factors which have influenced progress with these two interconnected deliverables. Firstly and above all the process of deciding upon the voluntary guidelines for use, the scope of this activity and the organization has taken until the end of December 2010 to clarify with the key stakeholders, notably the EC themselves. In order to align objectives it was considered potentially counter-productive to start the WP5 activity before this clarity was achieved.

Another small contributing factor to the delay to these two deliverables has been the change-over of WP5 leadership from Informationsforum RFID to AVANTA Global SPRL. The change of leadership was agreed at the Stockholm MB and announced at the Stockholm GA meetings on the 20<sup>th</sup> and 21<sup>st</sup> October respectively. Informationsforum RFID and WP5 leader Andrea Huber left Informationsforum RFID at the end of August 2010. Andrea informed RACE MB that Informationsforum RFID would be merged within the GS1 Germany organization by the end of December 2010 and cease to operate. It was therefore essential to WP5 to seek a new leader.

On the 30<sup>th</sup> September 2010 WP5 supported the common European sign meeting and presented the efforts made during early September to prepare three WP5 initiatives to support the common European sign. The three initiatives were:

1. An industrial design study
2. A code of conduct
3. A consumer survey

WP5 went on to propose a detailed draft contract in support of action 1) which include terms offering the transfer of artistic and IP rights to the EC in order that free access to the future sign could be assured. Further WP5 established dialogue with WP5 members, ERRT and CEN with respect to a code of conduct, concluding with a recommendation that a voluntary guideline for use may be better suited to fulfilling the objective. Lastly WP5 members invested considerable effort in preparing a consumer survey in several European countries. Continued dialogue between WP5, the EC and, other stakeholders continued through until the end of December 2010.

During January and February 2011 WP5 focused efforts upon supporting the EC's efforts to develop a voluntary guideline for use document. This involved creating and conducting an on-line survey amongst WP5 members to better understand how RACE stakeholders interpreted the wording of the Recommendation when considering practical implementation. The on-line survey was conducted between the XX and YY. A WP5 conference call to review results was held on the ZZ. All the resulting feedback was document in a document named DDDD which was issued to WP5 for review and final comment on the VVV. During this period WP5 reached out to gain stakeholder feedback from major European retailers and from the consumer interest group ANEC.

## Deliverables

The following document draft is being reviewed by RACE WP5 for finalizing by the end of March 2011.

### **1. Introduction**

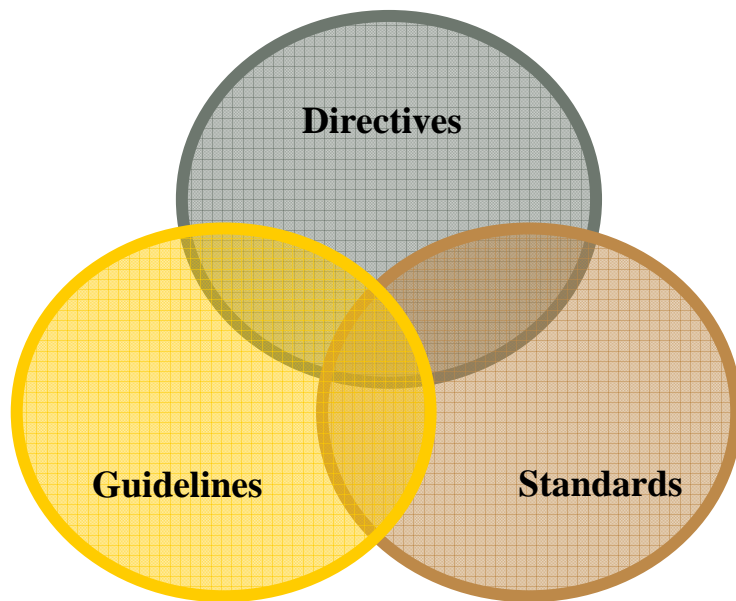
The European Commission has through stakeholder input determined that in the best interest of European citizens and also operators of RFID applications within European Member States that there must be a common European RFID sign displayed at locations which provide the public notification and transparency. The European Commission's RFID Recommendation clearly states the broad requirements for such a sign and the instances when the sign must be displayed.

The wording of the Recommendation references to the common European sign provides an excellent foundation. Nevertheless the breadth of possibly interpretations of the Recommendation wording may impede the adoption of the common European sign and, also RFID applications by many of those organizations who have not been part of the Recommendation's development process and perhaps lack clarity in their understanding. There exists a European Commission supported initiative to develop *voluntary guidelines for use*. Consistent with RACE networkRFID WP5's earlier deliverables in support of the Recommendation common European sign, WP5 through this document provides a foundation to the voluntary guideline for use document.

The guidelines for use initiative provides an important input to future common European sign standardization activities. The guidelines for use initiative can differentiate elements which may be introduced into future standards from those which must rest as voluntary recommended general best practices, at least for the foreseeable future.

It is acknowledged that individual organizations or, groups of organizations such as trade associations, etc. may develop their own guidelines. The European Commission supported initiative to create a common European sign guidelines for use document aims to assist such future initiatives.

Work Package 5 members are a valued stakeholder group contributing to the Recommendation and specifically the common European sign.



**Figure 1 Venn Diagram indicating general relationship between directives, standards and guidelines**

**Guidelines – voluntary and developed to aid accessibility and implementation**

Standards – voluntary unless referenced by Law

Directives – Law enforced mandatory requirements often referencing standards

## 2. Work Package 5 - D5.3.1 & 2 Process



**Figure 2 Process Overview**

The WP5 survey and WP5 conference call review were completed during early February 2011. The D5.3.1 & 2 „Guidelines for Use“ report will be issued at the end of March 2011. The report will contribute to the following initiatives:

- The European Commission – Guideline for Use document
- The common European sign – standardization project
- The common European sign – consumer survey (tbc)

The Recommendation is addressed to all RFID application operators with specific requirements for the sub-section or RFID operators who embed or add RFID tags to retail products. Due to the breadth of different RFID applications it is challenging to define a guidelines for use document. WP5 through this document assists the process of developing a guidelines for use document by working towards a consensus position as to how in practice the Recommendation common European sign requirements can be fulfilled efficiently considering the interests of stakeholders.

## 3. Key Terminology

Ref.	Term	Meaning	Reference	Comment
1	Article 211	1.3.8. The Commission LEGAL BASIS Articles 211 to 219 TEC.	1.1.4 Current prospectives for the European Union: the Treaty of Nice and Convention on the future of Europe I. TREATY OF NICE The Treaty was signed on 26 February 2001 and entered into force on 1 February 2003.	
2	Common	Prevailing, widespread, regular	Collins Concise English Dictionary, 2 <sup>nd</sup> Edition, 1988	
3	European	A person or attribute of the continent of Europe	Wikipedia	Use of the word European within the RFID Recommendation refers to all member states of the European Union.
4	Emblem	A visible object or representation that symbolizes a quality, type, group, etc.	Collins Concise English Dictionary, 2 <sup>nd</sup> Edition, 1988	
5	European Commission Recommendation	A recommendation in the European Union, according to Article 288 of the Treaty on European Union (formerly Article 249 TEC), is one of two kinds of non-binding acts cited in the Treaty of Rome.  Recommendations are without legal force but are negotiated and voted on according to the appropriate procedure. Recommendations differ from regulations, directives and	Wikipedia <a href="http://en.wikipedia.org/wiki/Recommendation_of_the_European_Union">http://en.wikipedia.org/wiki/Recommendation_of_the_European_Union</a>	

Ref.	Term	Meaning	Reference	Comment
		decisions, in that they are not binding for Member States. Though without legal force, they do have a political weight. The Recommendation is an instrument of indirect action aiming at preparation of legislation in Member States, differing from the Directive only by the absence of obligatory power.		
6	ISO/IEC	<p>ISO (International Organization for Standardization) is the world's largest developer and publisher of International Standards.</p> <p>ISO is a network of the national standards institutes of 159 countries, one member per country, with a Central Secretariat in Geneva, Switzerland, that coordinates the system.</p> <p>ISO is a non-governmental organization that forms a bridge between the public and private sectors.</p>	<p>ISO/IEC Web site:  <a href="http://www.iso.org/iso/about.htm">http://www.iso.org/iso/about.htm</a></p>	
7	ISO/IEC RFID Emblem	<p>ISO/IEC 29160:2010 specifies the design and use of the RFID Emblem: an easily identified visual guide that indicates the presence of radio frequency identification (RFID). It does not address location of the RFID Emblem on a label. Specific placement requirements are left to application standards developers.</p> <p>It also specifies an RFID Index, which can be included in the RFID Emblem and which addresses the complication added by the wide range of RFID tags (frequency, protocol and data structure). The RFID Index is a two-character code that provides specific information about compliant tags and interrogators. Successful reading of RFID tags requires knowledge of the frequency, protocol and data structure information provided by the RFID Index.</p>	<p>ISO/IEC 29160  <a href="http://www.iso.org/iso/iso_catalogue/catalogue_tc/catalogue_detail.htm?csnumber=45239">http://www.iso.org/iso/iso_catalogue/catalogue_tc/catalogue_detail.htm?csnumber=45239</a></p>	Standard yet to be published as at 02/2011.
8	Notification	The act of notifying (to make known, announce). Formal announcement. Something that notifies; a notice.	Collins Concise English Dictionary, 2 <sup>nd</sup> Edition, 1988	
9	Sign	A board, placard, etc., displayed in public and intended to inform, warn, etc.	Collins Concise English Dictionary, 2 <sup>nd</sup> Edition, 1988	

#### ***4. Clarification of the Recommendation – Reader operators***

The RFID Recommendation, page 7 states:

"8. Member States should ensure that operators take steps to inform individuals of the presence of readers on the basis of a common European sign, developed by European Standardisation Organisations, with the support of concerned stakeholders. The sign should include the identity of the operator and a point of contact for individuals to obtain the information policy for the application."



4.1. In general terms where should common European signs be placed to notify the public as to the presence of RFID readers?

4.1.1. At Entrances to locations where there are RFID readers installed beyond the entrance threshold e.g. facilities, bordered open areas, etc.?

Ref:	Discussion Point	Additional info.	Comment
4.1.1.1	Market stalls may have no entrances.	The objective is to inform the public about the presence of RFID readers as early as reasonably possible.	Market stalls and other locations which do not have an entrance would be advised to place a common European sign or signs so that customers approaching the unbounded area can be notified of the presence of RFID readers e.g. market stall on curtain wall behind stall or, on post(s) supporting material roof, etc.. Suggest adding this as another recommendation.  It is understood that scenarios will be provided in the guidelines for use document in order to illustrate the general recommendations.
4.1.1.2	Signs should be close to RFID readers.	This is similar to 4.1.2 below but not the same.  This is an appropriate comment for RFID readers based upon HF or, possibly LF as their magnetic field component restricts the distance over which passive tags can be read. However UHF RFID readers can read energized passive UHF tags over long distances. The latest UHF reader systems use exciters to energize UHF RFID tags and have separate RFID readers located centrally, covering wide areas.	Placing signs close to readers may not provide the public adequate advanced notification before they find that their in a zone where UHF RFID tags they are carrying can or, are being read. As it is challenging and sometimes impossible to accurately definitively establish the limits of the zone of UHF RFID tag reading it is preferred to adopt the precautionary principle by placing the common European sign so as it notifies the public as early as practically possible i.e. at the entrance.
4.1.1.3	Should not be an "alarm" message, but a statement similar to the various "WIFI-ZONE", which are located in airports, libraries, hotels, etc		The design appearance of the common European sign is the focus of a standardization initiative.
4.1.1.4	As the Recommendation states, standardization efforts are only needed for the development of the common sign. Guidelines should be very flexible. For example, there is no need to inform customers walking through the door of a retail store that RFID readers they will never see are in the back room.		The guideline for use is voluntary and is therefore very flexible.  Where UHF RFID readers are placed does not necessarily indicate the immediate area they can read tags. Not seeing a UHF RFID reader in no way indicates that tags you can see are not being read. The instability of UHF fields to changes in the local environment makes this challenge greater still.

*The feedback shows majority support for use of the common European sign at entrance locations, although a few disagree. This placement has been recommended by a number of organizations which have studied RFID signs.*

4.1.2. Where public interface with and/or use RFID applications and/or RFID readers?

Ref:	Discussion Point	Additional info.	Comment
RACE network	RFID	- 9 -	D5.1.3 (M18)

4.1.2.1	As the Recommendation states, standardization efforts are only needed for the development of the common sign. EPCglobal Guidelines state that notice should be given of the presence of EPC (RFID) technology, therefore we agree with the above. But this is not a topic for standardization because the placement and manner in which retailers communicate this information to their customers should be at the discretion of the retailer. A Chanel boutique does not manage signage the same way that a big box retailer does.		Correct. This is a voluntary guideline for use and therefore it is to encourage good practice by those who have not been involved in the Recommendation nor, the development of the common European sign.
4.1.2.2			

*There has been universally support for use of the common European sign at such locations.*

#### 4.1.3. Websites of RFID operators?

Ref:	Discussion Point	Additional info.	Comment
4.1.3.1	Do Web site operators need to be informed?		The objective was to encourage RFID reader operators to consider placing public information about their RFID application(s) on their Web sites and, where there is such information that they use the common European sign. Use of the common European sign on the public pages of operator Web sites would assist the public link with uses of the common European sign in the 'real' world.
4.1.3.2	Online information campaigns would be ideal for answering all privacy-related questions of the general public and consumers.		
4.1.3.3	That is not requested by the Recommendation.		Correct. This is a voluntary guideline for use and therefore it is to encourage good practice by those who have not been involved in the Recommendation nor, the development of the common European sign.
4.1.3.4	Only if consumers are involved in the technology. For example, a grocer only using the RFID technology in its back room would have no reason to put this information on its website.		No need is correct as this supports a voluntary guideline for use. However it may still be more efficient for the grocer to put information on Web site than to have staff attempt to answer questions about the RFID application.
4.1.3.5			

*There has been some confusion over the use of the common European sign on Web sites due misunderstandings about who is the operator. It is not the operator of the Web site but the RFID reader application operator who is recommended to consider use of the common European sign on their Web site. Nevertheless misunderstanding aside there is widespread support for the use of Web sites to inform the public about RFID and, for the use of the common European sign on such Web site public pages.*

#### 4.1.4. Somewhere else?

Ref:	Discussion Point	Additional info.	Comment
RACE networkRFID			D5.1.3 (M18)

4.1.3.1	That is not necessary.		
4.1.3.2	Again, this is not a topic for standardization. This is another example of why Guidelines work better than standards to address notice. We think commitment to notice is more important than prescriptive standards. For example, a flea market operator may need to hand a sign on a tree to provide notice to meet the EPCglobal Guidelines and we would not want him to withhold notice because trees are not addressed in the standard.		There are advantages from creating a voluntary guideline for use ahead of the standard as it defines the expectation as to which elements require flexibility and, provides an opportunity to justify the need for this flexibility.  EPCglobal Guidelines are associated with a commercial logo which is not freely available and, is associated with compliance with EPCglobal privacy requirements. It should not be confused with the common European sign which is focused upon public notification of the presence of RFID as described in the Recommendation.

*There has been widespread support **NOT** to include Other locations in guidelines for use.*

4.2. Further where **optionally** would it make sense to recommend that the common European sign be used?

4.2.1. At locations where there are no RFID readers nor, RFID tagged retail products in order for the occupier to be able to notify the public of how to access an explanation of the occupier's "no RFID" policy/approach?

Ref:	Discussion Point	Additional info.	Comment
4.2.1.1	That would potentially trigger a "no RFID" vs. "RFID" policy dispute between involved retailers.		Understood and agreed.
4.2.1.2			

*There has been widespread support **NOT** to include recommendation of such an option, recognizing that today there is no way to prevent such use.*

4.2.2. At Location Exits where there are or, may be RFID tagged items which the public could be expected to leave the location with? [As a reminder for those who did not see the sign at the Entrance]

Ref:	Discussion Point	Additional info.	Comment
4.2.2.1	Not necessary, if the sign is at the readers only.		Where UHF RFID readers are placed does not necessarily indicate the immediate area they can read tags. Not seeing a UHF RFID reader in no way indicates that tags you can see are not being read. The instability of UHF fields to changes in the local environment makes this challenge greater still.
4.2.2.2			

*There has been widespread but not universal support **NOT** to include recommendation of such an option, recognizing that today there is no way to prevent such use.*

4.2.3. On Websites, in catalogues, etc. of organizations which distribute RFID tagged items? [Providing public an informed choice before receiving the RFID tagged item(s)]

Ref:	Discussion Point	Additional info.	Comment
4.2.3.1	That might help for a more recognizable policy sign, like a "branded" sign.		
4.2.3.2	It should be the choice of the suppliers, if they use the RFID sign or not.		This process is supporting a voluntary guideline for use and thus provides choice and flexibility.
4.2.3.3	For information purposes.		

*There has been mixed support to include recommendation of such an option but without clarity as to the reasons why it would not be recommended. This question suggests that e-tailers, logistics and other organizations fulfil the obligation of an operator when they are not operators would be a valid argument against including this option. Nevertheless the public may feel reassured by being notified of the presence of RFID tags before they receive the RFID tagged products through the Post or via another distribution provider.*

4.2.4. On Websites, in presentations and, other public accessible communications which reference RFID applications, RFID technology, the RFID Recommendation, etc..?

Ref:	Discussion Point	Additional info.	Comment
4.2.4.1			
4.2.4.2			

*There has been widespread support for use of the common European sign in such circumstances.*

4.3. Further in general terms where should common European signs **not** be placed in order to neither over notify nor, alarming the public due to the presence of RFID readers?

4.3.1. **NOT** on other signs nor, information displays which are **not** related to RFID? [To avoid wrong notification and, incorrect associations]

Ref:	Discussion Point	Additional info.	Comment
4.3.1.1	Too many signs will simply not get read.	This comment was associated with a disagreeing with the statement.	Clearly the statement supports the idea that the common European sign should NOT be used on non-RFID signs.
4.3.1.2			

*There has been widespread support for recommending that use of the common European sign at such locations is **AVOIDED**.*

4.3.2. **NOT** on safety/hazard signs which could create a false association or, detract from the safety/hazard warning, **UNLESS** RFID forms a part of the safety information display or, system?

Ref:	Discussion Point	Additional info.	Comment
4.3.2.1	Strongly agree. False association to potential hazards should be avoided even subconsciously.		The primary intent was not to distract the public from the priority message related to the safety/hazard sign.

			However a secondary objective was to contribute to satisfying the motivation behind this discussion point.
4.3.2.2			

*There has been widespread support for recommending that use of the common European sign at such locations is **AVOIDED**.*

4.3.3. **NOT** in areas beyond the location Entrance(s)/Exit(s), **UNLESS** on a sign or information display associated with an RFID application(s) or RFID reader system(s)?

Ref:	Discussion Point	Additional info.	Comment
4.3.3.1			
4.3.3.2			

*There has been widespread support for recommending that use of the common European sign at such locations is **AVOIDED**.*

4.4. Further to question who in your opinion are the concerned stakeholders who should support operators responsible for RFID readers? And please provide examples of how stakeholders should support operators?

4.4.1. Government organizations?

Ref:	Discussion Point	Additional info.	Comment
4.4.1.1	Support by raising awareness for the way RFID works, the benefits of the technology, the sign and privacy protection.		
4.4.1.2	They can raise awareness as a public organization, increasing the confidence of the community in the industry reports (regarding safety, potential radiation hazards and mainly privacy).		
4.4.1.3	Governmental organizations are RFID operators, when they operate RFID passports, ID cards etc.		
4.4.1.4	Possible contributions of governmental organizations: - Economic contributions supporting investment (eg: tax breaks) - New laws and amendments (eg: any new retail /shop/whatever needs to be RFID-compliant).		Economic support to assist and encourage the deployment of the common European sign or, related to support RFID adoption? A guideline for use cannot reference the later.
4.4.1.5	We are not certain what is meant with "support". If support means informing consumers about the benefits of RFID technology, privacy protection, and the signification of the sign, we agree.		Further clarity on the meaning of the word "support" within the Recommendation is being sought.

*Generally active support by Government organizations is encouraged.*

4.4.2. Public interest groups?

Ref:	Discussion Point	Additional info.	Comment
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4.4.2.1	We are not certain what is meant with "support". If support means informing consumers about the benefits of RFID technology, privacy protection, and the signification of the sign, we agree.		Further clarity on the mean-ing of the word "support" within the Recommendation is being sought.
4.2.2.2			

*Overall there has been neutral support for encouraging public interest groups to support operators, recognizing that there were as many agreeing as disagreeing.*

#### 4.4.3. RFID application developers?

Ref:	Discussion Point	Additional info.	Comment
4.4.3.1	I think the opposite is true, services developers must be supported by providers of reader.		
4.4.3.2	They may need to support operators in providing notice.		

*Generally active support by RFID application developers is encouraged.*

#### 4.4.4. RFID technology providers?

Ref:	Discussion Point	Additional info.	Comment
4.4.4.1	They may need to support operators in providing notice.		
4.4.4.2			

*There has been widespread support for encouraging RFID technology providers to assist operators.*

#### 4.4.5. Others?

Ref:	Discussion Point	Additional info.	Comment
4.4.5.1	RFID operating body		Operators are stakeholders for sure. Clarity around this discussion point is requested. Does it infer that operators should help each other?
4.4.5.2			

*Generally there has been neutral with a tendency toward negative support that other stakeholders should assist RFID operators.*

## **5. Clarification of the Recommendation – RFID Tagged Products in Retail**

In the RFID Recommendation on page 7: *RFID applications used in the retail trade:*

"9. On the basis of a common European sign, developed by European Standardisation Organisations, with the support of concerned stakeholders, operators should inform individuals of the presence of tags that are placed on or embedded in products."

Wikipedia refers to products as things produced and offered to market, including goods and services.

- 5.1. What do you believe constitutes a retail product?
  - 5.1.1. Only the direct retail product that the consumer will use?

Ref:	Discussion Point	Additional info.	Comment
5.1.1.1	In my opinion this is the easiest way. The association between RFID and product must be made at source.		
5.1.1.2			

*Divergent views with the majority rejecting or opposing this description of retail products.*

- 5.1.2. The retail product **and** its retail product packaging?

Ref:	Discussion Point	Additional info.	Comment
5.1.2.1	It depends on the product.		
5.1.2.2			

*The most popularly supported description of retail products.*

- 5.1.3. The retail product **or** its retail product packaging?

Ref:	Discussion Point	Additional info.	Comment
5.1.3.1	It depends on the product.		
5.1.3.2			

*The least popularly supported description of retail products.*

- 5.1.4. That retail product packaging being all packaging presented to the consumer, whether containing the individual item or group of items?

Ref:	Discussion Point	Additional info.	Comment
5.1.4.1	For privacy-related matters, a "retail product" is everything that the consumer carries in-hand when walking out of the retail store.		
5.1.4.2			

*This is a largely supported description of retail products, marginally ahead of 5.1.2 above.*

- 5.2. Further retail covers a broad range of interfaces with the public from e-tailers, self-service, department stores, super markets, etc.. How can operators use the common European sign to meet their obligations to notify of RFID tags embedded in or attached to retail products?

Applying the common European sign:

5.2.1. Directly upon retail products with RFID tags embedded or attached?

Ref:	Discussion Point	Additional info.	Comment
5.2.1.1	That would help informing the consumer, but would be a huge burden and cost overhead in the RFID adoption process.		
5.2.1.2			

*There are divergent views with a slim majority rejecting or opposing use of the common European sign directly upon RFID attached or embedded retail products.*

5.2.2. On the retail product packaging indicating that the product it contains has an RFID tag?

Ref:	Discussion Point	Additional info.	Comment
5.2.2.1	I think this is optional.		
5.2.2.2			

*There are divergent views with a slim majority supporting use of the common European sign on product packaging.*

5.2.3. On the retail product packaging if the retail product packaging has an RFID tag embedded or attached?

Ref:	Discussion Point	Additional info.	Comment
5.2.3.1	I think this is optional.		
5.2.3.2			

*There are divergent views with a slim majority rejecting or opposing use of the common European sign directly upon RFID attached or embedded retail products.*

5.2.4. Directly upon the retail product if it has an RFID tag embedded or attached, or on the retail product packaging if it has an RFID tag embedded or attached and, repeated on all outer layers of packaging beyond the RFID tag which may be presented to consumers? [Providing notification to consumers whether they purchase one retail product or, several products consolidated within outer packaging]

Ref:	Discussion Point	Additional info.	Comment
5.2.4.1	Overkill.		
5.2.4.2	I think this is optional.		

*There has been generally widespread support **NOT** to recommend use of the common European sign on so many layers of product packaging.*

5.2.5. On the sales presentation infrastructure e.g. shelf, Website (e-tailer), automate self-service cabinet, etc. which is associated with distributing the RFID tagged retail product or, the RFID tagged retail product packaging?



Ref:	Discussion Point	Additional info.	Comment
5.2.5.1	Possibly could be misinterpreted if good improperly treated.		
5.2.5.2	Notice is important but must be as flexible as possible to be meaningful.		

*There has been generally widespread support **NOT** to recommend use of the common European sign on sales presentation infrastructure.*

#### 5.2.6. Other?

Ref:	Discussion Point	Additional info.	Comment
5.2.6.1			
5.2.6.2			

*There has been generally widespread support **NOT** to recommend use of the common European sign elsewhere.*

### 5.3. Further who in your opinion are the operators?

#### 5.3.1. Product manufacturers of retail goods which add RFID tags to their retail products?

Ref:	Discussion Point	Additional info.	Comment
5.3.1.1	In an efficient logistical system RFID is being used at all stages along the supply chain. In this case the initial operator hence is the producer, followed by several other operators.		
5.3.1.2			

*There has been generally widespread almost unanimous support for this approach.*

#### 5.3.2. Packaging suppliers which provide RFID tagged retail product packaging?

Ref:	Discussion Point	Additional info.	Comment
5.3.2.1	Packaging suppliers may not know anything about the characteristics of the product and so about information to write into the tag.		
5.3.2.2			

*There has been generally widespread support for this approach.*

#### 5.3.3. Logistics e.g. 3PLs which add RFID tags to retail products or their retail product packaging?

Ref:	Discussion Point	Additional info.	Comment
5.3.3.1			
5.3.3.2			

*There has been generally widespread support for this approach, with a minority opposing.*

5.3.4. European importers which import RFID tagged retail products or, RFID tagged retail product packaging or, apply RFID tags to retail products or their retail product packaging?

Ref:	Discussion Point	Additional info.	Comment
5.3.4.1	If they resell the goods in retail stores.		
5.3.4.2	Only those importers who apply tags to products are operators.		

*There has been widespread support for this approach.*

5.3.5. All organizations which add RFID tags to retail products or retail product packaging?

Ref:	Discussion Point	Additional info.	Comment
5.3.5.1			
5.3.5.2			

*There has been generally widespread almost unanimous support for this approach.*

5.3.6. Other?

Ref:	Discussion Point	Additional info.	Comment
5.3.6.1	Anyone add a tag whose content affects the end user.		
5.3.6.2	The operator is the organisation which operates the application. An organisation cannot be considered an operator unless they are using the technology.		

*There have been a few divergent opinions which overall generally support other approaches.*

5.4. Further who in your opinion are the concerned stakeholders who should support operators who RFID tag retail products? And please provide examples of how stakeholders should support such operators?

5.4.1. Government organizations?

Ref:	Discussion Point	Additional info.	Comment
5.4.1.1	Support by raising awareness for the way RFID works, the benefits of the technology, the sign and privacy protection.		
5.4.1.2	Possible contributions of governmental organizations: - Economic contributions supporting investment (eg: tax breaks) - New laws and amendments (eg: any new retail /shop/whatever needs to be RFID-compliant).		Economic support to assist and encourage the deployment of the common European sign or, related to support RFID adoption? A guideline for use cannot reference the later.
	We are not certain what is meant with "support". If support means informing consumers about the benefits of RFID technology, privacy protection, and the signification of		Further clarity on the meaning of the word "support" within the Recommendation is being sought.

	the sign, we agree.		

*Generally active support by Government organizations is encouraged.*

#### 5.4.2. Public interest groups?

Ref:	Discussion Point	Additional info.	Comment
5.4.2.1	Yes, tag content could directly affect the end-user.		
5.4.2.2	We are not certain what is meant with "support". If support means informing consumers about the benefits of RFID technology, privacy protection, and the signification of the sign, we agree.		Further clarity on the meaning of the word "support" within the Recommendation is being sought.

*There are divergent views but a majority encourage support provided by public interest groups.*

#### 5.4.3. RFID device manufacturers?

Ref:	Discussion Point	Additional info.	Comment
5.4.3.1	It is in their own interest.		
5.4.3.2	They may need to support operators in providing notice.		

*There has been widespread support for encouraging RFID technology providers to assist operators.*

#### 5.4.4. RFID application developers?

Ref:	Discussion Point	Additional info.	Comment
5.4.4.1	It is in their own interest.		
5.4.4.2	They may need to support operators in providing notice.		

*There has been widespread almost unanimous support for encouraging RFID application developers to assist operators.*

#### 5.4.5. Retailers?

Ref:	Discussion Point	Additional info.	Comment
5.4.5.1	It is in their own interest.		
5.4.5.2			

*There has been widespread support for encouraging retailers to assist operators.*

#### 5.4.6. Others?

Ref:	Discussion Point	Additional info.	Comment
5.4.6.1	As retailers are explicitly mentioned it is important to add consumer goods industry and suppliers. RFID		

	tags are mainly not applied to products by retailers, but at earlier stages of the supply chain.		
5.4.6.2			

*There were insufficient responses to this question to conclude a result.*

5.5. Please list any existing suitable candidate guidelines which could be used as a reference to develop guidelines for the common European sign's use. Examples: NFC Forum, CCTV guidelines, etc.

Ref:	Discussion Point	Additional info.	Comment
5.5.1	EPC Global Guidelines <a href="http://www.gs1.org/epcglobal/public_policy/guidelines">http://www.gs1.org/epcglobal/public_policy/guidelines</a>		EPCglobal Guidelines are associated with a commercial logo which is not freely available and, is associated with compliance with EPCglobal privacy requirements. It should not be confused with the common European sign which is focused upon public notification of the presence of RFID as described in the Recommendation.
5.5.2	I'm not sure if definitely useful... - opensource alliance: <a href="http://www.opensource.org/logo-usage-guidelines">http://www.opensource.org/logo-usage-guidelines</a> - canonical-ubuntu: <a href="http://design.canonical.com/brand/C.%20Canonical%20brand%20guidelines.pdf">http://design.canonical.com/brand/C.%20Canonical%20brand%20guidelines.pdf</a> - plone: <a href="http://plone.org/foundation/logo/logoguidelines.pdf">http://plone.org/foundation/logo/logoguidelines.pdf</a> - upnp: <a href="http://www.upnp.org/download/logo/UPnP_Logo_Usage_Guideline.pdf">http://www.upnp.org/download/logo/UPnP_Logo_Usage_Guideline.pdf</a> - linux foundation: <a href="http://www.linuxfoundation.org/about/linux-foundation-trademark-usage-guidelines">http://www.linuxfoundation.org/about/linux-foundation-trademark-usage-guidelines</a> - EU ecolabel: <a href="http://ec.europa.eu/environment/ecolabel/promo/pdf/logo%20guidelines.pdf">http://ec.europa.eu/environment/ecolabel/promo/pdf/logo%20guidelines.pdf</a> This is not a guideline, but interesting: <a href="http://www.wi-fi.org/brand.php">http://www.wi-fi.org/brand.php</a>		
5.5.3	Guidelines on EPC for Consumer Products <a href="http://www.gs1.org/aboutepc/guidelines">http://www.gs1.org/aboutepc/guidelines</a>		
5.5.4	NA		

## 6. WP5 Recommendation

TBC

## **Planned Activities to M36**

WP5 will complete the document reporting the RACE recommendations for the guidelines for use. This will involve further involvement with ERRT, CEN and possibly other stakeholders outside of RACE. The activities of D5.1.3.1 and 2 are to be completed by the end of March 2011. This aligns with the start of the common European sign standardization activities planned by CEN TC225. Nevertheless it is anticipated that WP5 will contribute to the CEN TC225 common European sign standardization process.

Further WP5 may offer to follow-up upon their offer to complete a consumer survey of the common European sign during 2011, a survey of both the common European sign design and the associated voluntary guidelines for use. Such an initiative will require the funding from outside of RACE networkRFID.