

## INTERGRAF POSITION

# REVIEW OF THE STATISTICAL CLASSIFICATION OF ECONOMIC ACTIVITIES – NACE Rev. 2

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Intergraf represents 21 national printing federations in 19 countries in Europe. Intergraf's main task is to promote and protect the interests of the European printing industry.

The printing industry in the 28 European countries comprises some 112,000 companies and employs around 625,000 people. The turnover in the printing industry is about € 79.5 billion. The industry throughout Europe consists mainly of small companies, as 90% of them employ fewer than 20 persons.

We herewith would like to share our views on the review of the NACE Rev.2 classification. A classification that reflects well our activities is of great interest to the European graphic industry as it provides greater reliability to statistics. Our comments mainly relate to the classification NACE 18.1 covering the activities that Intergraf represents.

### Maintain NACE 18.1 and related subcategories

**NACE 18.1** covers printing activities. They are to be distinguished from NACE 17 which covers the manufacture of paper, which requires different processes and different skills. The paper industry is one of the supplying industries of the printing industry.

Printing activities also have to be distinguished from publishing activities, which are covered by NACE 58. The publishing industry is one of the customers of the printing industry.

**NACE 18.11** covers newspaper printing and **NACE 18.12** covers all other printing activities, i.e. printing on paper as well as printing on other substrates, like plastics, textiles etc ...

NACE 18.13 and 18.14 are sub-categories that remain valid. **NACE 18.13** covers pre-press activities, that can be done in-house or by an external company. **NACE 18.14** covers post-press activities, that can also be done in-house or by an external company.

### Adapt wording to current technology in NACE 18.1

In the printing industry, new technologies have emerged and are increasingly used (i.e. digital printing technology), so have pre-press and post-press processes.

Moreover, some examples of printed products mentioned in the explanatory notes have become less relevant over time (i.e. business forms) whereas other printed products have gained in relevance (i.e. large format printing).

The explanatory notes (in particular the descriptive part under NACE 18 and NACE 18.1) would require some **adaptations of the wording to current technologies and products**. Intergraf is willing to provide proposals of changes.

## Clarify the scope of 18.12

NACE 18.12 is the only category aiming at encompassing all printing activities with the only exception of newspapers printing (NACE 18.11).

Whereas the explanatory notes reflect well the traditional publication printing activities, other printing activities are either not explicitly mentioned or not mentioned at all. Intergraf therefore suggests the following clarifications:

- **Decorative printing**

Decorative printing (also known as décor printing) is an area of the printing industry that is not mentioned in the current NACE 18.12. Typical examples of decorative printing include the production of wallpapers and the printing on paper or plastic for the production laminate furniture and floor coverings. The main manufacturing process in the production of these products is the printing process.

This should be clarified in the explanatory notes of NACE 18.12. The production of printed wallpapers should therefore be distinguished from the production of non-printed wallpapers covered by NACE 17.24.

- **Large format printing**

Large format printed products include signs, posters, billboards, banners, rollups, vehicle wrapping, building covers. They may be printed on paper or paperboard but also on textiles, plastic.

The coverage of these products under NACE 18.12 should be clarified in the explanatory notes.

- **Playing cards and beer mats**

The main manufacturing process involved in the manufacture of playing cards and beer mats is printing. The final product is clearly a printed product. The manufacture of playing cards should therefore be moved from NACE 32.40 to NACE 18.12 and the manufacture of beer mats from NACE 17.29 to NACE 18.12.

- **Printed packaging and labels**

The manufacture of packaging products is classified in NACE according to the material used (i.e. 17.21 for paper and paperboard products, 22.22 for plastic materials ...). The manufacturing process of packaging products may include printing in addition to converting activities. The material-based classification should remain. However, when the activity is predominantly or only printing of packaging products, NACE 18.12 may be applicable to that activity.

The same applies to the manufacturing of labels which is classified as NACE 17.29. The printing on labels is already listed under NACE 18.12.

The explanatory notes of NACE 18.12 should refer to the inclusion of printing on packaging materials (as is already the case for 'printing on labels') and should explicitly exclude the manufacture of packaging products and labels.

## Clarify the scope of 18.14

The above-mentioned proposed clarifications in 18.12 will also impact the description of activities in NACE 18.14.

The post-press activities in the above-mentioned areas are finishing activities that may be different from the already listed activities, which tend to relate to the finishing of publications only.

## Clarify the distinction between 18.13 and 74.10

Graphic design is a general term used for the preparation of an artwork to be disseminated on a print medium and/or a digital medium.

For printing, the graphic design is an integral part of the pre-press service as defined by NACE 18.13.

Graphic design can be done by an inhouse pre-press department or by an independent pre-press company which would be classified as 18.13.

However, there is an overlap between graphic design activities for printing covered by NACE 18.13 and general graphic design activities covered by NACE 74.10. The latter may cover activities that actually are pre-press activities for printing.

A clarification on the distinction between NACE 18.13 and NACE 74.10 is therefore necessary.

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