

# Packaging Labelling Legislation in Europe: A 2023 Regulatory Update

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## About The Author



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Freida is a Senior Global Regulatory Compliance Specialist with nearly 10 years experience working with Compliance and Risks.

She keeps clients up to date on a number of regulatory areas including; packaging, single-use plastics and the transport of dangerous goods.

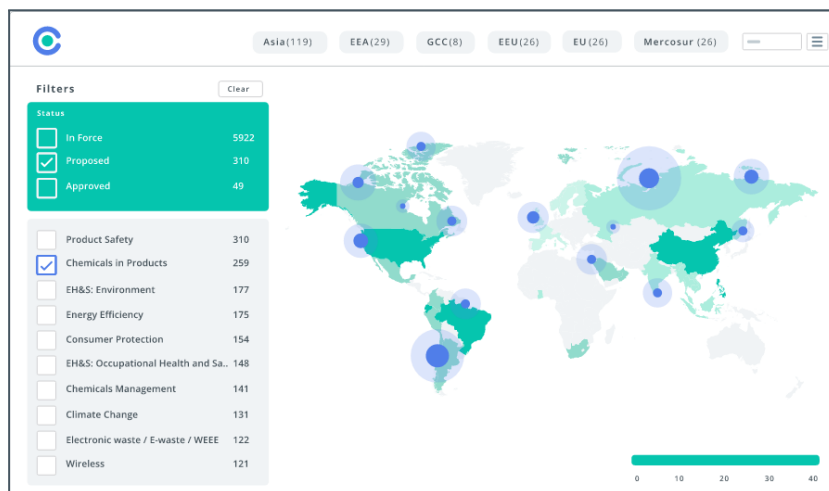
Freida has a BA in European Studies and German and an MSc in Environmental, Health and Safety Management.

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## 1. Introduction

In the year since the release of Compliance and Risks last White Paper on [packaging material labelling requirements](#) in Europe, there have been many significant developments at both an EU and a national level on packaging labelling.

Most notably, after many years of discussions and pressure from industry stakeholders, the EU Commission finally released its proposal for the recast of the Packaging and Packaging Waste Directive 94/62/EC. Considering the continued development of diverging packaging labelling schemes across the EU and the need to transition to a circular economy, the Commission's Draft aims to establish the development of a harmonised labelling approach in the EU on packaging material labelling for consumers.

At a national level, several significant changes have taken place in Spain, France, Italy and Bulgaria. All of which pertain to either the move towards a circular economy or amendments to measures considered disruptive to the EU's single market.

Movements towards the prohibition of misleading symbols on packaging have also gained momentum across Europe and in many instances may signify the eventual ban of the Green Dot (an EPR symbol denoting the payment of waste recovery fees) in its current form.

## 2. The EU

On 30 November 2022, the EU Commission released its eagerly anticipated proposal for the revision of Directive 94/62/EC on Packaging and Packaging Waste. In response to a growing lack of harmony across the EU on packaging requirements, the proposed recast has been presented as a Regulation rather than a Directive. By proposing a Regulation instead of a Directive, the EU can ensure the measures set out in its proposal take immediate effect in EU member states given that a Regulation is directly applicable to member states without the need for transposition. Therefore, this legal instrument has been proposed in a manner that will facilitate the direct replacement of national packaging labelling schemes such as the Triman logo and the Italian Environmental label, which producers have argued are creating barriers to the EU's internal market.

New proposals for packaging labelling requirements are presented in Article 11 of the Draft Regulation on Packaging and Packaging Waste and focus on the creation of a harmonised packaging material labelling scheme to better inform consumers of a package's composition in order to enable them to better sort their packaging waste. In addition to the creation of a harmonised labelling scheme for packaging materials, the Draft also proposed the introduction of corresponding labels for waste receptacles - in a move based on the voluntary Nordic labelling system for waste sorting.

Under the current version of the Draft, the deadline for affixing labels to waste receptacles is 1 January 2028, while the deadline for labelling packaging is set for 42 months after the entry into force of the Regulation. Despite proposing a harmonised labelling scheme, the EU has yet to release an example labelling template. It has however stated that further specifications for the labelling scheme will be released in implementing Acts, 18 months after the entry into force of the Regulation.

A harmonised label to denote recycled content in packaging is also being developed by the EU. However, since the provision of this information is not critical to ensure the proper end-of-life treatment of packaging, the supply of recycled content data shall be set out so that it may be voluntarily affixed to packaging by manufacturers.

Alongside the introduction of new mandatory labelling requirements, the Draft also announces new restrictions and prohibitions on packaging labelling.

For instance, Article 11.7 states; "economic operators shall not provide or display labels, marks, symbols or inscriptions that are likely to mislead or confuse consumers or other end users with respect to the sustainability requirements for packaging...".

As outlined in the introduction of the Draft Regulation, this measure aims to prohibit the use of the Green Dot symbol - which the EU considers misleading to consumers.

A detailed overview of all labelling requirements listed in the Draft can be found in the following tables overleaf.



## Overview of proposed mandatory labelling obligations

<b><i>Mandatory labelling obligations</i></b>	<b><i>Method of labelling</i></b>	<b><i>Proposed application deadline</i></b>
<p>Packaging to be marked with a label containing information on its material composition. E-commerce packaging is within scope of this obligation, while transport packaging is exempt.</p>	<p>Labels and the QR code shall be placed, printed or engraved visibly, clearly legibly and indelibly on the packaging. Where this is not possible on account of the nature and size of the packaging, they shall be affixed to the grouped packaging.</p>	<p>42 months after the entry into force of the Regulation</p>
<p>In addition to the previous labelling obligation, packaging subject to deposit and return systems i.e. beverage containers shall be marked with a harmonised label. This label is set to be established by an implementing act.</p> <p><i>18 months after the date of entry into force of the Regulation, the Commission shall adopt implementing acts on labelling specifications.</i></p>	<p>Labels and the QR code shall be placed, printed or engraved visibly, clearly legibly and indelibly on the packaging. Where this is not possible on account of the nature and size of the packaging, they shall be affixed to the grouped packaging.</p>	<p>42 months after the entry into force of the Regulation</p>
<p>Packaging shall bear a label on its reusability and a QR code or other type of digital data carrier that provides further information on packaging reusability including the availability of a system for re-use and of collection points, and that facilitates</p>	<p>Labels and the QR code or other type of digital data carrier shall be placed, printed or engraved visibly, clearly legibly and indelibly on the packaging. Where this is not possible on account of the nature and size of the packaging, they shall be affixed to the</p>	<p>48 months after the date of entry into force of the Regulation</p>

<p>the tracking of the packaging and the calculation of trips and rotations.</p> <p>In addition, reusable sales packaging shall be clearly identified and distinguished from single-use packaging at the point of sale.</p>	<p>grouped packaging.</p>	
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### Overview of proposed voluntary labelling obligations

<b><i>Voluntary labelling obligations</i></b>	<b><i>Method of labelling</i></b>
<p>Packaging included in an extended producer responsibility scheme or covered by a deposit and return system other than that referred to in Article 44(1) i.e. beverage containers, may be identified by means of a corresponding symbol throughout the territory in which that scheme or system applies.</p>	<p>The symbol shall be clear and unambiguous and shall not mislead consumers or users as to the recyclability or reusability of the packaging.</p> <p><i>Please note that paragraph 49 of the Draft's introduction classifies the Green Dot symbol as potentially misleading to consumers.</i></p>
<p>Where a unit of packaging is marked with a label containing information on the share of recycled content in accordance with Article 7, that label shall comply with the specifications set out in an implementing act.</p> <p><i>18 months after the date of entry into force of the Regulation, the Commission shall adopt implementing acts on labelling specifications.</i></p>	<p>Labels shall be placed, printed or engraved visibly, clearly legibly and indelibly on the packaging. Where this is not possible on account of the nature and size of the packaging, they shall be affixed to the grouped packaging.</p>

### 3. France

For the past two years, France has been engaged in a reform of its packaging labelling legislation to better inform consumers of their packages composition and encourage them to correctly dispose of such waste in an effort to help France transition to a circular economy. This has led France to introduce two significant changes.

Firstly, France mandated the use of the updated Triman logo on all household packaging (with the exception of glass packaging). From 9 March 2023, all packaging must include the new sorting labelling unless exempted by law.

Secondly, France initiated measures to prohibit the use of the Green Dot symbol on packaging, which was expected to take effect from 1 April 2021.

Despite the efforts of the French Ministry for Ecological Transition, both measures have been subject to court and infringement proceedings, both of which are still ongoing. With regards to the Green Dot, once the implications of the French Ministerial Order of 30 November 2020 and the Ministerial Order of 25 December 2020 were realised, the Green Dot's parent organisations in Europe "Der Grüne Punkt GmbH and PRO Europe s.r.l." alongside other stakeholders appealed to the French Supreme Administrative Court, the Conseil d'État, which granted an immediate suspension of the Orders, therefore allowing the continued use of the Green Dot in France.

The suspension will remain in effect until the Court reaches its final verdict. It is expected that the proceedings will continue throughout 2023.

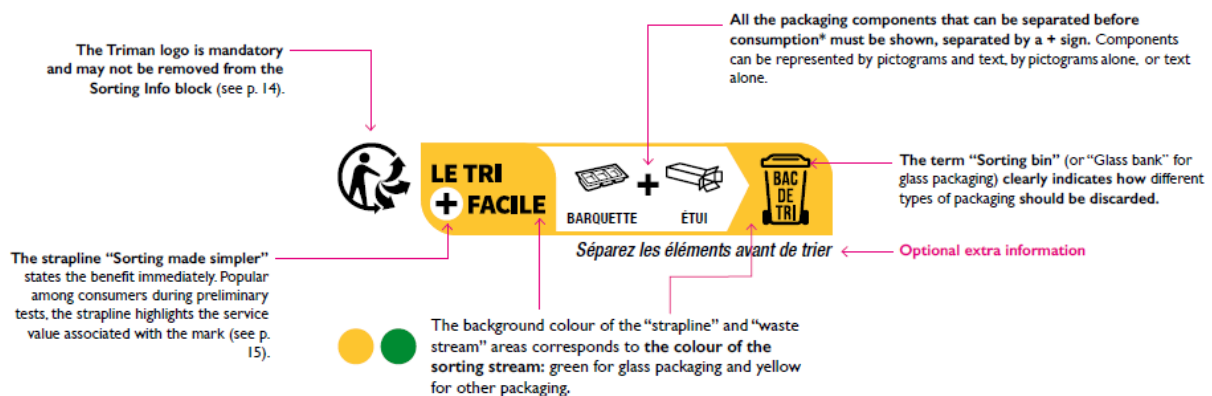
In addition to legal challenges to the prohibition of the Green Dot, the mandatory use of the Triman logo in the French market has led to the EU Commission pursuing infringement procedures against France. The Commission has argued that the infringement procedures are based on three failures on the part of France.

Firstly, the French Authorities failed to notify the Commission during the draft stages of the legislative process, thereby breaching the Single Market Transparency Directive (EU) 2015/1535.

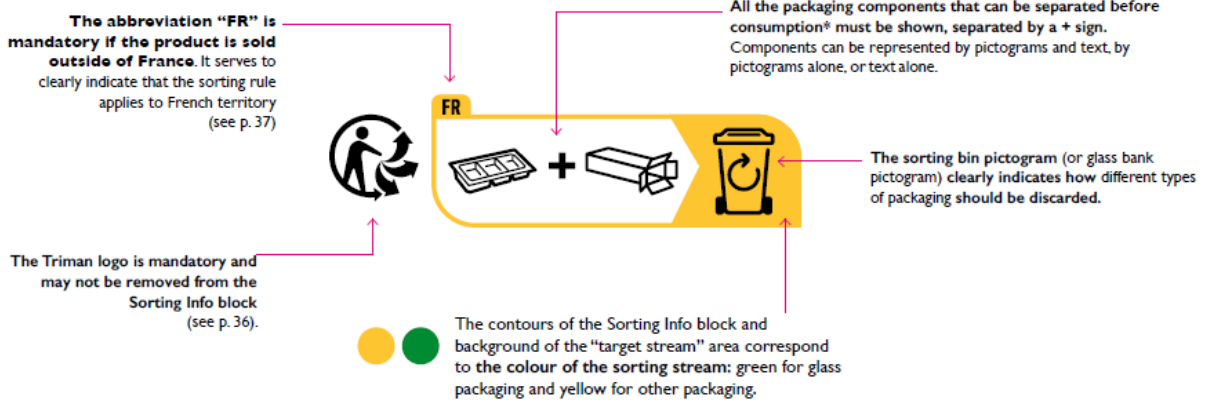
Secondly, waste sorting rules are not yet harmonised in the EU and the adoption of mandatory national obligations has resulted in an unnecessary burden for internal market trade and has therefore undermined the principle of free movement of goods which is enshrined in the Treaty on the Functioning of the EU (TFEU).

Lastly, besides French failure to respond to the Commission's concerns, the Commission argues that France did not conduct sufficient investigations into the impacts of their policy given that less restrictive options were available (In response to Italy's proposed Environmental label for packaging, the Commission made similar comments which led Italy to adopt the use of "digital channels" as a method for complying with its labelling obligation).

Following the issuance of the formal letter of Notice, France has until 15 April 2023 to respond to the arguments of the EU Commission. If the Commission decides that France is failing under its obligations to EU law based on its response, it will receive a formal request to comply with EU law within a certain time period. This period is normally two months.



Sample label for packaging marketed in France in accordance with CITEO Guidelines



Sample label for packaging marketed in France & abroad in accordance with CITEO Guidelines

## 4. Spain

On 27 December 2022, the Spanish Ministry for the Ecological Transition and Demographic Challenges approved Royal Decree 1055/2022 on packaging and packaging waste which resulted in the first comprehensive review of Spanish packaging legislation in twenty years.

Overall the Decree has two main objectives; to better align Spanish legislation with the EU's objectives as well as facilitating the transition to a circular economy for packaging.

In accordance with these aims, the Decree has sought to increase transparency and provide consumers with more information about a package's reusability as well as the most appropriate manner for its disposal through the introduction of the following; new mandatory packaging labels, labelling prohibitions and voluntary labelling schemes.

A detailed overview of all labelling requirements listed in the Decree can be found in the following tables overleaf.

## Overview of mandatory labelling obligations

<b><i>Mandatory labelling obligations</i></b>	<b><i>Compliance deadline</i></b>
<p>Packaging must indicate its reusability, and the symbol associated with its deposit and return system in accordance with the provisions of Article 46.8 i.e. the symbols must be clear and unequivocal and may not mislead consumers or users about their reusable condition and Article 47.7. i.e. applicable packaging must be distinguished, in such a way that it informs consumers that the package is part of a system that if returned the deposit paid will be paid to the returnee.</p>	<p>1 January 2025</p>
<p>Domestic packaging shall indicate the fraction or waste container in which said packaging waste should be deposited i.e. instructions for disposal. In the case of packaging made of different materials, if they can be separated easily, the fraction or container where each aspect should be deposited must be indicated. If the materials cannot be separated easily, or in the case of composite packaging, the fraction or waste container corresponding to the predominant material by weight will be indicated, unless it is shown that there is a better collection alternative that would avoid incidents in the recycling process.</p>	<p>1 January 2025</p>
<p>Compostable plastic packaging, shall be labelled to confirm certification with European standard UNE EN 13432:2001.</p>	<p>1 January 2025</p>
<p>Packaging compostable in domestic or industrial composting must be affixed with the label "Do not leave in the environment".</p>	<p>1 January 2025</p>

## Overview of prohibited labels

<b><i>Prohibited labels</i></b>	<b><i>Compliance deadline</i></b>
The marking of packaging with the words "environmentally friendly", or any other equivalent that may lead to its abandonment in the environment, is prohibited.	1 January 2025

## Overview of voluntary labelling options

<b><i>Voluntary labelling obligations</i></b>	<b><i>Entry into force date</i></b>
Packaging may be marked to indicate its material composition, in accordance with the abbreviations or numbers regulated in Decision 97/129/EC.	1 January 2025
Packaging may be marked with symbols accrediting its extended producer responsibility system, in accordance with the provisions of Article 21.4. i.e. this symbol must be clear and unambiguous and cannot mislead consumers or users about the recyclability of the packaging.	1 January 2025
Packaging may be marked with the percentage of packaging material, including its components, available for recycling. This information can only be applied if certified by an evaluation entity other than the manufacturer. Packaging producers must obtain and retain documentation supporting the information provided on the recyclability of packaging.	1 January 2025
Packaging may be marked to indicate the percentage of recycled material it	1 January 2025



contains. Documentation proving the information provided must be available in accordance with the procedure established in article 12.3.	
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Despite the scale and detail of the Decree, significant aspects relating to the new labelling requirements have yet to be clarified by the Ministry.

Firstly, the Decree does not contain examples of label designs for the mandatory labelling measures however it is anticipated that such information will be provided via supplementary legislation.

Secondly, despite Spain becoming the last EU country to make the Green Dot symbol voluntary, it has not expressly clarified whether the symbol is actually prohibited. In order to ascertain whether the Green Dot will become prohibited rather than voluntary in Spain under Article 21.4 of the Decree, which prohibits EPR symbols that may mislead consumers about a package's recyclability- Compliance and Risks contacted the Spanish authorities for further information.

Subsequently, the Spanish General Sub-Directorate of Circular Economy responded as follows;

*"Considering Article 21.4, which regulates general obligations for extended producer responsibility systems and the measure requiring extended producer responsibility symbols be "clear and unequivocal and not misleading to consumers or users on the recyclability of packaging", the General Subdirectorate considers that the "Green Dot" symbol can mislead consumers or users about the recyclability of the containers, and in their opinion, the systems who currently use this symbol, should replace it when they submit their request for authorization in accordance with Royal Decree 1055/2022."*

## 5. Bulgaria

Despite the entry into force of new packaging labelling requirements on 1 January 2022, the Bulgarian authorities approved Decree No. 419 on 19 December 2022, to make the application of the Tidyman logo and the Mobius Loop on packaging voluntary.

## 6. Italy

After several postponements, January 1st 2023 saw the Italian Environmental labelling obligations entered into effect. Prior to its enforcement, on 22 November 2022, the Italian Ministry of Environment and Energy Security published the final version of the packaging labelling Guidelines, in accordance with Art. 219 paragraph 5 of Legislative Decree 152/2006. In addition to being available in Italian, the Guidelines have also been made available in English.

Crucially, the Guidelines have been used by the Italian authorities to incorporate recommendations made by the EU Commission, and clarify that digital channels (e.g. Apps, QR codes, and websites) may be used partially or in full to meet the labelling obligation.

This revision of the Guidelines has come about following the submission of comments by the EU Commission on the potential for the environmental label to go against the free movement of goods principle, provided for in the TFEU.

The Guidelines summaries the labelling obligations as follows;

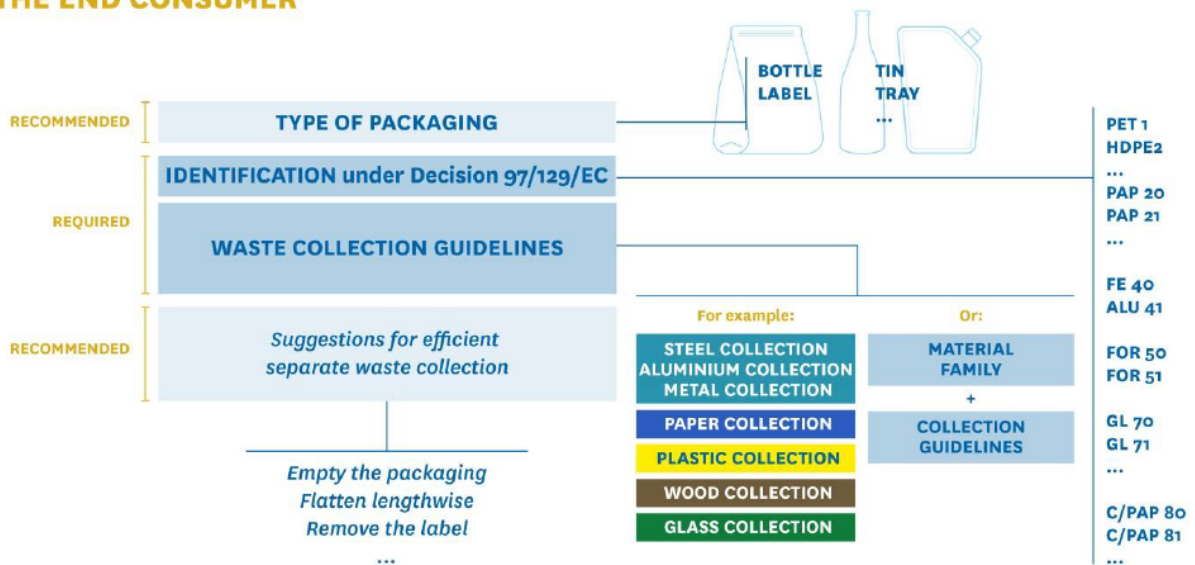
- Producers must indicate the alphanumeric code provided for in Decision 97/129/EC on all packaging (primary, secondary and tertiary);
- All packaging must be labelled in the form and manner that the company considers most suitable and effective for achieving the goal, for which it is always allowed the use of digital channels (e.g. App, QR code, website) as a complete or partial alternative to the physical affixing of the labelling on packaging;
- Packaging destined for the consumer must also bear suitable inscriptions aiding its disposal; and
- For plastic packaging made from polymers or polymer combinations not expressly provided for in Decision 97/129/EC, reference may be made to the UNI EN ISO 1043-1 standards for the identification of plastics not included in said Decision, and to the UNI EN ISO 10667-1 standards for the identification and recognition of recycled polymers.

Additionally, the Ministry has confirmed that the labelling obligations do not apply to medication or medical devices. Further information on this can be found in Italian on the Ministry's website [here](#).

Furthermore, packaging for products subject to Regulation (EU) 2017/1369 on energy labelling is also exempt from the Environmental labelling obligation, further details can be found [here](#).

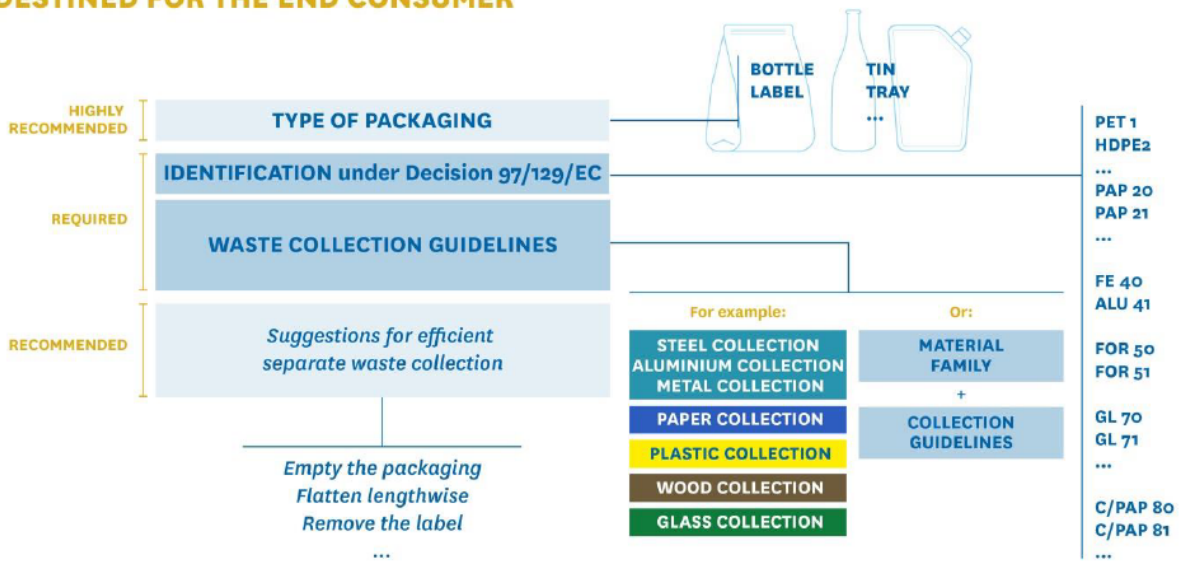
Lastly, CONAI the Italian National Packaging Consortium has published guidelines on the use of digital channels, as well as specific industry labelling guides for packaging manufacturers and electrical and electronic manufacturers among others. These guidelines are freely available [here](#).

**INFORMATION FOR THE ENVIRONMENTAL LABELLING OF SINGLE-COMPONENT PACKAGING DESTINED FOR THE END CONSUMER**



<b>REQUIRED</b>	<p>Information to be reported in accordance with art. 219, paragraph 5. The identification codes refer to Decision 129/97/EC.</p> <p>Disposal instructions may be communicated using the proposed formula or using any other method, provided it is effective.</p>
<b>HIGHLY RECOMMENDED</b>	<p>For multi-component packaging, identifying individual components through a written description or a graphical representation helps the consumer to separate and dispose of them correctly.</p>
<b>RECOMMENDED</b>	<p>Voluntary information that can be provided to help the consumer separate waste efficiently.</p>

**INFORMATION FOR THE ENVIRONMENTAL LABELLING OF MULTICOMPONENT PACKAGING (where components can be separated by hand) DESTINED FOR THE END CONSUMER**





<b>REQUIRED</b>	<p>Information to be reported in accordance with art. 219, paragraph 5. The identification codes refer to Decision 129/97/EC.</p> <p>Disposal instructions may be communicated using the proposed formula or using any other method, provided it is effective.</p>
<b>HIGHLY RECOMMENDED</b>	<p>For multi-component packaging, identifying individual components through a written description or a graphical representation helps the consumer to separate and dispose of them correctly.</p>
<b>RECOMMENDED</b>	<p>Voluntary information that can be provided to help the consumer separate waste efficiently.</p>

## 7. Conclusion

This paper aimed to provide an overview of current and upcoming legislative labelling requirements for packaging in Europe.

In doing so the paper highlighted a number of growing trends across Europe, namely, that national authorities are eager to encourage consumers to play a part in the development of a circular economy for packaging through the establishment of waste sorting labels and the removal of confusing symbols on packaging.

In response to this growing policy trend and continued legislative divergence, the EU is trying to catch up to member states with its proposed recast of the Packaging and Packaging Waste Directive and its aims to reprimand states enacting legislation that obstructs the functioning of the single market.

## Appendix 1 - Overview Of Current Labelling Requirements For Packaging In The EU

<b><i>EU &amp; EU member states</i></b>	<b><i>Status of material identification labelling</i></b>	<b><i>Status of the Green Dot</i></b>	<b><i>Additional labelling requirements</i></b>
EU	<p>Voluntary - however in the Draft Regulation on packaging and packaging waste, the EU Commission outlined proposals for the establishment of a harmonised labelling system for denoting a package's; material composition and reusability.</p> <p><i>Please see the section on the EU above for further information.</i></p>	<p>Voluntary - however in the Draft Regulation on packaging and packaging waste, the EU Commission discussed plans for the protection of consumers from misleading symbols. The Draft classified the Green Dot as misleading, thereby indicating the potential drafting of measures for its prohibition.</p>	<p>Packaging material information may be marked in accordance with Commission Decision 97/129/EC.</p> <p>Additional packaging labelling measures have been proposed in the EU's Draft Packaging and Packaging Waste Regulation.</p> <p><i>Please see the section on the EU above for further information.</i></p>
Austria	Voluntary	Voluntary	Packaging material



			information may be marked in accordance with Commission Decision 97/129/EC.
Belgium	Voluntary	Voluntary	If packaging material information is provided on packaging it must be done in accordance with Annex 2 of Royal Decree, 25 March 1999 i.e. Commission Decision 97/129/EC.
Bulgaria	<p>Mandatory - <i>Specifications for packaging material labelling are set out in Article 5 of the Packaging and Packaging Waste Ordinance.</i></p> <p><i>Please see the section on Bulgaria above for further information.</i></p>	Voluntary	The use of the Mobius Loop symbol and the Tidyman symbol is no longer mandatory in accordance with Decree No. 419/2022.
Croatia	Voluntary - No	Voluntary	If packaging



	<p><i>longer mandatory following the implementation of Ordinance NN 116/2017</i></p>		<p>material information is provided on packaging it must be done in accordance with Article 4 of Ordinance NN 116/2017 and Commission Decision 97/129/EC</p> <p>Manufacturers who place returnable (reusable) packaging on the market are obliged to mark such packaging with a mark for returnable packaging in accordance with Article 13 of Ordinance NN 88/2015. Croatia has released a Draft containing a proposed label for returnable packaging.</p> <p><i>Please see the section on Croatia above for further</i></p>
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			<i>information.</i>
Cyprus	Voluntary	Voluntary - <i>No longer mandatory as of 11.05.2021</i>	n/a
Czechia/Czech Republic	Voluntary	Voluntary	If packaging material information is provided on packaging it must be done in accordance with Commission Decision 97/129/EC  A person who places products on the market in returnable prepaid packaging shall be obliged to mark such packaging as returnable prepaid packaging (outlined in Section 9 of Act 477/2001).
Denmark	Voluntary - <i>However Denmark has created a voluntary labelling system for waste</i>	Not used - <i>If your company has a valid trademark agreement with a PRO Europe</i>	If packaging material information is provided on packaging it must be done in



	<i>sorting that can also be used on packaging. Further details in English can be found <a href="#">here</a>. It has subsequently been introduced to other Nordic countries including - Finland, Iceland, Norway and Sweden.</i>	<i>scheme, PRO Europe will tolerate if you deliver similarly packaged goods with the Green Dot also to Denmark.</i>	accordance with Article 17 of Statutory Order 1455/2015 and Commission Decision 97/129/EC.
Estonia	Voluntary	Voluntary	n/a
Finland	<i>Voluntary - However the Danish voluntary labelling system for waste sorting may be used on packaging. Further details in English can be found <a href="#">here</a>.</i>	<i>Not used - If your company has a valid trademark agreement with a PRO Europe scheme, PRO Europe will tolerate if you deliver similarly packaged goods with the Green Dot also to Finland.</i>	n/a
France	<i>Mandatory - France has created its own national sorting system to better help consumers identify and dispose</i>	<i>Voluntary - However, there have been recent efforts to ban the symbol as it is viewed as</i>	n/a



	<i>of waste packaging appropriately using the Triman logo. Official Guidelines and further details on the design and use of the Triman logo are provided by CITEO the French PRO for Packaging.</i>	<i>misleading to consumers. Court proceedings are ongoing on the matter and are scheduled to continue throughout 2023.</i>	
Germany	Voluntary	Voluntary	If packaging material information is provided on packaging it must be done in accordance with Annex 5 of Act BGBl. 2234, 2017 i.e. Commission Decision 97/129/EC.
Greece	Voluntary	Voluntary	n/a
Hungary	Voluntary	Voluntary	If packaging material information is provided on packaging it must be done in accordance with Annex 2 of Decree 442/2012 i.e.

			Commission Decision 97/129/EC.
Ireland	<i>n/a - No material labelling measures are cited in Irish packaging legislation.</i>	Voluntary	n/a
Italy	<p>Mandatory - Compliance with the Italian Environmental label may be achieved through the use of digital means i.e. Apps, QR codes, and websites.</p> <p><i>Please see the section on Italy above for further information.</i></p>	<p>Not used - <i>If your company has a valid trademark agreement with a PRO Europe scheme, PRO Europe will tolerate if you deliver similarly packaged goods with the Green Dot also to Italy.</i></p>	n/a
Latvia	Voluntary	Voluntary	n/a
Lithuania	Voluntary	Voluntary	n/a
Luxembourg	As set out in Article 10 of Law, 9 June 2022 packaging shall indicate the materials used in its production in accordance with	Voluntary	If packaging material information is provided on packaging it must be done in accordance with Commission



	<p>Commission Decision 97/129/EC. The marking shall be affixed either to the packaging itself or to the label. It must be clearly visible and easily readable. The marking must have an appropriate lifespan, including when the packaging is opened.</p>		<p>Decision 97/129/EC.</p>
<p>Malta</p>	<p>In accordance with Article 18 of Regulations L.N. 277/2006, producers shall ensure that the nature of any packaging material used is indicated on the packaging for the purposes of its identification and classification in order to facilitate the collection, reuse and recovery including recycling of packaging waste. Producers shall</p>	<p>Voluntary</p>	<p>n/a</p>

	<p>ensure that packaging bears the appropriate marking either on the packaging itself or on the label according to any existing laws and regulations. Such marking shall be clearly visible and easily legible, appropriately durable and lasting, even when the packaging is opened.</p>		
Netherlands	Voluntary	Voluntary	If packaging material information is provided on packaging it must be done in accordance with Commission Decision 97/129/EC.
Poland	<p>Voluntary - <i>However, there is a proposal to bring in packaging material labelling to aid the sorting of waste.</i></p>	Voluntary	n/a



Portugal	<p>Voluntary - <i>However, there is a draft under review to make packaging material marking based on Commission Decision No. 97/129/EC mandatory.</i></p> <p><i>Furthermore, the draft proposes the introduction of a waste sorting label for primary and secondary packaging intended for the consumers.</i></p>	Voluntary	<p>There is currently a proposal to introduce waste packaging “sorting labelling”, as well as a proposal to prohibit the Tidyman symbol.</p> <p>If the proposed packaging draft is approved reusable packaging and packaging, which is managed under a deposit system will also be subject to marking.</p>
Romania	Voluntary - <i>Briefly mandatory until measures were revoked in 2018.</i>	Voluntary	n/a
Slovakia	Voluntary	Voluntary	n/a
Slovenia	Voluntary - <i>Briefly mandatory until measures were revoked in 2021.</i>	Voluntary	If packaging material information is provided on packaging it must be done in



			accordance with Article 9 of Regulation 4391, UL 208/2021 and Commission Decision 97/129/EC.
Spain	<p>Packaging material labelling in accordance with Commission Decision 97/129/EC is voluntary.</p> <p>However, from 1 January 2025 domestic packaging must be labelled with instructions for its disposal by consumers.</p> <p><i>Please see the section on Spain above for further information.</i></p>	<p>No longer mandatory and potentially prohibited (the enforcement deadline is yet to be confirmed by the relevant authorities).</p> <p><i>Please see the section on Spain above for further information.</i></p>	<p>Packaging must indicate its reusability, and the symbol associated with its deposit and return system in accordance with the provisions of Article 46.8 and Article 47.7 of Royal Decree 1055/2022.</p> <p>Compostable plastic packaging, shall be labelled to confirm certification with European standard UNE EN 13432:2001.</p> <p>Packaging compostable in domestic or industrial composting must be affixed with the label "Do not leave</p>

			<p>in the environment".</p> <p>The marking of packaging with the words "environmentally friendly", or any other equivalent that may lead to its abandonment in the environment, is prohibited.</p> <p><i>Please see the section on Spain above for further information.</i></p>
Sweden	<p>Voluntary - <i>However the Danish voluntary labelling system for waste sorting may be used on packaging. Further details in English can be found <a href="#">here</a>.</i></p>	Voluntary	<p>If packaging material information is provided on packaging it must be done in accordance with Commission Decision 97/129/EC.</p>

## Appendix 2 - Overview of Current Labelling Requirements For Packaging In The EEA

<b><i>EEA member states</i></b>	<b><i>Status of material identification labelling</i></b>	<b><i>Status of the Green Dot</i></b>	<b><i>Additional labelling requirements</i></b>
Iceland	<p>In accordance with Article 5 of Regulation No. 609/1996, to facilitate the collection, reuse and recycling of packaging, the materials must be specified so that they can be identified and sorted.</p> <p>Furthermore, the packaging must be marked appropriately, either on the packaging itself or on a label attached to it.</p> <p>Markings must be visible and easy to read. Markings must remain and last as</p>	<p>Not used - <i>If your company has a valid trademark agreement with a PRO Europe scheme, PRO Europe will tolerate if you deliver similarly packaged goods with the Green Dot also to Iceland.</i></p>	<p>Additionally, the Danish voluntary labelling system for waste sorting may be used on packaging. Further details in English can be found <a href="#">here</a>.</p>



	appropriate, even when the packaging is opened.		
Liechtenstein	<p>In accordance with Article 7 of the 1997 Ordinance on Packaging and Packaging Waste, the manufacturing material of packaging must be made visible on the packaging or on a label in accordance with Decision 97/129/EC.</p> <p>Furthermore, the marking must be clearly visible, legible and durable, even after the packaging has been opened.</p>	<p>Not used - <i>If your company has a valid trademark agreement with a PRO Europe scheme, PRO Europe will tolerate if you deliver similarly packaged goods with the Green Dot also to Liechtenstein.</i></p>	n/a
Norway	<p>n/a - <i>However the Danish voluntary labelling system for waste sorting may be used on packaging. Further details in English can be found <a href="#">here</a>.</i></p>	Voluntary	n/a

## Appendix 3 - Overview Of Current Labelling Requirements For Packaging In Non EU / EEA States In The Single Market

<b><i>Non EU/EEA member states in the Single Market</i></b>	<b><i>Status of material identification labelling</i></b>	<b><i>Status of the Green Dot</i></b>	<b><i>Additional labelling requirements</i></b>
Switzerland	n/a	Not used - <i>If your company has a valid trademark agreement with a PRO Europe scheme, PRO Europe will tolerate if you deliver similarly packaged goods with the Green Dot also to Switzerland.</i>	n/a
Northern Ireland	<i>n/a - No material labelling measures are cited in Northern Irish packaging legislation.</i>	Voluntary	n/a

## Appendix 4 - Overview Of Current Labelling Requirements For Packaging In The Rest Of Europe Outside The EU/EEA/Single Market and The EAEU

<b><i>Non EU/EEA/Single Market</i></b>	<b><i>Status of material identification labelling</i></b>	<b><i>Status of the Green Dot</i></b>	<b><i>Additional labelling requirements</i></b>
United Kingdom (UK)	Despite holding a consultation on the introduction of a recyclability label for packaging in March 2021, the DEFRA has yet to release a formal draft on such a measure. Responses to the UK's proposals can be found <a href="#">here</a> .	Voluntary	n/a
Ukraine	In accordance with Article 3.5 of Order No. 289, 2004 to facilitate collection, sorting, transport, reuse and recovery, including recycling, the packaging must be marked for	n/a	n/a



	<p>identification and classification purposes: the relevant industry, the type of packaging material(s).</p> <p>The package shall contain the appropriate marking, either directly on the package itself or on a label, which must be clearly visible and easily recognizable. Marking must be wear-resistant and reliable, including when the package is opened.</p>		
Republic of Moldova	Voluntary	n/a	If manufacturers of packaging and/or packaged products mark the packaging to facilitate collection, reuse, recovery, and recycling, they shall apply the system of





			<p>identification and marking provided in Annex no. 5 in Decision No. 561, 2020, so that the packaging contains indications of the nature of the packaging material or materials used, to allow identification and classification in the sector concerned.</p> <p>The marking shall be applied directly to the package or label and must be visible, legible and durable, even after opening the package.</p> <p>Manufacturers who sell products packed in reusable primary packaging shall inform consumers about the reusable nature of the packaging, as the case may be,</p>
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			the deposit value and about the collection system.
Georgia	n/a	n/a	n/a
Republic of Serbia	<p>In accordance with Article 15 of the Packaging and Packaging Waste Law of 2009, packaging shall be identified and labelled according to the natural properties of the packaging materials used in its production to facilitate collection, reuse and recycling, composting, bio-degradation and utilization for energy purposes.</p> <p>The packaging shall bear the appropriate marking either on the packaging itself or on its label, and if the size of the</p>	Voluntary	Packaging that can be reused or recycled is marked with special symbols. These symbols are presented in Annex 2, of the Regulation on Numbering, Abbreviations and Symbols Used for Identification and Labeling of Packaging Materials of 2009.

	<p>packaging does not allow it, on the attached instructions. The mark shall indicate the type of material used in the production of the packaging, as well as the possibility of reuse and recycling, if any. The label should be clear, visible and easy to read, i.e. durable and permanent, even when the packaging is opened. Further details on the label are available in the Regulation on Numbering, Abbreviations and Symbols Used for Identification and Labeling of Packaging Materials of 2009.</p>		
Montenegro	n/a	n/a	n/a
Republic of Albania	In accordance with	n/a	Marks for the



	<p>Chapter 8 of Decision No. 177/2012, the manufacturer of packer of packaged goods shall mark packaging with; a) the identification number and abbreviation of the name of the packaging materials according to Appendix no. 4, b) the sign of recycling/recovery for packaging according to Appendix no. 4, and c) the note announcing the obligation for separate collection of packaging waste.</p> <p>Labels shall be clear, legible and fixed to the packaging even after it has been opened.</p>		<p>recyclability/recoverability of the packaging and the type of material from which it is made shall be affixed. A separate mark for identifying biodegradable materials shall also be used. Details of both labels are available in Appendix no. 4 of Decision No. 177/2012.</p>
Bosnia and Herzegovina	In accordance with Article 9 of Regulation of	Voluntary	n/a



	<p>December 2011, in order to facilitate collection, reuse and recovery of packaging, packaging must be sorted and designated according to the materials used in production. Packaging shall be sorted and designated according to the Ordinance on Sheet Form, Content and Informing on Significant Features of Products and Packaging by Producers, "Official Gazette of F BiH" number 6/08.</p>		
Republic of Azerbaijan	n/a	n/a	n/a
Republic of Türkiye /Turkey	Voluntary	n/a	Packaging material and recyclability labelling is voluntary, in accordance with Article 14 of the



			<p>2021 Regulation on the Control of Packaging Waste. If manufacturers opt to label their packaging, the abbreviation and material number of the packaging can be added in accordance with the Package Labelling System set out in Annex-2 and the label illustrated in Annex-3. The labelling must be easily visible, readable and durable.</p>
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## Appendix 5 - Overview Of Current Labelling Requirements For Packaging In The EAEU

<b><i>Eurasian Economic Union (EAEU/EEU) (Customs Union) member states</i></b>	<b><i>Status of material identification labelling</i></b>	<b><i>Status of the Green Dot</i></b>	<b><i>Additional labelling requirements</i></b>
EAEU/EEU	<p>In accordance with Article 6 of Decision No. 769 of 2011, packaging must contain the information necessary for identifying the material from which the packing is made, and also information on the possibility of re-using it, including informing the customers.</p> <p>The marking must contain a numerical designation and/or an alphabetical designation (abbreviation) of the material of which the packing is made, in accordance with Supplement 3, and contain pictograms and symbols in accordance with Supplements to this Decision i.e. Fig. 3 on packing not suitable for contact with food</p>	n/a	Labelling obligations for denoting the reusability of packaging are set out in Article 6 and Figure 4 of Decision No. 769 of 2011.

	products; Fig. 4 on packing that can be re-used (Möbius strip) etc.		
Republic of Armenia	<p>On 24.10.2021 the Armenian Decision No. 1544-N of 2006 on Packaging and Packaging Waste expired. Although it contained detailed labelling obligations in Chapter 5, it was replaced by EAEU Decision No. 769 of 2011.</p> <p><i>For details on this Decision please see the above section on the EAEU/EEU.</i></p>	n/a	<p>Decision No. 1544-N of 2006 contained mandatory labels for; denoting reusable packaging, and identifying packaging made of partially or fully secondary polymer raw materials, by indicating its percentage ratio. However, this Decision was repealed on 24.10.2021 by EAEU Decision No. 769 of 2011.</p> <p><i>For details on this Decision please see the above section on the EAEU/EEU.</i></p>
Republic of Belarus	<i>Please see the</i>	n/a	<i>Please see the</i>





	<i>above section on the EAEU/EEU.</i>		<i>above section on the EAEU/EEU.</i>
Russian Federation	<i>Please see the above section on the EAEU/EEU.</i>	n/a	<i>Please see the above section on the EAEU/EEU.</i>

## Referenced Legislation

- Albania: Management of Packaging and Packaging Waste, Decision No. 177/2012
- Austria: Packaging Waste Ordinance 184/2014
- Belgium: Product Standards for Packaging, Royal Decree, 25 March 1999
- Belgium: Product Standards for Packaging, Royal Decree, 25 March 1999 - Amendment - (on marking/labeling and harmonised standards) Royal Decree, 25 May 2011
- Bosnia and Herzegovina Federation: Management of Packaging and Packaging Waste, Regulation, December 2011
- Bosnia and Herzegovina Federation: Marking and Labelling of Packaging with Waste Management Information, Regulation, December 2007
- Bulgaria: Ordinance on Packaging and Packaging Waste, Decree No. 271/2012
- Bulgaria: Ordinance on Packaging and Packaging Waste, Decree No. 271/2012 - Amendment - (on making mobius loop and the tidyman logo voluntary, etc) Decree No. 419/2022
- CITEO: New Sorting Label for Household Packaging in France, Guidance Document, April 2022
- Croatia: Rules on Packaging and Packaging Waste, Ordinance NN 88/2015 - Amendment - (on plastic shopping bags, etc) Ordinance NN 116/2017
- Croatia: Management of Packaging, Waste Packaging and Single-use Plastic Products, Draft Pravilnik, November 2022
- Cyprus: Packaging and Packaging Waste Law No. 32(I), 2002
- Czech Republic: Packaging Act 477/2001
- Denmark: Essential Requirements for Packaging, Statutory Order 1455/2015
- Estonia: Packaging Act, 2004
- EU: Packaging and Packaging Waste, Draft Regulation, November 2022
- EurAsEC: Approving Technical Regulations on Safety of Packaging, Decision No. 769, August 2011
- EAEU: Approving Technical Regulations on Safety of Packaging, Decision No. 769, August 2011 - Proposed Amendment - (on scope, definitions, updated



safety and labelling requirements, restrictions on the use of polyvinyl chloride (PVC) label) Draft Decision, March 2021

- Finland: Packaging and Packaging Waste, Decree 1029/2021
- France: Procedure for Approval and Specifications for Individual Collection Schemes of Household Packaging Waste, Order, November 2016 - Amendment (on penalties for the use of symbols and markings that could lead to confusion on the waste sorting rule), Ministerial Order, December 2020
- France: Prohibition of Symbols and Markings that Could Lead to Confusion on the Waste Sorting Rule, Ministerial Order, November 2020
- France: Anti-waste and Promotion of Circular Economy, Law 2020-105
- Germany: Management of Packaging and Packaging Waste, Act BGBl. 2234, 2017
- Greece: Implementing Directives (EU) 2018/851 and 2018/852 on the Circular Economy Package, Law No. 4819, 2021
- Hungary: Management of Packaging and Packaging Waste, Decree 442/2012
- Iceland: Management of Packaging and Packaging Waste, Regulation No. 609/1996
- Ireland: European Union (Packaging) Regulations, SI 282/2014
- Italy: Environmental Labelling Obligations for Packaging, Guidelines, November 2022
- Italy: Postponement of Packaging Labelling Obligations, Law No. 15/2022
- Italy: Manual for the Use of Digital Channels for the Environmental Labeling of Packaging, Guidance Document, January 2023
- Latvia: Packaging and Packaging Waste Law, 2002
- Lithuania: Management of Packaging and Packaging Waste, Law No. IX-517, 200
- Liechtenstein: Packaging and Packaging Waste, Ordinance, 26 August 1997
- Luxembourg: Packaging and Packaging Waste Law, 21 March 2017 - Amendment - (on extended producer responsibility, circular economy, etc.) Law, 9 June 2022
- Malta: Waste Management (Packaging and Packaging Waste) Regulations L.N. 277/2006
- Moldova: Approving Regulations on Packaging and Packaging Waste, Decision No. 561, 2020



- Montenegro: Procedure for Collection and Treatment of Waste Packaging, Decree, July 2012
- Netherlands: Management of Packaging, Decree, 27 October 2014
- Poland: Labelling Design for Packaging, Regulation Nr. 1298, 2014
- Poland: Management of Packaging and Packaging Waste, Law 888/2013
- Poland: Management of Packaging and Packaging Waste, Law 888/2013 - Proposed Amendment - (on implementing Directive (EU) 2019/904, etc) Draft Law, August 2021
- Portugal: Specific Waste Law Management Regime, Decree-law 152-D/2017 - Proposed Amendment - (on labelling of packaging, etc.) Draft Decree-law, February 2021
- Portugal: Specific Waste Law Management Regime, Decree-law 152-D/2017
- Romania: Management of Packaging and Packaging Waste, Law No. 249/2015
- Turkey: Control of Packaging Waste, Regulation, June 2021
- Serbia: Packaging and Packaging Waste Law, 2009
- Serbia: Numbering, Abbreviations and Symbols Used for Identification and Labeling of Packaging Materials, Regulation, August 2009
- Slovak Republic: Extended Producer Responsibility and Waste Treatment, Decree 373/2015
- Slovenia: Management of Packaging and Packaging Waste, Regulation 1053, UL 54/2021
- Spain: Packaging and Packaging Waste, Royal Decree No. 1055/2022
- Sweden: Producer Responsibility for Packaging, Ordinance, SFS 2022:1274
- Ukraine: Approving Technical Regulation on Conformity Assessment of Packaging Materials and Packaging Waste, Order No. 289, 2004