

## JOINT STATEMENT

### Towards pragmatic and harmonised labelling in the EU: A joint call from manufacturers to prevent Single Market fragmentation and preserve competitiveness

June 2026

**We urge the European Commission and Member States to adopt a pragmatic approach for the future harmonised packaging labels, in line with the EU's agenda for the EU Single Market, simplification and competitiveness. The system should rely on text-free pictograms, available in achromatic or monochromatic versions matching the packaging palette, with the possibility of using digital labelling as a core element.**

Our associations represent manufacturers of consumer goods across Europe. Our products are used by millions of Europeans to care for themselves, their families, and their homes. At the heart of this relationship lies **trust**, built over time through product safety, quality and performance, and maintained through **clear and reliable communication with our consumers**.

In fast-moving retail environments, **product labelling plays a critical role as the primary interface between manufacturers and consumers**. Clear and recognisable labels are **essential visual cues that enable consumers to quickly identify products, understand their characteristics, and make informed choices**. Preserving this clarity is fundamental, particularly as mandatory information on packs becomes increasingly complex, with the risk of consumer confusion and information overload.

The manufacturers we represent aim to use packaging that can be placed on the entire EU market and beyond. However, the reality of product labelling is increasingly burdened by a **growing volume of cumulative, overlapping and sometimes conflicting mandatory information required on packaging** by EU legislation. Additional and divergent national requirements further exacerbate this situation. As acknowledged in the Single Market Strategy, fragmented labelling creates **barriers to the free circulation of goods**, forcing companies to **relabel and repackage products**, resulting in **operational inefficiencies, increased costs and unnecessary waste generation**. Moreover, accommodating translated text on packages presents considerable challenges, particularly as packaging volumes must instead be minimised under the Packaging and Packaging Waste Regulation (PPWR).

The **harmonisation and streamlining of labelling requirements is therefore an urgent priority for the integrity of the Single Market, the competitiveness of our industry, and our ability to clearly communicate to consumers**. This was also confirmed by the latest European Council's Conclusions<sup>1</sup>, which called on the European Commission to address product labelling fragmentation.

Nevertheless, the **harmonised labels under the PPWR risk creating new market barriers and unnecessary burdens on companies if they impose the use of text and colours on packaging**. According to our estimations, imposing the use of text on packs could lead to a disproportionate economic burden, and imposing additional colours can result in up to 30% extra cost, translating into several millions per company per year. Instead, the system should rely on **text-free pictograms, available in achromatic or monochromatic high-contrast versions matching the packaging palette**, with maximum flexibility for the possibility of using **digital labels** (QR codes or other types of data carriers) or the Digital Product Passport (if required by product legislation) to complement information or replace physical labels. A matching and actionable pictogram-based system, supported by awareness and educational campaigns<sup>2</sup>, will adequately guide consumers to correctly sort packaging waste. It should provide **maximum flexibility** for manufacturers, **avoiding the imposition of excessively granular obligations as well as recommended or prioritised label formats that could be interpreted and enforced**

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<sup>1</sup> [European Council Conclusions](#), 19 March 2026.

<sup>2</sup> "Behavioural research [...] highlights that information campaigns play a decisive role in supporting the adoption of new visual systems. Familiarisation, trust and repeated exposure are key behavioural drivers of correct sorting behaviour", JRC technical proposal on EU harmonised waste sorting labels under the packaging and packaging waste regulation (2026).

**inconsistently across supply chain actors and national authorities** – leading to market fragmentation and increased administrative and financial burdens for compliance.

In the coming years, manufacturers will need to repeatedly revise packaging artwork to comply with multiple labelling requirements due to different legislative deadlines set not only by the PPWR but also by other EU legislation. In this context, taking into account the process and time needed to update labels, flexibility and burden reduction are essential to enable companies to adapt packaging designs efficiently, minimising costs and operational disruption. Therefore, once the new PPWR harmonised labels are adopted, **Member States should promptly repeal existing national labelling requirements.** This is essential to **allow manufacturers to bundle multiple packaging artwork changes into a single implementation, preventing unnecessary additional costs.**

We thus urge the European Commission and Member States to ensure the adoption of a labelling system with a pragmatic approach that minimises the costs and burdens for the industry, while ensuring effective information for consumers.

**List of signatories:**

