

Insights

NEW EU PRODUCT LABELLING RULES: WHAT BUSINESSES MUST KNOW TO STAY SINGLE MARKET COMPLIANT

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The European Parliament's Internal Market and Consumer Protection Committee (IMCO) held a recent hearing to consider the challenges posed by differing national product labelling and recycling rules used in the EU. ECB analysis suggests that internal barriers in the EU goods market are equivalent to tariffs of around 65%. The committee heard from the European Commission, a representative from [EUROOPEN](#) (a member organisation for stakeholders in the packaging supply chain) and a representative of the [Environmental Coalition on Standards](#). At the heart of the discussion was the challenge to the single market posed by national Member States adopting their own labelling standards/requirements. This leads to divergent national requirements making it difficult for traders to use a single label to trade across the EU and also for consumers to understand how to use and dispose of goods / packaging in a sustainable way. The Commission noted that the EU needs to reconcile the need for adequate information for consumers (to ensure proper recycling / sorting of goods/packaging) whilst ensuring the functioning of the internal single market. From the Commission's perspective, it wants to avoid member states taking an approach which ignores the cross border element. This is detrimental for companies who have to repackage/relabel/oversticker products and can be confusing for consumers. In addition, it has found no correlation between adoption of national labelling systems and improved uptake in recycling.

The EU's 2025 Single Market Strategy identified 'the terrible ten' issues which contribute most to fragmentation in the single market, one of which is differing national rules on packaging, labelling and waste. This has led the Commission to take enforcement action in relation to national measures applied in France, Belgium and Spain (such as waste sorting 'on pack' instructions and Nutriscore information), where these measures are disproportionate to the objective pursued. Spain's new packaging waste labelling system was introduced in January 2025 after the Packaging and Packaging Waste Regulation was passed and France has indicated it intends to make use of the Triman recycling logo until 2028 (although both are subject to current European infringement proceedings).

The Commission is concerned that these types of unilateral measures increase costs (due to the need for relabelling / repackaging) and penalise SMEs and the outcomes sought could be achieved

by other means which do not have the same damaging impact on cross-border trade (for example, through in-store information on shelves, online labels, marketing campaigns). There are already areas of harmonisation (e.g. in the cosmetics sector) and developments in packaging waste rules, with the advent of the 2025 Packaging and Packaging Waste Regulation (2025/40), which mandates sustainability and labelling requirements for packaging throughout its life cycle, including production, use and waste management. Changes are also planned in the textile labelling sector – see below.

During the discussion, there was support for the idea that non-compliant or poor quality products thrive in environments where less product information is required and that it is better for the 'good actors' if common standards relating to product labelling information are adopted, to support consumers. There was also acknowledgement that that it takes time to build recognition/awareness amongst consumers for pictograms used e.g. in the recycling context. Whilst there was support for the increased use of digital labels (such as QR codes), it was felt that essential product information should be kept on product and not hidden online, as it is unlikely the average consumer would consult a QR code (and there are very different levels of digital literacy across the EU), so information accessible via a QR code should be limited to additional information and not key product information. The committee also discussed the risks of having too much information on a product or label, given the risks of consumer confusion.

TEXTILE LABELLING – REVISION OF RULES IN 2026

The Commission is also planning a revision of the Textile Labelling Regulations (EU 1007/2011) to move towards a 'single label' requirement to harmonise labelling requirements and reduce compliance costs for textile products. The current Textile Labelling Regulation (EU 1007/2011) focuses on the fibre composition of textile products (products which have at least 80% textile fibres). Given divergent national labelling requirements, the EU is considering the introduction of a single and uniform set of rules on labelling requirements for textile and related products of the textile ecosystem, including non-textile apparel and clothing accessories. The proposed revisions are to be made in the second quarter of 2026.

The revised regulation will focus on:

- 1. Sustainability:** There will be a particular emphasis on environmentally relevant information. Potential new labelling categories may include origin of manufacture ("made in"), details of allergenic substances, authenticity of leather and fur, organic or bio-based origin, and socially responsible production methods.
- 2. Visual Accessibility:** The revised regulation will prioritise clear and comprehensible labelling to enable consumers to readily interpret and compare product information. This may include the standardisation of symbols or codes.

3. **Proportionality:** The revised regulation will take into account what requirements are proportionate and manageable for businesses, especially smaller ones (SMEs).

DIGITISATION – PRODUCT COMPLIANCE INFORMATION – DIGITAL BY DEFAULT

In tandem, the EU Parliament IMCO committee has adopted proposals to simplify and digitise EU product compliance rules (while retaining paper-based requirements where necessary). The measures promote a 'digital by default' approach to product documentation, including EU declarations of conformity (DoC), instructions and contact details. Paper formats will continue to be required in specific cases, in particular for safety-related information. Manufacturers will also be required to ensure that consumers, including people with disabilities, elderly people and those without regular digital access, can request paper information through accessible means, including by phone. The proposals also mandate compulsory electronic correspondence / document exchange between traders and regulators. Under the proposals, EU DoCs will be digitalised and made available through a single document. Traders will also be required to offer a direct digital contact point, such as an email address or contact form, allowing consumers and authorities to contact them without registration, data sharing or the need to use dedicated applications. Deploying auto-replies, chatbots and phone lines will not satisfy this requirement. The proposals also introduce the concept of 'common specifications', which the European Commission will be able to adopt on an exceptional basis as a legally recognised fallback to demonstrate compliance with EU rules where harmonised standards are unavailable or insufficient. The Commission's exclusive power to adopt common specifications will be temporary, pending the entry into force of a revised EU standardisation framework.

In terms of timing, the Parliament will now vote to endorse the proposed negotiation mandate in March, after which it will be negotiated with the European Commission.

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