

Avenue des Gaulois 9 B-1040 Brussels Belgium Tel: +32 2 736 0305 TR: 107438267901 www.aim.be

Position

AIM's response to the EC public consultation on the Consumer Agenda 2025-2030

EXECUTIVE SUMMARY

- **Prioritise enforcing existing rules over introducing new ones**. Better implementation of existing legislation is critical to consumer trust, fair competition, and business certainty.
- Single Market fragmentation persists due to divergent national rules on labelling, packaging and product standards, raising costs and reducing efficiency.
- Brands do not restrict supply. Differentiated distribution conditions are not artificial
 barriers: they reflect different consumer demand, logistics, trends and compliance
 standards. Current EU law already addresses anti-competitive practices. Legislators must
 be careful not to be swayed by misleading narratives promoted by economically
 motivated operators, which obscure the true dynamics of supply and distribution within
 the Single Market. When designing surveys or consultations that inform policymaking,
 greater care should be taken to ensure that they reflect the complexity of supply chains
 and avoid reinforcing misleading assumptions.
- Ensuring fairness and legal certainty across the supply chain from producers to consumers is essential. Unfair Trading Practices (UTPs) continue to distort commercial relationships and undermine trust in the Single Market. Strengthening and harmonising the enforcement of the Unfair Trading Practices Directive (UTPD), including through a common legal base (Article 114 TFEU) and enhanced cross-border cooperation via Regulation COM/2024/576, is key to promoting a fair, resilient, and consumer-oriented supply chain.
- Online intermediaries must be held accountable. DSA enforcement should be strengthened by extending KYBC rules and granting IP right holders "trusted flagger" status to help combat counterfeit and non-compliant goods.
- Ensure full clarity and harmonisation in the implementation of the Directive on Empowering Consumers for the Green Transition.
- Further protect consumers by creating harmonised EU legislation to adequately tackle unauthorised sales (i.e., sales by an operator which is not authorised to sell branded products under tailored distribution networks, such as selective or exclusive distribution, franchising and consumer 'D2C' sales).
- **Reduce regulatory burden** through timeline alignment, fewer national deviations, and stronger use of TRIS and infringement tools.
- The Agenda must deliver **coherence**, **proportionality and enforcement**, ensuring consumers benefit from trust, innovation and choice across a unified market.

1. Introduction

AIM – the European Brands Association represents over 2,500 manufacturers of branded consumer goods operating across the EU. Our members include both small and medium-sized enterprises and large multinational companies producing a wide range of trusted products – from food and beverages to personal care, home care, apparel, toys and other fast-moving consumer goods. Built on decades of innovation, quality, and responsible business practices, these brands are central to daily life for consumers across Europe.

The branded goods industry is the third largest manufacturing sector in Europe and a major contributor to the EU economy. Every year, brands move over €276 billion worth of consumer goods within the EU, ensuring access to high-quality products across borders and sustaining a dynamic, interconnected Single Market.

Moreover, over 39% of FMCG goods are exported outside the EU, demonstrating that consumers around the world trust and value European brands for their safety, quality, and innovation.¹

We fully support the European Commission's ambition to define a forward-looking Consumer Agenda for 2025–2030 that safeguards consumer trust and reinforces the principles of fairness, safety and accessibility in the Single Market. A robust consumer policy must guarantee the effective enforcement of **existing rules** and ensure consistent application of the rights and obligations framework across all Member States. Without effective enforcement, consumer protection remains theoretical and the competitive balance of the Single Market becomes distorted to the detriment of compliant businesses and European consumers alike.

Rather than introducing new regulatory layers, the next Agenda should prioritise the following:

- (i) closing enforcement gaps,
- (ii) improving coordination between national authorities,
- (iii) harmonising national legislation and practices as much as possible, and
- (iv) **preventing fragmentation, which** creates uncertainty for both consumers and businesses.

A coherent enforcement framework strengthens consumer confidence, supports product safety and sustainability, and fosters fair competition in digital and physical marketplaces alike.

2. Enabling a competitive and integrated Single Market

2.1 Territorial Supply Constraints

The Single Market is one of the most significant and transformative achievements of the European Union. It fosters consumer choice, boosts competition and productivity, enabling brands to roll out innovations across national borders. In 2022, over €276 billion worth of consumer goods were traded within the EU – a clear demonstration of the dynamic cross-border flow of goods that benefits all consumers.

However, this potential is being curtailed by persistent fragmentation, including diverging national interpretations of labelling, packaging, product information, intellectual property rights and environmental requirements. This results in a growing need for brands to create multiple SKUs, alter packaging artwork, and redesign supply chain processes to comply with country-specific rules. These adaptations not only inflate production, distribution and logistics costs but also undermine sustainability efforts, such as packaging minimisation and the use of unified communication tools.

More importantly, we urge the Commission to avoid perpetuating the misleading narratives about so-called Territorial Supply Constraints (TSCs) promoted by economically motivated operators. The phrasing of certain questions in the consultation appears to suggest that brands routinely impose unjustified supply restrictions across borders. This implication is inaccurate and risks misrepresenting how branded goods supply chains function. Manufacturers do not engage in arbitrary restrictions on supply or access. Product availability reflects legitimate operational realities, including national consumer preferences, market dynamics, regulatory requirements, labelling obligations, tax systems, and logistics – not deliberate market segmentation.^{2 3} Allowing retailers to demand supply from any location would give them disproportionate influence over manufacturers' investment and sourcing decisions.⁴ This would destabilise the existing local supply structures across sectors by

¹ See AIM's Consumer Goods Industry Barometer 2024 for more information.

² See the comprehensive presentation "<u>Ensuring optimum parallel trade in a well-functioning Single Market</u>", which was presented to the Commission during the 7 April Stakeholder dialogue.

³ See AIM's insight paper on assortments and prices in Europe: https://aim.be/publication/insights-on-assortments-and-prices-in-europe

⁴ Indeed, as the retailers themselves acknowledge, "There are legal and commercial reasons for retailers not to sell everything everywhere just as there are reasons for not opening a store in every country and every town in their home state or abroad" — Eurocommerce, Geoblocking, Issue Brief September 2017, p.2. The risk of such an approach, rather than focusing on existing problems created by lack of harmonisation in the internal

encouraging concentration in lower-income Member States, which would have a negative effect on local supply chains.⁵

In addition, measures promoting EU-wide price convergence could force products made with **locally sourced materials** in higher-income markets to be priced at levels comparable to those in lower-income markets. This would put further downward pressure on suppliers, including farmers and SMEs, and ultimately discourage investment in innovation and the sustainable transition. Notably, when it comes to food, consumers themselves clearly prefer proximity: the majority say they prefer to buy products from their own country.⁶ Current EU competition law already provides sufficient safeguards against anti-competitive behaviour. Additional regulatory intervention could have unintended consequences, such as reducing incentives for innovation and investment in less mature markets and ultimately lowering consumer welfare and choice. It is retailers, not manufacturers, who set local market conditions through their pricing strategies. The European Central Bank has confirmed that price variation between Member States reflects commercial decisions by retailers, not territorial restrictions imposed by suppliers.⁷

Furthermore, serious concerns remain regarding the robustness of the Commission's current evidence base on TSCs. To date, the only Commission-backed study relied on a survey with just 34 responses, representing only 0.0006% of the wholesale and retail sector in Europe, and it provided no underlying data or documentation.⁸ A critical review of that study has been conducted and submitted, but the Commission has yet to formally acknowledge or address its findings.⁹

Instead, what is needed is a recommitment to the harmonised implementation of Single Market rules, consistency across environmental and consumer protection legislation, and effective enforcement mechanisms. EU law must offer predictability and coherence – not increase legal complexity through overlapping instruments or diverging national enforcement practices. This is particularly true in the case of labelling, where inconsistent national measures continue to create significant market distortions.

2.2 Unauthorised sales by an operator which is not authorised to sell branded products sold under tailored distribution networks (eg., selective or exclusive distribution, franchising, consumer 'D2C' sales)

Although brands are increasingly relying on selective, exclusive, and direct distribution systems, which are recognised under EU law and case law as being pro-competitive, ¹⁰ ¹¹ ¹² there is currently no EU legislation in place to prevent unauthorised sales outside of these networks. Such sales, carried out by operators without

market is laid out by <u>Luxembourg during discussions on the Geoblocking Regulation</u>, "Luxembourg remains skeptical as to the added value of the Regulation, which does not provide for legal certainty and which confirms, rather than removes, existing barriers. It obliges traders to sell everywhere in the EU without providing for any improvements and clarifications as regards the determination of the applicable law and the competent court. Businesses will not be able to protect themselves against legal and economic risks by restricting their sales to their domestic market or a limited number of markets, as they can today."

⁵ See AIM's letter to Humbert Gambs, Deputy DG, DG GROW, "Follow-up to stakeholder workshop 11th December on VVA study on Territorial Supply Constraints", 29 January 2021

⁶ According to an Ipsos/GlobeScan survey on food consumption, "on average, three in five consumers worldwide (60%) prefer purchasing food from their own country. In Italy, nearly three-quarters (74%) prefer buying food produced domestically" (cited by Euronews, <u>Consumers back Europe's anary farmers but struggle to afford locally-produced food</u>, 2024).

⁷ "Retailers practice cross-border price discrimination. This means that they maximise their profits separately in each country, even within the EU. Our study suggests that retailers have considerable market power vis-à-vis consumers, with the the border effect pointing to retailers choosing to apply price differentiation – for historical reasons – based on existing distribution networks" ECB Working Paper, 2023: Cross-country price and inflation dispersion: retail network or national border?

⁸ See AIM's letter to Humbert Gambs, Deputy DG, DG GROW, "Follow-up to stakeholder workshop 11th December on VVA study on Territorial Supply Constraints", 29 January 2021

⁹ NERA, <u>Study on territorial supply constraints in the EU retail sector: A critical review</u>, 9 December 2022

¹⁰ Commission Regulation (EU) 2022/720 (Vertical Block Exemption Regulation, "VBER"), OJ L 134, 11.5.2022.

¹¹ Metro I — Case 26/76, Metro SB-Großmärkte v Commission (1977)

¹² Metro II — Case 75/84, Metro SB-Groβmärkte v Commission (1986); and Coty — Case C-230/16, Coty Germany v Parfümerie Akzente (2017)

contractual authorisation, undermine the investments made by brands and authorised distributors. They also create unfair competition and deprive consumers of consistent product quality, warranties, and services. Although some Member States, such as France, have national measures in place, ¹³ cross-border unauthorised sales limit the effectiveness of enforcement and fragment the Single Market.

The issue of unauthorised sales belongs in a forward-looking consumer agenda:

- Safety & recalls. Off-network sellers lack traceability into the manufacturer's system, making recall notices impossible and safety instructions incomplete (wrong language, missing updates).¹⁴
- Warranties & remedies. Consumers may unknowingly buy from a non-authorised seller and later find manufacturer warranties, repairs, spare parts or software updates are refused.
- Authenticity & quality. Greater risk of altered, or expired goods, and of products not adapted to EU rules (labelling, instructions, conformity).
- **Transparency & deception**. Off-network sellers frequently imply they are "official/authorised" or that a "manufacturer guarantee applies" when it doesn't—a classic misleading practice.
- Digital/cyber risks for connected products. Devices outside authorised channels may miss security
 patches or cloud services, undermining cyber-safety and data protection.¹⁵
- **Sustainability & repairability**. Unauthorised flows undercut repair networks, access to spare parts, and product passports/traceability, frustrating right-to-repair goals.
- **Hidden costs**. Apparent bargains can lead to higher lifecycle costs (repairs, returns, compatibility issues) and no local after-sales service.
- **Single Market fragmentation**. Consumers face uneven protection across Member States; clear EU rules would level protection regardless of where they buy.

AIM therefore calls for the introduction of EU legislation to adequately prohibit unauthorised sales, ensuring the well-functioning of the Single Market and a level playing field, both of which are essential to economic growth and EU competitiveness. This could be achieved by extending the Unfair Trading Practices Directive to cover all consumer products, prohibiting buyers from participating in off-network resale or misrepresenting their status, and by addressing unauthorised sales under the Unfair Commercial Practices Directive to prevent misleading practices. Strong enforcement tools at EU level would allow brand owners to consistently protect their networks across borders, closing gaps created by fragmented national rules and preventing "forum shopping."

3. Fair business-to-business relations to protect consumers' interests

A fair and level playing field in business-to-business relations is essential for delivering choice, quality, and affordability to consumers. In recent years, European Retail Alliances (ERAs) have gained significant bargaining power by pooling the purchasing functions of major grocery retailers across borders. ¹⁶ These alliances exploit regulatory gaps in the enforcement of the UTP Directive (UTPD), establishing their legal presence in jurisdictions where supplier protections are limited or evading EU law altogether. ¹⁷ This circumvention of the

¹³ Code de commerce, <u>Article L.442-2</u>.

¹⁴ As per the Commission's 2021 study, direct, targeted recall notices (not usually available through unauthorised channels) massively improve returns; estimated €378m economic cost in 2019 of recalled products staying with consumers.

¹⁵ Per the <u>EU's cybersecurity agency</u> (ENSIA), devices sold through unauthorised channels can lack access to firmware/security update pathways or cloud service support, elevating cyber and safety risks for consumers.

¹⁶ The five most prominent ERAs operating in Europe account for approximately EUR 580 billion of the EU's total retailer footprint. For more info, see here: 2025-03-10-AIM-UTP-Enforcement-Regulation-submission.pdf

¹⁷ ERAs are structured in a way that exploits the fragmented landscape of national laws on unfair trading practices across the Single Market: by establishing their operations in jurisdictions where suppliers have limited protection from UTPs because UTP laws do not protect all suppliers (Eurelec and Coopernic are based in Belgium, and Everest and AMS Sourcing are based in the Netherlands) or no protection from UTPs (Epic Partners, AgeCore and EMD are based in Switzerland), ERAs effectively circumvent stricter national rules by freeriding on the uneven playing field across the EU.

rules weakens the effectiveness of the UTPD and places manufacturers, including SMEs, under pressure to accept unfair contract terms and arbitrary delisting threats. ¹⁸

At the same time, the increasing concentration within national retail markets has positioned dominant retailers as effective gatekeepers to shelf space with full control over pricing, product visibility, and even whether products can enter or remain on the market. ¹⁹ This dynamic is not limited to ERAs: similar imbalances are now occuring across the broader retail landscape, with powerful buying desks replicating coercive tactics even outside of formal alliances. Furthermore, this is happening in the context of continued growth in private labels, which currently account for around 39% of Europe's grocery sales by value. ²⁰ As direct competitors to branded manufacturers, retailers' own labels benefit from unique access to suppliers' business plans, innovation pipelines, and promotional strategies. This dual role raises serious concerns about fairness and competitiveness, as it enables retailers to act as both gatekeepers and competitors within the same market. ²¹

Ultimately, such unfair practices impact consumer access to branded goods, especially in smaller markets, by discouraging investment, reducing product availability, and undermining market dynamics. The Italian enforcement authority has noted inflationary effects from the operations of ERAs being passed onto consumers.²² The fragmentation of UTP rules, with variations in scope, turnover thresholds, and enforcement approaches across Member States further exacerbates these risks. Suppliers accessing the shelves of the same supermarket chain across the EU face different national rules, creating legal uncertainty and increasing compliance costs, which are ultimately passed down to consumers.

Furthermore, self-preferencing, which the EU has rightly prohibited on digital platforms under the Digital Markets Act, remains permissible in physical retail. This means that retailers can prioritise their own private label products on the shelves that they control, while also setting prices and controlling the placement of competing branded products on adjacent shelves. Nowhere else in the EU's industrial ecosystem does a direct competitor dictate a rival's market conditions in this manner. This structural imbalance deserves urgent policy attention.²³

To address this issue, AIM supports the implementation of a comprehensive and harmonised UTP framework extending beyond the current scope. We recommend supplementing the existing legal basis of the UTPD with Article 114 TFEU to enable a Single Market-wide approach to enforcement. We also recommend simplifying rule sets by eliminating annual turnover protection thresholds – a measure already adopted by many Member States when implementing the UTPD. The list of practices in the UTPD should be updated to reflect current market practices of retailers. In parallel, the proposed Regulation on cooperation among UTP authorities (COM/2024/576) should be swiftly adopted and strengthened to enable coordinated action in cross-border

¹⁸ AIM has collated a non-exhaustive list of <u>more than 100 decisions and judgments uncovering retailers' unfair trading and anticompetitive practices in Europe for the period 2014 – 2025</u>. Such practices ultimately have negative impacts on EU consumer welfare.

¹⁹ The practice of product delistings is just one way in which retailers restrict the supply of products to consumers. See <u>AIM's Product Delisting: How Supermarkets Control the Consumer Goods Market in Europe</u>

²⁰ Across 17 national markets tracked for PLMA by NielsenIQ, see PLMA, "European private label sales rose to 355 billion € last 'year'"

²¹ "The retailer sets the consumer price on supplier brands according to its retail strategy and its own retailer brands; as such the retailer has a dual role as a retailer and as its own supplier, competing directly against its intermediaries (wholesaler, suppliers) products. Retail can increase the consumer price of supplier brands to create a significant price gap with its own retailer brands, in order to make its retail brands more attractive to consumers. Retail margin on retailer brands vary per retailers and products, reating price differences". See AIM Insights Paper: A Perspective on Assortment and Consumer Price Differences in Europe, December 2020.

The Italian UTP enforcement authority <u>noted</u> in 2023 that ERAs "have inflationary repercussions because (of the) additional level of bargaining(, which) raises the level of consumer prices". They further added that they have "contacted some of [their] counterparts in the main European countries in order to assess a joint action to bring to the attention of the European institutions the risk of unfair commercial behaviour through international contracts".

²³ "Non-pricing practices may also be used to distort the consumer's in-store choice through degradation of services... better positioning of the supermarket brands, and copycat packaging." Javier Berasategi, <u>Supermarket Power: Serving Consumers or Harming Competition</u>, Social Science Research Network (SSRN), March 10, 2014. The paper explores how leading supermarkets act as vertically integrated bottlenecks, limiting competition among brands—including their own—and adversely affecting consumer welfare.

cases. The text adopted by the European Parliament Agriculture Committee text²⁴ in July 2025 with near-unanimous support should form the basis for finalising this file. Ultimately, robust and harmonised enforcement of UTP rules will protect suppliers, ensure fair commercial practices, and stabilise the supply chain for the benefit of consumers.

4. Consumer protection in the digital environment

Digital markets are evolving rapidly. While they offer increased convenience and choice, they have also introduced new risks for consumers, law enforcement agencies, and intellectual property right holders. We support the Commission's continued efforts to combat dark patterns, deceptive interface design, online fraud, and the lack of transparency and regulation surrounding influencer marketing. However, enhanced — and enforced — proactive and preventive measures are needed to ensure that non-compliant traders and illegal goods, including counterfeits, many of which originate from outside the EU, are not readily hosted and available online.

AIM calls for expanded accountability of all digital intermediaries (platforms, social media, etc.) and relevant supply chain players (dropshippers, agentic IA, buying agents, digital advertising providers, etc.), including under the Digital Services Act (DSA) where "trusted flagger" status must be granted to qualified IP right holders. Efficient reporting and the rapid removal of illegal and non-compliant goods, including dangerous goods, online is essential to safeguarding consumers, ensuring brand integrity, respecting environmental and sustainability standards, and maintaining trust in online transactions. Enforced, robust repeat offender policies are needed, as is a stay-down obligation for offers confirmed to be for illegal goods. The 'Know Your Business Customer principle' should also be extended to all intermediaries – it is a non-controversial good business practice that ensures a client who misuses a service to offer and sell illegal content can be identified. Stronger proactive and enforcement measures by all intermediaries, their cooperation with enforcement authorities and legitimate right holders and harmonised respect for and implementation of consumer and IP laws are all essential.

All intermediaries should be held responsible for the parts of the digital supply chain that they oversee. Unregulated channels must be brought into compliance and proactive cooperation with competent authorities should be the norm: consumers expect and deserve coherent protection and rights across all digital channels. Legislation must also be implemented in a way that avoids placing excessive burdens on compliant businesses, while ensuring that everyone plays their fair part in maintaining a clean and trustworthy digital ecosystem. AIM supports the principles of fairness and proportionality in enforcement, and calls on policymakers to take a balanced approach that does not penalise legitimate operators.

5. Supporting companies' compliance with the directive on empowering consumers for the green transition

Sustainability information is a catalyst for Brands' investments in innovation. It is key to support businesses to remain competitive and achieve the EU's environmental objectives, while empowering consumers to make sustainable choices. However, legal uncertainty and divergent interpretation of the rules will lead to fragmented enforcement across the EU, eroding businesses' regulatory predictability, which acts as a disincentive for companies' communication of sustainability efforts. It also increases burden and operational inefficiency, as companies need to adapt (e.g., through relabelling) to the differing national interpretations. The Directive on Empowering Consumers for the Green Transition (ECGT), set to become applicable by September 2026, requires swift clarification and guidance for the correct and harmonised application by companies and authorities. The new framework is based on unclear definitions (e.g. what constitutes an "environmental claim" or a "sustainability label") and provisions (e.g., when a claim is considered sufficiently

²⁴ For more information, please see AIM's Press Release, "<u>Tackling Imbalance of Bargaining Power: EP aims to strengthen protection against unfair trading practices in the EU"</u>

specificied in clear and prominent terms on the same medium and if digital solutions can be used to support the specification of the claim), which can be differently transposed by national legislators (including local language requirements) or differentely interpreted by national enforcement authorities, thereby complicating companies' compliance. Additionally, the absence of a "grandfathering rule" clarifying that the new rules do not apply to environmental claims and sustainability labels on products/packaging placed on the market before September 2026 would force companies to either withdraw products (resulting in destruction of packaging and, in some cases, products) or sticker them, both options carrying significant environmental and economic impacts. Moreover, manufacturers lose control over products once they are handed to distributors, making the process even more complex to manage.

The uncertainty, coupled with the potential for penalties and reputational risk, as well as the very tight timeline for compliance, may discourage businesses from making and communicating such investments, ultimately impacting consumer access to sustainability information. This runs contrary to the objectives of the policies adopted by the European Commission.

AIM calls on the European Commission to:

- Swiftly update the UCPD Guidance Document to reflect the new rules set in the ECGT Directive and ensure harmonised enforcement throughout the EU. This should address the many legal uncertainties of the text to support companies in the correct interpretation and compliance with the new rules.
 Or, if the guidance cannot be updated in a timely manner, swiftly publish a Frequently Asked Questions (FAQ) document on the ECGT Directive, to serve the same purpose.
- 2. Clarify that claims and labels printed on products/packaging placed on the market before September 2026 can continue to be marketed. Meanwhile, local enforcement authorities should take a lenient approach when companies can demonstrate their efforts towards compliance with the ECGT Directive.

6. Reducing administrative burden through policy coherence

Businesses across the EU are facing unprecedented regulatory pressure as they navigate multiple compliance obligations related to digital fairness, consumer rights, product safety, and sustainability. Although consumer protection remains a priority, excessive and inconsistent regulation undermines the same outcomes that it seeks to promote by diverting resources away from innovation and product development.

The Commission must minimise the administrative burden by:

- Avoiding gold-plating in Member State transpositions, and stepping up infringement actions where harmonisation is undermined,
- Strengthening the TRIS Directive to enforce transparency and compliance in national rulemaking processes, and
- Adopting a test-and-learn approach to consumer information requirements, particularly where digital tools can provide scalable, low-cost alternatives to physical labels.

7. Conclusion

In today's volatile global trading environment, it is vital to enhance the competitiveness of Europe's responsible manufacturers is vital to maintain consumer access to trusted, high-quality, and affordable products. A strong industrial base is essential for fostering the innovation and resilience that underpin the valued consumer goods brands that European consumers rely on daily. AIM remains committed to collaborating with EU institutions and stakeholders to create an environment in which both industry and consumers can thrive.

About AIM

AIM (Association des Industries de Marque) is the European Brands Association, which represents manufacturers of branded consumer goods in Europe on key issues that affect their ability to design, distribute and market their brands.

AIM comprises 2500 businesses ranging from SMEs to multinationals, directly or indirectly through its corporate and national association members. Our members are united in their purpose to build strong, evocative brands, placing the consumer at the heart of everything they do.

AlM's mission is to create for brands an environment of fair and vigorous competition, fostering innovation and guaranteeing maximum value to consumers now and for generations to come. Building sustainable and trusted brands drives the investment, creativity and innovation needed to meet and exceed consumer expectations.

AIM's corporate members

AB InBev • Arla Foods • Bacardi Limited • Barilla • Beiersdorf • BIC • Carlsberg Group • Chanel • The Coca-Cola Company • Colgate-Palmolive • Coty • Danone • Diageo • Dr. Oetker • Essity • Essilor International • Estée Lauder • Ferrero • Freudenberg/Vileda • Groupe Lactalis • Haleon • Heineken • Henkel • HP Inc. • JDE Peet's • Kenvue • Kellanova • The Kraft Heinz Company • Lavazza Group • The LEGO Group • Lindt & Sprüngli • L'Oréal • LVMH • Mars Inc. • McCormick • Mondelēz • Nestlé • Nike • Nomad Foods Europe • Orkla • PepsiCo • Perfetti Van Melle • Pernod Ricard • Philips • Procter & Gamble • Puma • Reckitt • Red Bull • Savencia Fromage & Dairy • SC Johnson • Sigma • Signify • Sofidel • Unilever

AIM's national association members

Austria Markenartikelverband • Belgilux BABM • Czech Republic CSZV • Denmark MLDK • Finland FFDIF • France ILEC • Germany Markenverband • Ireland Food & Drink Federation • Italy Centromarca • Netherlands FNLI • Norway DLF • Portugal Centromarca • Spain Promarca • Slovakia SZZV • Sweden DLF • Switzerland Promarca • United Kingdom British Brands Group

EU Transparency register ID no.: 1074382679-01

9