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AIM INPUT

Product and packaging labelling requirements in the EU: Examples of barriers in the Single Market and recommendations for solutions

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Introduction

Today, Europe's competitiveness and innovation potential are undermined by the persistent fragmentation of the Single Market. As highlighted in the reports by Enrico Letta[1] and Mario Draghi[2], the **fragmentation of the EU Single Market has a cascading effect on the EU's competitiveness.**

This fragmentation is **exacerbated by the divergent interpretation, application and enforcement of EU legislation by its Member States**. This imposes significant costs on companies operating in the Single Market, as also highlighted in the recent Single Market Strategy: country-specific packaging forces businesses to **set up separate production lines to comply with different legal requirements** (*e.g.*, for product formulation and packaging labelling) as well as re-package and re-label products – with environmental impacts that run counter to the objectives set in EU legislation. These disparities **impact production costs, capacity and logistics but also create barriers to the free movement of goods, hindering intra-EU trade**: For companies relying on the EU Single Market, the allocation of products to specific markets may not be determined in advance, hence any change to their destination becomes impossible if Member States impose unilateral labelling requirements.

Moreover, unilateral or divergent labelling requirements complicate companies' compliance with new EU rules – for instance, the need to adhere to different labelling requirements may lead to a larger packaging volume, contrary to the packaging minimisation requirements of the recently adopted Packaging and Packaging Waste Regulation (PPWR).

Ultimately, this **limits companies' ability to scale up innovative solutions**, thereby **stifling economic growth across the EU**.

You will find below our contributions to the questions under discussion in the SMET, as well as an Annex with concrete examples of divergent packaging or product labelling rules in the EU.

[1] Enrico Letta, "Much more than a Market"

[2] Mario Draghi, "The future of European competitiveness – A competitiveness strategy for Europe"

Questions on the SMET project addressing packaging and labelling challenges

Identification of the most burdensome packaging/labelling requirements

1. **Which are the most problematic packaging/labelling requirements for businesses? Are we aware of the most burdensome packaging/labelling requirements for local companies trading across the EU?**

    - Any EU legislation with unclear provisions or allowing Member States to impose unilateral measures (e.g., when transposing Directives) can lead to different labelling requirements across EU countries, with a severe impact on the Single Market. Moreover, over the past years, EU Institutions adopted new legislation establishing labelling requirements (e.g., Packaging and Packaging Waste Regulation, Directive on Empowering Consumers for the Green Transition, Regulation on the Classification, Labelling and Packaging of Substances and Mixtures, Detergents Regulation, etc.). All these frameworks have different timelines for the application of the new labelling measures and will thus force companies to repeatedly review the artwork of their packaging. This is not only extremely inefficient, leading to an increase in production costs, but can also create barriers to the free movement of goods in the EU, especially due to the very tight transition periods allowed for companies.

      Additionally, divergence in labelling requirements and fragmentation of the Single Market can also come through secondary legislation, if this is not drafted with a clear focus on avoiding creating further barriers in the internal market. For instance, the future EU harmonised waste sorting instructions for packaging, required under the Packaging and Packaging Waste Regulation (PPWR), will lead to fragmentation and run contrary to the harmonisation objectives of the PPWR if text keeps being required on packaging. The proposed system, which should rely on matching pictograms that are displayed on the packaging and the corresponding bin and waste receptacles, is still far from surviving to the test of the Single Market: While in the latest version the use of text is not mandatory, it is recommended to use the pictogram versions with text, and the text-free version is only allowed based on vague criteria. This can lead to situations where authorities and economic operators (from manufacturers to distributors) may have different interpretations. Authorities and distributors may even require further justifications from manufacturers on the chosen version over the recommended one (i.e. with text and full colour), with an unnecessary increase in the human and financial resources demand for manufacturers to address such discrepancies in interpretations and enforcement.

      It is thus key to ensure that the European Commission plays its role in ensuring a harmonised interpretation and enforcement of the EU rules through legislative proposals that effectively harmonise the requirements and provide clear provisions, as well as by supporting stakeholders and enforcement authorities after the adoption of EU legislation through guidance, FAQs and any other support relevant to clarify the correct and harmonised interpretation of the rules. The European Commission should also ensure that any divergence does not arise when developing secondary legislation, which should follow the same principles of preservation of the Single Market as primary legislation. The SMET should also be involved in any development of such secondary legislation to ensure the Single Market principles are respected.

- Any divergent or new labelling requirement set by a Member State will create a barrier to the EU Single Market and impose costs and operational inefficiencies. For companies relying on the EU Internal Market, the precise allocation of products to specific markets is not necessarily determined in advance. Any change to the destination of products across markets becomes impossible if Member States require specific information. Consumer goods companies have witnessed a considerable amount of unilateral legislation adopted by Member States, which keep adopting such measures without consideration of the consequences on the Single Market.

  The Commission must play its role in swiftly pursuing actions (infringement procedures) against such unilateral decisions of Member States.

We elaborate in the Annex on some examples of divergent interpretations, transposition and enforcement of EU legislation, as well as unilateral measures taken by EU Member States.

2. Which non-harmonised labelling requirements diverge a lot from MS to MS?

- While the recent Packaging and Packaging Waste Regulation (PPWR) aims to harmonise labelling requirements, notably by establishing EU harmonised labels (e.g., for sorting instructions, reusability, recycled content), environmental information saw a considerable amount of divergent requirements before harmonisation. For instance, France, Italy, Bulgaria and Spain have all adopted different sorting or environmental rules (e.g., Tidyman, Triman, pictograms or alphanumeric system) which not only led to the creation of barriers to the Single Market and increased costs and operational inefficiencies for companies, but they also contributed to increase consumers' confusion when reading labels. While the Commission has started infringement procedures against national requirements, the marking obligations currently apply to businesses operating in those markets, with all the negative consequences already highlighted above.

- Symbols for producer responsibility (EPR), such as the Green Dot. As an example, the use of this symbol is penalised in France but allowed in other Member States. The Green Dot used to be mandatory in Spain.

- Labelling on shrinkflation: Italy, France and Spain have introduced (or are currently considering the possibility of introducing) measures against shrinkflation, aimed at informing consumers whenever the quantity of a packaged product has been reduced while its price remained unchanged. While Italy and France have already introduced such measures, and an infringement procedure against Italy is ongoing, Spain is still discussing a draft law proposal at the national level.

3. Are there labelling requirements in one or more MS which are banned by other MS?

- As mentioned above, the use of the Green Dot is penalised in France, but allowed in other Member States – it even used to be mandatory in Spain. To note, the recent PPWR requires packaging included in an EPR scheme to be identified only through digital means.

- While Bulgaria mandates the Tidy-man logo, Portugal has notified of a possible ban on this symbol.

4. **What sources of information could be used to make a good overview of national requirements?**

   Institutional sources:

   - TRIS notifications and the European Commission's infringement databases.

   Stakeholders sources:

   - The Compendium of Single Market obstacles, prepared by a number of Associations.
   - The Annex to this document which provides a non-exhaustive list of examples of divergent labelling requirements.
   - The EUROPEN overview of EU Member States measures threatening the Single Market and free movement of goods across the EU.
   - FESI, FoodDrink Europe, Cosmetics Europe contributions, further detailing divergencies on packaging and product- or sector-specific rules.

Prioritisation of specific challenges

1. **Which are the sectors affected the most from the packaging/labelling requirements?**
   - Currently, consumer goods manufacturers are facing an extremely fragmented Single Market due to the many barriers stemming from divergent labelling requirements. Moreover, divergence of labelling requirements for packaging equally impacts all these sectors.
2. **Shall we prioritise/focus on certain sector/s for launching a SMET project? Which sector/s are the most suitable? (i.e. In this case we look into various labelling requirements for the same product group.)**
   - We recommend starting from the broader consumer goods sector, given it faces divergence in both packaging and product labelling requirements.
3. **Shall we focus only on specific labelling requirements (e.g. environmental labelling, energy labelling, etc.)?**
   - As explained above, the multiplying divergences in both product/sectoral legislation, coupled with divergences from packaging labelling requirements, contribute to the severe exacerbation of the fragmentation in the Single Market. They should be looked at together.
4. **Is there EU legislation on the pipeline to address those challenges? (mostly for the GROW SMET team to check)**

   Recently adopted EU legislation that will require implementation:

   - As mentioned above and below in the Annex, the recently adopted PPWR aimed to harmonise labelling requirements. It will need to be implemented through the adoption of secondary legislation or other initiatives (e.g., guidance documents). The DG GROW SMET team should thus be involved in all the discussions and work on such initiatives, to ensure that the principle of Single Market preservation is correctly and fully respected. For instance, immediate involvement is necessary in the ongoing preparatory work on the implementing act establishing the EU harmonised label on sorting instruction under the PPWR, which is to be adopted by 2026.

- The recently adopted Directive on Empowering Consumers for the Green Transition, which becomes applicable from September 2026, should be looked at by the SMET to ensure that clarity and guidance are provided to businesses and authorities, in order to avoid concerning divergences across Member States and facilitate the correct application of the rules.
- The recently adopted Ecodesign for Sustainable Products Regulation (ESPR) will also need to be implemented, including with the rollout of the Digital Product Passports (DPP). It will be paramount to ensure full coherence, even in the interlink between this legislation and other EU acts (e.g., PPWR).

Upcoming EU legislation:

- The European Commission is currently working on a future Circular Economy Act, expected by the end of 2026, which should bring further harmonisation (e.g., on EPR).

SMET actions

1. **What actions could be taken by SMET to address the identified challenges?**

    - **The SMET should be consistently involved in the preparation of any draft EU primary and secondary legislation that impacts product or packaging labelling. This is necessary to ensure that a "Single Market test" is enshrined and effectively adopted during the drafting of the legislation.** The SMET should also continue to be consulted and involved throughout legislative processes (to ensure, in particular, that any further amendments adopted by co-legislators risk undermining EU efforts on harmonisation) and in the monitoring and support to national authorities on correct and harmonised transposition and enforcement of EU legislation.
    - The SMET should also consider further promotion and uptake of digital solutions (e.g, QR codes or similar) to address the existing fragmentation of packaging and product requirements. The use of digital means allows manufacturers to provide up-to-date information without having to continuously review the artwork of their packaging. It also allows for avoiding situations where packaged products cannot be moved across EU markets due to non-compliant labels.

2. **Which stakeholders should be contacted to provide further input and cooperate with us?**

    - Non-exhaustive list of stakeholders who can be contacted to provide further input:
      AIM, EUROPEN, FoodDrink Europe, Cosmetics Europe, FESI, Toy Industries of Europe, A.I.S.E., Unesda, spiritsEUROPE, CAOBISCO.

Annex: Concrete examples of divergent packaging and product labelling requirements across the EU

<table>
<tr><th>Dossier</th><th>Impact on the Single Market</th><th>AIM recommendations</th></tr>
<tr><td colspan="3">Packaging legislation</td></tr>
<tr><td>Packaging and Packaging Waste Regulation (PPWR)</td><td>The recently adopted PPWR aims to harmonise requirements across the EU but allows Member States to introduce additional sustainability or information requirements beyond those outlined in the Regulation. We identify the following issues:

1. The PPWR implementing acts (e.g., on EU harmonised labels on waste sorting instructions) risk undermining the objectives set by the European Commission in its Single Market Strategy (SMS), leading to country-specific packaging and further fragmentation of the internal market. As acknowledged by the European Commission in its recent SMS, the use of text on packaging leads to barriers to the free movement of goods in the EU market, forcing manufacturers to have country-specific packaging. This leads to inefficiencies in the production lines and increased financial and human resources. The harmonised waste sorting instructions under development by the European Commission's Joint Research Centre (JRC) are recommending the use of text for pictograms, while allowing versions of text-free pictograms to be used based on vague criteria which can be differently interpreted. This is not acceptable, as it will lead to divergent enforcement and interpretations between manufacturers and other operators (e.g., distributors) and enforcement authorities. Authorities and distributors may even require further justifications from manufacturers on the chosen version over the recommended one (i.e. with text and full colour). This will require human and financial resources, while the primary objective of the labelling system is that the matching pictogram (i.e. the icon) is placed on the packaging to guide the consumer to place it in the right bin. Anything additional, from text to colours, will only complicate compliance for companies.</td><td>• The European Commission should also provide clear and detailed guidance on the interpretation and implementation of key requirements.
• Member States should refrain from adopting national measures, and the European Commission must promptly and actively address barriers by pursuing infringement actions against Member States introducing additional, country-specific requirements.
• Future PPWR implementing acts establishing harmonised labels should rely on text-free pictograms as an EU-harmonised solution. Language must be avoided to eliminate the need for translation and country-specific labels, which create challenges for manufacturers having to fit information on packaging that must be minimised.
• Finally, the PPWR implementing measures should also integrate the use of digital solutions (QR code or other similar data carriers) not only to provide additional information to consumers but also to replace harmonised labels whenever it is not possible to provide the information on the packaging, due to its limited size. Digital solutions provide more flexibility for manufacturers, enabling them to provide up-to-date information and avoid reviewing the artwork of their packaging.</td></tr>
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Dossier	Impact on the Single Market	AIM recommendations
	The use of text forces manufacturers to translate the label into different languages. As acknowledged also in the SMS, this forces "producers to develop different versions of the product for different markets or to relabel or even repackage products when moving them across borders". For companies operating and relying on the integrity of the EU Single Market, having to translate labels leads to operational inefficiencies as multiple production lines need to be set up to accommodate the different packaging needs. It will result in increased costs for companies and operational burdens, as the precise allocation of products to specific markets is not necessarily determined in advance; hence, any changes to the destination of products across markets would become impossible if text is required. Today, product labelling requirements are already complex and require extensive information to be provided on-pack. At the same time, the PPWR is mandating packaging minimisation. Manufacturers will thus need to fit the numerous labelling requirements into further limited space. Translating the sorting instructions will not contribute to streamlining labelling requirements but, on the contrary, further complicate them. A clear, simple, text-free pictogram-based system will thus be sufficient to ensure the provision of actionable information to consumers, without overburdening manufacturers. 2. The PPWR contains many uncertainties that, if not properly clarified, risk being differently interpreted and enforced by economic operators and national authorities. This may also force companies to revise the artwork of their packaging accordingly. 3. Differing national labelling requirements **create barriers to cross-border trade**, **complicating market access and increasing costs for manufacturers**. Today, companies must comply with multiple labelling measures, requiring several labels/stickers on products. For instance:	

Dossier	Impact on the Single Market	AIM recommendations
	• France's *Loi No 2020-105 du 10 février 2020 relative à la lutte contre le gaspillage et à l'économie circulaire* mandates the use of the **"Triman" logo** for products subject to Extended Producer Responsibility (EPR). This has created significant barriers to the free movement of packaged goods in the EU, as packaging must be specifically tailored for the French market, leading to additional costs associated with re-labelling, re-packaging, and adapting production lines. • Moreover, France had prohibited the **Green Dot label** (used to indicate that a producer complies with its EPR), while Spain and other countries had mandated its use on all packaging. This thus led to inconsistencies, preventing manufacturers from placing the same packaged product on the French and Spanish markets. • The **Spanish Royal Decree** 1055/2022 on packaging and packaging waste mandates the use of a label indicating packaging reusability and sorting instructions. This anticipates the EU-harmonised labelling system under the PPWR, forcing companies to re-design packaging twice – first for Spanish compliance and later for PPWR compliance. • With its Legislative Decrees 116/2020 and 360/2022, **Italy** requires producers to identify and classify packaging materials and mark the packaging accordingly, following the system laid down in Decision 97/129/CE and integrated by norms developed by the Italian Standardisation Body. This creates barriers to the Single Market and forces manufacturers to develop country-specific packaging, with increased costs and operational inefficiencies. These country-specific requirements impose substantial burdens on businesses during economic hardship, increasing instability and uncertainty. They also risk confusing consumers and hindering their understanding of the EU-harmonised labels. Additionally, the need to meet multiple labelling requirements conflicts with the packaging minimisation requirements (as packages need to be minimised	

Dossier	Impact on the Single Market	AIM recommendations
	in their volumes, thereby limiting the available space to fit the many labelling requirements).	
Horizontal EU legislation		
Directive on Empowering Consumers for the Green Transition (ECGT)	**The lack of clarity on the Directive's measures raises concerns that Member States may transpose, interpret and enforce the rules inconsistently, leading to further fragmentation of the Single Market. This will consequently impact packaging and product labels, with consequent unpredictability and uncertainty for companies, as well as increased human and financial resources:** • As the assessment of compliance with the Directive is left to the Member States, there is a risk that Member States diverge from the Directive by adding further requirements for the communication of environmental claims, with some authorities imposing bans on specific environmental claims. This potential fragmentation brings further negative impacts. Together with the risk of penalties and reputational harm, it contributes to increasing uncertainty for businesses. As a result, companies may be discouraged or prevented from communicating investments behind environmental claims, which will negatively impact their competitiveness and investments in innovation. • Moreover, the Directive does not include any "grandfathering clause", i.e. no provision for claims that are already printed on products and/or packaging placed on the market *before* the application of the Directive. We understand from exchanges with the European Commission's DG JUST that the Directive applies to commercial practices, not products. This means that the Directive will be enforced from September 2026, regardless of whether the product with the claims was placed on the market *before* the application of the Directive. Consequently, **companies will need to either withdraw products from the market (with consequent destruction of packaging and, in some cases, products) or sticker them, both options bringing considerable environmental and economic impacts**.	• The European Commission should promptly **update the Guidance Document for the Unfair Commercial Practices Directive** to ensure a harmonised interpretation of the rules adopted in the ECGT Directive, as well as a consistent transposition and enforcement of the Directive across EU Member States. • The European Commission should further **monitor Member States' transposition to swiftly address any inconsistencies**.

Dossier	Impact on the Single Market	AIM recommendations
	Moreover, manufacturers would not be in control of their products once they are handed over to the distributors, which further complicates any operation. • In addition, **the European Commission's DG JUST is refusing to update its 2021 Guidance Document to reflect the new rules.** This would have supported companies with a clear interpretation of how to comply with the rules. The lack of proper guidance will not support the harmonised enforcement of the Directive, increasing the risk of divergent interpretations among authorities and businesses.	
Sector or product-specific legislation		
CLP Regulation	The newly adopted Regulation for Classification, Labelling and Packaging of Mixtures and Chemicals (CLP) mandates an **increase in font size on packaging for certain products, limiting the available space for multiple languages on labels, and therefore, restricting the number of markets where products can be placed.** The prohibitive cost of creating additional SKUs for smaller markets may prevent companies from offering products in those regions. Additionally, the CLP's **increased information requirements lead to larger labels and, in some cases, bigger packaging, conflicting with the PPWR's goals** of waste prevention and reduction through the minimisation of packaging volumes.	It is crucial to ensure that **rules are consistent with those set out in other EU legislative proposals**, especially when addressing interlinked issues. The **European Commission should strive for consistency across DGs when drafting proposals, as well as throughout the legislative processes,** particularly when the legislation is being reviewed at the same time, to avoid clear conflicts.
Biocides Regulation	The Biocidal Products Regulation (EU) 528/2012 (BPR), has been in effect for over a decade to harmonise national rules and improve the functioning of the Single Market for biocides. However: • **Member States continue to operate national schemes**, creating challenges for businesses. • A key issue in recent years is the **introduction of national rules for certain biocidal product types (PTs),** exceeding EU requirements. These rules often restrict or ban in-store advertising of certain PTs, such as consumer insecticides, and impose additional measures for specially trained staff and locked shelves for products. • **As a result, many retailers have delisted these products, given their inability to comply with the law. This led to a de facto ban of certain products from consumer**	• A **consistent and harmonised application of the BPR** rules is essential to remove the obstacles created by national initiatives, ensuring the free movement of goods and safeguarding the Single Market. • While **Member States should refrain from adopting national measures**, the **European Commission should promptly and actively address barriers by pursuing infringement actions** against Member States introducing additional, country-specific requirements.

Dossier	Impact on the Single Market	AIM recommendations
	shelves, undermining the harmonisation goals of the BPR and limiting consumer access to registered products in some Member States.	• Further **harmonisation and clarification of rules and timelines** should be part of the BPR review to avoid further market fragmentation and unpredictability for businesses.
Food Information to Consumers	Manufacturers face **diverging national interpretations of the EU harmonised rules.** For instance, with Regulation 1169/2011 on **Food Information to Consumers (FIC), national requirements are adopted to establish specific on-pack measures. Such national initiatives compromise the smooth functioning of the Single Market and harm the competitiveness of the EU food and drink sector by adding complexity in food manufacturers' daily operations.** Concrete examples: • Belgium requires a warning label in Dutch and French if vitamins and/or minerals exceed set levels. • France set a specific definition of "potato crisps" and required all the front-of-pack information to be provided in French, and set up a mandatory origin labelling for cocoa products. • Finland requires a warning on the pack if the salt content exceeds set levels. • The Netherlands are introducing a new precautionary allergen label to communicate the presence of allergens in products. • Moreover, there are national interpretations of the concept of what is "misleading" for the consumer, including concerning pictorials representing ingredients on packs and claims, as well as "free from" claims. • The Irish Public Health (Alcohol) Act 2018 ("PHAA"), complemented by Public Health (Alcohol) (Labelling) Regulations 2022, notified by Ireland to the EC on 22 June 2022, introduced new labelling requirements for alcohol product containers. • Romanian order requiring economic operators to provide consumers with clear and complete information on foods that are or contain species of any insect authorised to be placed on the market as novel foods (2023).	It is key to address these inconsistencies and ensure a harmonised implementation throughout Member States.

Dossier	Impact on the Single Market	AIM recommendations
	• Hungarian Minister of Agriculture (AM) Decree amending Ministry of Agriculture (FM) Decree No 36/2014 of 17 December 2014 on food information introducing a mandatory label for foodstuff containing insect proteins. • Italian Ministry of Agriculture four decrees on food and preparations intended for human consumption obtained by using the partially defatted powder of Acheta domesticus or frozen, dried and powdered forms of Acheta domesticus (link), Tenebrio molitor larvae (link), Locusta migratoria (link) and Alphitobius diaperinus larvae (link), dated from 6 April 2023, and that came into effect on 29 December 2023. Those decrees require mandatory additional labelling of products containing ingredients from insects (authorised by EFSA). • Divergent interpretations of the labelling of allergen ingredients by national authorities lead to confusion for business operators and can also hinder the Single Market through different interpretations of the same rules (e.g., Spain). • The absence of generally agreed quantitative benchmarks for the application of precautionary allergen labelling and the consequent lack of consistent harmonised standards among Member States and across industry led to a lack of transparency and confusion among allergic consumers.	
National measures		
Spanish Draft Royal Decree for labelling in Braille	The Spanish Law 4/202 indicates that the Government will develop an implementing act for labelling in Braille, as well as in other formats that ensure universal accessibility of goods and consumer products. Spain has recently notified the European Commission of its draft Royal Decree establishing such labelling. The Decree will create significant barriers to the free movement of packaged goods in the EU, as packaging must be specifically tailored for the Spanish market, leading to massive costs for the adaptation of all consumer goods packages associated with re-labelling, re-packaging and adaptation of production lines.	The European Commission opened infringement procedures for some of these national measures. The Commission must pursue such national actions to ensure Member States do not continue to adopt legislation that further fragments the EU Single Market. Moreover, Member States should not diverge from existing EU legislation nor introduce any labelling requirement that will force manufacturers to produce country-specific packaging.

Dossier	Impact on the Single Market	AIM recommendations
German law on labels for toothpaste and mouthwash	The German Federal Institute for Risk Assessment (BfR) requires manufacturers to label toothpaste with the Fluoride content. Moreover, mouthwashes need to indicate the alcohol content on their labels. Such requirements force manufacturers to develop country-specific packaging for Spain. This entails barriers to the free movement of goods in the EU, increased costs and operational inefficiencies.	
Italian label on "shrinkflation"	Italy's 2023 Annual Law for the market and competition includes provisions on the re-portioning of pre-packaged products (so-called "shrinkflation"). As of 1 April 2025, products in scope must be re-labelled with the sentence "This package contains a product less than X (unit of measurement) compared to the previous quantity". While the measure aims to address "shrinkflation", the requirement poses a serious risk of a barrier to the free movement of goods in the EU. It will also force manufacturers to re-label and re-package products (having country-specific packaging for Italy), leading to increased costs and operational inefficiencies.	
Mandatory Eco Score labelling schemes set at national level	France established a voluntary "**Eco-Score"**, a label rating products from A to E, based on their environmental footprint. While it is voluntary, if companies intend to present environmental information in the form of an eco-score, they are obliged to use the French Eco-Score. This presents serious concerns for its **creation of barriers to cross-border trade**. It will impose **significant costs on companies due to country-specific labelling and compliance with non-harmonised criteria that may conflict with those set in other EU markets** and those that could be set under the implementation of the **Ecodesign for Sustainable Products Regulation (ESPR).**	

Dossier	Impact on the Single Market	AIM recommendations
German interpretation of EU Commission Recommendation 2006/647/EC	German authorities are considering the EU Commission Recommendation 2006/647/EC as mandatory. In case of missing phrases – even individual ones, companies are urged to add them to the packaging of their products.	
Expansion of the scope of the REACH microplastics restriction	Despite guidance from the European Commission stating that glitter in textiles and clothing is not in the scope of the REACH restriction on the intentional use of microplastics, some Member States' authorities intend to keep the in scope.	