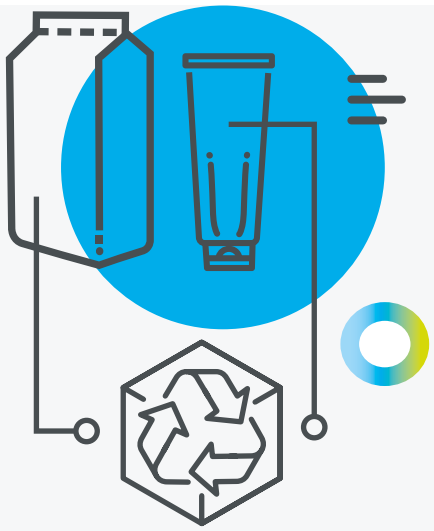
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EUROPEAN BRANDS ASSOCIATION

TOWARDS A PRAGMATIC LABELLING SYSTEM IN THE EU



To deliver on the objectives of the Packaging and Packaging Waste Regulation (PPWR), labels should be simple and fully harmonised, reducing compliance burdens while providing consumers with clear information.

The future labelling system should thus rely on:

Text-free pictograms to avoid translations, country-specific packaging or relabelling, thereby preserving the Single Market and allowing to use the same packaging across multiple markets.

Achromatic and monochromatic versions (black and white, transparent background or single colour already used on packaging) to guarantee flexibility and integration into existing packaging designs, avoiding the costs and technical constraints associated with introducing new colours.

A flexible, non-prescriptive labelling system allowing manufacturers to determine the appropriate label version, size, placement and accessibility features, without justification requirements based on undefined criteria that could lead to inconsistent interpretations and enforcement.

Technology-neutral digital solutions that can complement or, where appropriate, replace physical labels, ensuring the framework remains future-proof and capable of accommodating technological innovation.

Printing technology neutrality, ensuring labels are compatible with the wide range of production and marking techniques used across the packaging industry, including conventional printing, inkjet printing, embossing, engraving and label-less packaging solutions.

Compatibility with existing production set-ups, allowing manufacturers to minimise packaging redesigns, production changes and disruptions, transition costs and unnecessary waste.

Removal of overlapping national labelling requirements, with the adoption of the harmonised labels, to enable manufacturers to implement a single EU-wide update of packaging artwork.

WHY THE PPWR LABELS SHOULD NOT MANDATE TEXT AND/OR COLOURED LABELS

The PPWR should deliver **one harmonised solution** for the whole Single Market that works across diverse packaging materials, technologies and production processes, **avoiding 27 packaging versions** and unnecessary colour requirements.



IMPACT OF TEXT ON LABELS

Single Market fragmentation

It requires manufacturers to:

- Translate labels into multiple languages
- Develop country-specific packaging
- Separate production lines for different markets
- Reduce the ability to redirect products across Member States.

This undermines the harmonisation objectives of the PPWR and the broader Single Market, Simplification and Competitiveness agenda.

Increased packaging complexity

Today, packaging already needs to accommodate:

- Mandatory consumer information
- Safety information
- Marketing elements
- Other legal requirements.

However, PPWR requires packaging minimisation. Mandatory text makes labels significantly harder to fit with all the on-pack information, particularly for small packaging.



Operational costs for companies

Accommodating text forces to manufacturers:

- Additional packaging artwork
- Multiple production lines
- Reduced economies of scale
- Higher supply chain complexity.

Additional artwork and supply chain inefficiencies from text requirements alone can cost millions of euros per company.



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IMPACT OF MANDATING COLOURS ON LABELS



Increased printing and manufacturing costs

Adding new labels requires:

- New cylinders and plates (i.e. new colours)
- Extra printing stations
- Additional print runs
- More cleaning and maintenance
- Increased ink inventories.

Production inefficiencies

Additional colours can lead to:

- Slower production time
- Reduced printing capacity
- Increased production waste.

Increased impact on recyclability and brand consistency

Additional colours can:

- Require extra inks
- Affect recyclability
- Interfere with established brand colours
- Reduce label readability when colours blend into packaging artwork.

Technical constraints

Many packaging formats already operate at the limits of existing printing capabilities. Examples:

- **Aluminium cans:** Up to six colours. As black and white already occupy two of these, only four colours remain available for packaging design.
- **PET labels:** Up to eight colours. However, given limited surface, printing in small size can affect accuracy and readability. Semi-transparent labels may also require a white base coat beneath the printed elements, leading to additional production steps and costs.
- **Carton packaging:** Up to eight colours. If Pantone colours are used to ensure brand consistency across packaging, introducing additional colours may require new direct inks and increase production costs across an entire product portfolio.
- **Naturally brown cardboard:** Usually up to six colours. It requires a white underlayer to ensure sufficient contrast and readability to print coloured pictograms.

Depending on the printing technologies, annual printing costs may increase substantially. We estimate up to 30% additional printing cost, which could translate into millions of euros per company per year.

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