

Packaging Labelling Legislation in Europe: A Regulatory Update

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1. Overview Of EU Labelling Requirements

In the past year, many European countries have discussed the potential for packaging material labelling to enable consumers to partake in the sorting and recycling of waste packaging. This discussion has inevitably led many countries to review current packaging labelling practices, and has highlighted that certain packaging labels such as the Green Dot have the ability to mislead consumers on the recyclability of consumer packaging. With the need to ensure a move to a more circular economy, the lack of a harmonised labelling approach has continued to appear at the forefront of packaging policy discussions. This is also partially due to industry efforts to pressurise the EU Commission into penalising member states who have endeavoured to make the material marking specifications in Commission Decision 97/129/EC mandatory, due to perceived infringements to single-market access and potential cost increases for manufacturers selling across EU states.

Subsequently, in 2018 following industry pressure the European Commission's regulatory fitness and performance programme (REFIT) was tasked with undertaking a review of the potential misuse by some Member States of the voluntary system for marking and identification of EU packaging material set out in Commission Decision, 97/129/EC.

REFIT concluded that the introduction of the mandatory use of the EU packaging material symbols at Member State level was in conflict with fully harmonised EU legislation and that a revision of the Packaging and Packaging Waste Directive (PPWD) may be required to resolve the issue. Moreover, the review highlighted an important point, that notwithstanding the voluntary status of Commission Decision, 97/129/EC, the wording of the PPWD, stops the Commission from enforcing infringement proceedings against member states, as Article 8 of the Directive states:

“To facilitate collection, reuse and recovery including recycling, packaging shall indicate for the purposes of its identification and classification by the industry

concerned the nature of the packaging material(s) used on the basis of Commission Decision 97/129/EC.”

In spite of the wording of the Directive, it is important to clarify that it is up to the individual countries to devise their own laws on how to reach the goals of the Directive. Therefore, it is unsurprising that there is a certain amount of variance across EU countries, as well as other countries with access to the single market, on packaging labelling requirements (These differences are covered in the appendices of this paper). In addition to variances in policy outlook, these differences are also a result of the differing collection, sorting and recycling infrastructures in place across EU member states.

The EU Commission has outlined that it strives to clarify the relationship between the directive and the decision in its review of the PPWD. According to the Commission's schedule, the release of a draft revision of the PPWD and an impact assessment is expected by 20 July 2022.

2. Recent Changes And Proposals To Packaging Labelling Across Europe

2.1 France

In 2021, there were a number of packaging labelling developments in France that revolved around efforts to facilitate the appropriate disposal and treatment of waste packaging by consumers.

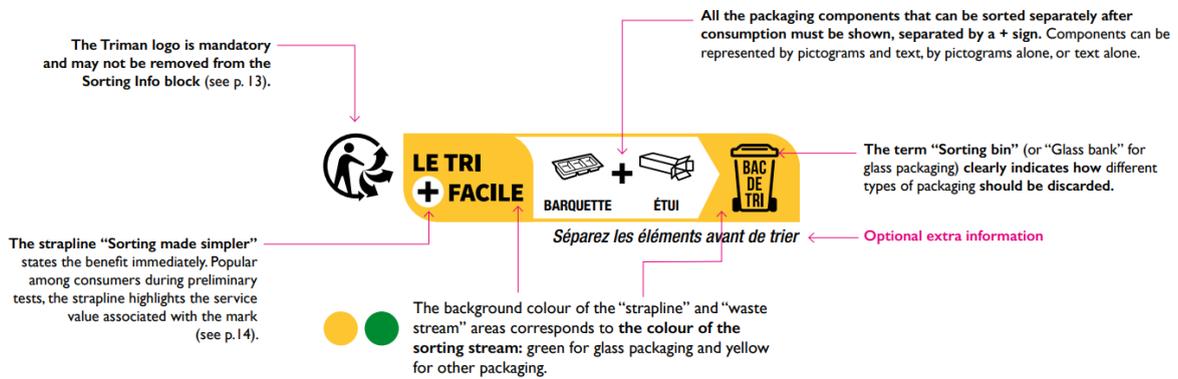
Firstly in January, a French Ministerial Order based on the provisions of Article L541-10-3 of the Environmental Code was published. It prohibited the use of the Green Dot label in France on account of research suggesting that it was confusing to consumers i.e. research highlighted that consumers mistakenly interpreted the Green Dot label as symbolising a package's recyclability. The Ministerial Order was set to introduce financial penalties to packaging placed on the French market with the Green Dot label from 1 April 2021. However, legal action taken by Der Grüne Punkt and PRO Europe against the French Ministry for Ecological Transition led to the immediate suspension of the Ministerial Order and an accompanying Ministerial Order from the previous year.

The applicants contested the legality of the Ministerial Order under a number of different premises including the Treaty on the Functioning of the European Union and argued manufacturers would be unfairly penalised by the need to create new packaging or face the payment of sanctions. The French Court therefore ordered the state to pay a total sum of 3,000 euros to the applicants and clarified that the court would again review the legality of the Ministerial Orders and Article L541-10-3 of the Environmental Code at a later date. Current information suggests that the case will resume in the summer of 2022.

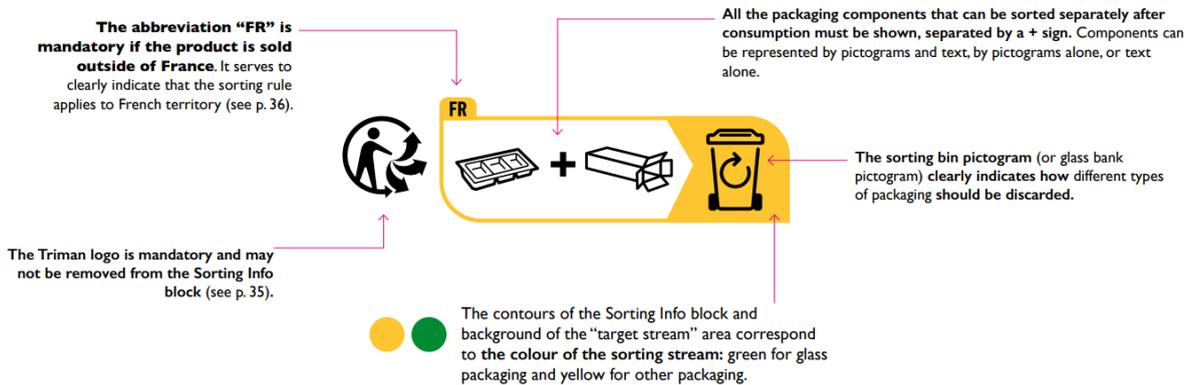
In addition to efforts by the French Ministry for Ecological Transition to phase out the use of the Green Dot label, the Ministry also established new requirements for the use of sorting labels on packaging (with the exception of glass packaging) that would include the Triman Logo (Article 17 of the French AGECL Law and its implementing Decree No. 2021-835 establish the legal basis of the requirement). This harmonised label aims to provide consumers with a simplified overview of all relevant information needed to sort and dispose of household waste packaging and became mandatory on 1 January 2022.

CITEO, a French extended producer responsibility scheme for packaging, has received approval from the Ministry for its sorting label design. CITEO has provided an overview of its sorting label in its “Sorting Info Guide”, which also contains a section answering frequently asked questions, the Guide is available for download in English on C2P. The Guide has been divided into two separate sections depending on whether packaging is solely designated for the French market or several markets in addition to the French market. Although the labelling requirement is in force, the compliance deadline for labelling household packaging is 9 September 2022. The extension period for marketers to sell existing stocks of packaging manufactured or imported before 9 September 2022, expires on 8 March 2023. From the 9 March 2023, all packaging must include the new sorting labelling unless exempted by law.

In addition to the compliance deadlines set out in the CITEO guide, the PRO guide released by Ecologic, Soren, Corepile, Ecosystem and Screlec establishes that the Ministry is aiming to harmonize the implementation schedule for the labelling of household products and their packaging (EEE, portable batteries, photovoltaic panels, lamps, and small fire extinguishers). Accordingly, the Ministry has granted an additional 3 months for the implementation of the sorting label for household packaging, thereby extending the compliance deadline to 15 June 2023 instead of 9 March 2023. Since this extended deadline is not reflected in the updated CITEO guide for the packaging of these products, Compliance and Risks recommends contacting your French PRO for further clarification on compliance deadlines.



Sample label for packaging marketed in France in accordance with CITEO Guidelines



Sample label for packaging marketed in France & abroad in accordance with CITEO Guidelines

2.2 Italy

In 2020, Italy began the process of enacting mandatory environmental labelling requirements for packaging. However, on 28 February 2022, a further postponement of the environmental labelling obligations was approved, thereby delaying the enforcement of the measures until 31 December 2022.

As established by Article 219.5 of Decree No. 116/2020

“appropriately labelled in accordance with the procedures laid down in the applicable UNI technical standards and in compliance with the decisions of the European Commission, in order to facilitate the collection, reuse, recovery and recycling of packaging, and to provide consumers with proper information on the final destination of packaging. For the purposes of identifying and classifying packaging, producers are also required to indicate the nature of the packaging materials used, on the basis of Commission Decision 97/129/EC.”

These measures have been adopted in order to facilitate the collection, reuse, recovery and recycling of packaging, and to provide consumers with proper information on the final destination of packaging.

Therefore, packaging producers shall ensure packaging is affixed with:

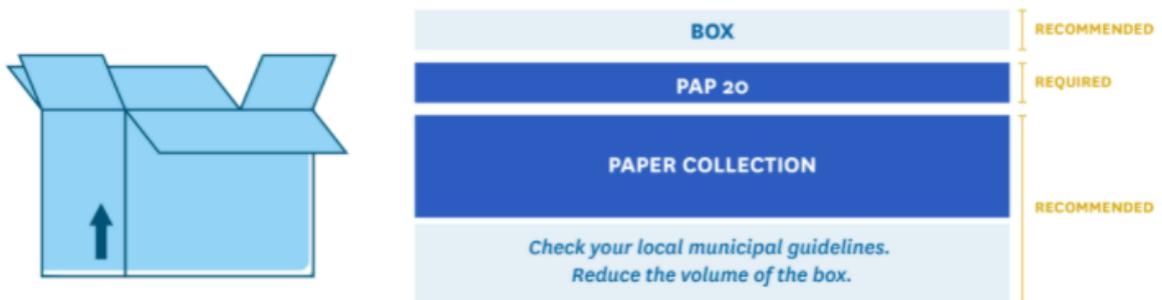
- alphanumeric codes provided for in Decision 97/129/EC on all packaging (primary, secondary and tertiary);
- suitable information aiding its disposal on packaging destined for consumers (business to consumers [B2C]);

Guidelines in English for the labelling of packaging have been provided by CONAI (*the Italian PRO for packaging*) and are available [here](#). CONAI has also developed an online tool for the creation of labels which can be accessed [here](#). Please note however, that

the Italian Ministry of Ecological Transition shall enact, within 90 days of the entry into force of the labelling obligations, official technical guidelines for the correct labelling of packaging, as specified in Decree-Law No. 228/2021. Subsequently, on 7 April 2022, the Italian Ministry of Ecological Transition notified the EU Commission of a Draft version of these guidelines for review (*the Draft is available in Italian and for download in C2P*). The EU Commission is scheduled to review the Draft until 8 July 2022, after which it will be officially published.

It is notable that the Draft has been formulated in accordance with the guidelines published by CONAI and therefore clarifies many questions raised by CONAI's guidelines, including which UNI standards are applicable. Additionally, the Draft outlines details on the scope of the labelling obligations and provides illustrated instructions for the design of B2B and B2C packaging labels.

CORRUGATED CARDBOARD BOX FOR B2B FREIGHT TRANSPORT



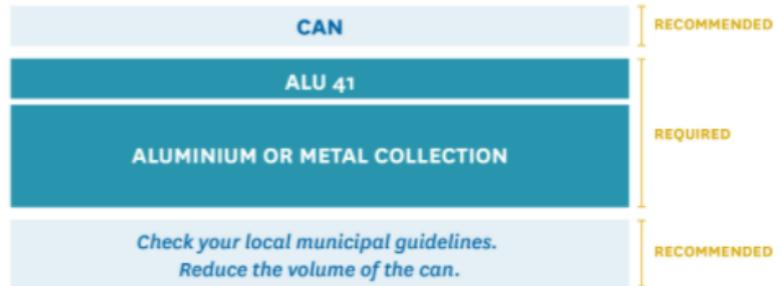
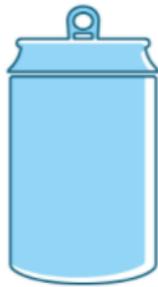
Sample label for B2B packaging as devised by CONAI

Esempio SCATOLA IN CARTONE ONDULATO PER TRASPORTO DI MERCI B2B



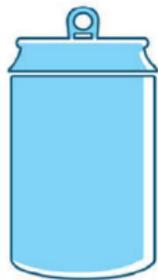
Draft label for B2B packaging as devised by the Italian Ministry of Ecological Transition

ALUMINIUM CAN



Sample label for B2C packaging as devised by CONAI

Esempio LATTINA IN ALLUMINIO



Draft label for B2C packaging as devised by the Italian Ministry of Ecological Transition

Based on the interpretation of the requirements by CONAI and the Draft guidelines provided by the Ministry, it is anticipated that business to business (B2B) packaging will not need to provide information on the final destination of the packaging, but must be affixed with the code of the packages material composition in accordance with Decision 129/97/EC.

Furthermore, products that do not meet the labelling requirements and have already been sold or labelled by 1 January 2023 may be sold until stocks last. The Draft guidelines provide an overview of the documentary proof needed to verify whether packaging was placed on the market prior to the compliance deadline i.e. purchase documents and production batch dates.

2.3 Slovenia

After initially enacting legislation in April 2021, to make the use of material identification labelling mandatory, in accordance with Commission Decision 97/129/EC, the Slovenian authorities quickly revoked these measures due to an acknowledgement that the use of the packaging materials identification system in Decision 97/129/EC is currently voluntary within the EU and the designation of this system as mandatory in Slovenia could establish trade barriers that may go against the functioning of the EU's internal market in accordance with Article 1 of Directive 94/62/EC on packaging and packaging waste. Therefore, on 1 January 2022 packaging material labelling became voluntary in Slovenia again.

2.4 Spain

On 28 September 2021, Spain announced a far reaching Draft Packaging and Packaging Waste Decree to further the development of a circular economy for packaging. Despite the scale of the proposal, it remained ambiguous as to whether the use of the Green Dot label (el punto verde) would remain mandatory in Spain. Therefore, Compliance and Risks contacted the Spanish authorities for clarity on the status of the Green Dot under the current proposal.

Compliance and Risks was informed by the Spanish Subdirectorato General for Circular Economy that the current Draft does not require the mandatory use of the Green Dot label on packaging, however extended producer responsibility (EPR) schemes such as Ecoembes and Ecovidrio may still request the use of markings on packaging to denote EPR membership.

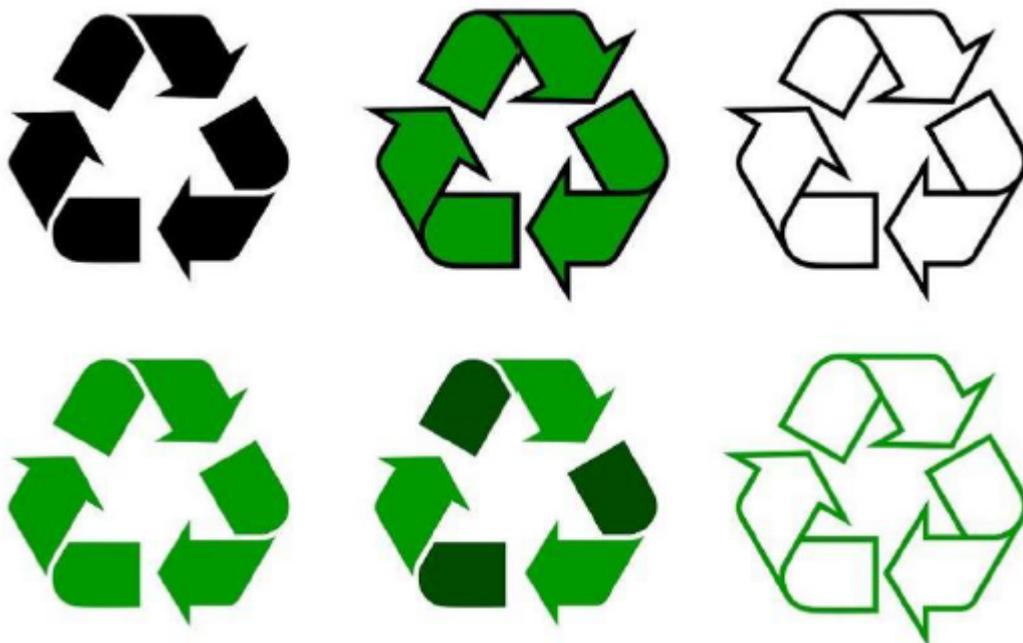
Although EPR schemes may request the use of packaging labels to symbolise the payment of EPR fees etc on packaging, the Subdirectorato has stated that this symbol does not have to be the Green Dot label, as it may mislead consumers on the recyclability of packaging. Please note that Article 21 of the Draft stipulates that EPR symbols must be clear and unambiguous and must not mislead consumers or users about the recyclability of packaging.

2.5 Cyprus

On 11 May 2021, the Cypriot Parliament amended Article 11 of the Packaging and Packaging Waste Law to make the use of Green Dot label voluntary. This change in status has left Spain as the only country in the EU requiring the mandatory use of the Green Dot on packaging.

2.6 Bulgaria

From 1 January 2022, packaging placed on the Bulgarian market must be labelled in accordance with the updated requirements set out in Annex 3 of the Packaging and Packaging Waste Ordinance. This amendment was carried out to correct the earlier depiction of the Mobius Loop, which presented the arrows pointing in the incorrect direction and subsequently caused issues for producers selling products across different markets. The current label is now in line with both European and international depictions of the Mobius Loop.

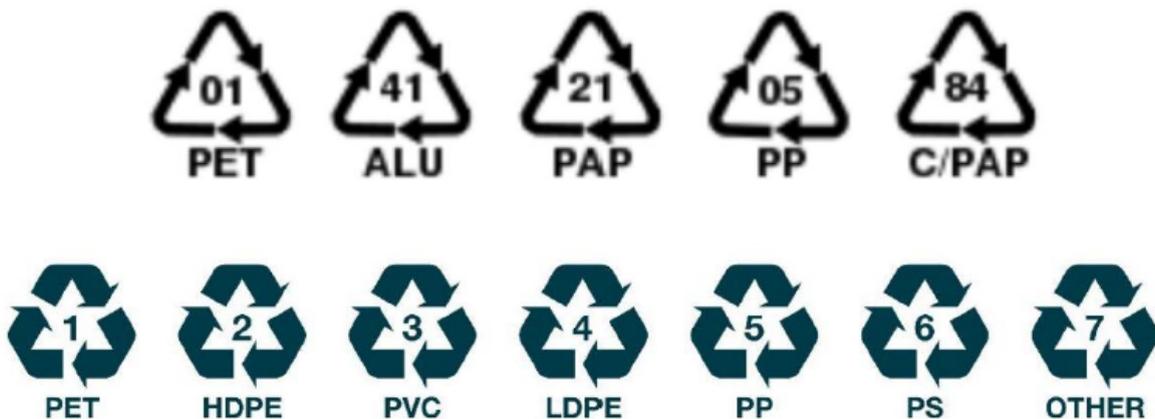


Options for presenting the Mobius Loop in accordance with Annex 3

Packaging that was placed on the market prior to 1 January 2022, may continue to be sold until stocks are exhausted.

In addition to the Mobius Loop, packaging must also be labelled with;

- An identification number and / or abbreviation according to Annex 2 (abbreviation codes in accordance with Commission Decision 97/129/EC)
- marking for separate collection of packaging waste according to Annex 4 (*Tidyman symbol*)



Options for presenting markings in accordance with Annexes 2 and 3



Options for presenting the Tidyman symbol in accordance with Annex 4

There are no particular technical parameters for labels in relation to colour or thickness. The Bulgarian authorities have provided a detailed guideline on the use of labels, which is available in Bulgarian [here](#). Compliance and Risks has also been informed by the Bulgarian authorities that it is possible to affix the markings by sticker. The use of signs other than those specified in Annexes 2 and 3 to identify the relevant packaging materials is prohibited.

2.7 Poland

In 2021, Poland proposed legislation to amend the Management of Packaging and Packaging Waste Law. If approved, the amendment will introduce new requirements for the marking of packaging with details of its material composition, in an effort to help consumers dispose of waste packaging appropriately. The Polish Ministry of Climate Affairs is currently tasked with the development of labels.

The Draft also contains an exemption for packaging that is manufactured, introduced or imported into Poland from outside of the EU. Additionally, packaging acquired prior to the entry into force of the amendment will be exempt from the labelling requirements.

2.8 Portugal

In February 2021, Portugal proposed extensive changes to its packaging labelling system in order to better inform consumers of the correct recycling and disposal practices for packaging. Accordingly, the Draft proposes the following four changes;

1. The prohibition of the Tidyman symbol (*it is considered confusing to consumers*),
2. The mandatory labelling of consumer packaging with sorting instructions, in particular the colour of the recycling bin in which waste packaging should be placed (*this is set to apply to primary and secondary packaging intended for consumers*),
3. The introduction of a new symbol for packaging managed under a deposit system,
4. The introduction of mandatory packaging material marking in accordance with the identification system established in Commission Decision No 97/129/EC (*it is positioned that this may facilitate collection, reuse and recovery, including recycling.*)

Consumer sorting information must meet the following specifications:

- Be presented by iconography or written text, or both;
- Be printed in a visible, legible and indelible form.

An exemption to the obligation for the labelling of consumer primary and secondary packaging with sorting information is proposed for packaging whose size does not permit it. Furthermore, if the Draft is approved, a compliance deadline for these requirements will be established by a separate Ordinance and will be published by 31 December 2022.



Lastly, the Draft establishes that *“non-reusable primary packaging from other Member States of the European Union or third countries which has been marked with a specific symbol at origin may be placed on the market with that symbol.”*

2.9 UK

On 24 March 2021, the UK Department for Environment, Food and Rural Affairs (DEFRA) launched a consultation with the aim of introducing mandatory labelling requirements for packaging recyclability.

In comparison to other European packaging labelling obligations, the proposed UK system will mark packaging as either 'Recyclable' or 'Not Recyclable' or 'Recycle' or 'Do Not Recycle'. The onus to determine whether packaging is recyclable will be placed on the packaging producer. In tandem with assessing the recyclability of packaging for the mandatory labelling requirement, DEFRA also intends the classification to be used when determining modulated fees for packaging.

The consultation defines obligated producers as:

- Manufacturers of products produced and packaged in the UK
- Importers of packaged products for sale in the UK

Specific details regarding label design, as well as the labelling schemes operation, are yet to be decided. However, it is proposed that labels should be applied to:

- All primary packaging
- Primary packaging that comprises of multiple components
- All shipment packaging (packaging associated with online, catalogue or phone purchases, regardless of whether orders are delivered or collected)

Additionally, the following packaging categories will be exempt from the mandatory labelling requirements:

- Packaging in scope of the Scottish deposit return scheme and the English, Welsh and Northern Irish deposit return scheme
- All secondary and tertiary (transit) packaging

If the recommendations are approved, DEFRA proposes their enactment through the introduction of a new extended producer responsibility regulation in late 2022, with a phased roll out of the obligations expected at the end of financial year 2026/27, due to current infrastructural limitations.

3. Conclusion

This paper aimed to provide an overview of recent changes to packaging labelling requirements across EU member states, as well as countries with access to the EU's single market and the UK. In doing so the paper highlighted a number of growing trends across Europe namely that national authorities are eager to encourage consumers to play a part in the development of a circular economy for packaging through the establishment of waste sorting labels and the removal of confusing symbols on packaging.

Additionally, the paper underlines the limitations of the EU's current identification system for packaging materials which was not explicitly designed for use by consumers. Since the system is not universally mandated across the EU, it also raises questions as to whether the identification system is of much relevance to recyclers. Consequently, it is anticipated that the EU's upcoming revision of the Packaging and Packaging Waste Directive will aim to address the lack of harmony across EU packaging labelling practices.

Appendix 1. Overview of current labelling requirements for packaging in the EU, the EEA, Switzerland and the UK

| EU Country | Status of material identification labelling | Status of the Green Dot | Additional labelling requirements |
|------------|---|-------------------------|--|
| Austria | Voluntary | Voluntary | Packaging material information may be marked in accordance with Commission Decision 97/129/EC. |
| Belgium | Voluntary | Voluntary | If packaging material information is provided on packaging it must be done in accordance with Annex 2 of Royal Decree, 25 March 1999 i.e. Commission Decision 97/129/EC. |
| Bulgaria | Mandatory - <i>Specifications for packaging material labelling are set out in Article 5 and Appendices 2, 3 & 4</i> | Voluntary | Packaging must also be affixed with the Mobius Loop symbol and the Tidyman symbol, as set out in |

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| | <p><i>of the Packaging and Packaging Waste Ordinance. Please see the section on Bulgaria above for further information.</i></p> | | <p>Appendices 3 & 4 of the Packaging and Packaging Waste Ordinance.</p> |
| <p>Croatia</p> | <p><i>Voluntary - No longer mandatory following the implementation of Ordinance NN 116/2017</i></p> | <p>Voluntary</p> | <p>If packaging material information is provided on packaging it must be done in accordance with Article 4 of Ordinance NN 116/2017 and Commission Decision 97/129/EC</p> <p>Manufacturers who place returnable (reusable) packaging on the market are obliged to mark such packaging with the mark for returnable packaging (Article 13 of Ordinance NN 88/2015).</p> |

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| Cyprus | Voluntary | Voluntary - <i>No longer mandatory as of 11.05.2021</i> | n/a |
| Czechia/Czech Republic | Voluntary | Voluntary | <p>If packaging material information is provided on packaging it must be done in accordance with Commission Decision 97/129/EC</p> <p>A person who places products on the market in returnable prepaid packaging shall be obliged to mark such packaging as returnable prepaid packaging (outlined in Section 9 of Act 477/2001.</p> |
| Denmark | Voluntary - <i>However Denmark has created a voluntary labelling system for waste sorting that can also be used on packaging. Further details in English</i> | Not used - <i>If your company has a valid trademark agreement with a PRO Europe scheme, PRO Europe will tolerate if you deliver similarly packaged</i> | If packaging material information is provided on packaging it must be done in accordance with Article 17 of Statutory Order 1455/2015 and |

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| | <p>can be found here. It has subsequently been introduced to other Nordic countries including - Finland, Iceland, Norway and Sweden.</p> | <p>goods with the Green Dot also to Denmark.</p> | <p>Commission Decision 97/129/EC.</p> |
| Estonia | Voluntary | Voluntary | n/a |
| Finland | <p>Voluntary - However the Danish voluntary labelling system for waste sorting may be used on packaging. Further details in English can be found here.</p> | <p>Not used - If your company has a valid trademark agreement with a PRO Europe scheme, PRO Europe will tolerate if you deliver similarly packaged goods with the Green Dot also to Finland.</p> | n/a |
| France | <p>Mandatory - France has created its own national sorting system to better help consumers identify and dispose of waste packaging appropriately using the Triman logo. Please see the</p> | <p>Voluntary - However, there have been recent efforts to ban the symbol as it is viewed as misleading to consumers. Court proceedings are ongoing on the</p> | n/a |

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| | <i>section on France above for further information.</i> | <i>matter and are scheduled to end in the summer of 2022.</i> | |
| Germany | Voluntary | Voluntary | If packaging material information is provided on packaging it must be done in accordance with Annex 5 of Act BGBl. 2234, 2017 i.e. Commission Decision 97/129/EC. |
| Greece | Voluntary | Voluntary | n/a |
| Hungary | Voluntary | Voluntary | If packaging material information is provided on packaging it must be done in accordance with Annex 2 of Decree 442/2012 i.e. Commission Decision 97/129/EC. |
| Ireland | <i>n/a - No material labelling measures are cited in Irish packaging legislation.</i> | Voluntary | n/a |



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| Italy | Mandatory - <i>Please see the section on Italy above for further information.</i> | Not used - <i>If your company has a valid trademark agreement with a PRO Europe scheme, PRO Europe will tolerate if you deliver similarly packaged goods with the Green Dot also to Italy.</i> | n/a |
| Latvia | Voluntary | Voluntary | n/a |
| Lithuania | Voluntary | Voluntary | n/a |
| Luxembourg | Voluntary - <i>However in 2020 a recast of the Luxembourgish packaging and packaging waste law was proposed. If approved it will make packaging material identification in accordance with Commission Decision, 97/129/EC mandatory.</i> | Voluntary | If packaging material information is provided on packaging it must be done in accordance with Commission Decision 97/129/EC. |
| Malta | Mandatory - <i>Article 18 of Regulations</i> | Voluntary | n/a |



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| | <p><i>L.N. 277/2006 states that producers shall ensure that the nature of any packaging material used is indicated on the packaging for the purposes of its identification and classification in order to facilitate the collection, reuse and recovery including recycling of packaging waste. Producers shall ensure that packaging bears the appropriate marking either on the packaging itself or on the label according to any existing laws and regulations. Such marking shall be clearly visible and easily legible, appropriately durable and lasting, even when the packaging is</i></p> | | |
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| | <i>opened.</i> | | |
| Netherlands | Voluntary | Voluntary | If packaging material information is provided on packaging it must be done in accordance with Commission Decision 97/129/EC. |
| Poland | Voluntary - <i>However, there is a proposal to bring in packaging material labelling to aid the sorting of waste. Please see the section on Poland above for further information.</i> | Voluntary | n/a |
| Portugal | Voluntary - <i>However, there is a draft under review to make packaging material marking mandatory. Please see the section on Portugal above for further information.</i> | Voluntary | There is currently a proposal to introduce waste packaging “sorting labelling”, as well as a proposal to prohibit the Tidyman symbol. |

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| Romania | Voluntary - <i>Briefly mandatory until measures were revoked in 2018.</i> | Voluntary | n/a |
| Slovakia | Voluntary | Voluntary | n/a |
| Slovenia | Voluntary - <i>Briefly mandatory until measures were revoked in 2021.</i> | Voluntary | If packaging material information is provided on packaging it must be done in accordance with Article 9 of Regulation 4391, UL 208/2021 and Commission Decision 97/129/EC. |
| Spain | Voluntary - <i>This is established in Article 14 of Royal Decree 782/98.</i> | Mandatory on sales packaging - <i>However there is Draft legislation proposing to make its use voluntary. Please see the section on Spain above for further information.</i> | n/a |
| Sweden | Voluntary - <i>However the Danish voluntary labelling system for</i> | Voluntary | If packaging material information is provided on packaging it must |



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| | <i>waste sorting may be used on packaging. Further details in English can be found here.</i> | | be done in accordance with Commission Decision 97/129/EC. |
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| EEA country | Status of material identification labelling | Status of the Green Dot | Additional labelling requirements |
|-------------|---|--|---|
| Iceland | <i>Mandatory - Article 5 of Regulation No. 609/1996 specifies that in order to facilitate collection, reuse and recycling, the packaging, material (s) must be specified in order to identify and sort them. The identification system is outlined in Annex 2 of the Regulation and is based on Commission Decision, 97/129/EC. The</i> | <i>Not used - If your company has a valid trademark agreement with a PRO Europe scheme, PRO Europe will tolerate if you deliver similarly packaged goods with the Green Dot also to Iceland.</i> | In addition to the mandatory requirements, the Danish voluntary labelling system for waste sorting may be used on packaging. Further details in English can be found here . |



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| | <p><i>packaging must be marked appropriately, either on the packaging itself or on a label affixed to it. Markings must be visible and legible. Labelling must be maintained and last as appropriate, even when the packaging is opened.</i></p> | | |
| Liechtenstein | <p><i>Mandatory - The manufacturing material of packaging must be made visible on the packaging or on a label in accordance with Decision 97/129/EC. The marking must be clearly visible, legible and durable, even after the packaging has been opened.</i></p> | <p><i>Not used - If your company has a valid trademark agreement with a PRO Europe scheme, PRO Europe will tolerate if you deliver similarly packaged goods with the Green Dot also to Liechtenstein.</i></p> | n/a |
| Norway | <p><i>n/a - However the Danish voluntary labelling system for</i></p> | Voluntary | n/a |



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| | <i>waste sorting may be used on packaging. Further details in English can be found here.</i> | | |
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| Non EU/EEA country in the Single Market | Status of material identification labelling | Status of the Green Dot | Additional labelling requirements |
|---|--|--|-----------------------------------|
| Switzerland | n/a | Not used - <i>If your company has a valid trademark agreement with a PRO Europe scheme, PRO Europe will tolerate if you deliver similarly packaged goods with the Green Dot also to Switzerland.</i> | n/a |
| Northern Ireland | <i>n/a - No material labelling measures are cited in Northern Irish packaging legislation.</i> | Voluntary | n/a |

| Non EU/EEA/Single Market | Status of material identification | Status of the Green Dot | Additional labelling requirements |
|--------------------------|-----------------------------------|-------------------------|-----------------------------------|
|--------------------------|-----------------------------------|-------------------------|-----------------------------------|



| | labelling | | |
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| United Kingdom (UK) | <i>n/a - However in March 2021 DEFRA outlined plans for the introduction of mandatory recyclability labelling for packaging by the end of 2026/27. Please see the section on the UK above for further information.</i> | Voluntary | n/a |

Appendix 2. Referenced Legislation

Austria: Packaging Waste Ordinance 184/2014

Belgium: Product Standards for Packaging, Royal Decree, 25 March 1999

Bulgaria: Ordinance on Packaging and Packaging Waste, Decree No. 271/2012

Bulgaria: Ordinance on Packaging and Packaging Waste, Decree No. 271/2012 and Others - Amendment - (on implementing Directive (EU) 2018/851 and Directive (EU) 2018/852) Decree No. 420/2020

CITEO: New Sorting Label for Household Packaging in France, Guidance Document, September 2021

Croatia: Rules on Packaging and Packaging Waste, Ordinance NN 88/2015

Croatia: Rules on Packaging and Packaging Waste, Ordinance NN 88/2015 - Amendment - (on plastic shopping bags, etc) Ordinance NN 116/2017

Cyprus: Packaging and Packaging Waste Law No. 32(I), 2002

Czech Republic: Packaging Act 477/2001

Denmark: Essential Requirements for Packaging, Order No. 1271, 2021

Denmark: Essential Requirements for Packaging, Statutory Order 1455/2015

EU: Establishing the Identification System for Packaging Materials, Commission Decision, 97/129/EC

Estonia: Packaging Act, 2004

Finland: Packaging and Packaging Waste, Decree 1029/2021

France: Anti-waste and Promotion of Circular Economy, Law 2020-105

Germany: Management of Packaging and Packaging Waste, Act BGBl. 2234, 2017

Greece: Packaging and Alternative Management of Packaging and Other Waste Law 2939, 2001

Hungary: Management of Packaging and Packaging Waste, Decree 442/2012

Iceland: Management of Packaging and Packaging Waste, Regulation No. 609/1996

Iceland: Management of Packaging and Packaging Waste, Regulation No. 609/1996 - Amendment - (on identification system for packaging materials) Regulation No. 1064/2018

Italy: Environmental Labelling Obligations for Packaging, Draft Guidelines, March 2022

Italy: Postponement of Packaging Labelling Obligations, Law No. 15/2022

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