

## **Joint Industry Statement on Harmonised Waste Sorting Instructions for Packaging**

The undersigned organisations express their strong concern and opposition to the use of text and colour for waste sorting labels on packaging. This would reintroduce national barriers to the free movement of packaged goods in the Union, directly contradicting the recent Single Market Strategy<sup>1</sup> where the European Commission identified divergent packaging labels as one of the ten most disruptive barriers to the internal market.

The latest version of the draft Joint Research Centre's (JRC) guidelines on EU waste sorting labels continues to prioritise the use of full-colour labels with accompanying text when used on packaging. Although the draft offers some design options for a pictogram-based system, it simultaneously proposes restricting the use of colour- and text-free alternatives to cases justified by economic constraints, specific consumer readability needs, or to very small packaging.

This approach runs completely counter to the goals of the Packaging and Packaging Waste Regulation (PPWR) and will significantly fragment the Union market. Under Article 12 of the PPWR, the European Commission is mandated to harmonise consumer sorting instructions, an essential step to ensuring a functioning Single Market, improving separate collection and recycling of packaging waste, and removing unnecessary burden for industry. Prioritising a labelling system with full colour and text - which will require translation in one or more national languages as established by Member States<sup>2</sup> - directly contravenes these objectives, reopening the door to divergent national requirements. As a consequence, a product would have to carry a label with up to 24 local terms, also contravening the objective of the labelling scheme to make sorting instructions clearer to consumers.

The direction proposed by the JRC also stands in direct contradiction to the Commission's ongoing efforts to safeguard the Single Market, as clearly outlined in the Single Market Strategy and reinforced in recent years through infringement procedures initiated against national sorting instructions systems<sup>3</sup>. The strategy clearly reaffirms the Commission's commitment to protecting the integrity of the Single Market, recognising the need to balance providing clear information to consumers while minimising market barriers and burdens on industry.

Different packaging labelling rules across Member States will result in operational inefficiencies, higher costs, and consumer confusion. More critically, it will jeopardise the environmental and economic goals of the PPWR and the Single Market Strategy.

We therefore urge the Commission to reconsider the current direction of the JRC guidelines and ensure that the future EU labelling system aligns with the goals of EU-wide harmonisation, large-scale recyclability, and protection of the Single Market.

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<sup>1</sup> See COM(2025) 500 final, also available [here](#).

<sup>2</sup> This is foreseen under Article 12(5) of Regulation (EU) 2025/40 on Packaging and Packaging Waste.

<sup>3</sup> See [INFR\(2022\)4028](#) and [INFR\(2024\)4029](#).

**Signatories:**



AGMPM - Association of the Greek Manufacturers of Packaging & Materials



AHPI - Association of Hellenic Plastics Industries



AIM - European Brands Association



A.I.S.E - International Association for Soaps, Detergents and Maintenance Products



Aluminium Closures Group



APPLiA - Home Appliance Europe



ARAM - Romanian Association for Packaging and the Environment



AVU - Allianz Verpackung und Umwelt



Cosmetics Europe



CEFLEX - A Circular Economy for Flexible Packaging



CEO - Comité Européen de l'Outillage



CICIPEN - Czech Industrial Coalition for Packaging and the Environment



CITPA - The International Confederation of Paper and Board Converters in Europe



DIGITALEUROPE



EAlFA - European Aluminium Foil Association



ECMA - The European Carton Makers Association



EDANA - The Voice of the Nonwovens Industry



EFIC - European Furniture Industries Confederation



EKO-PAK - Packaging Industry Union of Employers



Les entreprises de l'emballage  
plastique et souple

ELIPSO - Les entreprises de l'emballage plastique et souple



ENVALORA - Spanish Collective Extended Producer  
Responsibility System for industrial and commercial packaging  
in various sectors



EUROPEAN  
OUTDOOR  
GROUP

EOG - European Outdoor Group



EPLF - European Producers of Laminate Flooring Association



ESA - European Snacks Association



EuPC - European Plastics Converters



EuroCommerce



European Aluminium



EUROPEN - European Organisation for Packaging and the Environment



EVA - European Vending & Coffee Service Association



EXPRA - Extended Producer Responsibility Alliance



FBCA - The Food & Beverage Carton Alliance



FDE - FoodDrinkEurope



FEA - European Aerosol Federation



FEC - Federation of the European Cookware, Cutlery and Houseware Industries



FEDEMCO - Spanish Federation of Wooden Packaging and its Components



FEDIAF - European Petfood Association



FEFCO - The European Federation of Corrugated Board Manufacturers



FEPA - Federation of European Producers of Abrasives



FESI - Federation of the European Sporting Goods Industry



FEVE - The European Container Glass Federation



FPE - Flexible Packaging Europe



GROW International - Federation of wooden light weight packaging



HDSL - Federal Association of the German Footwear and Leather Goods Industry



Herstellerverband Haus & Garten



INCPEN - The Industry Council for Packaging & the Environment



Intergraf - European Federation for Print and Digital Communication



Independent Retail Europe



Istituto Italiano Imballaggio



IVSH - Association of the German Cutlery and Housewares Industries



LE - Lighting Europe



MedTech Europe - The European Trade Association for the Medical Technology Industry



MMFA - Multilayer Modular Flooring Association



MPE - Metal Packaging Europe



NATRUE - The International Natural and Organic Cosmetic Association



PAKKAUS - The Finnish Packaging Association



PET Europe - Producers' Association



PET Sheet Europe



Plastics Europe



Pro Carton - European Association of Carton and Cartonboard manufacturers



PRO Europe - Packaging Recovery Organisation Europe



PRO Food



RUCODEM - Romanian Union of Cosmetics and Detergents Manufacturers



spiritsEUROPE



SZZV - Slovak Association for Branded Products



The Brewers of Europe





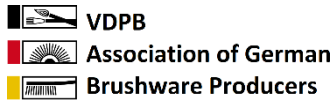
TIE - Toy Industries of Europe



UNESDA - Soft Drinks Europe



UNIONPLAST - The Italian Plastics Converting Association



VDPB - Association of German Brushware Producers