



European Union: EU Marking, Labeling and Packaging – An Overview

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Summary

There is a broad array of EU legislation pertaining to the marking, labeling and packaging of products, with neither an “umbrella” law covering all goods nor any central directory containing information on marking, labeling and packaging requirements. This overview is meant to provide the reader with a general introduction to the multitude of marking, labeling and packaging requirements or marketing tools to be found in the EU.

Introduction

The first step in investigating the marking, labeling and packaging legislation that might apply to a product entering the EU is to draw a distinction between what is mandatory and what is voluntary. Some EU legislation refers only to the former, and vice versa; some legislation refers to both. In addition, decisions related to mandatory marking, labeling and/or packaging requirements may sometimes be left to individual member states. Finally, voluntary marks and/or labels are used as marketing tools in some EU member states. This report is focused primarily on the mandatory marks and labels seen most often on consumer products and packaging, which are typically related to public safety, health and/or environmental concerns. It also includes a brief overview of a few mandatory packaging requirements, as well as more common voluntary marks and/or labels used in EU markets.

It is also important to distinguish between marks and labels. A mark is a symbol and/or pictogram that appears on a product or its respective packaging. These range in scope from signs of danger to indications of methods of proper recycling and disposal. The intention of such marks is to provide the end-user with information concerning safety, health and/or environmental issues relating to the use or consumption of a product. Labels, on the other hand, appear in the form of written text or numerical statements, which may be required but are not necessarily universally recognizable. Labels typically indicate more specific information about a product, such as measurements, or an indication of materials that may be found in the product (such as in textiles or batteries).

OVERVIEW

Mandatory Marks & Labels

- Textiles
- Cosmetics
- Dangerous Substances
- Explosive Atmosphere
- Electrical & Electronic Equipment
- Household Appliances
- Pricing
- Recycling - Separate Collection
- Footwear
- Units of Measurement
- Automotive
- Maritime
- Materials in Contact with Food
- Noise Emission

Voluntary Marks and Labels

- Cup/Fork Symbol (material in contact with food)
- Eco-Label
- Green Dot
- Energy Star
- 'e' Mark
- Recycling Marks

APPLICABILITY OF VOLUNTARY AND MANDATORY MARKS AND LABELS

Countries in the European Union (EU)

- Austria
- Belgium
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Spain
- Sweden
- Slovakia
- Slovenia
- United Kingdom

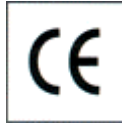
Additional Countries of the European Economic Area (EEA) and European Free Trade Association (EFTA)

- Iceland
- Norway
- Switzerland (EFTA)
- Liechtenstein

Candidate Members

- Bulgaria
- Romania
- Turkey

MANDATORY MARKS AND LABELS



CE MARKING

This is probably the most widely used and recognized marking required by the EU. Found in all “New Approach” legislation with a few exceptions, the CE marking demonstrates that a product meets all essential requirements (typically related to safety, health and/or environmental concerns). CE marking is required for the following products/product families:

- Cableway installations
- Civil explosives
- Construction products
- Electromagnetic compatibility
- Gas appliances
- Hot water boilers
- Lifts
- Low voltage equipment
- Medical devices (3)
- Non-automatic weighing instruments
- Personal protective equipment
- Pressure equipment
- Radio and telecommunications terminal equipment
- Recreational crafts
- Refrigeration appliances
- Machinery
- Toys
- Simple pressure vessels
- Equipment and protective systems in potentially explosive atmospheres

Each “New Approach” directive typically contains references to harmonized European standards, the use of which provides the manufacturer with the presumption of conformity with essential requirements. While other non-EU standards may be used to demonstrate a product’s compliance with the applicable directive(s), the manufacturer best seek certification from member state test laboratories (in contrast to the presumption of conformity).

An array of standardized safety warning symbols/pictograms may also be applicable to each of the above product categories.

For more information

www.europa.eu.int/comm/enterprise/newapproach/legislation/guide/document/chap07.pdf
www.newapproach.org

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TEXTILES

Textile products must be labeled or marked whenever they are put onto the market for production or commercial purposes (sale). The names, descriptions and details of a textile’s fiber content must be indicated on products available to consumers. With the exception of trademarks or the name of the undertaking, information other than that required by the directive must be listed separately. Member States may require that their national language be used on the labeling and marking required by the directive.

For more information

Report on Exporting Textiles, available online at:
http://buyusainfo.net/docs/x_1305151.pdf

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FOOTWEAR



lining & sock

Labels must convey information relating to the upper, the lining and insole sock, and the outer-sole of the footwear article. The information must be conveyed by means of approved pictograms or textual information, as defined by the directive.

The label must be legible, firmly secured and accessible, and the manufacturer or his authorized agent established in the Community is responsible for supplying the label and for the accuracy of the information contained therein. Only the information provided for in the directive need be supplied. There are no restrictions preventing additional information being included on the label.

For more information

Parliament and Council Directive 94/11/EC, relating to the labeling of the materials used in the main components of footwear for sale to a final consumer, available online at:

http://europa.eu.int/smartapi/cgi/sqa_doc?smartapi!celexapi!prod!CELEXnumdoc&lg=EN&numdoc=31994L0011&model=guichett

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COSMETICS



Containers and/or packaging (in certain cases) must bear, in indelible, easily legible and visible characters, the following:

- The name, trade name and address, or registered office of the manufacturer or person responsible for marketing the cosmetic product within the Community
- The nominal contents at the time of packaging (by weight or volume)
- The date of minimum durability indicated by "Best before end", for products with a minimum durability of less than 30 months
- The period after opening during which the product can be used without harm to the consumer, for products with a minimum durability of less than 30 months (indicated by a symbol representing an open cream jar, as shown above)

- Particular precautions for use
- The batch number or product reference, for identification
- The product's function

The Member States are to draw up procedures for providing the information set out above in the case of cosmetic products that have not been pre-packaged. The product function and list of ingredients also have to appear on the container or packaging. Member States may stipulate that the information on the label is provided in their national or official language(s).

For more information

Council Directive 76/768/EEC, relating to cosmetic products, available online at:
<http://europa.eu.int/scadplus/leg/en/lvb/l21191.htm>

Language Requirements for Product Labels
http://www.buyusainfo.net/docs/x_534375.pdf

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HOUSEHOLD APPLIANCES

The directive sets a framework for the adoption of product-specific directives on the proper energy efficiency labeling of household appliances. Each “daughter” directive contains detailed and very specific requirements for labeling and marking related to energy consumption. Product-specific directives can be found at the website listed below, and the directives cover the following:

- Refrigerators, freezers and their combinations
- Washing machines, dryers and their combinations;
- Dishwashers
- Ovens
- Water heaters and hot-water storage appliances
- Lighting sources
- Air-conditioning appliances

For more information

Council Directive 92/75/EEC on labeling and standard product information of the consumption of energy and other resources by household appliances, available online at:
<http://europa.eu.int/scadplus/leg/en/lvb/l32004.htm>

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DANGEROUS SUBSTANCES



The labeling of dangerous substances must indicate the following:

- The name of the substance
- The origin of the substance (the name and address of the manufacturer or distributor)
- The danger symbol and an indication of danger involved in the use of the substance
- A reference to the special risks arising from such dangers.

The dimensions of the label must not be less than a standard A8 sheet (52 x 74mm), and each symbol must cover at least one-tenth of the label's surface area. Member States may require their national language(s) to be used in the labeling of dangerous substances. Where the packaging is too small, the labeling may be affixed in some other manner. The packaging of products considered dangerous which are neither explosive nor toxic may go unlabeled if the product contains such small quantities of dangerous substances that there is no danger to users.

Symbols must be employed if the substance can be defined as any one of the following (as shown above): explosive, oxidizer, flammable, harmful, toxic irritant, corrosive, or harmful to environment. Containers of hazardous substances should include, in addition to the appropriate symbols, a raised triangle to alert the vision-impaired to their contents. Note that this directive has undergone numerous amendments relating, amongst other things, to the marking and labeling of additional substances. Accordingly, it is advisable to consult all literature. In particular, it should be noted that the EU, like the U.S., will shortly be implementing the globally harmonized system (GHS) for classification and labeling. This will result in changes in some of the chemical symbols. For the latest developments on GHS, see the website of the Commercial Service at the U.S. Mission to the EU: http://www.buyusa.gov/europeanunion/us_government_resources.html

For more information

Council Directive 1967/548/EEC, relating to the classification, packaging and labeling of dangerous substances, available online at:

<http://europa.eu.int/scadplus/leg/en/lvb/l21276.htm>

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DEVICES FOR USE IN POTENTIALLY EXPLOSIVE ATMOSPHERE



In addition to applying a CE marking for products falling under this directive, it is necessary to display the Ex mark, which is a specific marking of explosion protection. Located next to the Ex mark will be a symbol designating the product group or category as specified in the directive.

For more information

Council Directive 94/9/EC, available online at:
<http://europa.eu.int/comm/enterprise/atex/direct/text94-9-en.pdf>

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NOISE EMISSION OF OUTDOOR EQUIPMENT



Machines used outdoors are subject to CE marking requirements. Noise emission levels are covered separately. The sample mandatory label shown above specifies noise emission levels.

For more information

Directive 2000/14/EC of the European Parliament, and of the Council of 8 May 2000, on the approximation of the laws of the Member States relating to the noise emission in the environment by equipment for use outdoors, available online at:
<http://europa.eu.int/scadplus/leg/en/lvb/l28048.htm>

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THE WASTE ELECTRICAL AND ELECTRONIC EQUIPMENT DIRECTIVE (WEEE)



This directive is designed to tackle the rapidly increasing waste stream of electrical and electronic equipment, and complements European Union measures on landfills and waste incineration. Increased recycling of electrical and electronic equipment, in accordance with the directive requirements, limits the total quantity of waste going to final disposal. This directive affects the following product categories:

- Large and small household appliances
- Consumer equipment
- Lighting equipment
- IT and Telecommunications equipment
- Electrical and Electronic Tools
- Toys and Sports equipment
- Medical Devices
- Monitoring and Control equipment
- Automatic dispensers

The symbol shown above must be displayed on all products that fall under this directive, and indicates that the product is not to be discarded with normal household waste. It is a required mark on batteries. In instances where this symbol cannot be displayed on the equipment itself, it should be included on the packaging.

For more information

Directive 2002/96/EC, available online at:
<http://europa.eu.int/scadplus/leg/en/lvb/l21210.htm>

NB: RoHS. Directive 2002/95/EC on the restriction of the use of certain hazardous substances in electrical and electronic equipment does not include any marking requirements. The European Commission's guidance on the subject states that, "companies are free to mark their products on a voluntary basis, as long as this [...] does not violate [...] the free movement of goods." In practice, this means that marks must not become a means of exclusion from the market of unmarked or differently marked, but RoHS-compliant, products.

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QUANTITIES IN METRIC UNITS

This directive specifies permissible ranges of nominal quantities, container capacities and the volumes of products sold in aerosols. Manufacturers are advised to take note that all labels require metric units, although dual labeling is also acceptable until the end of December 2009.

For more information

Council Directive 80/232/EC, relating to ranges of nominal quantities/nominal capacities, available online at:
http://europa.eu.int/eur-lex/en/consleg/main/1980/en_1980L0232_index.html

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PRICE DISPLAY

The directive requires an indication of the selling price, and price per unit of measurement, on all products offered to consumers. The aim is to improve the information available to the consumer and to facilitate price comparison. This information must be unambiguous, clearly legible and easily identifiable. If advertising mentions the item's selling price, it must also indicate its unit price. For products sold in bulk, the unit price is the only item whose indication on the label is mandatory. National authorities may provide alternatives for products sold by small retail business operations.

For more information

Directive 98/6/EC, on the indication of the prices of products offered to consumers, available online at:
http://europa.eu.int/comm/consumers/cons_int/safe_shop/price_ind/index_en.htm

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AUTOMOTIVE



Nearly every vehicle component must be certified for safety as specified under the various directives relating to automobiles. The number shown in the rectangle on the label indicates the particular Member State in which the approval process was conducted. A "base approval number" must also be provided adjacent to this certification. This four-digit number will correspond to the directive and type of device in question. The country-number correlation is as follows:

1	Germany	6	Belgium	18	Denmark
2	France	9	Spain	21	Portugal
3	Italy	11	UK	23	Greece
4	Netherlands	13	Luxembourg	24	Ireland

For more information

All existing directives on motor vehicles, in chronological order, available online at:
<http://europa.eu.int/comm/enterprise/automotive/directives/vehicles/index.htm>

Photometry



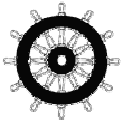
A similar marking is an 'E' surrounded by a circle, which applies to the testing of headlight lamps, brake light lamps and turning signal lamps of all vehicles seeking EU market entry. These include consumer vehicles, low-volume production trucks, light and heavy goods vehicles, trailers, motorcycles, cranes, agriculture and forestry tractors, and special-purpose and off-road vehicles.

For more information

<http://europa.eu.int/comm/enterprise/automotive/directives/vehicles/index.htm>

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MARITIME



The "steering wheel" mark shown above is the equivalent of CE marking for marine equipment. It applies to equipment for use on board any new EU ship, wherever the ship is situated at the time of construction, and to equipment placed on board existing EU ships, whether for the first time or to replace equipment already carried on board. It does not apply to equipment already on board on the date on which the directive entered into force in 1997. The directive applies to the following equipment categories:

- Life-saving appliances
- Marine pollution prevention
- Fire protection
- Navigation equipment
- Radio-communication equipment

For more information

Directive 96/98/EC on Marine Equipment, available online at:
<http://www.emsa.eu.int/Docs/other/consolidated%20med%20to%203rd%20amendment.pdf>

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PACKAGING MATERIAL

The EU Packaging and Packaging Waste Directive harmonized member state legislation regarding packaging material composition and the management of packaging waste. Composition of packaging material is addressed in a series of EU-wide standards. For the management of packaging waste through recycling targets and collection and recycling systems, member states have adopted voluntary marking mentioned in the following report.

For more information

EU Packaging and Packaging Waste Market Research Report, available online at:
http://www.buyusainfo.net/docs/x_6455675.pdf

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Wood Packaging



XX represents the ISO country code.
000 represents the unique number assigned by the national plant protection organization.
YY represents either HT for heat treatment or MB for methyl bromide fumigation.

Like the U.S., the EU has adopted legislation to ensure pest control in wood packaging. The marking used for regulated materials is based on the International Plant Protection Convention compliance symbol shown above.

For more information

Requirements for wood packaging material
http://europa.eu.int/comm/food/plant/organisms/imports/special_en.htm

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VOLUNTARY MARKS AND LABELS

MATERIALS IN CONTACT WITH FOOD



Manufacturers of containers, plates, cups, and other material that is intended to come into contact with food are required to check the compliance of their product with EU chemical safety requirements. Using the symbol shown above shows compliance with these requirements.

For more information

Framework Directive and symbol, available online at:

http://eur-lex.europa.eu/LexUriServ/site/en/oj/2004/l_338/l_33820041113en00040017.pdf

Other material directives

http://ec.europa.eu/comm/food/food/chemicalsafety/foodcontact/legisl_list_en.htm#02-72

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THE e-MARK



The e-mark, shown above, acts as a metrological "passport" to facilitate the free movement of prepackaged goods. It guarantees that certain liquids and other substances, as defined in the directives 75/106/EEC and 76/211/EEC, have been packed by weight or volume in accordance with the directives. While compliance is not mandatory, free movement throughout the EU is guaranteed for prepackaged products that do comply with the provisions of the directive.

Containers with an e-mark also bear an indication of the weight or volume of the product, known as its "nominal" weight or volume. The packer (or importer, if the container is produced outside the EU) is responsible for ensuring that the containers meet the directive's requirements. The responsibility for measuring and checking the actual contents of the containers rests with the packer or importer.

For more information

<http://europa.eu.int/scadplus/leg/en/lvb/l32029.htm>

<http://europa.eu.int/scadplus/leg/en/lvb/l32003.htm>

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THE ECO-LABEL



The European Eco-label scheme enables European consumers, including public and private purchasers, to easily identify officially approved green products across the European Union, Norway, Liechtenstein and Iceland. Introduced in 1992, the label communicates to the customer that the marked products meet specific eco-friendly criteria that have been developed to apply to everyday consumer goods and services.

The Eco-label program has recently been expanded to cover fish and fishery products. This means that eco-labeled products have been produced in accordance with specific environmental standards.

The symbol may apply to the following 27 product and services groups:

Bed mattresses	Indoor paints and varnishes	Textile products
Campsite Services	Laundry detergents	Tissue paper
Copying and graphic paper	Light bulbs	Tourist accommodation service
Detergents for dishwashers	Lubricants	Vacuum cleaners
Dishwashers	Personal computers	Washing machines
Footwear	Portable computers	
Furniture	Printed Paper Products	
Hand dishwashing detergents	Refrigerators	
Hard floor coverings	Soaps and Shampoos	
Heat Pumps	Soil improvers	
Household cleaning products	Televisions	

Manufacturers should be aware that similar eco-friendly markings are often used nationally, such as the Nordic Swan or the German Blue Angel, shown below.



For more information

European Eco-label website

<http://europa.eu.int/comm/environment/ecolabel/>

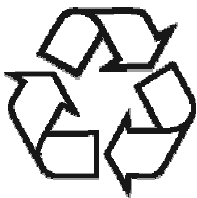
http://ec.europa.eu/comm/fisheries/doc_et_publ/factsheets/facts/en/ecolabel_definition.htm

European Eco-Label Market Research Report, available online at:
http://www.buyusainfo.net/docs/x_1968520.pdf

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RECYCLING



The “mobius loop” (sometimes known as the “chasing arrows”), based on an international standard, may be found on products throughout Europe and is meant to help consumers identify and participate in recycling schemes for product packaging and materials. As well as being used on printed packaging, the chasing arrow symbol is sometimes featured in the moulds of glass, metal, paper, or plastic products. Various kinds of loops indicate whether the product is recyclable (as shown above), recycled or contains recycled material.

For more information

http://europa.eu.int/comm/environment/waste/waste_topics.htm

Plastics



EU Number	Abbreviated Description	Full Plastic Description
1	PET	Polyethylene Terephthalate
2	HDPE	High Density Polyethylene
3	PVC	Poly Vinyl Chloride
4	LDPE	Low Density Polyethylene
5	PP	Polypropylene
6	PS	Polystyrene

The symbol above is an example of how a plastic's type may be indicated on a product. As part of the EU voluntary identification system for plastics, the following marks are used for the most common types of plastics (Decision 97/129/EC):

Glass



There are no EU-wide symbols used to designate the recyclable nature of glass. However, it is certainly encouraged on the national level with an array of symbols. The two shown above are only a small sample of the total existing to show recycling capability.

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THE ENERGY STAR



The Energy Star, shown above, is a voluntary labeling program to help consumers identify the most energy-efficient office equipment on the market, such as computers, monitors, printers, fax machines, copiers, scanners and multifunction devices. The Energy Star may be placed on products that meet or exceed energy-efficiency guidelines. Initiated by the United States, an agreement with the EU was signed in December 2000 with the goal of co-ordinating the labeling program in the two markets. The agreement lays out a common set of energy-efficiency specifications, with a common logo that doubles as a marketing tool.

For more information

www.eccj.or.jp/ene-star/english/prog/

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GREEN DOT



The Green Dot system is a scheme in which participating bodies coordinate the collection, sorting and recovery of used packaging. This system is actually administered according to national packaging laws (adhered to by packaging manufacturers, fillers, retailers and importers), and it should be noted that all participating national systems operate independently. The umbrella organization, PRO-Europe, is responsible for managing the Green Dot labeling system in Europe. More than 460 billion pieces of packaging marked with the Green Dot, shown above, are distributed worldwide. Interested applicants should contact one of the national administering authorities.

<http://www.pro-e.org/>

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A FINAL NOTE ON BARCODES

Barcodes are not legislated by the European Union; neither are they legislated by its member states. It is rare, however, to see products without barcodes. The code system and its use is governed by voluntary industry agreements. Competing systems exist, and importers and distributors can provide advice on this subject.

For more information

<http://en.wikipedia.org/wiki/Barcode>

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FUTURE REQUIREMENTS

EU legislation requires a declaration of origin for certain goods that have been imported from third countries, but there is no obligation for third-country exporters to provide an indication of geographical origin when exporting to the EU. These circumstances may change in the future, since the Commission recently proposed legislation for mandatory origin marking in addition to the requirement for a certificate of origin. If adopted, mandatory origin marking may become a requirement for a range of consumer goods such as footwear and textiles, as specified in EU legislation, as soon as mid-2007.

For more information

European Union: Proposal for an Origin Marking Scheme for Imported Products, available online at:
<http://buyusainfo.net/info.cfm?id='139462'&keyx='EF74BE5E88E3BAC1D597670AA3F7D1A7'&navcol=>

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For More Information

The U.S. Commercial Service at the U.S. Mission to the European Union in Brussels, Belgium can be contacted via e-mail at brussels.ec.office.box@mail.doc.gov or visit our website www.buyusa.gov/europeanunion.

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