

Ramboll Study: Labelling Requirements

Comments from the Rethink Plastic Alliance (RPA) on Ramboll's study on labelling requirements under the Packaging and Packaging Waste Regulation (PPWR)

Comments on Ramboll's labelling study

Influence on consumers

Information about plastic influences consumers' purchasing decisions, as shown in [this consumer survey](#). The vast majority of consumers are more likely to make a purchase if the packaging is labelled as fully recyclable or as containing recycled plastic. Even though most people believe that plastic products and packaging are a rather negative choice for the environment, the majority perceive them as an environmentally positive choice when they are marked with green logos.

Labels on recycled content in plastic packaging

No circular or green imagery

We appreciate that the proposed label for packaging recycled plastic content does not include a closed loop or green imagery that could give the false impression to consumers of endless plastic circularity, or even suggest the plastic packaging would have a positive impact on the environment.

Such closed loop or green imagery would not be aligned with the key principles of the EU Directive on unfair commercial practices ([UCPD](#)), as amended by Directive (EU) [2024/825](#) on Empowering Consumers for the Green Transition. According to the UCPD Guidance (4.1.1.3), "in order not to be misleading, environmental claims must be truthful, not contain false information and be presented in a clear, specific, unambiguous and accurate manner". They shall neither deceive nor likely deceive the average consumer. "Accordingly, also the imagery and overall product presentation (i.e. layout, choice of colours, images, pictures, sounds, symbols or labels), should be a truthful and accurate representation of the scale of the environmental benefit, and should not overstate the benefit achieved."

This was demonstrated in the outcome of the [European external alert](#) from the European Consumer Organisation (BEUC) against bottling companies advertising environmental claims on plastic bottles. Following this alert, two large brands committed, in respect of their own claims, to "ensuring that the overall impression of the label and the marketing is not misleading consumers regarding environmental benefits of the packaging."

Recycled content percentage

For the recycled plastic content label, the percentage shall not concern the specific packaging since the share of recycled content is “per packaging type and format [...] calculated as an average per manufacturing plant and year” (PPWR articles 12(4) and 7(1)). The share of recycled content shall only concern the packaging production process, e.g. “on average our production method uses X% recycled content in 2026”.

In addition, the term “attributed recycled content” shall not be mentioned in the packaging label as consumers do not understand it. This was confirmed by the Netherlands Authority for Consumers and Markets (ACM) in [this decision](#): companies should not give the impression that individual products are more sustainable through a 'mass balance system', because it is impossible to guarantee that an individual product actually contains the sustainable material the labelling refers to. If recycled content based on attribution is used, the specific packaging may not contain the percentage claimed. Other claims on the packaging label than exact recycled plastic content should be used to focus on the production system, e.g. “made in a factory using X% recycled content on average. This specific product may contain a different proportion of recycled content due to production variations”.

Labels for bio-based plastic packaging

Leaf imagery issue

The proposed label for packaging bio-based plastic content shall not include a leaf or any other green or nature image. Such green imagery prompts the false idea of environmental neutrality and may even give the impression that the plastic packaging would have a positive impact on the environment. According to the [UCPD Guidance](#) (4.1.1.3), an environmental claim can indeed be misleading when “the use of images (e.g. trees, rainforests, water, animals) and colours (e.g. blue or green backgrounds or text) are associated with environmental sustainability”. The leaf symbol could thus lead to the same issue of “misleading consumers regarding environmental benefits of the packaging” raised in the European external alert against recycling claims on plastic bottles.

Bio-based content percentage

The lack of any percentage on the proposed bio-based plastic content label can give the misleading overall impression to consumers that the packaging is made of 100% bio-based plastic content, whereas only a smaller share is included. This is not compatible with the UCPD: “environmental claims are likely to be misleading if they consist of vague and general statements of environmental benefits without appropriate substantiation of the benefit and without indication of the relevant aspect of the product the claim refers to”, according to the UCPD Guidance. The Empowering Consumers Directive also gives ‘biobased’ as one of the examples of prohibited generic environmental claims “or similar statements that suggest or create the impression of excellent environmental performance”.

To ensure the environmental claim is specific and “provided in clear and prominent terms on the same medium”, the precise share of bio-based plastic shall be included in both the physical and the digital label (it is already proposed in the digital label). Additionally, the use of “attributed

content” through a ‘mass balance system’ should not be authorised as this method is not considered suitable to confirm the actual share of bio-based input.

Radiocarbon-based measurement

The 2022 [Communication](#) setting an EU policy framework on biobased, biodegradable and compostable plastics recommended the use of radiocarbon-based methods “as their results are robust and their use is widely accepted” (it measures precisely ^{14}C as a marker for bio-based carbon content). It acknowledged “the crosscutting standards developed by the European Technical Committee for Standardisation for bio-based products (EN 16640:2017 and EN 16785-1:2015 from CEN/TC 411) offer guidance on aspects such as measuring methods of biobased content, business-to-business and business-to-consumer communication. These voluntary standards are widely used by the market and their application is recommended as it ensures a consistent approach.” It added “Documenting the use of biomass through a chain of custody and attributing a share to end-products through mass balance accounting is a method which is not considered suitable for confirming the actual share of biobased content.”

ASTM D6866 is also a standard helping to accurately measure the share of biogenic carbon. As an example, USDA BioPreferred / USDA Certified Biobased Product label uses a percentage of “bio-based content” defined using ASTM D6866 (radiocarbon standard). It is a good example of radiocarbon-based testing and transparency with exact percentage statements distinguishing product and packaging bio-based content. BioPreferred|Seller

In contrast, the mass balance method in EN 16785-2 should not be allowed, as it enables firms to claim bio-based content without physical proof, allowing products made entirely from fossil feedstock to be marketed as “bio-based.” This approach, often favoured by large companies, is problematic as it makes it impossible to verify the actual bio-based content of individual products.

In addition, bio-based plastics are often composed of a base biopolymer combined with additives which may not be bio-based. The study should specify non-bio-based additives are excluded from the bio-based plastic content.

Certification schemes for recycled / bio-based plastic content labels

The recycled plastic content and the bio-based plastic content labels are voluntary labels and fall in the definition of a “sustainability label” according to the consolidated UCPD (article 2(q)), as amended by the Empowering Consumers Directive. As such, they shall be based on a certification scheme according to the UCPD Annex I. If not, they shall be considered unfair commercial practices. The UCPD further clarifies the certification scheme “means a third-party verification scheme” (article 1(r)) and sets minimum conditions of transparency and credibility. The UCPD Guidance (4.1.1.3) complements these requirements to ensure consumers shall be informed about the scheme used and be able to access information “with a reference to where all information about the certification can be found”.

These requirements should be added to the study to ensure consumers can trust these environmental labels.

Labels on reusable packaging

Reusable label

- **The wording "reusable" should be mandatory.** The label should clearly communicate that the packaging is **reusable**, rather than relying solely on a symbol. While symbols can help with harmonisation across the EU, including the word "reusable" alongside the pictogram would significantly improve consumer understanding, particularly during the transition period while the label becomes familiar, as it is a new label for them. A clear textual indication also reduces the risk of misinterpretation and helps reinforce the message that the packaging is intended to be returned and used multiple times.
- **The proposed barcode does not provide added value for consumers.** Most packaged products already carry one or more barcodes for commercial and logistical purposes. Adding another barcode to indicate reusability is unlikely to improve consumer information, while taking up valuable space on the packaging. Instead, this space should be used for clear, visible consumer information—such as the word "**reusable**"—which directly communicates the intended use of the packaging without requiring consumers to scan a code.
- **Reusable packaging should not carry waste sorting labels.** Packaging that is part of a reuse system should display only the reusable label and should not also bear waste sorting labels (e.g. the glass recycling label). Waste sorting labels signal that the packaging should be disposed of after use, whereas reusable packaging is designed to be returned to the reuse system. Displaying both labels risks sending contradictory messages to consumers and may encourage disposal instead of return, undermining the effectiveness of reuse systems. Only once reusable packaging reaches the end of its service life should it enter the waste management system for recycling.
- **Reusable label enforceability:** Lastly, we would like to reiterate that the EU reuse label will only achieve its intended purpose if it is underpinned by clear, harmonised and enforceable rules ensuring that only genuinely reusable packaging can bear the symbol, as already highlighted in the joint stakeholder [statement](#) on the reuse label. To this end, we call for the establishment of a coherent **EU reuse governance framework** that brings together the EU-wide reuse symbol, the minimum number of rotations, the methodology for calculating reuse targets and the minimum reuse requirements laid down in the PPWR. Together, these elements would create a robust and credible framework that prevents misuse of the label and greenwashing, while providing legal certainty for operators and effective enforcement for market surveillance authorities.

Correlation between reuse and DRS labels for consumers

Greater clarity is needed regarding the relationship between reuse and DRS labels to ensure consumers can easily identify and correctly return packaging. Reusable packaging systems frequently operate through deposit return schemes, with consumers paying a deposit that is refunded when the packaging is returned.

Our understanding from the consultants' study is that the EU DRS label would apply only to packaging covered by Article 50(1) of the PPWR, namely single-use plastic and metal beverage packaging. However, in practice, the same return infrastructure may be used for both single-use and reusable packaging, as encouraged by the PPWR. If reusable packaging does not carry a DRS-related indication while consumers are expected to return it through the same infrastructure, this may create unnecessary confusion. Clear consumer information and awareness-raising will therefore be essential to ensure the correct functioning of both systems. Specific countries such as Latvia for instance have a deposit logo which is declined in two versions based on whether the deposit is reusable or single-use packaging (see [here](#)). This could ensure that consumers are aware of the return modalities of the reusable packaging.

Correlation between EU and national labels

Further clarification is also needed regarding the relationship between the future EU harmonised labels and existing national labels. Our understanding is that Member States will remain free to retain or introduce national labels alongside the EU label. This is particularly relevant in countries where deposit return schemes for reusable packaging are already well established.

For example, in Belgium, the existing deposit label ("consigne"/"statiegeld") enables consumers to identify reusable packaging that can be returned through a deposit return system. If the future EU DRS label applies only to single-use beverage packaging, while national DRS labels continue to identify reusable packaging, consumers may struggle to distinguish between the two.

To avoid confusion, we recommend either:

- ensuring comprehensive consumer communication clearly explaining the different functions of EU and national labels;
- or, preferably, requiring **all packaging subject to a deposit**, whether single-use or reusable, to display a harmonised DRS (deposit) label, while reusable packaging would additionally carry the EU reuse label. This approach would better reflect how consumers interact with deposit systems and provide a more intuitive and consistent user experience across the EU.

Substances of concern

While Art. 12 (7) requires that a digital label contains information about substances of concern present in each material in a packaging unit, it does not limit access to this information to waste (recycling) operators and to end-consumers. In principle, all actors should have access to such essential information, from waste operators to economic actors and end-consumers.

It is important to ensure adequate access / readability of this data to the operators of reusable packaging systems as well. This will support informed testing of chemical migration by these operators (which differs from testing of single-use packaging), along tracking the rotations of reusable packaging. As recognised in the Commission Regulation (EU) 2025/351, repeated use may lead to deterioration of the plastic material or article, leading to an increase of migration of constituents (such as substances of concern) into food that may endanger human health.

According to Art. 14.1 ('Labelling') of Regulation 2025/351, the manufacturer or other operator responsible for placing on the market a final plastic food packaging intended for repeated use, shall provide to its users the following:

- (a) appropriate instructions designed to slow down deterioration of the article;
- (b) a description of observable changes of the packaging that may indicate the deterioration of the article or material;
- (c) a warning in case specific damages or foreseeable misuse would cause increased migration or would cause the article to become otherwise unsuitable for further use in contact with food.

Given that the vast majority of reusable food packaging is currently made of plastic, harmonising the labelling rules contained in various legal acts while designing a digital label is the most appropriate and effective way to avoid additional administrative burdens for economic operators.

About the Rethink Plastic Alliance

The Rethink Plastic Alliance is a coalition of leading European NGOs advocating for ambitious EU policies to tackle the growing crisis of plastic pollution. It brings together the Center for International Environmental Law (CIEL), ClientEarth, the Environmental Investigation Agency (EIA), the European Environment Bureau (EEB), the European Environmental Citizen's Organisation for Standardisation (ECOS), Greenpeace, Seas At Risk, Surfrider Foundation Europe, and Zero Waste Europe. Together, these organisations represent thousands of active groups, supporters and citizens in every EU member State working towards a future free from plastic pollution.