

Targeted stakeholder consultation on the design of EU harmonised waste sorting labels under the Packaging and Packaging Waste Regulation

Fields marked with * are mandatory.

1 Data privacy

Before you proceed, please take a moment to understand how we will use the personal data that you will provide while participating in this survey.

Participation in this survey is voluntary, and you may withdraw at any time without any negative consequences. Your responses will be stored securely and accessed only by the research team and relevant European Commission staff on a need-to-know basis.

In line with the Better Regulation guidelines on stakeholder consultations, your survey responses will be made publicly available. Please keep this in mind when sharing any personal information. You can exercise your data protection rights by contacting the Data Controller at: JRC-WASTE-LABELLING@ec.europa.eu

All data will be processed in accordance with [Regulation \(EU\) 2018/1725](#) on the protection of personal data by EU institutions and bodies.

Before starting the survey, **please read the data privacy statement**. To proceed, you must tick the checkbox below to confirm that you have read and understood it.

☒ I have read and understood the privacy statement.

[2024-08-05-DPS-WSL-consultation-noTC.pdf](#)

2 Introduction

We kindly ask organisations to coordinate internally and to submit one consolidated feedback per organisation.

We suggest you fill out this surveys on a PC or laptop, as it is not optimised for mobile phones.

Below you will find relevant information on the survey and answers to Frequently Asked Questions (FAQs).

What is this?

This is a targeted consultation to gather feedback on key characteristics and application rules of the upcoming harmonised material-based waste sorting labels to be applied to packaging and waste receptacles in the European Union, as part of the Packaging and Packaging Waste Regulation.

Who created this?

The European Commission (Directorate-General for the Environment and Joint Research Centre, JRC) created this consultation to gather stakeholders' views.

Who is it for?

This consultation targets expert stakeholders across the EU packaging and waste management sectors. It is relevant for:

- Waste collectors, transporters, sorters, and treatment facilities
- Packaging and product manufacturers
- Retailers, packagers, and labelling professionals
- Consumer organisations and environmental advocates
- Policy-makers, researchers, and government agencies
- NGOs, industry networks, and platforms
- Stakeholders at all levels (EU, national, regional, local, international) are welcome to contribute.

Why the consultation?

The JRC is developing a technical proposal for harmonised EU waste sorting labels in collaboration with DG ENV. To support this, the JRC is gathering stakeholder input on specific elements of the planned system. This is the second round of targeted consultation, following a first round held in September 2024, which received input from over 150 respondents. This new consultation builds on those findings and seeks further input to refine the labelling proposal.

What does this consultation include?

This survey focuses on key aspects of the draft technical proposal, including:

- Visual design of labels
- Application rules and labelling system features

Participants will be directed to relevant background materials. Contributions should be based on accurate information, as only well-founded input can be used in further analysis.

What is expected from you?

This survey invites you to provide feedback on several aspects of the draft technical proposal and parts of the draft user manual. You are encouraged to provide clear, well-reasoned explanations to support your position.

Please be precise and concise in your responses. There will also be space at the end of the survey for additional comments not covered by specific questions. Some questions will use predefined answer options.

When can you participate?

This consultation is open from 19/05/2025 until 16/06/2025, 23:59 UTC+1.

Late responses will not be accepted.

You may complete the survey in multiple sessions—just remember to save your progress using the provided function.

How will your input be used?

The JRC will use your feedback alongside other forms of evidence and expert analysis to inform the final version of the harmonised labelling proposal. Responses will not be judged solely by majority consensus but will be assessed for their relevance and quality.

The [first consultation](#) provided valuable insights that shaped the current proposal. We look forward to similarly constructive input in this second round.

2.1 Frequently Asked Questions (FAQs)

☐ Show

☐ Hide

3 Disclaimer

We kindly ask participants not to repeat requests or positions that they have already communicated to the JRC—either during the previous stakeholder consultation or through bilateral exchanges—unless specifically requested to do so.

The JRC has thoroughly reviewed and duly considered all stakeholder input received to date. As part of its mandate, the JRC's primary role is to develop a scientifically grounded technical proposal for EU

harmonised waste sorting labels, to be submitted to the European Commission's Directorate-General for Environment (DG ENV). All stakeholder contributions are being appropriately taken into account alongside other relevant evidence and information sources.

4 Background

Below you will find relevant background information.

EU rules on packaging and packaging waste

EU rules on packaging and packaging waste cover both packaging design and packaging waste management. They aim to deal with the increasing quantities of packaging waste, which cause environmental problems. They also aim to remove barriers in the internal market – caused by EU countries adopting different rules on packaging design, restrictions or labels.

EU rules on packaging cover all types of packaging placed on the European market and the resulting packaging waste. This means all materials and packaging, including industrial, commercial, household and packaging from any other sectors.

For more information, see [Packaging waste - European Commission \(europa.eu\)](https://europea.eu).

Past and related policies

Directive 94/62/EC on packaging and packaging waste aims to harmonise national measures concerning the management of packaging and packaging waste and to improve the quality of the environment by preventing and reducing the impact of packaging and packaging waste on the environment. The latest amendment of Directive 94/62/EC by Directive (EU) 2018/852 contains reinforced measures aimed at preventing the generation of packaging waste, and promoting the reuse, recycling and other forms of recovering of packaging waste, instead of its final disposal, thus contributing to the transition towards a circular economy.

For more information, see [this website](#).

The current focus: Packaging and Packaging Waste Regulation

On December 16, 2024, the European Council formally adopted the Packaging and Packaging Waste Regulation (PPWR), which was published on January 22, 2025 in the Official Journal of the European Union.

The PPWR requires the introduction of harmonised labelling of packaging and waste bins to facilitate correct consumer disposal of packaging waste.

For more information, see [this version](#).

Waste sorting labels as described in the PPWR (Articles 12 and 13)

A key measure of the Packaging and Packaging Waste Regulation is harmonised labelling of packaging and waste receptacles to inform consumers and enable them to dispose of packaging waste in an appropriate manner.

The PPWR outlines requirements for EU harmonised waste sorting labels in Article 12 for packaging and Article 13 for waste receptacles.

Specifically,

1. the harmonised WSLs must indicate waste materials (as opposed to waste destinations). For example, instead of indicating where packaging needs to be disposed of with a label indicating “plastic waste bin” or “yellow bin”, the label must indicate the material “plastic”;
2. the harmonised WSLs need to be displayed both on packaging and on waste receptacles. Thus, they communicate to users how to dispose of waste by establishing visual correspondence between labels applied to both packaging and receptacles.

This approach is identical to the Nordic Pictogram scheme (see section 5 of the [JRC report “Setting the scene for harmonised waste-sorting labels in the European Union”](#)).

Furthermore, an EU harmonised waste-sorting labelling scheme needs to work for different underlying separate waste collection schemes (SWC) that exist in Member States and/or regions within Member States.

A selection of key specifications is provided in the below table. The list is not exhaustive and all other specifications from the PPWR apply.

4.1 Table of key specifications and related PPWR articles and recitals.

| | Aspect | Article |
|---|--|-------------------|
| 1 | Indicate packaging material composition | 12(1) |
| 2 | Match on packaging and waste receptacles | 13(2) |
| 3 | Use language minimally, be easily understandable, also for persons with disabilities | 12(1), recital 64 |
| 4 | Bear optional QR codes or other digital data carriers | 12(1), 12(5) |
| 5 | Consider the specificities of Member States’ collection systems | 13(2) |
| 6 | Consider the specificities of composite packaging | 13(2) |
| 7 | Be exempt from transport packaging (except e-commerce) and DRS packaging | 12(1) |
| 8 | Be available in one or more easily understood languages, determined by Member State | 12(5) |
| 9 | Apply to certain types of compostable packaging (Article 9) indicating the material is compostable, not suitable for home composting, and shall not be thrown away in nature | 12(1) |

4.2 Show more information on past, present and future work of the Joint Research Centre regarding this project

- ☐ Show more
☐ Show less

5 Stakeholder information

Before you proceed, please provide us with your personal contact details and information on your organisation.

* 5.1 What is your first name?

* 5.2 What is your last name?

* 5.3 What is your E-Mail address?

* 5.4 What is your country of residence?

- ☐ AT - Austria
☒ BE - Belgium
☐ BG - Bulgaria
☐ HR - Croatia
☐ CY - Cyprus
☐ CZ - Czechia
☐ DK - Denmark
☐ EE - Estonia
☐ FI - Finland
☐ FR - France
☐ DE - Germany
☐ EL - Greece
☐ HU - Hungary
☐ IE - Ireland
☐ IT - Italy
☐ LV - Latvia
☐ LT - Lithuania
☐ LU - Luxembourg
☐ MT - Malta
☐ NL - Netherlands
☐ PL - Poland
☐

- ☐ PT - Portugal
- ☐ RO - Romania
- ☐ SK - Slovak Republic
- ☐ SI - Slovenia
- ☐ ES - Spain
- ☐ SE - Sweden
- ☐ ID27 - ZZ - Other country

We would also like to know more about the organisation or association you are working for.
Please answer the following questions:

* 5.6 What is the name of your organisation or association?

Confindustria

* 5.7 Which of the following best describes the focus of your organisation or association's work? [Tick all that apply]

- ☐ Consumer organisation
- ☐ Packaging design
- ☐ Packaging labelling
- ☐ Packaging manufacturing
- ☐ Producer Responsibility Organisation
- ☐ Product design
- ☐ Product labelling
- ☐ Product manufacturing
- ☐ Receptacle labelling
- ☐ Waste collection
- ☐ Waste management (private)
- ☐ Waste management(public)
- ☐ Waste policy
- ☐ Waste sorting / recycling
- ☐ Waste transport
- ☐ Waste treatment
- ☒ Other (please specify)

5.8 Please specify

Industry Federation

* 5.9 What best defines your role in your organisation or association? [Tick all that apply]

- ☐ Designer
- ☐ Politician / Policymaker
- ☐ Production or operational manager
- ☐ Marketing or sales manager
- ☒ Public, International or EU legal affairs manager

- ☐ Responsible for communication
- ☐ Senior manager
- ☐ Technical expert
- ☐ Other (please specify)

* 5.11 Which of the following group(s) does your organisation or association *represent*?

- ☐ Consumers
- ☐ Environment
- ☐ Government / Public Authority
- ☐ Labels and brands
- ☒ Product manufacturers
- ☒ Packaging manufacturers
- ☒ Suppliers
- ☐ Retailers
- ☒ Utilities
- ☐ Workers
- ☐ Science / research
- ☐ Other (please specify)

* 5.13 Which of the following group(s) do(es) your organisation's or association's actions or decisions *affect*?

- ☒ Consumers
- ☐ Environment
- ☐ Government / Public Authority
- ☒ Labels and brands
- ☒ Product manufacturers
- ☒ Packaging manufacturers
- ☒ Suppliers
- ☒ Retailers
- ☒ Utilities
- ☒ Workers
- ☐ Science / research
- ☐ Other (please specify)

* 5.15 What best describes the type of your organisation or association? [Tick all that apply]

- ☒ For-profit
- ☐ Governmental / Public Authority
- ☐ Network or association
- ☐ Non-governmental
- ☐ Not for profit
- ☐ Other (please specify)

* 5.17 What best describes the level of operation of your organisation or association?

- ☐ Europe (EU and other countries, including UK and EEA countries)
- ☒ European Union
- ☐ Local / Regional
- ☐ Municipal

- ☐ National
- ☐ Worldwide
- ☐ Other (please specify)

* 5.19 In which country or countries do(es) your organisation or association operate? [Tick all that apply]

- | | | | |
|---|---|--|---|
| <input type="checkbox"/> Austria | <input type="checkbox"/> Finland | <input type="checkbox"/> Lithuania | <input type="checkbox"/> Slovenia |
| <input checked="" type="checkbox"/> Belgium | <input type="checkbox"/> France | <input type="checkbox"/> Luxembourg | <input type="checkbox"/> Spain |
| <input type="checkbox"/> Bulgaria | <input type="checkbox"/> Germany | <input type="checkbox"/> Malta | <input type="checkbox"/> Sweden |
| <input type="checkbox"/> Croatia | <input type="checkbox"/> Greece | <input type="checkbox"/> Netherlands | <input type="checkbox"/> All of the EU |
| <input type="checkbox"/> Cyprus | <input type="checkbox"/> Hungary | <input type="checkbox"/> Poland | <input type="checkbox"/> Other (please specify) |
| <input type="checkbox"/> Czechia | <input type="checkbox"/> Ireland | <input type="checkbox"/> Portugal | |
| <input type="checkbox"/> Denmark | <input checked="" type="checkbox"/> Italy | <input type="checkbox"/> Romania | |
| <input type="checkbox"/> Estonia | <input type="checkbox"/> Latvia | <input type="checkbox"/> Slovak Republic | |

* 5.21 How did you hear about this consultation? *(Your answer will not impact your participation in this survey. It is for information only.)*

- ☒ I received an invitation mail directly from the JRC or the European Commission.
- ☐ I was informed from someone other than the JRC or the European Commission.
- ☐ Don't know/don't want to say

* 5.22 Have you or your organisation provided input to any previous steps of this particular work on waste sorting labels in the European Union?

- ☐ Yes, I participated in the stakeholder consultation during September 2024.
- ☒ Yes, I participated in the participatory design workshops during 2024 and 2025.
- ☐ Yes, I participated in other activities on EU waste sorting labels.
- ☐ No
- ☐ I don't know/don't want to say

6 EU harmonised waste sorting labels

Below, we outline key aspects of the labelling system that you want to consider when providing your feedback.

Material-focus (and exceptions)

EU waste sorting labels are based on the material composition of packaging—not on its local waste stream destination. This approach ensures consistency across Member States and aligns with the Packaging and Packaging Waste Regulation (PPWR).

Most labels represent broad material groups (e.g., 'Paper', 'Flexible Plastic'), with three key exceptions:

- **Residual Waste:** Applies to packaging that does not fall under any defined material group or must be sorted separately despite its material, due to applicable waste sorting rules.
- **Compostable packaging:** Refers to packaging designed for home or industrial composting ([Art. 9 PPWR](#)), regardless of whether it is made from bio-based, plastic-based, or fibre-based materials. The focus is on its end-of-life treatment, not physical composition.
- **Hazardous packaging.** Refers to packaging with hazardous properties, potentially due to its former contents. See [Art. 55\(1\) \(c\) PPWR](#).

Per [Recital 13](#) of the PPWR, packaging with less than 5% by mass of a second material is not considered composite. Such packaging should be labelled according to its main material.

Matching labels on packaging and receptacles

To guide consumer sorting, **the same label design is applied to both the packaging and the corresponding waste receptacle.**

- Labels on packaging may appear in black and white and may not include text.
- Labels on receptacles must include the local language(s) and should be displayed in colour.
- **Pictograms are the key matching element:** if the pictograms match, the item belongs in that receptacle.

Granularity of labels

Granularity refers to the level of detail in distinguishing materials with separate labels. Striking the right balance is crucial: too little granularity can result in vague guidance, too much can overwhelm consumers and complicate implementation.

The following key considerations are used to assess when a material deserves a distinct label:

1. **Citizen understanding:** The system must remain intuitive. Too much detail may reduce sorting accuracy.
2. **Current collection practices:** If a material is not separately collected anywhere in the EU, it likely does not require its own label. If it is, MS should not be encouraged to separate less.
3. **Impact on recycling:** Where mis-sorting degrades recycling outcomes, more detailed labels may be justified.
4. **Industrial sorting capacity:** If facilities can already separate a material effectively, consumer-level differentiation may not be needed.
5. **Clarity of material definition:** Each label should correspond to a clearly defined and consistently applicable material category.

The table below specifies the current granularity underlying the label prototype with reference to Commission Decision [97/129/EC](#) and [Table 1 of PPWR Annex II](#).

6.1 Granularity of current EU harmonised labelling system.

The table on page 29 of the attached user manuals is slightly out of date with respect to this one, as it misses the differentiation between EU-wide and MS-specific industrially compostable packaging, as well as the hazardous packaging label. This will be updated in the next version of the user manuals.

| No. | Material - lvl 1 | Material - lvl 2 | Material - lvl 3 | 97/129/EC | PPWR, Annex II, Table 1 |
|-----|-----------------------|--------------------------|--|---------------------------|---|
| 1 | Glass | Colourless glass | Colourless | 70 | Glass |
| 2 | Glass | Coloured glass | Green | 71 | Glass |
| 3 | Glass | Coloured glass | Brown | 72 | Glass |
| 4 | Paper and cardboard | Cardboard | Cardboard | 20 | Paper/cardboard packaging |
| 5 | Paper and cardboard | Paper | Paper | 22 | Paper/cardboard packaging |
| 6 | Wood | Wood | Wood | 50 | Wooden packaging |
| 7 | Cork | Cork | Cork | 51 | Cork packaging |
| 8 | Metal | Steel | Steel | 40 | Steel |
| 9 | Metal | Aluminium | Aluminium | 41 | Aluminium - rigid and flexible |
| 10 | Plastic | Flexible plastic | Flexible plastic | 1-6 | PET/PE/PP/others - flexible |
| 11 | Plastic | Rigid plastic | Rigid plastic | 1-6 | PET/PE/PP/HDPE/PS/XPS/EPS - rigid |
| 12 | Composite packaging | Fibre-based composite | Mixed canister | 80-85 | Composite packaging of which the majority is paper/cardboard |
| 13 | Composite packaging | Fibre-based composite | Beverage carton | 80-85 | Composite packaging of which the majority is paper/cardboard |
| 14 | Composite packaging | Other composite | Other composite | 90-98 | Composite packaging of which the majority is not paper/cardboard |
| 15 | Textile | Textile | Textile | n/a | Natural and synthetic textile fibres |
| 16 | Ceramics | Ceramics | Ceramics | n/a | Clay, stone |
| 17 | Compostable packaging | Industrially compostable | Throughout the EU (Art. 9(1) PPWR) | n/a | Packaging and packaging components made of industrially compostable packaging, including biodegradable plastics - rigid (e.g. PLA, PHB) and flexible (e.g. PLA). This refers to plastics that are readily biodegradable (meaning a proven ability to convert >90% of the original material into CO2, water and minerals by biological processes within 6 months) and regardless of the feedstock used for their production. |
| | | | | | |

| | | | | | |
|----|-----------------------|--------------------------|--|-----|---|
| 18 | Compostable packaging | Industrially compostable | In some Member States (Art. 9(2) PPWR) | n/a | Packaging and packaging components made of industrially compostable packaging, including biodegradable plastics - rigid (e.g. PLA, PHB) and flexible (e.g. PLA). This refers to plastics that are readily biodegradable (meaning a proven ability to convert >90% of the original material into CO2, water and minerals by biological processes within 6 months) and regardless of the feedstock used for their production. |
| 19 | Compostable packaging | Home compostable | Home compostable | n/a | n/a |
| 20 | Residual | Residual | Residual | n/a | n/a |
| 21 | Hazardous packaging | Hazardous packaging | Hazardous packaging | n/a | n/a |

Modular approach and meta-labels

Packaging and waste receptacles are often used for multiple materials. To reflect this, **the labelling system follows a modular approach, allowing multiple labels to be applied to a single item.**

- **For packaging:** Multiple labels help consumers correctly sort individual components (e.g., a plastic container with a cardboard lid).
- **For receptacles:** Multiple labels indicate that different material types can be deposited in the same receptacle (e.g., soft and rigid plastic, paper, and cardboard). These labels can be applied together or separately, depending on the local waste collection system.

Meta-labels combine two pictograms into a single label to represent two material types. They are intended only for waste receptacles—not for packaging—and help reduce the number of individual labels needed on receptacles.

- **Why not on packaging?** Applying a meta-label to packaging (e.g. “Paper + Cardboard”) may confuse consumers in regions where paper and cardboard are collected separately. This would undermine the goal of providing accurate, location-appropriate sorting guidance.
- Relevant cases for meta-labels include
 - Cardboard + Paper
 - Rigid + Flexible Plastic
 - Beverage Cartons + Mixed Containers
 - Coloured Glass Variants

These combinations are valid for receptacles only, where simplification is beneficial without compromising sorting precision.

See the below image for several possible applications of multiple labels on packaging (a) and receptacles without (b and c) and with meta-labels (d and e).

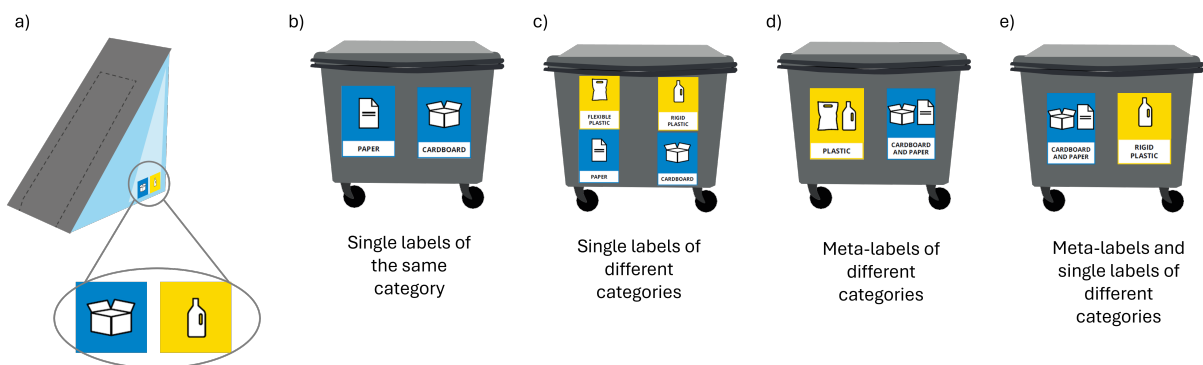


Image constitutes an example, not to scale.

Limitations

The harmonised labels are designed to be simple and visually intuitive. As such, **they do not communicate detailed instructions directly on the label**—such as:

- Whether an item is contaminated
- How to disassemble multi-material components
- Specific regional sorting rules

The level of **granularity**—i.e., how finely material types are distinguished—affects how much information the system can convey:

- **Higher granularity** allows for more specific guidance but increases complexity for producers and consumers.
- **Lower granularity** simplifies implementation but may not capture regional exceptions or material-specific sorting rules.

If certain packaging types are collected differently in a region for reasons beyond material composition, these exceptions may not be visible on the label alone.

To address such cases, additional guidance mechanisms may be required, including:

- **Finer granularity:** Introducing more specific labels.
- **Exception indicators:** Identifying region- or country-specific applicability.
- **Supplementary information:** e.g., messages like “Check local guidelines”.

Additional aspects: Digital and context-specific labelling

Under [Article 12\(1\), \(5\) PPWR](#), **digital-only labelling may be used, but only in specific cases:**

- **Multi-component packaging:** A digital code (e.g., QR) may supplement physical labels to indicate the correct sorting of each component.
- **Technical constraints:** Where printing, engraving, or affixing a label is not feasible due to size, shape, or packaging material - including on grouped packaging.
- **Accessibility considerations:** To ensure non-discriminatory access for vulnerable groups (e.g., visually impaired persons), digital data carriers may be used.
-

Note: Digital-only labelling is not a general alternative to physical labels. It is intended as a complement or as a fallback in limited circumstances.

Deposit-Refund System (DRS) exemption

Packaging included in a Deposit-Refund System (DRS) is exempt from the waste sorting label requirement under [Article 12\(1\) PPWR](#).

However, if such packaging is also placed on the market in countries where one or more of its materials are not covered by a DRS, then:

- A waste sorting label is required, and
- The label must explicitly state the country where it applies.

7 Question focus

To ensure data quality and integrity, and to value your time, we want to show you the questions that are relevant for you.

To do so, please answer the question below.

While you may choose to view all questions, this may lead to questions that are difficult or impossible for you to answer.

Please answer only the questions that are relevant for you and that you can confidently answer.

7.1 To present you with relevant questions, please provide the following information.

- ☐ I am interested in **packaging labels** and want to answer related questions
- ☐ I am interested in **waste receptacle labels** and want to answer related questions
- ☒ I am interested in **packaging and waste receptacle labels** and want to answer all questions

8 Disclaimer: User manuals

Before you start, please download the current version of the user manuals

[here](#)

(<https://jrcbox.jrc.ec.europa.eu/index.php/s/GcsPBnSTiOZRj5b>)

(Password: JRC-WSL-2025).

Please review them carefully before responding to the survey.

Note that the draft user manuals contain information for all target groups. We will develop separate user

manuals for different target groups at a later stage.

You will have the opportunity to provide general feedback on the user manuals at the end of the survey.

☒ Please confirm that you have downloaded and consulted the provided [draft user guidelines](#) before answering the survey.

9 Packaging questions

Below, we show you the available labels and ask you specific questions on them and related aspects.

Please answer all questions thoroughly and honestly.

Some of these questions will impact other questions you will see in the remainder of the survey.

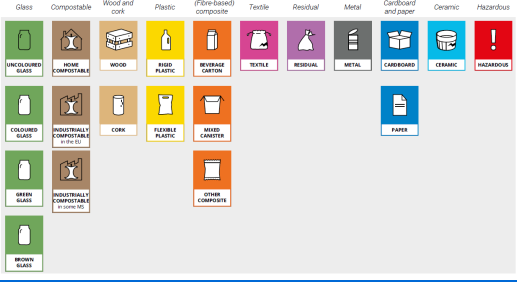

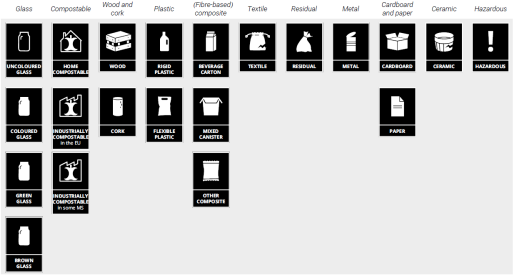
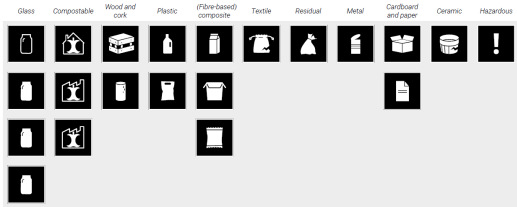
Click on the question marks next to the questions for additional information.

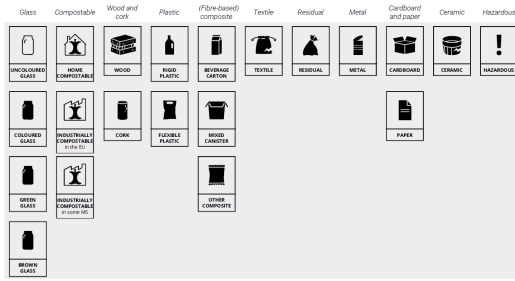
9.1 Label variations (click on the images to enlarge them)

Please note that the packaging labels exclude meta-labels, which are meant only for waste receptacles.

The reason is that applying meta-labels to packaging would not provide consumers with adequately granular sorting information in countries with finer sorting rules.

For example, applying the 'Cardboard+Paper' meta-label on packaging would not guide consumers to correctly sort packaging with 'cardboard' or 'paper' in countries where both are collected in separate receptacles. This applies to the other fractions that include meta-labels, i.e., 'rigid' and 'flexible' plastic, 'beverage carton' and 'mixed containers', and differently coloured glass.

| | |
|---|--|
| <div><p>Colour + Text</p><p>Colour + Text</p></div> | <div><p>Colour + No Text</p><p>Colour + No Text</p></div> |
| <div><p>Opaque White + Text</p><p>Opaque White + Text</p></div> | <div><p>Opaque White + No Text</p><p>Opaque White + No Text</p></div> |
| <div><p>Transparent Black + Text</p></div> | <div><p>Transparent Black + No Text</p></div> |

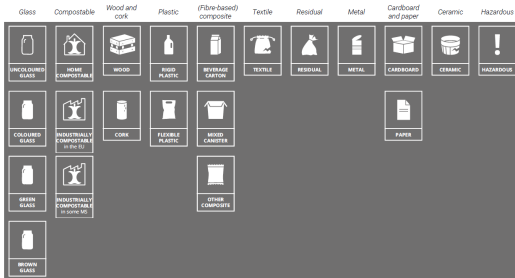


Transparent Black + Text



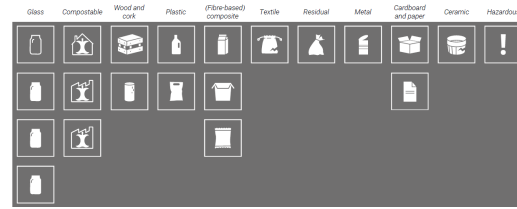
Transparent Black + No Text

Transparent White + Text



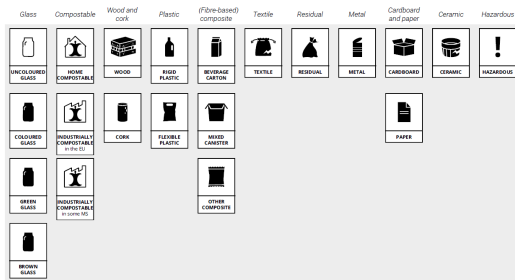
Transparent White + Text

Transparent White + No Text



Transparent White + No Text

Opaque Black + Text



Opaque Black + Text

Opaque Black + No Text



Opaque Black + No Text

9.2 Considering your packaging and the labelling system shown above, can you identify all relevant label variations (in terms of colours and text)?

- ☒ Yes
☐ No
☐ I don't know

9.5 Which of the following labels are relevant for you? [Tick all that apply]

Your answers will determine other questions you will see later. Please make sure to select all that apply to your case.

If you are unsure, please consult Table 6.1 in this survey. This table (which is also included in the user manuals that you downloaded) clarifies which labels pertain to which materials as specified in [97/129/EC](#) and [Annex II, Table 1 PPWR](#).

- | | | | |
|---|--|--|---|
| <input checked="" type="checkbox"/> Metal | <input checked="" type="checkbox"/> Other Composite | <input checked="" type="checkbox"/> Brown Glass | <input checked="" type="checkbox"/> Residual |
| <input checked="" type="checkbox"/> Ceramic | <input checked="" type="checkbox"/> Rigid Plastic | <input checked="" type="checkbox"/> Textile | <input checked="" type="checkbox"/> Hazardous packaging |
| <input checked="" type="checkbox"/> Cardboard | <input checked="" type="checkbox"/> Flexible Plastic | <input checked="" type="checkbox"/> Home Compostable | <input type="checkbox"/> I don't know |
| <input checked="" type="checkbox"/> Paper | <input checked="" type="checkbox"/> Uncoloured Glass | <input checked="" type="checkbox"/> Industrially Compostable | |
| <input checked="" type="checkbox"/> Beverage Carton | <input checked="" type="checkbox"/> Coloured Glass | <input checked="" type="checkbox"/> Wood | |
| <input checked="" type="checkbox"/> Mixed Canister | <input checked="" type="checkbox"/> Green Glass | <input checked="" type="checkbox"/> Cork | |

9.7 Are you unsure about any of the labels or if they relevant for you?

For example, do you not know which label to pick based on the information provided in the user manuals?

- ☒ Yes
☐ No

9.8 Please clarify which label(s) and explain why.

Please also make sure that you carefully read the provided information here in this survey and in the user manual.

The granularity proposed at table 6.1 of this survey, especially in the case of non-fiber composite packaging, cannot be represented by a pictogram system, because it just represents the packaging format or the packaging waste treatment. The granularity introduced by the Decision 129/1997 is way more flexible and leaves the opportunity to add an alphanumeric codification to the functional units for all the packaging materials and so for each of the composites packaging (fiber and not fiber based, indicated from the n. 80 to 99 of the Decision 129/1997).

9.9 Does any of your packaging contain more than one material type covered by the labelling scheme, and therefore require multiple labels?

We are interested here solely in different materials that would require different labels, such as paper and cardboard, or flexible and rigid plastic, but not further fine grained differentiation, such as PET and PE, except if you think they should be separately collected by citizens.

- ☒ Yes
☐ No
☐ I don't know

9.11 How many different material types—each requiring a separate waste sorting label—are typically used in your packaging?

Only values between 2 and 10 are allowed

We are only referring to material types that would require separate labels—for example, paper and cardboard, or flexible and rigid plastic.

Do not count finer distinctions (e.g. PET vs. PE) unless you believe they should be separately sorted by citizens.

9.12 Considering your packaging, which of the following would you do to help consumers sort the different packaging components correctly? (see images below) [Tick all that apply]

Component pictograms may be used to clarify the association of material labels and packaging components.

Packaging producers may design the component pictograms themselves.

They should be proportional in size to the labels and located in direct proximity to the labels, preferably on the left.

The component pictograms must clearly represent the packaging and packaging components and unambiguously inform users about material labels associated with each relevant component.

The indications for component pictograms apply equivalently to alternative label versions, i.e., black and white, transparent, white, etc.

- ☐ I would apply all labels in the same place (option a).
- ☐ I would apply the labels in the same place, including a pictogram of my packaging showing which waste label belongs to which component (option b).
- ☐ I would apply the labels on the respective packaging components (option c).
- ☒ None of the above

9.13 Please provide a reason for your answer.

As outlined above, adopting the coding system established by Decision 129/97/EC and updated in line with Annex II, Table 1 of Articles 12 and 13 of the PPWR—rather than relying on packaging pictograms, which are limited and not adaptable to all scenarios—offers greater flexibility. The coding approach does not require a predefined position or format, as it depends on the packaging design, the separability of its components, and the materials used.

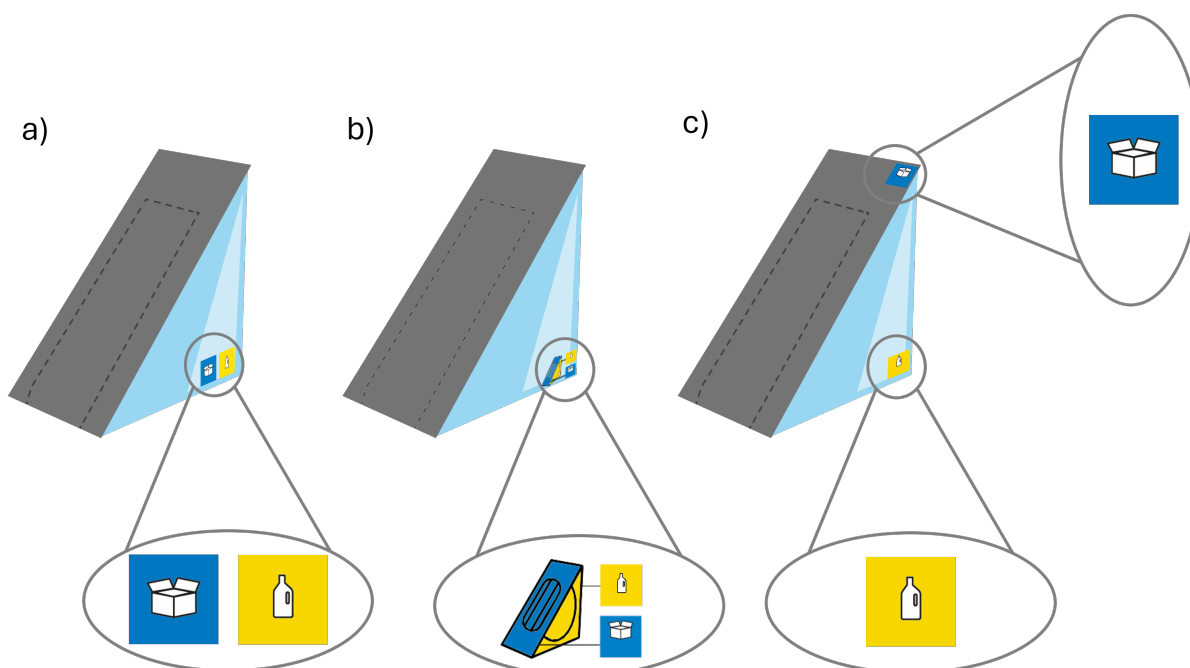


Image constitutes an example, not to scale.

9.14 For your packaging, which of the following label versions **could** you realistically print and apply as intended? [Tick all that apply]

| | Text | No Text |
|-------------------|--------------------------|-------------------------------------|
| Colour | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Opaque Black | <input type="checkbox"/> | <input type="checkbox"/> |
| Transparent Black | <input type="checkbox"/> | <input type="checkbox"/> |
| Opaque White | <input type="checkbox"/> | <input type="checkbox"/> |
| Transparent White | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

9.15 For any label version that you cannot technically print or apply, please explain why. Include specific details about the limitations or challenges involved.

The code system allows for the use of a coloured or transparent white background even when the pictogram representing the packaging format cannot technically be printed on the packaging.

9.16 Based on your packaging, please rank the following label versions in order of preference, starting with the one you would be most likely to use.

Use drag&drop or the up/down buttons to change the order or accept the initial order.

☐ Colour + No Text

☐ Transparent White + No Text

☐ Opaque Black + No Text

☐ Transparent Black + Text

☐ Opaque Black + Text

☐ Transparent White + Text

☐ Transparent Black + No Text

☐ Opaque White + No Text

☐ Opaque White + Text

☐ Colour + Text

9.17 Considering your packaging, if you had to use labels with text, how many languages would you have to incorporate on the labels?

Only values between 1 and 24 are allowed

24

9.18 Please select all languages that apply.

- | | | | |
|---|---|--|--|
| <input checked="" type="checkbox"/> Bulgarian | <input checked="" type="checkbox"/> Estonian | <input checked="" type="checkbox"/> Irish | <input checked="" type="checkbox"/> Portuguese |
| <input checked="" type="checkbox"/> Croatian | <input checked="" type="checkbox"/> Finnish | <input checked="" type="checkbox"/> Italian | <input checked="" type="checkbox"/> Romanian |
| <input checked="" type="checkbox"/> Czech | <input checked="" type="checkbox"/> French | <input checked="" type="checkbox"/> Latvian | <input checked="" type="checkbox"/> Slovak |
| <input checked="" type="checkbox"/> Danish | <input checked="" type="checkbox"/> German | <input checked="" type="checkbox"/> Lithuanian | <input checked="" type="checkbox"/> Slovenian |
| <input checked="" type="checkbox"/> Dutch | <input checked="" type="checkbox"/> Greek | <input checked="" type="checkbox"/> Maltese | <input checked="" type="checkbox"/> Spanish |
| <input checked="" type="checkbox"/> English | <input checked="" type="checkbox"/> Hungarian | <input checked="" type="checkbox"/> Polish | <input checked="" type="checkbox"/> Swedish |

9.19 What is the minimum area (in square millimetres) that you can allocate for the waste sorting labels on your packaging, considering the labels that apply?

Only values between 0 and 1000 are allowed

 mm²

9.20 Please provide a reason for your answer.

9.21 Based on your packaging, would you be able to apply the label(s) in accordance with the instructions provided in the user manual?

- ☐ Yes
☒ No
☐ I don't know

9.23 Why can you not apply the label(s) in line with the provisions in the user manual?

- ☒ I cannot make enough space available on my packaging to comply with the size requirements
☐ I cannot print any of the provided label alternatives because of the colours
☐ I cannot print any of the provided label alternatives because of the level of detail / complexity
☒ I cannot apply the labels to a position where they are sufficiently visible to consumers
☒ I cannot apply the labels because I am missing essential information
☐ I cannot comply due to other reasons (please specify)

9.24 Do you think your packaging, according to [Art. 12\(5\) PPWR](#) prevents affixing, printing or engraving the label or does not warrant its application on account of the nature and size of the packaging, such that the label, QR code or other standardised, open, digital data carrier shall be affixed to the grouped packaging?

- ☐ Yes
☒ No
☐ I don't know

9.25 Do you think that your packaging, according to [Art. 12\(5\) PPWR](#), prevents applying the label even to grouped packaging or that this is not warranted on account of the nature and size of the packaging or that it is relevant to provide for non-discriminatory access to information for vulnerable groups, particularly visually impaired persons, such that the information shall be provided via a single electronically readable code or other type of data carrier only?

- ☐ Yes
☒ No

☐ I don't know

9.29 You answered that you cannot apply the labels to a position where they are sufficiently visible to consumers. Why not?

Especially, due to the size of the packaging.

9.30 You answered that you cannot apply the labels because you are missing essential information. Which information are you missing?

Most importantly, the manual separability of the material components information is missing. In the case of plastic packaging with plastic components that are required to be marked.

9.32 Considering your packaging, could you make the labels accessible for people with reading impairments (e.g., by using tactile labels)?

See pages 41-42 in the user manual.

- ☒ Yes
☐ No
☐ I don't know

9.34 Considering your packaging, which of the following actions would you take to provide additional information (e.g. on preparation, disassembly or cleaning of packaging)?

I would complement the label(s) with...

- ☒ ... a QR code.
☒ ... another type of data carrier.
☐ ... textual information.
☐ ... another type of information.
☐ ... none of the above.

9.36 Considering your packaging, would you have to apply DRS labels for some countries and waste sorting labels for others? For additional information, please refer to the last bullet point in Section 5.

According to Art. 12(1), DRS packaging is exempt from the waste sorting labels. However, packaging that is also shipped to countries in which one or more of its materials are not part of a DRS require a waste sorting label explicitly stating to which country it applies.

- ☒ Yes
☐ No
☐ I don't know

9.38 Considering your packaging, would you have to apply the residual waste category label because it does not fit any of the other labels, or because it is sorted differently from the materials due to applicable waste sorting rules?

Material-focus (and exceptions)

Labels are based on the material composition of the packaging — not the local waste stream destination. This ensures a consistent approach across countries and aligns with the PPWR. Most labels represent a material group (e.g. "Paper," "Plastic"), the residual waste label is an exception. It is used for packaging that doesn't fall into any

other material category or or must be sorted separately from its material according to applicable waste sorting rules. Please note that "residual" does not mean "not recyclable".

- ☒ Yes
- ☐ No
- ☐ I don't know

9.39 Please explain why you would apply the residual waste category, e.g. it does not fit any of the other labels/it is sorted differently from its material due to applicable waste sorting rules, etc.

Because the residual waste is sorted differently.

9.40 Considering your packaging, would you have to inform consumers about the fact that sorting instructions might change if the packaging is contaminated (e.g., by remains of food or liquid)?

For example, a clean cardboard box might go into the cardboard and paper fraction while the dirty cardboard box might go to residual. Both labels might be required to adequately and clearly guide consumer sorting and consumers must understand when the respective labels apply.

- ☒ Yes
- ☐ No
- ☐ I don't know

9.41 Please provide a reason for your answer and any suggestions you may have for conveying this information.

All packaging waste shall be sorted emptied from the product. In the event where it's not possible, they are not allowed to be sorted in the separate collection receptacles and goes into the residual collection ones.

9.42 Is your packaging considered hazardous and must thus not be sorted with other packaging of the same material, requiring further clarification?

- ☐ Yes
- ☒ No
- ☐ I don't know

9.44 If you had to implement the currently proposed waste sorting labels within the next two years, how would that impact you?

- ☐ Very negatively
- ☐ Moderately negatively
- ☒ Slightly negatively
- ☐ No impact / Neutral
- ☐ Slightly positively
- ☐ Moderately positively
- ☐ Very positively
- ☐ Don't know / Don't want to say

9.45 Please provide a reason for your answer.

For all the reasons outlined above, relying on pictograms based on packaging formats would undermine the effectiveness of the current labelling system. An alphanumeric coding approach—grounded in Decision 129 /97/EC and updated according to Annex II, Table 1 of Articles 12 and 13 of the PPWR—is more effective

and efficient than using limited pictograms focused solely on packaging shape or waste treatment methods, as suggested in the JRC guidance. The granularity offered by the existing system under Decision 129/97/EC ensures greater clarity, simplicity, flexibility, and adaptability across the EU.

9.46 Do you know how to use the provided compostable packaging labels (home and industrially compostable) to guide correct consumer sorting, based on the waste sorting rules relevant to you?

See particularly [Article 9 of the PPWR](#).

- ☐ Yes
- ☒ No
- ☐ I don't know

9.47 Please provide a reason for your answer.

The pictograms do not appear to meet the requirement of being easily understandable, as most people are unaware of the distinction between industrial composting—which is the standard—and home composting, which is only an optional provision left to the discretion of Member States. Furthermore, the selected image fails to clearly convey this distinction, as it reflects the waste treatment operation rather than the nature of the material (as the codes do) or the packaging format.

9.48 Considering your packaging, do you see the need to communicate additional sorting-relevant information beyond the information provided through the label?

- ☒ Yes
- ☐ No
- ☐ I don't know

9.49 Please provide a reason for your answer.

It's important to communicate the separability or not of the packaging material components

9.50 What do you consider appropriate wording to identify the "mixed canister" label indicating fibre-based composites that are not beverage cartons (please provide a reason for your answer)?

The 'mixed canister' category refers to fibre-based composite packaging that is not beverage carton, corresponding to 97/129/EC categories 80-85 that are not beverage cartons and PPWR Annex II Table 1 category "Composite packaging of which the majority is paper/cardboard"

The terminology and corresponding pictograms proposed for fibre-based composite packaging are unclear and insufficiently detailed. As previously mentioned, the material coding system established under Decision 129/97/EC—and to be updated in line with Annex II, Table 1 of Articles 12 and 13 of the PPWR—is more effective, granular, and efficient than pictograms based solely on packaging format, such as those used for mixed canisters. Under the current system, fibre-based composites are assigned a specific code (ranging from 80 to 85) based on the predominant material. This coding approach helps prevent consumer confusion by clearly indicating how to manage the different functional units of packaging waste, whether separable or not.

9.51 What do you consider appropriate wording to identify the "other composite" label indicating non-fibre-based composites (please provide a reason for your answer)?

The 'other composite' category refers to non-fibre-based composite packaging, corresponding to 97/129/EC categories 90-98 and PPWR Annex II Table 1 category "Composite packaging of which the majority is not paper /cardboard"

Regarding the wording and pictograms for non-fibre-based composite packaging, the level of detail provided by the pictogram approach is clearly insufficient and inadequate to accurately represent the full range of composite packaging types identified in Decision 129/97/EC, specifically those numbered from 86 to 99. A generic pictogram and label for 'other composites' cannot effectively encompass all the variations included in the Decision—for example, glass-based composites commonly used in the cosmetics sector or metal-based composites prevalent in the food and chemical industries.

10 Receptacle questions

Below, we show you the available labels and ask you specific questions on them and related aspects.

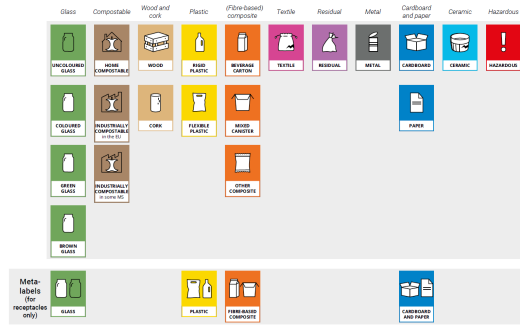
Please answer all questions thoroughly and honestly.

Some of these questions will impact other questions you will see in the remainder of the survey.

Click on the question marks next to the questions for additional information.

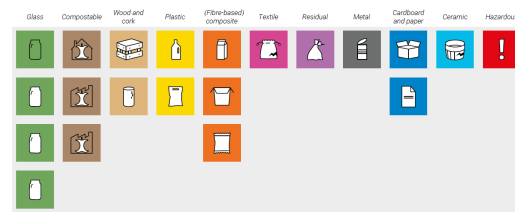
10.1 Label variations (click on the images to enlarge them)

Colour + Text



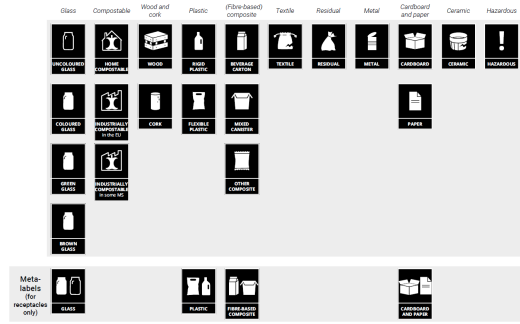
Colour + Text

Colour + No Text



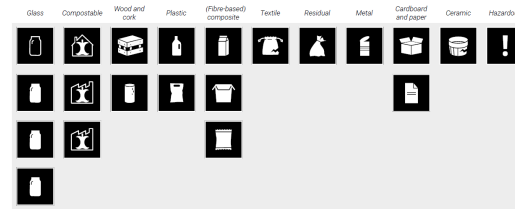
Colour + No Text

Opaque White + Text



Opaque White + Text

Opaque White + No Text

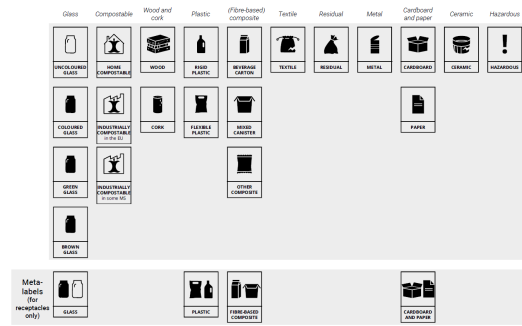


Opaque White + No Text

Transparent Black + Text

Transparent Black + No Text





Transparent Black + Text

Transparent Black + No Text

Transparent White + Text



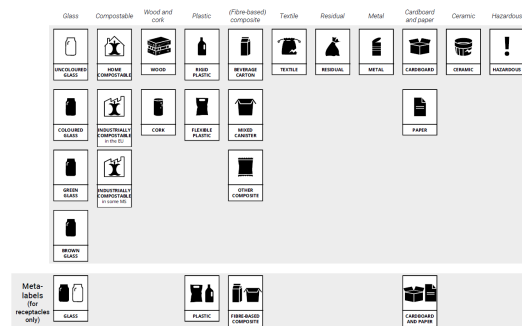
Transparent White + Text

Transparent White + No Text



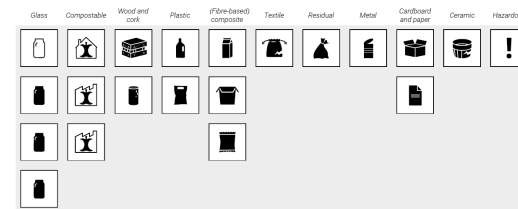
Transparent White + No Text

Opaque Black + Text



Opaque Black + Text

Opaque Black + No Text



Opaque Black + No Text



10.2 Can you identify all relevant label variations (in terms of colours and text), based on the waste sorting rules relevant to you?

- ☒ Yes
☐ No
☐ I don't know

10.5 Which of the following labels are relevant for you? [Tick all that apply]

Your answers will determine other questions you will see later. Please make sure to select all that apply to your case.

If you are unsure, please consult Table 6.1 in this survey. This table (which is also included in the user manuals that you downloaded) clarifies which labels pertain to which materials as specified in [97/129/EC](#) and [Annex II, Table 1 PPWR](#).

- | | | | |
|---|--|---|---|
| <input checked="" type="checkbox"/> Metal | <input checked="" type="checkbox"/> Rigid Plastic | <input checked="" type="checkbox"/> Home Compostable | <input checked="" type="checkbox"/> Meta-label: Plastic |
| <input checked="" type="checkbox"/> Ceramic | <input checked="" type="checkbox"/> Flexible Plastic | <input checked="" type="checkbox"/> Industrially Compostable | <input checked="" type="checkbox"/> Meta-label: Glass |
| <input checked="" type="checkbox"/> Cardboard | <input checked="" type="checkbox"/> Uncoloured Glass | <input checked="" type="checkbox"/> Wood | <input checked="" type="checkbox"/> Hazardous packaging |
| <input checked="" type="checkbox"/> Paper | <input checked="" type="checkbox"/> Coloured Glass | <input checked="" type="checkbox"/> Cork | <input type="checkbox"/> I don't know |
| <input checked="" type="checkbox"/> Beverage Carton | <input checked="" type="checkbox"/> Green Glass | <input checked="" type="checkbox"/> Residual | |
| <input checked="" type="checkbox"/> Mixed Canister | <input checked="" type="checkbox"/> Brown Glass | <input checked="" type="checkbox"/> Meta-label: Cardboard + Paper | |
| <input checked="" type="checkbox"/> Other Composite | <input checked="" type="checkbox"/> Textile | <input checked="" type="checkbox"/> Meta-label: Fibre-Based Composite | |

10.7 Are you unsure about any of the labels or if they relevant for you?

- ☒ Yes
☐ No

10.8 Please clarify which label(s) and explain why.

Please also make sure that you carefully read the provided information here in this survey and in the user manual.

As already expressed in reference to section 9, the granularity offered by the Decision 129/1997 is way wider and more flexible, easier to adapt and update respect the one expressed with the pictograms, which is limited, especially in the case of each of composites packaging. It's impossible to distinguished through the pictogram "other composites" the composition of the packaging (prevalent material, if are separable or not) and give a clear information to the consumer on how to sort the relative packaging waste. This issue could affect the quality and the recyclability of the packaging waste if not well sorted.

10.9 Should labels tell consumers to put different parts of the packaging into separate receptacles, based on the waste sorting rules relevant to you?

- ☒ Yes
☐ No
☐ I don't know

10.10 Please provide a reason for your answer.

The following questions refer to waste bins in particular.

10.11 Which of the following labels **could** you print as intended on **waste bins**, considering the waste sorting rules relevant to you? (Tick all that apply)

| | Text | No Text |
|-------------------|-------------------------------------|--------------------------|
| Colour | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Opaque Black | <input type="checkbox"/> | <input type="checkbox"/> |
| Transparent Black | <input type="checkbox"/> | <input type="checkbox"/> |
| Opaque White | <input type="checkbox"/> | <input type="checkbox"/> |
| Transparent White | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

10.12 For any variation that you are not technically able to print and apply, please provide details and the reasoning behind your answer.

10.13 Please rank the following label versions in order of preference, starting with the one you would be most likely to use for **waste bins**, based on the waste sorting rules and infrastructure relevant to you.

Use drag&drop or the up/down buttons to change the order or accept the initial order.

⋮ Colour + Text

⋮ Transparent White + Text

⋮ Transparent Black + Text

⋮ Opaque White + Text

⋮ Opaque Black + Text

⋮ Opaque Black + No Text

⋮ Opaque White + No Text

⋮ Transparent White + No Text

⋮ Colour + No Text

⋮ Transparent Black + No Text

10.14 What is the minimum area (in square centimetres) that you can allocate for the waste sorting labels on **waste bins**, considering the labels that apply?

Only values of at most 1000 are allowed

625

cm²

10.15 Please provide a reason for your answer.

As illustrated in the national standard UNI 11686 on waste visual elements

10.16 Could you apply the label(s) to waste **bins** in accordance with the user manual, considering the waste sorting rules and infrastructure in your area of responsibility?

- ☐ Yes
☒ No
☐ I don't know

10.17 Please provide a reason for your answer.

For the same reasons explained in the previous section, namely, the lack of fundamental information for the separate collection of packaging waste, insufficient detail in the pictograms for specific cases, and the need for digital tools to provide comprehensive information to consumers, the UNI Standard 11686 should be adopted.

10.18 Why can you not apply the label(s) in line with the provisions in the user manual?

- ☐ I cannot make enough space available on waste bins to comply with the size requirements
☐ I cannot print any of the provided label alternatives because of the colours
☒ I cannot print any of the provided label alternatives because of the level of detail / complexity
☐ I cannot apply the labels to a position where they are sufficiently visible to consumers
☒ I cannot apply the labels because I am missing essential information
☐ I cannot comply due to other reasons (please specify)

10.19 You indicated that you cannot apply any of the provided label alternatives because of the size requirements. Which requirements are keeping you from applying them?

10.21 You answered that you cannot print any of the provided label alternatives because of the level of detail / complexity. Which details of which labels in particular are preventing you from printing them?

As already mentioned above, for the same reasons affecting on-pack information, there is a lack of fundamental details regarding the origin of the packaging material, the separability of packaging waste components, and the absence of digital tools to provide sorting instructions.

10.23 You answered that you cannot apply the labels because you are missing essential information. Which information are you missing?

Same reasons as above.

10.25 Would you make the labels on **waste bins** accessible for people with reading impairments (e.g., by using tactile labels or Braille), based on the waste sorting rules and infrastructure relevant to you? See page 41-42 in the user manual.

- ☒ Yes
☐ No
☐ I don't know

10.27 Which of the following actions would you take to provide additional information on **waste bins** (e.g. on preparation, disassembly and cleaning of packaging, packaging that must not be disposed in a receptacle), based on the waste sorting rules and infrastructure relevant to you?

I would complement the waste sorting label(s) with...

- ☒ ... a QR code.
☒ ... another type of data carrier.
☐ ... images representing the admissible waste materials.
☐ ... pictograms representing non-admissible waste materials.
☐ ... textual information on admissible waste materials.
☐ ... textual information on non-admissible waste materials.
☐ I would do none of the above.

The following questions refer to waste bags in particular.

10.29 Which of the following labels **could** you print as intended on **waste bags**, considering the waste sorting rules relevant to you? (Tick all that apply)

| | Text | No Text |
|-------------------|-------------------------------------|--------------------------|
| Colour | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Opaque Black | <input type="checkbox"/> | <input type="checkbox"/> |
| Transparent Black | <input type="checkbox"/> | <input type="checkbox"/> |
| Opaque White | <input type="checkbox"/> | <input type="checkbox"/> |
| Transparent White | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

10.30 For any variation that you are not technically able to print and apply, please provide details and the reasoning behind your answer.

Feasibility of printing directly on transparent bags for identifying packaging waste materials.

10.31 Please rank the following label versions in order of preference, starting with the one you would be most likely to use for **waste bags**, based on the waste sorting rules and infrastructure relevant to you.

Use drag&drop or the up/down buttons to change the order or accept the initial order.

:: Transparent White - Text

:: Colour - Text

:: Transparent Black - Text

| | |
|---|-----------------------------|
| ⋮ | Opaque White - Text |
| ⋮ | Opaque Black- Text |
| ⋮ | Transparent Black - No Text |
| ⋮ | Colour - No Text |
| ⋮ | Opaque White - No Text |
| ⋮ | Opaque Black- No Text |
| ⋮ | Transparent White - No Text |

10.32 What is the minimum area (in square centimetres) that you can allocate for the waste sorting labels on **waste bags**, considering the labels that apply?

Only values of at most 1000 are allowed

 cm²

10.33 Please provide a reason for your answer.

10.34 Could you apply the label(s) to **waste bags** in accordance with the user manual, considering the waste sorting rules and infrastructure in your area of responsibility?

- ☐ Yes
☒ No
☐ I don't know

10.35 Please provide a reason for your answer.

As already mentioned above, for the same reasons affecting on-pack and on receptacles information, there is a lack of fundamental details regarding the origin of the packaging material, the separability of packaging waste components (especially for multi-material packaging), and the absence of digital tools to provide sorting instructions.

10.36 Why can you not apply the label(s) in line with the provisions in the user manual?

- ☐ I cannot make enough space available on waste bags to comply with the size requirements
☐ I cannot print any of the provided label alternatives because of the colours
☒ I cannot print any of the provided label alternatives because of the level of detail / complexity
☐ I cannot apply the labels to a position where they are sufficiently visible to consumers
☒ I cannot apply the labels because I am missing essential information
☐ I cannot comply due to other reasons (please specify)

10.39 You answered that you cannot print any of the provided label alternatives because of the level of detail / complexity. Which details of which labels in particular are preventing you from printing them?

Same reasons as in the waste bin section.

10.41 You answered that you cannot apply the labels because you are missing essential information. Which information are you missing?

Same reasons as in the waste bin section.

10.43 Which of the following actions would you take to provide additional information on **waste bags** (e.g. on preparation, disassembly and cleaning of packaging, packaging that must not be disposed in a receptacle), based on the waste sorting rules and infrastructure relevant to you?

I would complement the waste sorting label(s) with...

- ☒ ... a QR code.
- ☒ ... another type of data carrier.
- ☐ ... images representing the admissible waste materials.
- ☐ ... pictograms representing non-admissible waste materials.
- ☐ ... textual information on admissible waste materials.
- ☐ ... textual information on non-admissible waste materials.
- ☐ I would do none of the above.

The following questions refer to waste receptacles in general.

10.45 If using text labels, how many languages would you need to include, based on the waste sorting rules relevant to you?

Only values between 1 and 24 are allowed

10.46 Please select all languages that apply.

- | | | | |
|---|---|--|--|
| <input checked="" type="checkbox"/> Bulgarian | <input checked="" type="checkbox"/> Estonian | <input checked="" type="checkbox"/> Irish | <input checked="" type="checkbox"/> Portuguese |
| <input checked="" type="checkbox"/> Croatian | <input checked="" type="checkbox"/> Finnish | <input checked="" type="checkbox"/> Italian | <input checked="" type="checkbox"/> Romanian |
| <input checked="" type="checkbox"/> Czech | <input checked="" type="checkbox"/> French | <input checked="" type="checkbox"/> Latvian | <input checked="" type="checkbox"/> Slovak |
| <input checked="" type="checkbox"/> Danish | <input checked="" type="checkbox"/> German | <input checked="" type="checkbox"/> Lithuanian | <input checked="" type="checkbox"/> Slovenian |
| <input checked="" type="checkbox"/> Dutch | <input checked="" type="checkbox"/> Greek | <input checked="" type="checkbox"/> Maltese | <input checked="" type="checkbox"/> Spanish |
| <input checked="" type="checkbox"/> English | <input checked="" type="checkbox"/> Hungarian | <input checked="" type="checkbox"/> Polish | <input checked="" type="checkbox"/> Swedish |

10.47 Would you use the provided meta-labels or single labels to apply them to receptacles, based on the waste sorting rules relevant to you (see image below)?

The design principle follows a modular approach, like a building brick system: multiple individual labels can be applied to packaging and waste receptacles. This appreciates that packaging can be made of multiple materials that can and should be separately disposed of by consumers. It also reflects that one waste receptacle can collect multiple waste materials. The matching logic still applies.

Some material labels are combined into one label, a so-called meta-label.

Product can feature only single labels. For multi-material packaging, all the single labels associated with the different materials must be shown. Applying meta-labels to packaging would not provide users with complete information to sort correctly.

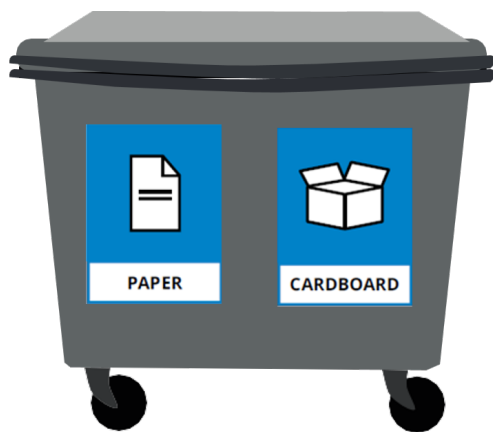
Receptacles can feature meta-labels when different materials are collected together (e.g., “cardboard and paper” for joint collection), and space is limited. Where possible, it is preferable to always show multiple single labels instead of the meta-label on receptacles.

- ☐ Single labels (option a)
- ☐ Meta-label (option b)
- ☒ Both
- ☐ I don't know

10.48 Please provide a reason for your answer.

As detailed in the national standard UNI 11686, depending on the situation, it is preferable to use either single labels or meta-labels, particularly in cases involving multi-material packaging collection.

a)



b)



Image constitutes an example, not to scale. Conversely for waste bags.

The following questions refer to general aspects related to waste sorting and waste sorting labels.

10.49 To the best of your knowledge, is there packaging in your country covered by a deposit return scheme (DRS) that is not covered in other countries?

According to Art. 12(1), DRS packaging is exempt from the waste sorting labels. However, packaging that is also shipped to countries in which one or more of its materials are not part of a DRS require a waste sorting label explicitly stating to which country it applies.

- ☐ Yes
- ☒ No
- ☐ I don't know

10.51 Will adding the residual waste label to specific receptacles help guide consumers to sort waste correctly, based on the waste sorting rules relevant to you?

Labels are based on the material composition of the packaging — not the local waste stream destination. This ensures a consistent approach across countries and aligns with the PPWR. Most labels represent a material group (e.g. “Paper,” “Plastic”), with the exception of residual waste: This is used for packaging that doesn’t fall into any other material category or must be sorted separately from its material according to applicable waste sorting rules. Please note that “residual” does not mean “not recyclable”.

- ☒ Yes
- ☐ No
- ☐ I don't know

10.53 Do you know how to use the provided compostable packaging labels (home and industrially compostable) to guide correct consumer sorting, based on the waste sorting rules relevant to you?

See particularly [Article 9 of the PPWR](#).

- ☐ Yes
- ☒ No
- ☐ I don't know

10.54 Please provide a reason for your answer.

The pictograms do not appear to meet the requirement of being easily understandable, as most people are unaware of the distinction between industrial composting (which is the standard) and home composting (which is merely an optional provision available at the discretion of Member States). Moreover, the chosen image fails to clearly convey this difference because it reflects the treatment operation instead of the nature of the material (codes) neither the packaging format (as for others materials).

10.55 Is there packaging that, when contaminated, must be sorted separately from clean packaging of the same material, based on the waste sorting rules relevant to you?

For example, a clean cardboard box might go into the cardboard and paper fraction while the dirty cardboard box might go to residual. Both labels might be required to adequately and clearly guide consumer sorting and consumers must understand when the respective labels apply.

- ☒ Yes
- ☐ No
- ☐ I don't know

10.56 Please provide information on the relevant packaging, packaging materials, and sorting instructions.

As illustrated, packaging that has not been emptied is not considered packaging waste and therefore should not be placed in separate collection bins but disposed of with residual waste. The packaging format pictogram approach does not convey this important information. Implementing a digital solution would be beneficial to address this issue effectively.

10.57 In situations where packaging must be sorted as residual when dirty, and with the material when clean, how do you think should consumers be informed about this?

For example, a clean cardboard box should go in a receptacle for cardboard but a dirty cardboard box might have to go in a receptacle for residual waste in some countries.

- ☒ Material label + QR code or other digital data carrier
- ☐ Material label + Residual label

- ☐ Material label + Residual label + Clarifying text
- ☐ I don't know

10.58 Please provide a reason for your answer.

10.59 Is some packaging considered hazardous that must not be mixed with other packaging of the same material, based on the waste sorting rules relevant to you?

- ☐ Yes
- ☒ No
- ☐ I don't know

10.61 Would the label for hazardous waste contained in the EU harmonised waste sorting label prototype be appropriate to deal with this?

- ☐ Yes
- ☐ No
- ☐ I don't know

10.63 If you had to implement the currently proposed waste sorting labels within the next two years, how would that impact you?

- ☐ Very negatively
- ☐ Moderately negatively
- ☒ Slightly negatively
- ☐ No impact / Neutral
- ☐ Slightly positively
- ☐ Moderately positively
- ☐ Very positively
- ☐ Don't know / Don't want to say

10.64 Please provide a reason for your answer.

10.65 Do you see a need for complementary information campaigns to help consumers understand the waste sorting labels, based on the waste sorting rules relevant to you?

- ☒ Yes
- ☐ No
- ☐ I don't know

10.66 What do you think are the most important messages to convey to citizens in information campaigns about the labels and facilitate consumer understanding?

How to interpret them and sort their packaging waste correctly at home to minimize the risk of contamination across material recycling streams.

10.67 To help us better understand key requirements for label granularity, please indicate whether the following materials are separately collected **by consumers**, considering the waste sorting rules relevant to you.

Select 'Always separately' if consumers must separately collect the indicated materials, 'Never separately' if consumers must collect them in the same receptacle, "Sometimes separately" if they must sometimes be collected together and sometimes separately.

| | Always separately | Sometimes separately | Never separately | I don't know |
|--|----------------------------------|----------------------------------|----------------------------------|-----------------------|
| Paper and cardboard | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Coloured and uncoloured glass | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Green, brown, and uncoloured glass | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Beverage cartons and fibre-based composites ('mixed canister') | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Non-fibre-based composites ('other composite') and fibre-based composites ('beverage carton' and 'mixed canister') | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Flexible and rigid plastic | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

10.68 What are common instructions for citizens on how to sort **wooden packaging**, considering the waste sorting rules relevant to you? Are they collected together with any other packaging material(s)?

In the current system, wooden packaging are collected in the bio-waste bin at home. Through the use of the alphanumeric system established by Decision 129/97, the classification is based on the nature of the material rather than the waste treatment method, making it well-defined and easier to sort for consumers.

10.69 What are common instructions for citizens on how to sort **textile packaging**, considering the waste sorting rules relevant to you? Are they collected together with any other packaging material(s)?

10.70 What are common instructions for citizens on how to sort **ceramics packaging**, considering the waste sorting rules relevant to you? Are they collected together with any other packaging material(s)?

10.71 What are common instructions for citizens on how to sort **cork packaging**, considering the waste sorting rules relevant to you? Are they collected together with any other packaging material(s)?

In the current system are collected in the bio-waste bin at home. Through the use of the alphanumeric system established by Decision 129/97, the classification is based on the nature of the material rather than

the waste treatment method and the packaging format, making it well-defined and easier to sort for consumers.

10.72 What are common instructions for citizens on how to sort **non-fibre-based composite packaging**, considering the waste sorting rules relevant to you? Are they collected together with any other packaging material(s)?

In the current system, wooden packaging are collected depending on the prevalent material if not separable, and it can go to bin plastic or glass bin at home. Through the use of the alphanumeric system established by Decision 129/97, the classification is based on the nature of the material with a specific codification rather than the waste treatment method and the packaging format, making it well-defined and easier to sort for consumers.

10.73 Based on your experience, what aspects of label design and implementation can help to improve the life-cycle and maintenance of receptacle labels?

Through the use of the alphanumeric system established by Decision 129/97 and to be updated in accordance with Annex II, Table 1 of Articles 12 and 13 of the PPWR, the classification is based on the nature of the material rather than the waste treatment method and the packaging format, making well defined and easier to sort for consumers

11 Alternative pictogram designs

Below, we will ask you questions on alternative pictogram designs based on the materials relevant to you.

If nothing is shown, please proceed to the following questions.

Please rank the following **pictogram designs** according to your preferences.

Only the pictograms are relevant!

11.1 Please rank the following pictogram designs for cardboard according to your preferences.

Use drag&drop or the up/down buttons to change the order or accept the initial order.

⋮ CP2

⋮ CP4

11.2 Cardboard pictogram alternatives

CP2.jpg



CP4.jpg



11.3 Please rank the following pictogram designs for beverage carton according to your preferences (from preferred at the top to less preferred at the bottom).

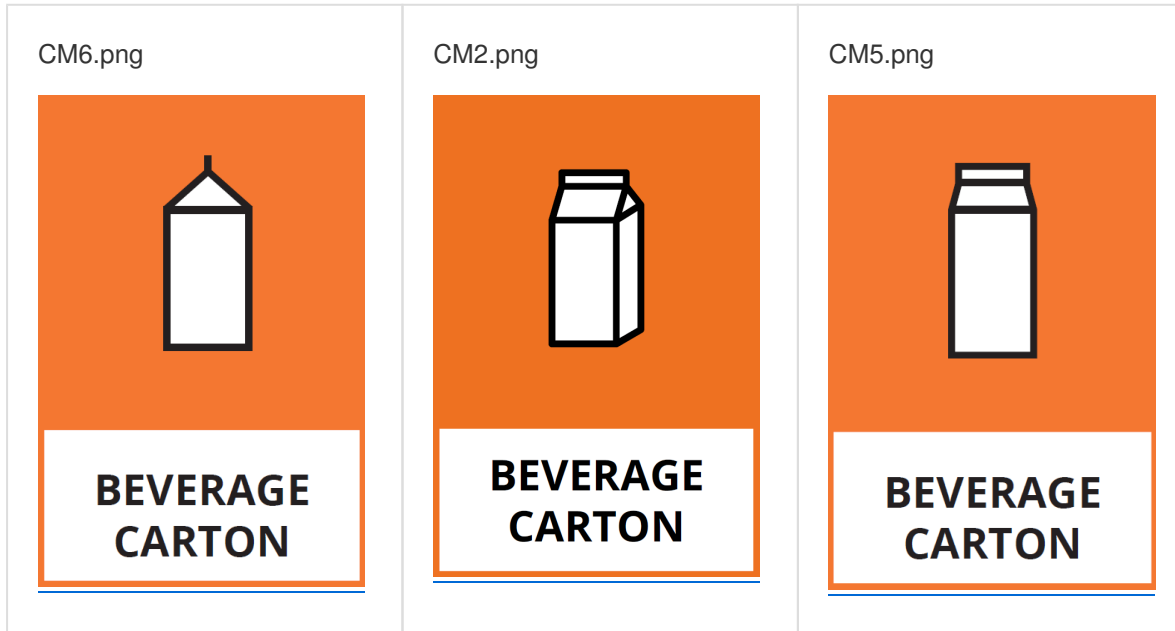
Use drag&drop or the up/down buttons to change the order or accept the initial order.

⋮ CM5

⋮ CM6

⋮ CM2

11.4 Beverage Carton pictogram alternatives



11.5 Please rank the following pictogram designs for mixed canister according to your preferences (from preferred at the top to less preferred at the bottom).

Use drag&drop or the up/down buttons to change the order or accept the initial order.

| | |
|---|------|
| ⋮ | CM8 |
| ⋮ | CM3 |
| ⋮ | CM10 |
| ⋮ | CM12 |
| ⋮ | CM11 |
| ⋮ | CM7 |

11.6 Mixed Canister pictogram alternatives

CM3.png



**MIXED
CANISTER**

CM7.png



**MIXED
CANISTER**

CM8.png



**MIXED
CANISTER**

CM11.png



**MIXED
CANISTER**

CM10.png



**MIXED
CANISTER**

CM12.png



**MIXED
CANISTER**

11.7 What do you consider appropriate wording to identify the "mixed canister" label indicating fibre-based composites that are not beverage cartons (please provide a reason for your answer)?

The 'mixed canister' category refers to fibre-based composite packaging that is not beverage carton, corresponding to 97/129/EC categories 80-85 that are not beverage cartons and PPWR Annex II Table 1 category "Composite packaging of which the majority is paper/cardboard"

The wording and corresponding pictograms for fibre-based composite packaging are unclear and insufficiently detailed. As previously mentioned, the material coding system established by Decision 129/97/EC—and to be updated in accordance with Annex II, Table 1 of Articles 12 and 13 of the PPWR—is more effective, granular, and efficient than pictograms based solely on packaging format, such as those used for mixed canisters. Under the current system, fibre-based composites are assigned specific codes (ranging from 80 to 85) based on the predominant material. This coding approach helps prevent consumer confusion by clearly indicating how to handle the different functional components of the packaging waste, whether separable or not.

11.8 Please rank the following pictogram designs for glass according to your preferences (from preferred at the top to less preferred at the bottom).

Use drag&drop or the up/down buttons to change the order or accept the initial order.













⋮ F-H

⋮ I-K

⋮ A-C

⋮ L-N

11.9 Glass pictogram alternatives

| Glass A-C | Glass F-H | Glass I-K | Glass L-N |
|--|--|---|--|
| <p>A</p>  <p>GLASS</p> | <p>F</p>  <p>GLASS</p> | <p>I</p>  <p>GLASS</p> | <p>L</p>  <p>GLASS</p> |
| <p>B</p>  <p>UNCOLOURED GLASS</p> | <p>G</p>  <p>UNCOLOURED GLASS</p> | <p>J</p>  <p>UNCOLOURED GLASS</p> | <p>M</p>  <p>UNCOLOURED GLASS</p> |
| <p>C</p>  <p>COLOURED GLASS</p> | <p>H</p>  <p>COLOURED GLASS</p> | <p>K</p>  <p>COLOURED GLASS</p> | <p>N</p>  <p>COLOURED GLASS</p> |

11.10 Please rank the following pictogram designs for compostable packaging according to your preferences (from preferred at the top to less preferred at the bottom).

Use drag&drop or the up/down buttons to change the order or accept the initial order.

⋮ CO1, CO2

⋮ CO7, CO8

⋮ CO5, CO6

⋮ CO3, CO4

11.11 Compostable packaging pictogram alternatives (ONLY THE PICTOGRAM IS RELEVANT HERE)

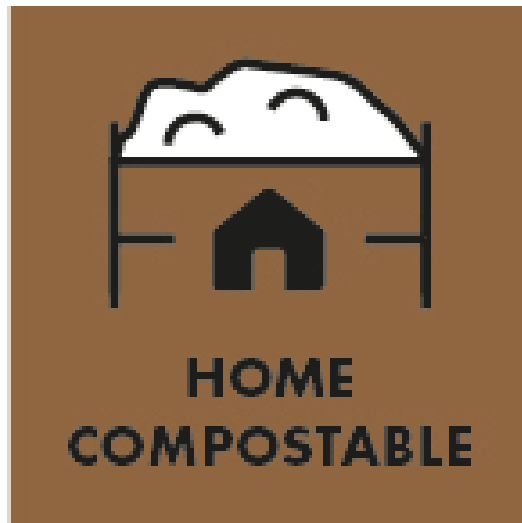
CO1.jpg



CO2.jpg



CO3.jpg



CO4.jpg



CO5.jpg



CO6.jpg



CO7.jpg



CO8.jpg



11.12 Please provide concrete suggestions or alternative designs for the pictogram of the "industrially compostable" and "home compostable" label, if you think the current pictogram is not feasible or clear enough. *Please do not provide your own certification labels, or similar.*

Since the distinction between home and industrial composting is not well understood by consumers, it is proposed to adopt a single label and pictogram exclusively for industrial composting, as outlined in Articles 9 and 12. This approach avoids references to home composting, which is optional, limited in scope, and may cause confusion.




11.13 Upload any designs if you have them.

For compostable packaging covered by [Article 9\(1\) of the PPWR](#)—and, where applicable, [Article 9\(2\)](#)—the label must indicate the following:

- That the material is **compostable**
- That it is **not suitable for home composting**
- That it **must not be discarded in nature**

While the label implicitly signals that the item should be properly sorted, the JRC is considering whether the message “must not be discarded in nature” should be made more prominent.

11.14 Please rate the following options to do so:

| | |
|---|--|
| Auxiliary pictogram (see below) |  |
| Auxiliary text ("Do not throw into nature" in national language(s)) |  |
| QR code or other digital data carrier |  |

Available versions of the 'DO NOT THROW IN NATURE' label. This can be used with or without text.



**DO NOT THROW
IN NATURE**



**DO NOT THROW
IN NATURE**

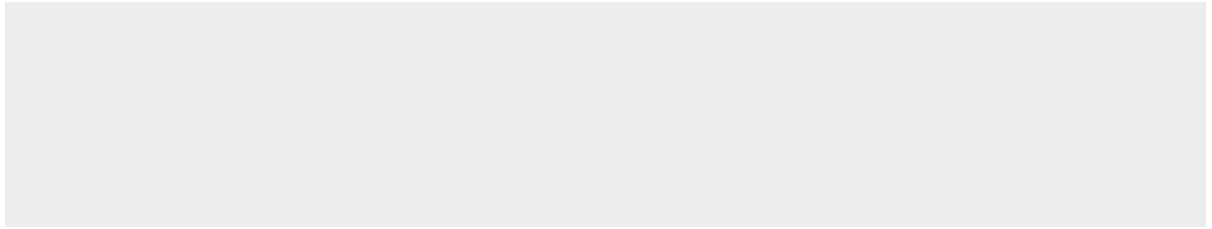


**DO NOT THROW
IN NATURE**



**DO NOT THROW
IN NATURE**



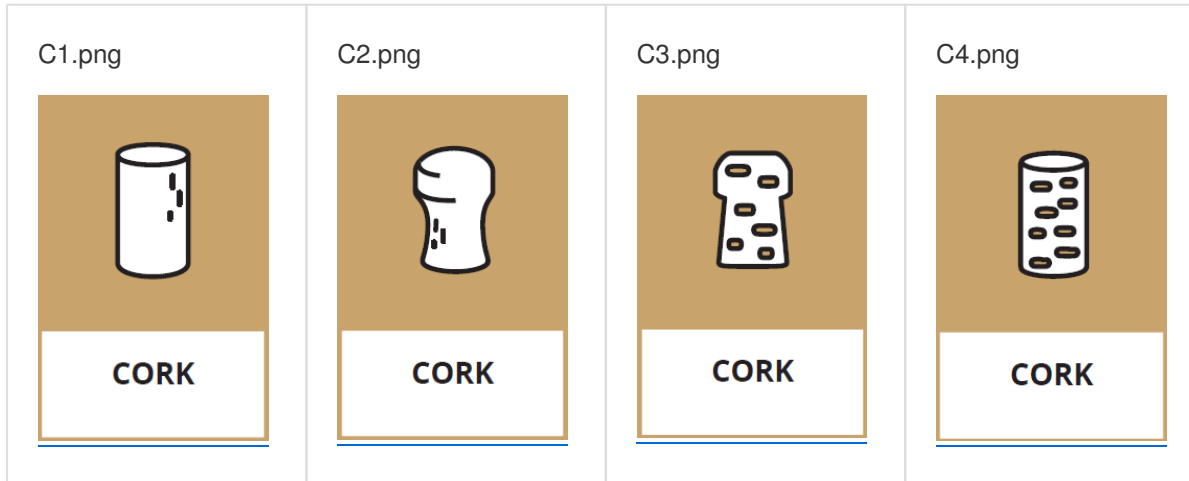


11.15 Please rank the following pictogram designs for cork according to your preferences (from preferred at the top to less preferred at the bottom).

Use drag&drop or the up/down buttons to change the order or accept the initial order.

| | |
|---|----|
| ⋮ | C3 |
| ⋮ | C4 |
| ⋮ | C2 |
| ⋮ | C1 |

11.16 Cork pictogram alternatives



11.17 Please provide concrete suggestions or alternative designs for the pictogram of the "cork packaging" label, if you think the current pictogram is not feasible or clear enough.

Mind that the labels refer to packaging only.

By using the alphanumeric system established in Decision 129/97 updated according to Annex II, Table 1 of Articles 12 and 13 of the PPWR, classification is based on the material's nature rather than limited pictograms representing waste treatment methods or packaging formats. This makes the system more precise and easier for consumers to use when sorting.

11.18 Upload any designs if you have them.

11.19 Please rank the following pictogram designs for wood according to your preferences (from preferred at the top to less preferred at the bottom).

Use drag&drop or the up/down buttons to change the order or accept the initial order.

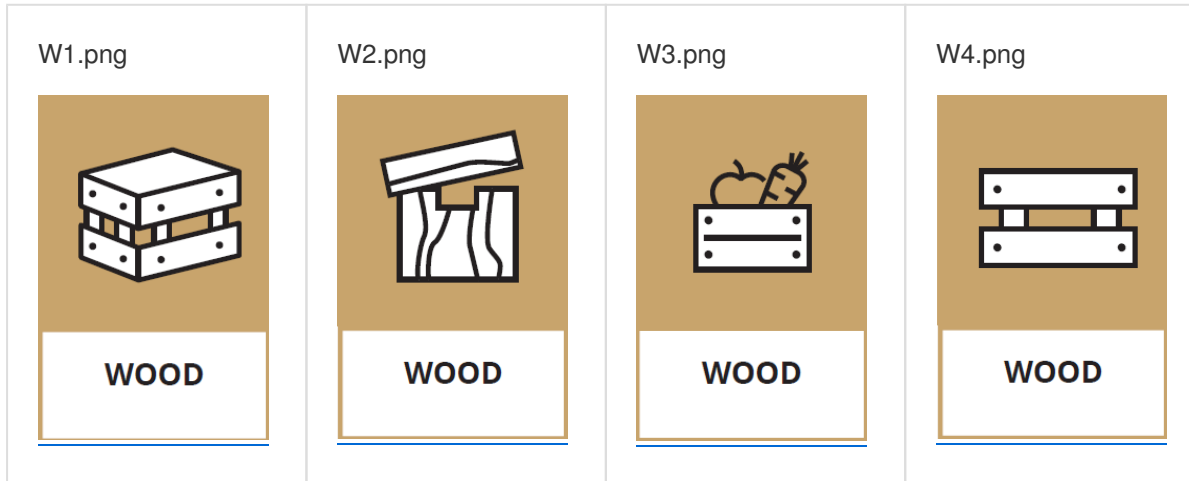
⋮ W3

⋮ W2

⋮ W1

⋮ W4

11.20 Wood pictogram alternatives



11.21 Please provide concrete suggestions or alternative designs for the pictogram of the "wood packaging" label, if you think the current pictogram is not feasible or clear enough.

Mind that the labels refer to packaging only.

By using the alphanumeric system established in Decision 129/97 and updated according to Annex II, Table 1 of Articles 12 and 13 of the PPWR, classification is based on the material's nature rather than limited pictograms representing waste treatment methods or packaging formats. This makes the system more precise and easier for consumers to use when sorting.

11.22 Upload any designs if you have them.

11.23 Please provide concrete suggestions or alternative designs for the pictogram of the "other composite" label, if you think the current pictogram is not feasible or clear enough.

Mind that the labels refer to packaging only.

11.24 Upload any designs if you have them.

11.25 What do you consider appropriate wording to identify the "other composite" label indicating non-fibre-based composites (please provide a reason for your answer)?

The 'other composite' category refers to non-fibre-based composite packaging, corresponding to 97/129/EC categories 90-98 and PPWR Annex II Table 1 category "Composite packaging of which the majority is not paper /cardboard"

Regarding the wording and pictograms for non-fibre-based composite packaging, the level of detail provided by the pictogram approach is insufficient and inadequate to accurately represent each type of non-fibre composite packaging listed in Decision 129/97, specifically codes 86 to 99. A single general pictogram and label for "other composites" cannot effectively cover all the cases identified in the Decision.

11.26 Please rank the following pictogram designs for textile according to your preferences (from preferred at the top to less preferred at the bottom).

Use drag&drop or the up/down buttons to change the order or accept the initial order.

⋮ T2

⋮ T4

⋮ T1

⋮ T3

11.27 Gallery



11.28 Please provide concrete suggestions or alternative designs for the pictogram of the "textile packaging" label, if you think the current pictogram is not feasible or clear enough.

11.29 Upload any designs if you have them.

11.30 Please rank the following pictogram designs for ceramics according to your preferences (from preferred at the top to less preferred at the bottom).

Use drag&drop or the up/down buttons to change the order or accept the initial order.

⋮

CE1

⋮

CE3

⋮

CE4

⋮

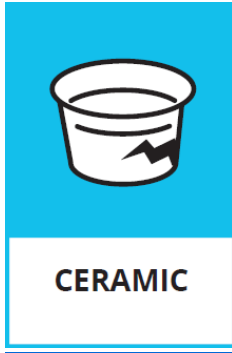
CE2

11.31 Gallery

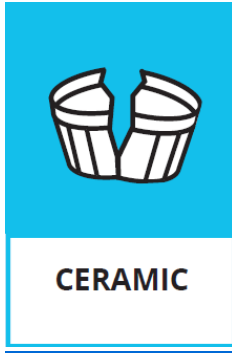
CE1.png



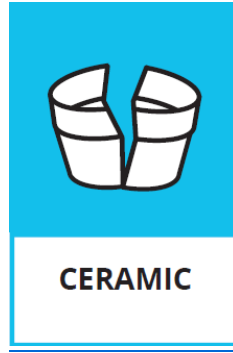
CE2.png



CE3.png



CE4.png



11.32 Please provide concrete suggestions or alternative designs for the pictogram of the "ceramic packaging" label, if you think the current pictogram is not feasible or clear enough.

11.33 Upload any designs if you have them.

12 Composite packaging

Below, we will present some pending issues regarding composite labels and ask you some questions.

Please read the information carefully.

To reflect the specificities of composite packaging in the development of harmonised EU waste sorting labels, we are exploring improved ways to communicate material composition on composite packaging.

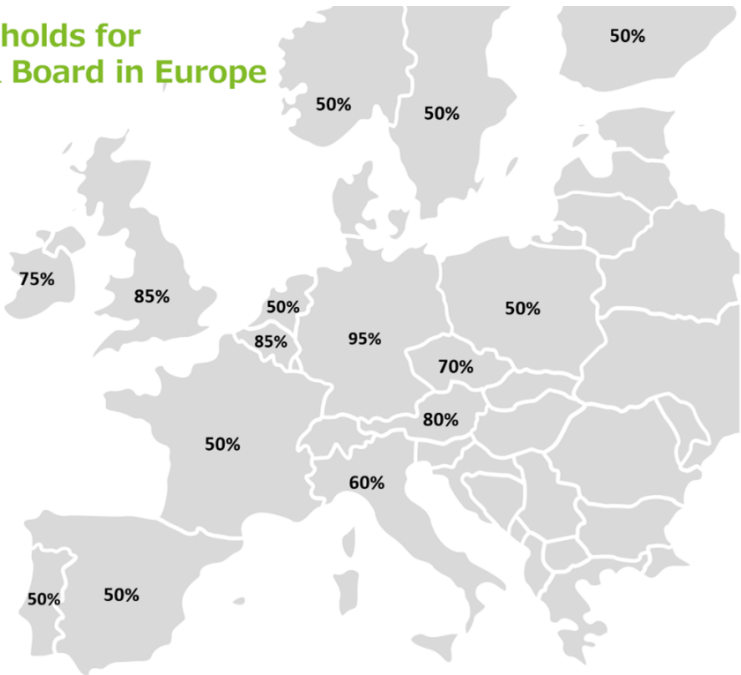
The current proposal on composite packaging labels applies the same label ('mixed canister') to all fibre-based packaging (except 'beverage carton').

However, Member States apply different thresholds for fibre content in their sorting systems, ranging from 50% to 95%, creating inconsistencies in how composite packaging is sorted across the EU (see map).

Paper-content thresholds for licensing as Paper & Board in Europe

Beverage Carton Collection often separate from Paper & Board including fibre-based composites

| Collection stream for beverage cartons | Applicable Country |
|--|------------------------|
| Paper & Board | SE, NO, FI, RO, BG |
| Lightweight Packaging | AT, BE, DE, ES, NL, PT |
| Co-mingled | FR |



To address this, we are currently considering two options:

1. a more granular labelling approach indicating exact percentages of fibre content on packaging labels and threshold-based categories on receptacle labels. This could help align packaging labels with national sorting rules while preserving EU-wide harmonisation.
2. a somewhat more granular labelling approach using two instead of one label for fibre-based composite packaging, i.e. one for High paper content: around 85 to 95% Medium paper content: around 50 to 85%

The **first option** would require

- Packaging producers to indicate the fibre-content percentage on the label, as indicated below ("X% FIBRE")
- Waste management to define ranges of fibre-content to be collected in separate receptacles and apply the respective labels ("Y% - Z%").

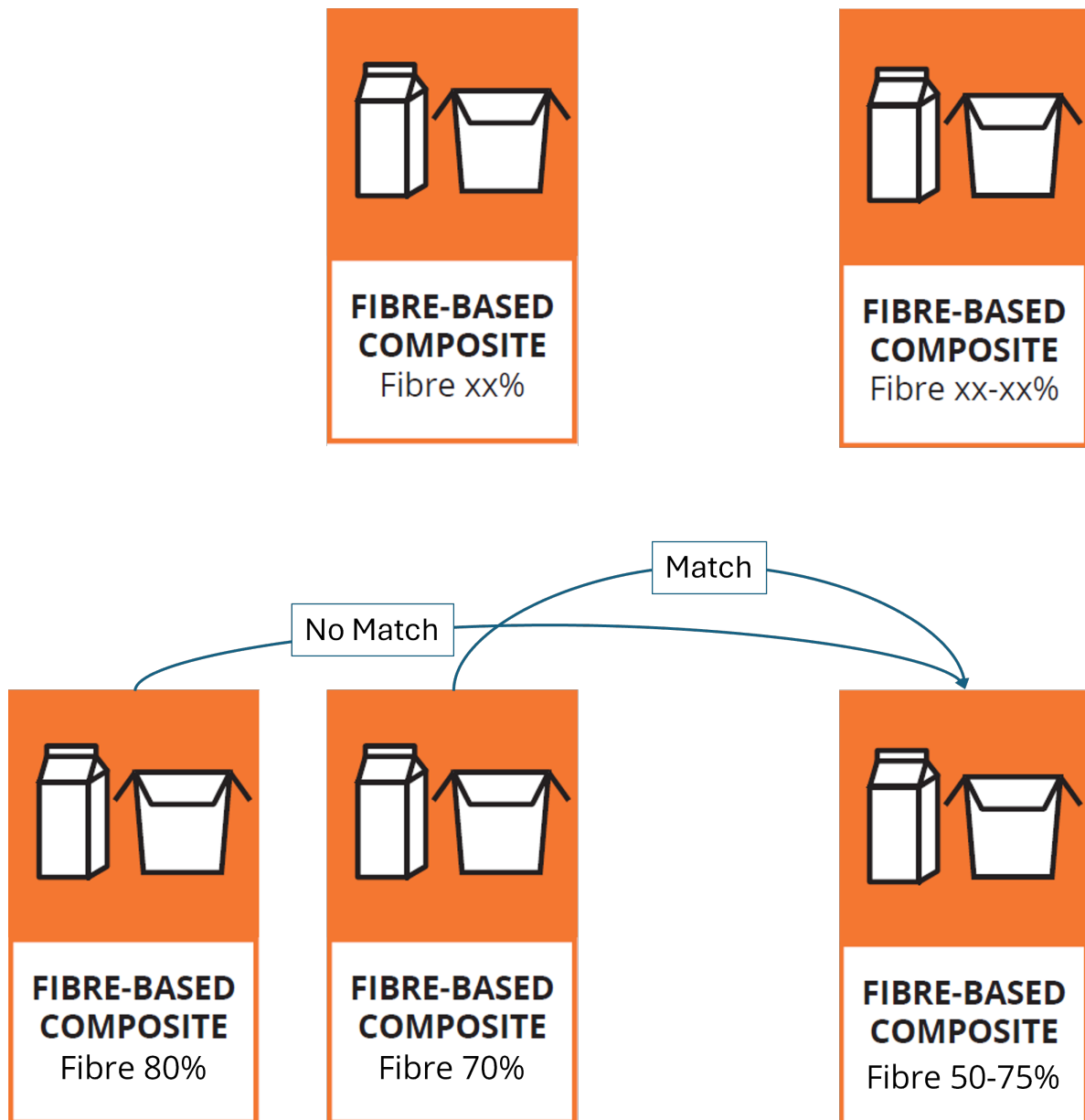
We recognise that thresholds and percentages are challenging to communicate in a simple and understandable way to citizens. They will have to understand the percentages and thresholds. Particularly in situations with scarce time and other resources, such inferences could be error prone.

At the same time, text like “above” and “below” would have to be translated and thus would not be appreciated by the packaging industry.

Mathematical operators like “>”, “<”, “≤”, and “≥” are unambiguous but are also not clearly understood by everyone, hampering accessibility.

Product label

Receptacle label



The **second option** would introduce an additional label for composite packaging to complement the current labels for 'beverage carton' and 'mixed canister', differentiating the latter according to the fibre-content, creating one label (incl. pictogram) for composite packaging with fibre content up to around 85%, and one for higher percentages.

Thus, it would not be capable to accommodate all the sorting practices in EU Member States indicated in the map above. For instance, packaging labelled with 60% and 75% would both be labelled on packaging as "Medium paper content" but they would only go in the same receptacle in countries with thresholds up until 60, whereas in Czechia, the 60% composite would not go into P&C, but the 75% composite would.

12.1 How would you rate the **first option** in terms of dealing with the complexities of composite packaging sorting?

- ☐ Very poorly – Does not address the complexities at all
- ☐ Poorly – Addresses the complexities in a limited or ineffective way

- ☐ Somewhat poorly – Addresses some aspects but misses key challenges
- ☐ Somewhat well – Addresses most relevant complexities reasonably
- ☐ Well – Effectively deals with the complexities in most respects
- ☐ Very well – Fully addresses the complexities in a practical and effective manner

12.2 How would you rate the **second option** in terms of dealing with the complexities of composite packaging sorting?

- ☐ Very poorly – Does not address the complexities at all
- ☐ Poorly – Addresses the complexities in a limited or ineffective way
- ☐ Somewhat poorly – Addresses some aspects but misses key challenges
- ☐ Somewhat well – Addresses most relevant complexities reasonably
- ☐ Well – Effectively deals with the complexities in most respects
- ☐ Very well – Fully addresses the complexities in a practical and effective manner

12.3 If you have any information on such thresholds for countries not contained in the map above, please indicate them below.

Specifically, the percentages refer to the threshold at which composite packaging is collected together with paper and cardboard.

| | Threshold (in %) |
|---|--|
| 1 | Bulgaria <i>Only values of at least 0 are allowed</i> <input type="text"/> % |
| 2 | Croatia <input type="text"/> % |
| 3 | Cyprus <input type="text"/> % |
| 4 | Denmark <input type="text"/> % |
| 5 | Estonia <input type="text"/> % |
| 6 | Greece <input type="text"/> % |
| 7 | Hungary <input type="text"/> % |
| 8 | Latvia <input type="text"/> % |
| 9 | Lithuania <input type="text"/> % |

| | | | |
|----|------------|----------------------|---|
| 10 | Luxembourg | <input type="text"/> | % |
| 11 | Malta | <input type="text"/> | % |
| 12 | Romania | <input type="text"/> | % |
| 13 | Slovakia | <input type="text"/> | % |
| 14 | Slovenia | <input type="text"/> | % |

12.4 Please indicate below if you think any of the thresholds shown in the map are wrong and provide a correction and explanation, if possible.

12.5 Please provide additional insights on composite packaging if you have any that were not already communicated to us.

13 General labelling requirements

We are also interested in the general labelling requirements relevant to you, that is beyond waste sorting labels.

This includes for example environmental labels, animal welfare labels, nutrition labels or recycling labels.

13.1 How would you rate the challenges posed by country-specific labelling requirements for your case?

- ☐ Not at all challenging
- ☐ Slightly challenging
- ☐ Moderately challenging
- ☐ Very challenging
- ☐ Extremely challenging

13.2 How would you rate the challenges posed by general labelling requirements for your case?

- ☐ Not at all challenging
- ☐ Slightly challenging
- ☐ Moderately challenging
- ☐ Very challenging
- ☐ Extremely challenging

13.3 What are your main challenges associated with packaging labels? [Tick all that apply]

- ☐ Member States have been introducing unilateral measures to improve information about recycling on the label of products. The different requirements are making it harder – sometimes almost impossible – to have one product for the whole Single Market
- ☐ The underlying methodology for calculations related to labels or logos is often unclear. This leads to problems and uncertainty for companies.
- ☒ The definitions of products are often unclear. Resulting in uncertainty under which category a product will fall, and which labels or logos are required.
- ☐ It is often unclear if a certain label or logo is legally required or is advised.
- ☐ Member States have been banning specific logos from being used on packaging. This leads to an insoluble problem for a producer if another Member State requires that logo on the package.
- ☐ Other (please specify)

13.5 With respect to your packaging, how many distinct labels are you required to apply?

Only values between 0 and 20 are allowed

labels

Please indicate which of the following labels are relevant for your packaging. You can also indicate additional labels that you do not find in the list.

13.6 Recycling and environmental labels

- ☐ Mobius Loop – Indicates that packaging is recyclable. May include a percentage to show the recycled content.
- ☐ Green Dot (Der Grüne Punkt) – Symbol indicating that the producer has made a financial contribution to a recycling scheme.
- ☐ Tidyman – Encourages the consumer to dispose of the package properly.
- ☐ Compostable (Seedling Logo) – Indicates that packaging is industrially compostable (EN 13432 standard).
- ☐ OK Compost / OK Compost HOME – Certifications for industrial and home compostability respectively.
- ☐ FSC (Forest Stewardship Council) – Identifies packaging made with responsibly sourced paper/cardboard.
- ☐ PEFC – Certification for sustainable forest management.
- ☐ Ecolabel (EU Flower) – Voluntary EU label for environmentally friendly products and services.
- ☐ Single Use Plastics (SUP) Label–Mandatory for specific plastic products under the EU Single-Use Plastics Directive (e.g., hygiene wipes, wet wipes, tobacco filters, and beverage cups).
- ☐ Others (please specify)

13.8 Hazardous Materials & Safety Labels

- ☐ CLP Regulation Pictograms (GHS symbols) – Required for chemical products: Explosive, Flammable, Oxidizing, Compressed Gas, Corrosive, Toxic, Health Hazard, Environmental Hazard, etc.
- ☐

CE Mark – Indicates conformity with EU health, safety, and environmental protection standards.

- ☐ WEEE Symbol (Crossed-out Wheelie Bin) – Applies to electronic products; indicates they should not be disposed of in general waste.
- ☐ Others (please specify)

13.10 Food Contact & Hygiene Labels

- ☐ Glass & Fork Symbol – Indicates material is safe for food contact.
- ☐ "e" Mark (Estimated Sign) – Used for prepacked products; shows compliance with EU quantity tolerances.
- ☐ Lot/Batch Number – Mandatory for traceability in food and cosmetics.
- ☐ Use-by / Best-before Date – Indicates product shelf life.
- ☐ Open Book Symbol – Used for cosmetics and some food products, indicating more information is available (e.g., in a leaflet).
- ☐ Period After Opening (PAO) Symbol – Used in cosmetics to show the time the product remains usable after opening (e.g., "12M").
- ☐ Others (please specify)

13.12 Retail & Logistics Labels

- ☐ Barcode (EAN / GTIN) – Essential for retail; identifies products globally.
- ☐ QR code or other digital data carrier – Often used for traceability, consumer information, or marketing.
- ☐ Country of Origin – Sometimes mandatory depending on product category (especially food).
- ☐ Temperature-sensitive Labels – Used in cold chain logistics to indicate temperature thresholds.
- ☐ Tamper-evident Seals – Especially used in pharma and food packaging to show integrity.
- ☐ Others (please specify)

13.14 Cosmetic & Personal Care Packaging

- ☐ Cruelty-Free / Leaping Bunny – Voluntary label indicating no animal testing.
- ☐ Vegan – Denotes absence of animal-derived ingredients.
- ☐ EcoCert / COSMOS – Organic and natural cosmetic standards.
- ☐ Others (please specify)

14 Final remarks

Congratulations, you arrived at the end of this survey, and we sincerely thank you for your information and insights.

We deeply appreciate the time you have taken. Your insights are invaluable to us.

14.1 Below you may provide general feedback on the user manuals that you did not already provide in this or earlier communications to the JRC.

In general, an alternative to the newly proposed approach could be to avoid drafting an entirely new delegated act and instead focus on consolidating and refining the existing framework—specifically Decision 97/129/EC updated in accordance with Annex II, Table 1 of Articles 12 and 13 of the PPWR—without fully repealing it. This would help preserve the legal and practical continuity of measures that have already

proven effective, while allowing for updates and integration to address current needs and challenges in packaging and labelling, without any constraints of the pictogram's proposed system. A targeted and cost-efficient revision of the existing decision could enhance alignment with the broader regulatory framework, reduce administrative burdens for stakeholders, and provide legal certainty. This approach could also support a smoother transition for Member States and economic operators, particularly small and medium-sized enterprises, who might otherwise face substantial adaptation costs under a completely new act.

14.2 Below you may provide general feedback on the survey or other relevant aspects that you did not already provide in this or earlier communications to the JRC.

14.3 If you would like to share any documents with us, you can upload them here:

**7e88a28f-076d-4023-8c0a-67e3ffe3961e/10.06.25_PP_Confindustria_-
_CONAI_analysis_and_proposal_to_the_JRC_harmonized_labelling_prototype.pdf**

The scientific work for this project is being conducted by the EU Policy Lab of Unit S.1 of the Joint Research Centre in Brussels, in cooperation with Unit B.5 of the Joint Research Centre in Sevilla. The work is conducted for the Directorate-General for the Environment.

For any questions related to this project, please contact JRC-WASTE-LABELLING@ec.europa.eu.

For further or future key information, please visit the [website of the EU Policy Lab](#).

Useful links

Packaging and Packaging Waste Regulation (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202500040&pk_campaign=todays_OJ&pk_source=EUR-Lex&pk_medium=X&pk_content=Environment&pk_keyword=Regulation)

JRC report Separate collection of municipal waste: citizens involvement and behavioural aspects (<https://publications.jrc.ec.europa.eu/repository/handle/JRC131042>)

JRC report Behavioural insights for waste-sorting labels in the European Union (<https://publications.jrc.ec.europa.eu/repository/handle/JRC134206>)

JRC report "Harmonised labelling of waste receptacles with matching product labels" (<https://data.europa.eu/doi/2760/09021>)

JRC report "Setting the scene for harmonised waste-sorting labels in the European Union" (<https://publications.jrc.ec.europa.eu/repository/handle/JRC135860>)

Factual summary report of targeted stakeholder consultation on EU harmonised waste sorting labels as part of the packaging and packaging waste regulation (<https://publications.jrc.ec.europa.eu/repository/handle/JRC141019>)

Design and behavioural research study to create evidence-based, EU harmonised consumer waste sorting labels
(<https://publications.jrc.ec.europa.eu/repository/handle/JRC141556>)

Contact

jrc-waste-labelling@ec.europa.eu