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LABELLING FOR CONSUMER INFORMATION: DIGITAL FIRST

The below signed associations urge European policymakers to embrace the sweeping change in consumer behaviour when seeking information, and craft forward-looking policy suited for the next twenty years and permit more labelling information to be provided to consumers primarily via digital labelling such as 2D codes, namely QR or datamatrix codes.

Numerous European regulations, including the Batteries Regulation (Regulation (EU) 2023/1542), Medical Device Regulation (Regulation (EU) 2017/745), CLP regulation (Regulation (EC) 1272/2008), Textiles Regulation (Regulation (EU) 2011/1007) and Toy Safety Regulation (Regulation (EU) 2025/2509), among others, require various information to be communicated with consumers via labelling. In parallel, legislations such as the Ecodesign Regulation introduce even more data points that should be communicated to the consumer for the same product, pointing to a trend of increased information requirements. At the same time, the recently adopted Packaging and Packaging Waste Regulation (Regulation (EU) 2025/40) requires manufacturers to reduce packaging weight and volume, which necessarily affects the packaging size. To both provide relevant information to consumers and reduce packaging waste, manufacturers should have more flexibility to provide product information digitally, accessible via a single data carrier on the product or packaging.

Digital labelling policy benefits consumers. By adopting a more flexible and consistent EU legislation labelling policy that incorporates different digital means of communication, consumers can receive the most recent and clear information regarding the product, which can be understood by consumers in different EU countries and beyond. Digital labelling interfaces can be updated in real-time, rather than requiring very costly and lengthy physical re-labelling of thousands of products. Therefore, regulatory and other updates (such as recycling infrastructure changes or an update in non-essential information) would be integrated in the digital label instead of leading to a costly change in the packaging. In addition,

digital labelling can facilitate cross-border trade by reducing the need for translations, ensure access to information post-sales, and foster innovation in the way consumer information is displayed and communicated. Furthermore, digital labels, such as a QR code, could provide a flexible solution for avoiding the overcrowding of information on the product labels when it needs to be displayed in multiple languages.

2D codes are reliable and a commonly utilised technology. Today, 2D codes are ubiquitous across a wide range of applications. The use of QR technology grew exponentially during the COVID-19 pandemic, with over 86% of European consumers scanning QR codes, including over 36% of users scanning QR codes on a weekly basis. (MarTech Alliance, 2023). For business-to-business transactions, Germany began phasing in mandatory e-invoicing on January 1, 2025, under the Growth Opportunities Act (Wachstumschancengesetz). Similarly, Poland also understands the benefits of QR codes and mandates that most invoices contain QR code payment options (Krajowy System e-Faktur (KSeF) (National e-Invoice System)). The technology is safe, widely used, and trusted by governments, businesses, and consumers throughout Europe.

Digital labelling policy reduces waste. Digital labelling helps reduce packaging waste, resource use and supports sustainability efforts. Digital labels also avoid unnecessary destruction of products and packaging when new regulations/obligations are implemented by the European Union or in a Member State. Additionally, digital labelling allows for smaller packaging if information that would be required on the package (and thus requiring packaging to be a certain size) can be presented in an alternative format.

Product safety will not be impacted. Of course, some information must always remain on physical packaging, such as safety warnings related to the safe use of toys, medical devices, safety warnings for lithium coin cell batteries or warnings on the safe use of chemicals in candles. However, information consumers rely upon less in making purchasing decisions, such as country-specific recycling information or the material composition of articles, could be moved to a digital label to ensure the most important information is more prominent on the product. Such a system would maintain consumer protection while allowing for more timely information on less safety-critical items.

Several European Union laws encourage digital labelling. The Textiles Regulation (Regulation (EU) 2011/1007), CLP regulation (Regulation (EC) 1272/2008), Wine Labelling Regulation (Commission Delegated Regulation (EU) 2023/1606), Toy Safety Regulation (Regulation (EU) 2025/2509) and agreement to update to the Detergent Regulation acknowledge the role of digital labelling in communicating information to consumers, introducing conditions to communicate information digitally, via the Digital Product Passport or digital labels. Forward-looking regulations must demonstrate that digital labelling has a place in the future of European consumer goods legislation.

Digital labelling will enhance European competitiveness. Innovative developments such as digital labelling are directly in line with the report by Mario Draghi on the Future of European Competitiveness's call to embrace and guide rapid technological change and sectoral transitions. European economic operators can be nimbler in product offerings while growing the Union's technological industries. Relieving economic operators of outdated requirements developed over the past century will accelerate the industry's growth into the next century.

For these reasons, the associations identified in this document call upon the European Commission to pursue a broad consumer labelling policy that prioritises widely-utilised technologies, remains flexible for future innovation, and retains the highest level of consumer protection.

European Automobile Manufacturers' Association

European Candle Manufacturers Association

EPBA – Consumer Batteries Europe

European Safety Federation

Independent Retail Europe

RECHARGE

Toy Industries of Europe

EUROMCONTACT