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LABELLING FOR CONSUMER INFORMATION: DIGITAL FIRST

EPBA Consumer Batteries Europe implore European policymakers to embrace the sweeping change in consumer information-seeking behaviour, craft forward-looking policy suited for the next twenty years instead of the last and permit 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 (Directive 2009/48/EC), among others, require specific label contents for consumer review. At the same time, the recently adopted Packaging and Packaging Waste Regulation (Regulation (EU) 2025/40) requires manufacturers to reduce packaging weight, which necessarily means packaging size. To both provide relevant information to consumers and reduce packaging waste, manufacturers should have more flexibility to provide product information online, accessible via 2D code on the product or packaging.

Digital labelling policy benefits consumers. By adopting a more flexible labelling policy that incorporates different digital codes, consumers can receive the most recent and clear information regarding the product, which can be understood by consumers in different EU countries and beyond. The sites to which the digital labelling directs consumers can be updated in real-time, rather than requiring very costly and lengthy physical re-labelling of thousands of products, should something such as recycling infrastructure changes or an update in warnings warrant a change in the status of packaging.

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 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 one specific 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 for lithium coin cell batteries and other significant warnings. 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 ensure the most important information is more prominent. 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), General Product Safety Regulation (EU) 2023/988 (GPSR), CLP regulation (Regulation (EC) 1272/2008), Wine Labelling Regulation (Commission Delegated Regulation (EU) 2023/1606), and agreement to update to the Detergent Regulation acknowledge the value of digital labelling to consumers. All call on manufacturers to provide information online for the convenience of consumers. These forward-looking regulations demonstrate that digital labelling has a place in the future of European consumer goods packaging.

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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 manufacturers can be nimbler in product offerings while growing the Union's technological industries. Relieving manufacturers of outdated requirements developed over the past century will accelerate the industry's growth into the next century.

For these reasons, EPBA Consumer Batteries Europe 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.

Michael Dickstein
Chairman

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About EPBA – Consumer Batteries Europe

We are the leading organisation of quality manufacturers of portable batteries and power solutions in Europe. It comprises of a total of seven member companies, along with several associated members. In 2023, our members sold 5.5 billion batteries i.e. Alkaline, Zinc Carbon, Lithium coin and other button cells, and rechargeable batteries, along with two million chargers in Europe. The sector employs around 4,000 people in Europe, and the VAT contribution amounts to approximately EUR 260 million. We are dedicated to advancing the sustainable, safe, and efficient use of portable batteries across Europe. Our mission is to advocate for innovation and environmental stewardship in the battery industry, promote best practices in manufacturing and recycling, and ensure compliance with stringent safety and environmental standards. We work closely with stakeholders, including the EU institutions, policymakers, and consumers, to safeguard and enhance our positive contribution to the EU economy, the environment, and the communities in which we operate.

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