



## ANALYSIS

### **Circular Economy Product Labels**

Will current EU harmonisation efforts reduce fragmentation on the Single Market?

## Summary

The EU's objective to transition to a circular economy has prompted both the EU and its Member States to adopt new rules to ensure that the products placed on the EU market are sustainable, reusable, repairable and recyclable. This has led to a situation where companies now must alter their products to be able to sell them in the different Member States, for example by affixing different labels depending on which Member State they want to sell the product to. We have looked at what rules on labelling that aim to promote the transition to a circular economy exist on EU level, on Member State level and in up-coming EU legislation.

Our study shows that several EU Member States have adopted their own rules on labelling to inform consumers and users about, for example, product content, how easy it is to repair a product and on how to sort the product once it has become waste. In some cases, these national requirements are contradictory – some Member States require a label that is prohibited in other Member States. This means that the companies cannot sell the same product in all Member States and that goods cannot move freely across the borders.

The EU legislature has, in recent years, presented proposals for new legislation that in part aim to facilitate the shift to a circular economy in the EU, but also to address the problems that arise when Member States adopt their own product rules.

We have analysed the legislative proposals that the Commission has recently presented on new rules for packaging and eco-design of products, on green claims, on critical raw materials and on batteries. We can see that these proposals will, in part, mean that some national labels are replaced with new, common EU labels. This will mean that companies must only adhere to one uniform set of rules, instead of several different national rules. However, we also see that these proposals leave room, and in some cases even require, that Member States develop completely new labels. There is a risk that the current problems with diverging rules within the EU persist.

We give several recommendations to both the Commission and to the Member States. We propose, for example, that the Commission prioritises adopting new rules on information on how easily repairable a product is, and that the Member States must scrutinise their labelling requirements to see if they are truly necessary to ensure the shift to a circular economy.

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**Authors:** Hanna Pettersson and Katarina Paul.

Valuable comments and suggestions have been received from Linda Bodén.

## 1 Background and purpose

Combating the climate crisis and shifting towards a circular economy has been high on the agenda of the EU and its Member States for several years. Both the EU and the Member States have taken action to accelerate this shift. As the Member States have adopted slightly different approaches to solve this common problem, we have observed a fragmentation of the Single Market. Many European companies have highlighted the proliferation of different requirements and have called for a more harmonised approach.<sup>1</sup> One issue often cited is the emergence of national labelling requirements for products and packaging. The Commission has recently presented a number of legislative proposals aimed at improving circularity. These proposals also partially intend to address fragmentation in the European market.

With this study, the National Board of Trade Sweden aims to map national labelling requirements relating to the circular economy and to analyse if and to what extent forthcoming EU legislation will harmonise such requirements.<sup>2</sup>

## 2 Circular economy legislation in the EU

The EU adopted its first Circular Economy Action Plan<sup>3</sup> in 2015. It was renewed in 2020.<sup>4</sup> However, the EU has had legislation that can facilitate the shift towards a circular economy for years. The first Waste Framework Directive was adopted in 1975 and was replaced by the current Waste Framework Directive (WFD) in 2008.<sup>5</sup> The EU has also adopted several directives on specific waste streams, such as batteries and accumulators,<sup>6</sup> electrical and electronic equipment,<sup>7</sup> packaging and packaging waste,<sup>8</sup> end-of-life vehicles<sup>9</sup> and extractive waste.<sup>10</sup> The current Eco-design Directive was adopted in 2009.<sup>11</sup>

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<sup>1</sup> See for example [Examples of Single Market barriers for businesses | BusinessEurope](#), [Environment: Orgalim Position Paper on the draft French Decree on consumer information for waste-generating products | Orgalim](#), [So many labels - ERT](#) and [This way up - ERT](#).

<sup>2</sup> The study has been commissioned by the Swedish Ministry for Foreign Affairs.

<sup>3</sup> Closing the loop - An EU action plan for the Circular Economy, COM/2015/0614 final.

<sup>4</sup> A new Circular Economy Action Plan, For a cleaner and more competitive Europe, COM(2020) 98 final.

<sup>5</sup> Directive 75/442/EEC of 15 July 1975 and Directive 2008/98/EC.

<sup>6</sup> Directive 2006/66/EC.

<sup>7</sup> Directive 2012/19/EU (WEEE).

<sup>8</sup> Directive 94/62/EC.

<sup>9</sup> Directive 2000/53/EC.

<sup>10</sup> Directive 2006/21/EC.

<sup>11</sup> Directive 2009/125/EC.

## 3 Circular economy labels

### 3.1 EPR schemes and EPR organisations

The term "extended producer responsibility" (EPR) refers to an obligation on the part of producers to bear either financial or financial and organisational responsibility for their products in the waste stage of their life cycle. An EPR scheme refers to a set of measures put in place to realise such an obligation.<sup>12</sup> The Specific Waste Stream Directives contain provisions on the EPR schemes that the Member States are obliged to implement. Since 2018, the Waste Framework Directive (WFD) has stipulated the minimum requirements applicable to all such schemes, regardless of whether or not they are required by EU law.<sup>13</sup> The WFD does not lay down any provisions on labelling.

In most EU Member States, EPR obligations may be fulfilled individually or collectively. When producers choose to fulfil their obligations collectively, this is most often carried out via an EPR organisation. In Germany, it is mandatory for packaging producers to be members of an EPR organisation.<sup>14</sup> In Estonia, it seems to be mandatory for producers of tyres, batteries and accumulators and electrical and electronic equipment to belong to an EPR organisation.<sup>15</sup> It has been reported that Ireland will make membership of an EPR organisation mandatory for large producers of packaging.<sup>16</sup>

Producers who are members of an EPR organisation are often allowed to display a symbol to prove their membership and that their EPR obligations as producers are thus fulfilled. The most commonly used EPR symbol for packaging is the Green Dot (see figure 1 below). It is used in 24 European countries and shows that EPR obligations in the form of financial contributions have been fulfilled.<sup>17</sup>

**Figure 1. The Green Dot**



We are not aware of any EPR organisation that contractually obliges its members to label products with the organisation's symbol.

<sup>12</sup> See Article 3.21 of the WFD.

<sup>13</sup> See Article 8 and 8 a of the WFD. See also Directive (EU) 2018/851.

<sup>14</sup> 7 § Gesetz über das Inverkehrbringen, die Rücknahme und die hochwertige Verwertung von Verpackungen. See also 2007/546/D.

<sup>15</sup> Jäätmeseadus, available at [Jäätmeseadus–Riigi Teataja](#). See also 2017/456/EE.

<sup>16</sup> [gov.ie - Minister Ryan signs new packaging and packaging waste rules into law \(www.gov.ie\)](#).

<sup>17</sup> [The Green Dot Trademark \(pro-e.org\)](#)

Since the mid-nineties, Spain has required packaging producers who belong to an EPR organisation to mark their products with the EPR organisation's symbol.<sup>18</sup> However, in 2022, Spain notified a new Packaging Act,<sup>19</sup> which made it voluntary to label packaging with EPR organisation symbols. The draft act initially prohibited misleading labelling from being used, specifically referring to the Green Dot. This reference to the Green Dot was removed from the Spanish draft after comments from the Commission.

## 3.2 Deposit Return Systems

One specific type of EPR system are deposit return systems. In deposit return systems, a fee is charged in addition to the sales price of a product. The customer is reimbursed the fee when they return the product (once it has become waste) to a specific collection system.

There are no EU rules on deposit return systems. However, such systems are mentioned in the current Packaging and Packaging Waste Directive (PPWD) and in the Single-Use Plastics (SUP) Directive.<sup>20</sup> The PPWD lists the establishment of a deposit return system as a means of encouraging an increase in the share of reusable packaging that is placed on the market.<sup>21</sup> The SUP Directive lists the establishment of such systems as a means of achieving the separate collection targets for single-use plastic beverage bottles.<sup>22</sup>

Many EU Member States have deposit return systems in place for packaging, notably, drinks packaging. Some of the Member States (Germany, Sweden, Denmark, the Netherlands) have used deposit return systems for drinks packaging for nearly three decades. Other Member States (for example, Malta, Romania, Greece) more recently established such systems and have either just implemented them or are in the process of implementing them. Still other Member States (France, Luxemburg, Spain and Belgium) do not currently have such systems in place, but either allow such systems to be established or will establish such systems if their national recycling targets are not met.

Many deposit return systems apply to drinks packaging made from (single-use) plastics and metal. They often only apply to packaging for certain types of drinks. This often includes soft drinks, mineral water and juices. In some countries the deposit return system includes packaging for alcoholic beverages. Croatia has adopted a deposit return system that also includes milk and other milk products.

A deposit return system often entails different types of labelling requirements, including specific deposit labels showing that the packaging is subject to a deposit return system, EAN codes, and labels showing the amount of the deposit.

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<sup>18</sup> TRIS case number 1996/6001/E.

<sup>19</sup> TRIS case number 2022/325/E.

<sup>20</sup> Directive (EU) 2019/904.

<sup>21</sup> Article 5.1 a) of the PPWD.

<sup>22</sup> Article 9.1 and Part F of the Annex of the SUP Directive.

### 3.3 Waste sorting instructions

EU legislation on specific waste streams, such as the SUP Directive, the Batteries Directive and the WEEE Directive, contains requirements to label products with waste sorting instructions. The labelling requirements under the SUP Directive only cover a few products and there is much scope for the Member States to decide on the design of the label.<sup>23</sup> The WEEE Directive<sup>24</sup> and the Batteries Directive<sup>25</sup> both lay down an obligation to mark electrical and electronic products and batteries with the crossed-out bin symbol (see figure 2 below).

**Figure 2. Crossed-out bin symbol**



Apart from the waste sorting instruction labels imposed by EU law, some Member States have introduced mandatory national waste sorting labels for packaging. One well-known example is the Triman logo (see figure 3 below), introduced in France in 2014.<sup>26</sup> The Triman logo is supposed to be affixed to all recyclable products that are subject to a sorting instruction. Initially, the logo could be affixed to the product packaging, appear in the user manual or be published online. In 2020, France notified a change to the Triman regulations, making it mandatory to affix the symbol to products that are subject to an EPR scheme. It was no longer possible to provide the instructions online only. The Triman logo has to be accompanied by instructions on the sorting or the return of waste.<sup>27</sup>

**Figure 3. Triman logo**



<sup>23</sup> Article 7 of the SUP Directive provides that sanitary towels, tampons and tampon applications, wet wipes, certain tobacco products and cups for beverages must be labelled. Labels must include information on the appropriate waste management options, the presence of plastic in the product and on the negative impact of littering or other inappropriate means of waste disposal.

<sup>24</sup> Article 14.4 and Annex IX of the WEEE Directive.

<sup>25</sup> Article 20 of the Batteries Directive.

<sup>26</sup> TRIS case number 2012/204/F.

<sup>27</sup> TRIS case number 2020/410/F.

Italy has also adopted regulations on mandatory labelling with waste sorting instructions.<sup>28</sup> However, it appears that the Italian labelling requirements are met even if only a digital label is used.

Another well-known logo is the Tidyman logo (see figure 4 below), which previously had to be affixed to packaging in Bulgaria to show that it was subject to a separate collection requirement. A recent change in the Bulgarian regulations has meant it is now voluntary to affix the Tidyman logo.<sup>29</sup> Portugal has proposed banning the Tidyman logo on reusable and recyclable packaging. Portugal has also proposed that packaging must be marked with the colour of the waste container in which it should be placed once it becomes waste.<sup>30</sup> Spain has a similar rule on matching labels on packaging with waste containers. Spain also requires compostable packaging to be labelled with information discouraging users from disposing of it in nature.<sup>31</sup>

**Figure 4. Tidyman logo**



A type of labelling that does not constitute waste sorting instructions *per se* but is intended to facilitate, for example, sorting, are labels that indicate the materials that are used in packaging. The current PPWD empowers the Council of the EU to lay down rules on the marking of packaging. According to the PPWD, labelling must indicate the nature of the packaging materials used on the basis of Commission Decision 97/129/EC.<sup>32</sup> The Commission Decision establishes a harmonised system for numbering and abbreviations (e.g. PET for *polyethylene terephthalate*) for packaging materials.

In many Member States, labelling to indicate the nature of the packaging materials remains voluntary. However, if such labelling is used, it must use the numbering and abbreviations system established by the Commission Decision. In Italy, Bulgaria, Cyprus and Luxemburg it is a mandatory requirement to indicate on the packaging what packaging materials was used.<sup>33</sup> Portugal has also proposed a similar mandatory labelling requirement.<sup>34</sup>

<sup>28</sup> TRIS case numbers 2022/108/I and 2022/196/I.

<sup>29</sup> See Article 5 and the final and transitional provisions of the Ordinance on packaging and packaging waste. Available at, [Lex.bg - Laws, regulations, constitution, codes, official gazette, implementing regulations.](#)

<sup>30</sup> TRIS case number 2021/118/P.

<sup>31</sup> TRIS case number 2022/325/E.

<sup>32</sup> Article 8 of the PPWD.

<sup>33</sup> Article 5 of the Ordinance on packaging and packaging waste (Bulgaria), 2022/18/I and 2022/196/I and 2020/485/L.

<sup>34</sup> TRIS case number 2021/118/P.



In addition, some EPR organisations recommend that their members label their packaging with waste sorting instructions. A Swedish EPR organisation recommends that packaging should be labelled with symbols for the packaging material used and written waste sorting instructions, such as “sorted as plastic packaging”.<sup>35</sup>

In the Nordic countries, municipal waste organisations, EPR organisations and other stakeholders have developed a common pictogram system for waste sorting.<sup>36</sup>

### 3.4 Information on product performance and environmental impact

#### 3.4.1 Product characteristics

A vast amount of EU legislation deals with product characteristics. If we focus on legislation that is relevant to the circular economy, the Eco-design Directive, the REACH Regulation,<sup>37</sup> the CLP Regulation,<sup>38</sup> the Batteries Directive and the RoHS Directive<sup>39</sup> contain provisions on product characteristics and information requirements relating to product characteristics.

The current Eco-design Directive only covers energy-related products.<sup>40</sup> It is a framework directive. For the rights and obligations provided for in the Directive to take effect, the Commission must adopt implementing acts covering specific products or product groups. Consequently, the Eco-design Directive will only prevent Member States from prohibiting, restricting and hindering products that comply with its provisions in cases in which there is an implementing act in place that covers such products. Furthermore, even if an implementing act has been adopted, it only prevents Member States from adopting national regulations that regulate the same aspects or parameters that the implementing act regulates. To illustrate, if an implementing act only lays down regulations relating to the energy efficiency of a product, the Member States can still adopt their own regulations relating to the repairability of the same product. The Commission has adopted several implementing acts on a wide range of products.<sup>41</sup> Products that comply with the requirements of the Eco-design Directive must be CE marked. Similarly, products that comply with the provisions on maximum levels of hazardous substances in electrical and electronic products in the RoHS Directive must also be CE marked.

The CLP Regulation lays down detailed regulations on, for example, the labelling of substances and mixtures, and the REACH Regulation contains obligations on suppliers to provide certain information to customers.

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<sup>35</sup> Förpackning och tidningsinsamlingen; [Märk dina förpackningar för enklare sortering - FTI](#)

<sup>36</sup> [Common Symbols for waste sorting - Sverige sorterar \(eupicto.com\)](#).

<sup>37</sup> Regulation (EC) No 1907/2006.

<sup>38</sup> Regulation (EC) No 1272/2008.

<sup>39</sup> Directive 2011/65/EU.

<sup>40</sup> Article 2.1 of the Eco-design Directive.

<sup>41</sup> [Energy efficient products \(europa.eu\)](#).

The Batteries Directive requires batteries, accumulators and button cells that contain more than a certain percentage of mercury, cadmium and lead to be marked with “Hg”, “Cd” or “Pb”, respectively. The capacity of the batteries must also be indicated on a label.<sup>42</sup>

Apart from these mandatory EU regulations on information on product characteristics, a number of Member States have also introduced national labelling regulations relating to such information.

Apart from introducing reparability scores (see section [3.4.2](#)), France has introduced information requirements on product characteristics on several products. Construction products must be labelled with information on the emission of volatile compounds.<sup>43</sup> France has notified similar regulations for furniture,<sup>44</sup> but these do not seem to have been adopted. France has also introduced an obligation on producers to inform customers about the presence of endocrine disruptors in products,<sup>45</sup> as well as on environmental qualities and characteristics (reparability, durability, compostability, incorporation of recycled material, use of renewable resources, reuse opportunities, recyclability, presence of precious metals, presence of rare earths, traceability and presence of plastic microfibres, hazardous substances) of waste-generating products.<sup>46</sup>

German law<sup>47</sup> allows the German government to adopt regulations that require products that contain critical raw materials to be labelled to this effect.<sup>48</sup>

Portugal has notified legislation requiring reusable packaging to be marked with information stating that it is reusable.<sup>49</sup> Similarly, it would appear that Croatia requires reusable packaging to be marked with a recycling label and a “returnable” label.<sup>50</sup> In Greece, it is prohibited to label packaging containing PVC with a recyclability label.<sup>51</sup>

Spain requires compostable packaging to be marked with information that it has been certified in accordance with certain standards. Spain also requires all packaging to state whether it can be reused.<sup>52</sup>

Italy has notified new regulations on waste, requiring products prepared for reuse to be labelled “Product prepared for reuse”.<sup>53</sup>

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<sup>42</sup> Article 21 of the Batteries Directive.

<sup>43</sup> Partie réglementaire, Livre II, Titre II, Chapitre Ier, Section 5, Sous-section 5, Articles R221-22, R221-23, R221-24, R221-25, R221-26, R221-27 et R221-28 Code de l’environnement.

<sup>44</sup> See TRIS case number 2017/22/F and 2017/23/F.

<sup>45</sup> See TRIS case number 2020/832/F, 2020/833/F and 2023/116/F and 2023/117/F.

<sup>46</sup> TRIS case number 2021/644/F, 2023/25/F and 2023/26/F.

<sup>47</sup> Gesetz zur Förderung der Kreislaufwirtschaft und Sicherung der umweltverträglichen Bewirtschaftung von Abfällen.

<sup>48</sup> TRIS case numbers 2011/148/D and 2020/39/D.

<sup>49</sup> TRIS case number 2021/118/P.

<sup>50</sup> TRIS case number 2017/245/HR.

<sup>51</sup> Article 80 Law 4819/2021 (Government Gazette 129/A' 23.7.2021).

<sup>52</sup> TRIS case number 2022/325/E.

<sup>53</sup> TRIS case number 2022/108/I.

### 3.4.2 Repairability scores

The Commission has introduced product requirements relating to repairability in the implementing acts adopted under the Eco-design Directive, for example, for household washing machines and washer-dryers<sup>54</sup> and electronic displays<sup>55</sup>. Such requirements include maximum delivery times for spare parts and access to repair information. The Commission also recently published a draft implementing act on mobile phones, cordless phones and slate tablets that contains provisions on design for repair and reliability, such as provisions on the availability of spare parts, access to repair and maintenance information, maximum delivery times for spare parts, disassembly requirements, resistance to accidental drops, battery endurance, scratch resistance, etc.<sup>56</sup>

France and Belgium notified repairability scores in 2020<sup>57</sup> and 2022, respectively.<sup>58</sup> These scores can be affixed to the product itself or placed in its immediate vicinity. The scores apply to energy-related products (washing machines, dryers, lawn mowers, TVs, laptops, smartphones, etc.) and are calculated based on parameters such as the availability of spare parts, price of spare parts, ease of disassembly, etc.

### 3.5 Prohibition on green claims

The EU currently has no rules on green claims, i.e. claims that a certain product or type of packaging are environmentally friendly or have less harmful impacts on the environment than other products or packaging.

France, Spain and Greece have notified rules prohibiting the use of certain words in the marketing of products, such as “re-packaged”, “eco-friendly”, “biodegradable”, “respectful to the environment” or “green”, etc.<sup>59</sup> France has also notified rules regulating claims that a product or service are carbon neutral.<sup>60</sup>

### 3.6 Table on national labels

The table below contains an indicative list of the number of Member States that have labelling requirements in place that go beyond the requirements laid down in EU legislation. The list should not be seen as exhaustive, but rather an indication that *at least* this number of Member States require or have proposed requirements on a certain type of labelling.

Regarding EPR organisation labels, we do not know how many (if any) EPR organisations require their members to use their logo or include waste sorting

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<sup>54</sup> Regulation (EU) 2019/2023.

<sup>55</sup> Commission Regulation (EU) 2019/2021.

<sup>56</sup> COMMISSION REGULATION (EU) .../... of XXX laying down ecodesign requirements for mobile phones, cordless phones and slate tablets.

<sup>57</sup> TRIS case numbers 2020/468/F to 2020/473/F and 2020/475/F to 477/F.

<sup>58</sup> TRIS case numbers 2022/634 to 2022/637/B.

<sup>59</sup> TRIS case numbers 2022/325/E, 2021/30/F, 2021/644/F, 2011/405/GR and 1997/407GR.

<sup>60</sup> TRIS case number 2021/904/F.

instructions on their packaging. Three Member States require (or will require) mandatory membership of an EPR organisation.

**Table 1. National labels**

Label	Member States
Deposit return systems	14
Labels on waste sorting (incl. mandatory labels on packaging material)	7
Product characteristics	6
Repairability scores	2
Prohibition on green claims	3

## 4 Private certification schemes and international outlook

In addition to the labelling requirements imposed by EU and Member State legislation, there are also private, or semi-private, voluntary sustainability certification schemes in place throughout Europe. Examples of such schemes include the EU Ecolabel, the German Blue Angel Ecolabel, the Nordic Swan Ecolabel and the Forest Stewardship Council's (FSC) sustainable forestry scheme.

European companies that operate in third countries may also be subject to labelling requirements imposed by these countries (see [figure 1](#), p. 22).

## 5 Harmonisation achieved by upcoming EU legislation

### 5.1 The proposal for a Packaging and Packaging Waste Regulation (PPWR)

#### 5.1.1 EPR schemes

The proposal for a PPWR<sup>61</sup> does not harmonise labels that indicate that the packaging is subject to an EPR scheme.<sup>62</sup> However, no labels are permitted to mislead consumers as to the recyclability or the reusability of the packaging.<sup>63</sup> According to the preamble, the Green Dot is an example of such a misleading label.<sup>64</sup>

#### 5.1.2 Deposit return systems

The PPWR provides that by 2029, Member States shall, in principle,<sup>65</sup> set up deposit return systems for single-use plastic beverage bottles and metal beverage containers with a capacity of up to three litres. This will not apply to packaging for wine, aromatised wine products, spirit drinks and milk and milk products.<sup>66</sup> The Commission will introduce a harmonised label for covered bottles and containers through an implementing act.<sup>67</sup> This label must be affixed on the covered products. Plastic bottles and metal containers with this harmonised label will benefit from free movement across the Single Market.<sup>68</sup>

Member States will still be allowed to maintain additional labelling requirements. However, they cannot restrict, prohibit or impede products that have a harmonised label from being placed on the market.<sup>69</sup> Thus, once an implementing act establishing the harmonised label has been adopted, compliance with the national regulations on labelling for such products would be voluntary.

The PPWR does not lay down any detailed rules on the design of the harmonised label.<sup>70</sup> In particular, it is not clear whether or not the harmonised label should display the deposit amount. Under the PPWR, it will be up to Member States to set the deposit amount at a level that is sufficient to achieve the required collection rates.<sup>71</sup> Currently,

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<sup>61</sup> COM/2022/677 final.

<sup>62</sup> Articles 4.5 and 11.8 of the PPWR.

<sup>63</sup> Article 11.8 of the PPWR.

<sup>64</sup> Preamble 49.

<sup>65</sup> Under certain conditions, a Member State may request to be exempted from this obligation.

<sup>66</sup> Article 44 of the PPWR.

<sup>67</sup> Article 11 of the PPWR.

<sup>68</sup> Article 4.3 of the PPWR.

<sup>69</sup> Article 4.4 of the PPWR

<sup>70</sup> Article 11.5 of the PPWR. Preamble 50 of the Proposal specifies that the Commission, when developing the specifications for labelling requirements should take into account scientific or other available technical information, including relevant international standards.

<sup>71</sup> See Annex X to the PPWR.

many Member States require packaging that is subject to a deposit return system to be labelled with the amount of the deposit. If the harmonised label displays the deposit amount, this would mean that the label looks different in all Member States, especially as not all Member States have the same currency. It appears that Estonia has a system in place where different letters on the deposit label represent different categories of packaging and deposit amounts. This allows the deposit amount to be changed without also having to change the label.<sup>72</sup> The Commission could consider a similar approach.

As for other types of packaging, the Member States are encouraged to set up deposit return systems for single-use glass beverage bottles, beverage cartons and reusable packaging.<sup>73</sup> All deposit return systems should meet the minimum criteria listed in Annex X to the PPWR.<sup>74</sup>

There will be no harmonised label for packaging belonging to deposit return systems for other types of packaging than single-use plastic beverage bottles and beverage metal cans. The Member States remain free to adopt labelling requirements for the purpose of identifying the deposit return system to which other packaging belongs.<sup>75</sup> However, symbols in accordance with such national labelling requirements must be clear and unambiguous and must not be misleading.<sup>76</sup> The Member States will also remain at liberty to prevent such other packaging that does not comply with national labelling requirements from being placed on the market.<sup>77</sup> The same applies for packaging for wine and wine products and milk and milk products subject to deposit return systems, regardless of the packaging materials used or whether or not it is single-use or reusable packaging.

### 5.1.3 Waste sorting instructions on packaging

The PPWR has introduced an obligation to label packaging with information on its material composition.<sup>78</sup> This is paired with an obligation to label waste containers to enable the separate collection of each material-specific fraction of packaging waste by January 2028.<sup>79</sup> Combined, this forms waste sorting instructions for packaging as users will be able to match the symbols on the packaging with that on waste containers.<sup>80</sup> The obligation to label packaging with information on material composition will enter into force 42 months after the PPWR enters into force. Packaging labelled with information on material composition will benefit from the free movement clause from that point in time. Compliance with any additional

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<sup>72</sup> TRIS case number 2009/118/EE.

<sup>73</sup> Article 44.6 of the PPWR.

<sup>74</sup> Article 44.9 of the PPWR.

<sup>75</sup> Article 4.5 of the PPWR.

<sup>76</sup> Article 11.8 of the PPWR.

<sup>77</sup> Cf. Article 4.4 of the PPWR.

<sup>78</sup> Article 11.1 of the PPWR.

<sup>79</sup> Article 12 of the PPWR.

<sup>80</sup> See also preambles 44 and 45.

national labelling requirements will be voluntary.<sup>81</sup> Misleading labels, marks and inscriptions will be prohibited.

#### 5.1.4 Product characteristics

The PPWR requires packaging to carry a label on reusability and a QR code or other type of digital data carrier with additional information on the reusability of the packaging, including the availability of a system for reuse and collection points.<sup>82</sup> If plastic packaging is labelled with information about the recycled content or the share of bio-based plastics, the label must comply with the specifications laid down in the implementing acts.<sup>83</sup>

As is the case with the harmonised deposit return label, packaging that carries a reusability label and plastic packaging will enjoy free movement in the Single Market. Once an implementing act has been adopted, any additional national labelling requirements that are adopted will have to be considered as optional.

#### 5.1.5 Summarising table

**Table 2. Harmonisation achieved by the PPWR**

Label	Harmonised label?	National labels allowed?
<b>Information that the packaging is subject to an EPR scheme</b>	No	Yes
<b>Deposit return system labels</b>	<ul style="list-style-type: none"> <li>– Single-use plastic bottles &lt; 3 litres</li> <li>– Single-use metal beverage containers &lt; 3 litres</li> </ul>	<ul style="list-style-type: none"> <li>– All other packaging</li> <li>– Plastic and metal packaging for wine, wine products, milk and milk products</li> <li>– Deposit?</li> </ul>
<b>Sorting instructions (packaging waste)</b>	Yes	No (only voluntary compliance)
<b>Product characteristics</b>	Yes	No (only voluntary compliance)

<sup>81</sup> Cf. Article 4.4 of the PPWR.

<sup>82</sup> Article 11.2 of the PPWR.

<sup>83</sup> Article 11.3 of the PPWR.

## 5.2 The proposal for a Ecodesign for Sustainable Products Regulation (ESPR)

### 5.2.1 Harmonised labels in the ESPR

In principle, the ESPR proposal<sup>84</sup> covers all physical products. Exceptions include, for example, food and medicinal products.<sup>85</sup> The ESPR uses the same approach to harmonisation and ensuring free movement as the current Eco-design Directive.<sup>86</sup> Thus, the degree of harmonisation will depend on the content of the delegated acts adopted by the Commission.

The proposal mandates the Commission to adopt delegated acts laying down eco-design requirements.<sup>87</sup> The eco-design requirements are divided into two categories: performance requirements and information requirements.<sup>88</sup> Information requirements are requirements that a product must be accompanied by certain information.<sup>89</sup> Such information can be about, for example, durability, reliability, reusability, repairability, etc. It can also include information on product performance and on how to install, use, maintain, repair or dispose of a product.<sup>90</sup>

A delegated act containing information requirements should specify how the information should be communicated.<sup>91</sup> Information can be supplied, for example, on the product itself, on a label, on the packaging or via an app. However, all products must be accompanied by a digital product passport<sup>92</sup> that includes the required information.<sup>93</sup> The product passport is itself a label, since a data carrier that offers access to the product pass must be affixed to the product, its packaging or a user manual.<sup>94</sup>

A delegated act may stipulate that the required information must be displayed on a physical label. The delegated act must also specify the content of the label, its lay-out and the manner in which it must be displayed to customers in case of distance selling.<sup>95</sup>

Lastly, a product that fulfils all the eco-design requirements (including the information requirements) laid down in a delegated act must, in principle, be CE marked.<sup>96</sup>

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<sup>84</sup> COM/2022/142 final.

<sup>85</sup> Article 1.2 of the ESPR.

<sup>86</sup> Article 3 of the ESPR.

<sup>87</sup> Article 4 of the ESPR.

<sup>88</sup> Article 2.7 of the ESPR.

<sup>89</sup> Article 2.9 of the ESPR.

<sup>90</sup> Article 7 of the ESPR.

<sup>91</sup> Artikel 7.6 of the ESPR.

<sup>92</sup> Article 8.1 of the ESPR.

<sup>93</sup> Article 8.2. a of the ESPR and Annex III a).

<sup>94</sup> Article 9.1. b of the ESPR.

<sup>95</sup> Article 14.1 of the ESPR.

<sup>96</sup> Articles 38 and 39 of the ESPR. The Commission can establish alternative markings for conformity, see for example Article 40 of the ESPR.



To sum up, a compliant product under a delegated act adopted under the ESPR will be 1) CE marked, 2) labelled in accordance with the delegated act and 3) marked with a data carrier with access to a digital product passport.

The question of whether the Member States may impose national labelling requirements once the ESPR has been adopted is not clear-cut. It wholly depends on the delegated acts adopted under the ESPR. If a delegated act lays down information requirements regarding, for example, a reparability score (see section [5.2.3](#) below), a Member State cannot impose an additional requirement on a product that it must also display a national reparability score. However, a Member State may still be allowed to require that the same product is marked with instructions on it should be sorted once it has become waste. Similarly, if a product is CE marked in accordance with the ESPR, no other label may be used to demonstrate compliance with the ESPR.<sup>97</sup> However, national labels or markings that are used to show other product characteristics not covered by a delegated act are probably still allowed.

The ESPR contains provisions that require economic operators to abstain from displaying labels, marks or symbols etc. that are likely to mislead or confuse customers.<sup>98</sup> Until we have further information on what should be considered misleading or confusing, we do not know which types of labels will be prohibited by these provisions.

The ESPR does not provide a schedule for when different products or product groups will be regulated under the Regulation. The Commission shall adopt and regularly update a working plan setting out a list of product groups for which it intends to establish eco-design requirements over the next three years.<sup>99</sup> It can be noted that in certain cases, it has taken the Commission 6 to 8 years to adopt implementing acts under the Eco-design Directive instead of the expected 3.5 years.<sup>100</sup>

## 5.2.2 Information on product characteristics

As a minimum, the information requirements adopted through delegated acts under the ESPR must include requirements related to substances of concern. The information requirements shall also enable the tracking of substances of concern<sup>101</sup> throughout the life cycle of products.<sup>102</sup> Once adopted, these information requirements could replace the French requirements to inform consumers about endocrine disruptors or hazardous substances. However, information requirements under the ESPR should not impose obligations on labelling of substances of mixtures for reasons relating “primarily to

<sup>97</sup> Article 30.4 of Regulation (EC) No 765/2008 of the European Parliament and of the Council of 9 July 2008 setting out the requirements for accreditation and market surveillance relating to the marketing of products and repealing Regulation (EEC) No 339/93.

<sup>98</sup> Article 26.4 b) of the ESPR.

<sup>99</sup> Article 16 of the ESPR.

<sup>100</sup> Communication from the Commission, Ecodesign and Energy Labelling Working Plan 2022-2024, 2022/C 182/01, C/2022/2026.

<sup>101</sup> A substance of concern is defined in Article 2.28 of the ESPR as a substance that meets the criteria of the REACH Regulation, is classified in certain hazard classes under the CLP Regulation or negatively affects the re-use and recycling of product materials.

<sup>102</sup> Article 7.2 and 7.5 of the ESPR.

their hazards to health or the environment.”<sup>103</sup> The CLP Regulation has recently been revised to include provisions on endocrine disruptors.<sup>104</sup> The French requirements might instead be replaced by provisions in that proposal.

In addition to information on substances of concern, the information requirements may include information on, for example, product performance in relation to certain parameters, such as durability and reliability, ease of repair, ease of reuse, etc.<sup>105</sup> We understand this to mean that the Commission will develop different types of “scores” relating to, for example, reusability. Such scores could potentially replace the need for labelling that indicates that a product is reusable. The same applies to consumer information requirements on other environmental qualities, such as those adopted by France.

### 5.2.3 Repairability scores

As explained in the previous section, the ESPR enables the Commission to adopt delegated acts containing information on product performance. Such information may include performance relating to repairability, i.e. a repairability score.<sup>106</sup> If the score is displayed as a label, the label should enable customers to easily compare product performance.<sup>107</sup>

### 5.2.4 Waste sorting instructions

The ESPR also allows the Commission to adopt information requirements on information on treatment facilities, on disassembly, recycling and end-of-life disposal.<sup>108</sup>

The proposal for a Green Claims Directive also contains provisions relevant to waste sorting instructions. This is discussed further in section [5.3](#)

### 5.2.5 Summarising table

**Table 3. Harmonisation achieved by the Proposal for an ESPR**

Label	Information requirement?	National label allowed?
<b>Repairability scores</b>	Yes	Depends on the scope and wording of the delegated act.
<b>Sorting instructions</b>	Yes	Depends on the scope and wording of the delegated act.
<b>Hazardous content</b>	Yes, except chemical safety	Depends on the scope and wording of the delegated act.

<sup>103</sup> Article 7.3 of the ESPR.

<sup>104</sup> COM(2022) 748 final.

<sup>105</sup> Article 7 of the ESPR and Annex I to the ESPR.

<sup>106</sup> Article 7.1 b) i) of the ESPR and Annex I.

<sup>107</sup> Article 1422 of the ESPR.

<sup>108</sup> Article 7.2.b.iii of the ESPR.

### 5.3 Proposal for a Green Claims Directive

The proposal for a new Green Claims Directive<sup>109</sup> was presented alongside a proposal for a Directive on Empowering Consumers for the Green Transition,<sup>110</sup> which will amend the existing Unfair Commercial Practices Directive.<sup>111</sup>

The Green Claims Directive would apply to explicit environmental claims, i.e. messages or representations in text form or sustainability labels<sup>112</sup> made by traders in their commercial activities. It also applies to environmental labelling schemes.<sup>113</sup>

In principle, the Green Claims Directive will oblige the Member States to ensure that traders carry out an assessment in order to substantiate their environmental claims.<sup>114</sup> This assessment must fulfil the requirements set out in the Directive. This means that the Member States' bans on green claims will have to be replaced by the provisions on substantiation in the Green Claims Directive.

If an environmental claim concerns a final product, and the user phase is the most relevant part of that product's life cycle, the claim must inform the consumer on how to use the product.<sup>115</sup> According to the preamble to the Directive, this can include information on how to sort a product once it has become waste.<sup>116</sup> Information on the product that is the subject of an environmental claim as well as information on the substantiation must be made available together with the claim in physical form or in the form of a web link, QR code or equivalent.<sup>117</sup>

The Green Claims Directive will also regulate certification schemes, such as the Blue Angel and the Nordic Swan. The Directive will establish requirements that such schemes must fulfil and will make them subject to verification.<sup>118</sup> The Directive will ban new national or regional environmental schemes established by national public authorities and lay down conditions for the approval of new private labelling schemes.<sup>119</sup>

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<sup>109</sup> COM (2023)166 final.

<sup>110</sup> COM (2022) 143 final.

<sup>111</sup> Directive 2005/29/EC.

<sup>112</sup> Article 2.1 of the Directive and Article 1 of COM (2022) 143 final.

<sup>113</sup> Article 1 of the Directive.

<sup>114</sup> Articles and 4 of the Directive.

<sup>115</sup> Article 5.3 of the Directive.

<sup>116</sup> Preamble 34 of the Directive.

<sup>117</sup> Article 5.6 of the Directive.

<sup>118</sup> Articles 7-10 of the Directive.

<sup>119</sup> Article 8.3 and 8.5 of the Directive.

**Table 4. Harmonisation achieved by the Proposal for a Green Claims Directive**

<b>Label</b>	<b>Harmonisation achieved?</b>
<b>Waste sorting instructions</b>	No, may lead to a proliferation of (private) sorting instructions
<b>Prohibition on green claims</b>	Yes, in principle, harmonised rules on verification and substantiation
<b>New national or regional environmental claims or labelling schemes by public authorities</b>	Will be banned
<b>New national or regional environmental claims or labelling schemes by private actors</b>	Partly harmonised; conditions for approval by the Member States will, in principle, be harmonised

## 5.4 The CRMA

In March 2023, the Commission presented a proposal for a Regulation on Critical Raw Materials, the CRMA.<sup>120</sup> One of the objectives of the CRMA is to increase the EU's recovery capacity for critical raw materials. The CRMA sets out targets for recovery capacity<sup>121</sup> and it mandates the Member States to introduce financial measures to increase the recovery of critical raw materials. Such measures can include the establishment of deposit return systems in particular, such measures should cover products that are not already subject to requirements for collection, recycling, treatment and reuse in the EU.<sup>122</sup>

The CRMA contains specific labelling requirements relating to permanent magnets.<sup>123</sup> Certain listed products (including vacuum cleaners, washing machines, tumble dryers, electric motors, etc.) that contain certain types of permanent magnets must be labelled with information about the kind of permanent magnets they contain. Eventually, all products containing the relevant permanent magnets will have to have a data carrier with this information. If a product is required to have a digital product passport under the ESPR, the information must instead be included in the digital product passport.

Additionally, any natural or legal person placing a certain amount of permanent magnets on the market will have to provide information on a website on the share of recycled content in the permanent magnets used in their products. Any marking, symbol etc. that can mislead or confuse customers regarding recycled content will be prohibited.

The CRMA will harmonise national labelling requirements to indicate the presence of critical raw materials, but only for permanent magnets. The French and German

<sup>120</sup> COM (2023) 160 final.

<sup>121</sup> Article 1.2 a) of the CRMA.

<sup>122</sup> Article 25 of the CRMA.

<sup>123</sup> Articles 27-28 of the CRMA.

regulations on indicating presence of critical raw materials can be maintained for other types of critical raw materials.

**Table 5. Harmonisation achieved by the proposal for the CRMA**

Label	Harmonisation achieved?
<b>Contains critical raw materials</b>	Yes, but <u>only</u> for permanent magnets

## 5.5 The Battery Regulation

The Commission presented a proposal for a Battery Regulation in 2020.<sup>124</sup> The legislative process is ongoing.

The Battery Regulation would replace the current Batteries Directive and also introduce new rules for the production and use of batteries. The Commission's proposal contains several provisions on the labelling of batteries. For example, batteries for electric vehicles and rechargeable industrial batteries must carry a carbon footprint label. Like today, batteries will have to be labelled with a crossed-out bin symbol, battery capacity and the chemical symbol for cadmium and lead. They will also have to carry a label specifying, for example, hazardous content, chemical composition and the presence of critical raw materials. This information should be available through a QR code. The QR code should also give access to information on the carbon footprint and share of recycled cobalt, lead, lithium and nickel, etc.

Batteries that comply with the requirements of the Battery Regulation be CE marked.

<sup>124</sup> Proposal for a Regulation of The European Parliament and of the Council concerning batteries and waste batteries, repealing Directive 2006/66/EC and amending Regulation (EU) No 2019/1020, COM (2020) 798 final.

## 6 Concluding remarks

Our analysis shows that products on the European market are subject to multiple different labelling requirements relating to the circular economy, under both EU and national law. Companies that want to sell their products in Europe have to adapt to various labelling requirements in national regulations and EU law. They may have to make their packaging larger in order to accommodate all the required labels, as well as produce different kinds of packaging for different markets, thereby losing out on economies of scale. Lastly, they have to collect the necessary data and information to label their product correctly. This can be both time-consuming and costly. Different labelling requirements could potentially also be confusing for consumers.

The recent proposal for a new PPWR will achieve the harmonisation of national labelling requirements to some extent. However, it might also create the need to introduce more national labels, for example labels necessary to show that packaging belongs to a deposit return system for packaging other than single-use plastics and metal cans.

It is difficult to assess the harmonising effect of the ESPR as this is highly dependent on the delegated acts adopted under that Regulation. The current Eco-design Directive allows the Commission to adopt eco-design requirements that are relatively similar to those that will be adopted under the ESPR. However, thus far, the focus of the implementing acts under that Directive has mainly been on energy efficiency. Given the vast range of products covered and the high number of product parameters and aspects included in the ESPR, we believe that it will take several years before we have enough harmonised rules on the EU market to let us speak of a common market for sustainable goods. There will still be room for national labelling requirements for a long time to come.

The Member States will remain free to adopt labelling requirements for packaging related to EPR schemes. Unless the Commission adopts implementing acts under the ESPR that regulates this issue, this will also be true for products.

The Green Claims Directive will ensure the adoption of a common approach to environmental claims, but might lead to a proliferation of (private) waste sorting instructions for both packaging and products.

The recent proposals for a Battery Regulation and the CRMA will introduce new labelling requirements in sectors that, as far as we can tell, have previously been relatively unaffected by national labelling requirements. While the two Regulations might impose additional burdens on the affected producers, they will at least create a uniform legal framework throughout the EU. The CRMA could potentially create the need to introduce new national labelling requirements for critical raw material content, given that the Member States are being encouraged to take measures to increase collection of waste with high critical raw materials recovery potential, such as deposit return systems.

European companies, especially companies that are also selling their products to third country markets, are subject to several circular economy labelling requirements. As

already mentioned, labelling can be a costly and complicated process. Figure 5 below shows an example of a product label displaying several national and EU labels.

**Figure 5. Labels**



In addition to the labels circled with red, the figure above also shows the UK, Ukrainian, Eurasian and Korean equivalent of CE markings, as well as an Indian marking.

There is a trend in the Commission's proposals for new EU product legislation to insert provisions on digital labels. This may reduce the number of labels required on packaging and products and would be in line with the objectives on packaging minimisation in the PPWR. We have also noted that Member States, for example Italy and France, allow for information to be displayed online or require that products carry a digital marking with access to product information. However, it is important to remember that any labelling requirements also require companies to collect data and information about their products. Therefore, harmonised labelling requirements are crucial to alleviate the financial burden on companies regardless of whether the label is digital.

The harmonisation efforts covered by this study could contribute to reducing the regulatory burden of the different labelling requirements on European companies. Our analysis shows the need for adopting harmonising legislation as soon as possible as we have noted that new national requirements are continuously being drafted.

## 7 Recommendations

Based on our findings, we would like to propose a set of recommendations to the Commission and to the Member States. We believe our recommendations could contribute to the shift to a circular economy while preserving the functioning of the Single Market, as well as global trade.

The National Board of Trade Sweden makes the following recommendations.

### To the Commission:

- When designing the harmonised deposit return label foreseen under the PPWR, the Commission should consider adopting the Estonian system of using letters that represent different deposit amounts, rather than displaying the deposit amount. This recommendation applies if the Commission plans to display the deposit amount on the harmonised label.
- When drafting delegated acts under the ESPR (once adopted), the Commission should prioritise developing repairability scores for the products currently covered by the French and Belgian repairability scores.
- The Commission should issue guidelines on what constitutes misleading labels under the ESPR, the PPWR and the CRMA and on how provisions on misleading labels relate to, for example, labelling requirements in third countries and the Green Claims Directive, if adopted.

### Jointly to the Commission and the Member States:

- The Commission must have adequate resources in place to ensure that delegated and implementing acts under the ESPR and the PPWR, respectively, can be adopted on schedule and without undue delay.
- The Commission and the Member States should seek to align national and European labelling schemes with international standards. The EU should engage in the appropriate international fora to influence or promote new international standards in line with EU priorities in circular economy labelling.

### To the Member States:

- The Member States in the Eurozone should consider charging the same deposit fee for single-use plastic bottles and metal cans.
- The Member States should restrict national circular economy labelling requirements to only include labels necessary for the functioning of the EPR schemes that are in place.
- When developing new EPR schemes (such as a deposit return system under the PPWR or the CRMA), the Member States should exchange information and best practices with a view to streamlining the labelling requirements.
- While implementing acts and delegated acts under the PPWR and the ESPR are being developed, the Member States should scrutinise their respective labelling requirements to assess whether they are really necessary to achieve a circular economy in the EU. This could be discussed in the Single Market Enforcement Taskforce (SMET). One label that should be evaluated is the Tidyman logo.



## Sammanfattning på svenska

### Summary in Swedish

Kommerskollegium har på uppdrag av Utrikesdepartementet gjort en kartläggning över EU-lagstiftning och kommande EU-lagstiftning som harmoniserar eller avser harmonisera märkningskrav med koppling till produkters miljöpåverkan och till den cirkulära ekonomin. Vi har också kartlagt vilka sådana nationella märkningskrav som finns i EU:s medlemsstater.

Inom EU finns flera rättsakter som innehåller regler om märkning av produkter kopplade till deras miljöpåverkan och till avfallshantering. Exempel på sådana krav är krav på märkningar med sorteringsinstruktioner för batterier och elektriskt och elektroniskt avfall, på märkningar med information om förpackningars innehåll och på särskilda märkningar för vissa engångsprodukter i plast.

Utöver dessa gemensamma märkningskrav ställer EU:s medlemsländer också upp olika nationella märkningskrav som bland annat syftar till att skydda miljön och till att skynda på övergången till en cirkulär ekonomi. Exempel på sådana märkningskrav är instruktioner för avfallssortering, information om produkters miljömässiga påverkan och märkningar om att förpackningar ingår i ett pantsystem.

Vi har analyserat om och i vilken utsträckning kommissionens förslag till ny ekodesignförordning, förpackningsförordning, batteriförordning och förordning om kritiska råvarumaterial samt förslaget till direktiv om gröna påståenden kommer att medföra harmonisering av sådana nationella märkningskrav som nämns ovan.

Vi drar slutsatsen att de föreslagna rättsakterna kommer att medföra att viss harmonisering av nationella märkningskrav sker. Samtidigt innehåller de bestämmelser som uppmuntrar till att medlemsstaterna tar fram nya märkningskrav för att uppfylla målsättningarna i EU-rättsakterna. Det gäller bland annat för förordningen om kritiska råvarumaterial som uppmuntrar medlemsstaterna att vidta åtgärder för att förbättra insamlingen av avfall med potentiellt högt innehåll av kritiska råvarumaterial.

Vi ger också rekommendationer till EU-lagstiftaren och till medlemsstaterna om hur de bör agera för att undvika att spretiga nationella märkningskrav leder till fortsatt och framtida fragmentering av EU:s inre marknad.

**The National Board of Trade Sweden** is the government agency for international trade, the EU internal market and trade policy. Our mission is to facilitate free and open trade with transparent rules as well as free movement in the EU internal market.

Our goal is a well-functioning internal market, an external EU trade policy based on free trade and an open and strong multilateral trading system.

We provide the Swedish Government with analyses, reports and policy recommendations. We also participate in international meetings and negotiations.

The National Board of Trade, via SOLVIT, helps businesses and citizens encountering obstacles to free movement. We also host several networks with business organisations and authorities which aim to facilitate trade.

As an expert agency in trade policy issues, we also provide assistance to developing countries through trade-related development cooperation. One example is Open Trade Gate Sweden, a one-stop information centre assisting exporters from developing countries in their trade with Sweden and the EU.

Our analyses and reports aim to increase the knowledge on the importance of trade for the international economy and for the global sustainable development. Publications issued by the National Board of Trade only reflect the views of the Board.

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