

WORKING GROUPS



# NON-FOOD FMCG WORKING GROUP



## CHAIRMAN:

SERGEY BYKOVSKIH,  
HENKEL

### ON THE PARTICULARITIES OF IMPLEMENTING MANDATORY LABELING WITH MEANS OF IDENTIFICATION IN THE FRAGRANCE AND PERFUME INDUSTRY

The labeling of perfumery products with means of identification became effective in October 1, 2020. Nevertheless, at present, the experience of labeling perfumery products with means of identification has shown that labeling needs to be introduced only in conditions of the complete readiness of the technical solution, which must take the characteristics of the industry and the coherence of the regulatory base into account in order to avoid an unreasonable burden on businesses and prevent legal conflicts.

One of the problems faced by the fragrance and perfume industry is how to label perfumery sets. Before September 1, 2021, a moratorium on labeling sets and packages of perfumery products was in effect in Russia. From September 1, 2021, the Rules, approved by Resolution No. 1957 of the Russian Federation Government of December 31, 2019, require their labeling. However, the rules on customs declarations of sets and packages have not been adopted by the Eurasian Economic Commission. This legal conflict makes it impossible to import sets and packages of foreign-made perfumery products.

As per the meeting of the project and expert group, the Department for the System of Digital Labeling of Goods and Legalization of Product Circulation of the Ministry of Industry and Trade of Russia has agreed with this assessment and intended to ensure that the moratorium for sets and packages of perfumery products be extended until March 1, 2020.

Yet, at this time, no such changes have been made in Resolution No. 1957 of the Russian Federation Government of December 31, 2019.

### RECOMMENDATIONS

- ▶ To extend the approval of amendments on the extension of the moratorium with regard to sets and packages of perfumery products until March 1, 2022 and have them remain in effect from September 1, 2021.
- ▶ To accelerate the adoption of rules of customs declarations for sets and packages at the level of the Eurasian Economic Commission.

The development of the institution of labeling with means of identification in the fragrance sector will be more effective if the following recommendations are adhered to:

- ▶ Take account of the characteristic features of the sector and the high volume of imported products, enable importers to apply labeling with means of identification at importers' warehouses in Russia, after customs clearance has been completed, since labeling at a customs warehouse makes the logistics chain more complicated and leads to additional costs, including the increased cost of customs clearance.

### "ON LEGAL REGULATION OF THE USE OF RETURNABLE CONTAINERS IN RUSSIA"

The use of reusable, returnable containers or packaging, suitable for refilling and subsequent use is one of the fundamental ways to achieve UN Sustainable Development Goal No. 12, Responsible Production and Consumption. Such solutions materially reduce the volume of packaging in circulation on the market, decrease the volumes of greenhouse gases emitted in the course of its production, and reduce the volume of product consumption waste.



Nevertheless, the current legal regulation, including the regulation comprising a part of the Extended Liability of Manufacturers, does not provide for any incentives for using this kind of packaging solution.

Nor do the current technical regulations or regulations in the sphere of consumer goods safety contain any special norms that would apply to the active implementation of such packaging solutions.

## RECOMMENDATIONS

- › The regulation in the area of ELM is very promising when it comes to promoting the active implementation of multi-trip, reusable, returnable, or refillable containers for sustainable development. The working group will pre-

pare relevant proposals and submit them to the Ministry of Natural Resources and Environment.

- › The AEB member companies are interested in ensuring the safe and responsible implementation of such packaging solutions on the Russian market; therefore, they will develop and propose a project to improvement regulations on safety assurance for such containers.



**More information on the  
Committee page**