



DANONE PROPOSED COMMITMENTS TO THE CPC NETWORK CONCERNING THE COORDINATED ACTION FOLLOWING THE EXTERNAL ALERT SUBMITTED BY BEUC ON 7 NOVEMBER 2023

Danone is willing to propose the following voluntary commitments in relation to the packaging of plastic bottles marketed by Danone within the EU and EEA.

For the avoidance of doubt, these commitments do not constitute, and shall not be interpreted as, an admission that Danone current or past claims are non-compliant with EU consumer law.

1. Recycled material sourcing — exclusion of virgin PET scraps and off-cuts

Danone commits that PET bottles labelled as being “bottle made from 100% recycled plastic”, “bottle made of 100% recycled PET”, or equivalent wording, does not count as recycled material any material derived from virgin PET or virgin PET scraps/off-cuts (by-products from bottle production), that have been reused without being subject to a recycling process governed by Commission Regulation (EU) 2022/1616.

2. Recycled-content claims wording

Danone commits that, where a recycled-content claim is used on PET plastic bottles, the claim will refer to the bottle itself, unless the claim is expressly substantiated for all relevant packaging components.

Accordingly, recycled-content claims will be formulated in a way that clearly identifies the scope of the claim and makes apparent that the recycled-content percentage relates only to the bottle body. For example, claims may be expressed as:

- “Bottle made of 100% recycled plastic, excluding cap and label”;
- “Bottle made of 100% recycled PET, excluding cap and label”;

or equivalent local language wording.

The exclusion of the cap and/or label will be integrated into the claim itself and presented with equivalent prominence to the recycled-content claim, including equivalent font size.

3. Overall impression of the label containing symbols and imagery

Danone ensures that the overall impression to be conveyed by the label and marketing is consistent with the environmental characteristics of the packaging. For the avoidance of doubt, images depicting the origin and natural source of the product are used to communicate product provenance and source attributes and are not intended to convey environmental benefits of the packaging.

4. Other forms of marketing, including digital contents

Danone commits to continuing the monitoring of digital materials, including brand websites and other relevant online consumer-facing communications in the EU and EEA, to ensure that claims are consistent with the principles set out in these commitments.

5. Implementation timeline

Where it has not already been implemented, Danone will implement these label adjustments after existing labels (or labels that entered the production cycle up to the date of acceptance of these commitments) are exhausted during the next 6 to 18 months (and in any event, within 18 months) of the date of acceptance of these commitments.

Where it has not already been implemented, Danone will implement the corresponding updates to digital materials and websites within 3 months of the date of acceptance of these commitments.

Nothing in these commitments shall prevent Danone from adapting the wording, design, presentation or substantiation of claims to comply with future regulatory requirements, such as PPWR and its secondary legislation, provided that such adaptations remain consistent with the principles underlying these commitments.