

TECHNICAL UPDATE: OVERVIEW OF EU LABELLING OF LEATHER PRODUCTS

Correct labeling of leather prevents any deceptive or misleading information about the composition of leather goods. In order not to deceive consumers, leather terms or any terms that suggest the use of leather cannot be used to describe a product unless all substantial parts of the product are composed of leather.

There is currently no EU-level framework that covers the labelling of leather and leather products. The EU has only set up legislation regarding the labelling of textile products (EU Regulation No. 1007/2011) and footwear (Directive 94/11/EC), and there is only limited legislation on leather product labelling in certain European countries.

In the EU, the increase in the number of misleading and false indications in relation to leather products (other than footwear) has led the European Commission to explore the need and the feasibility of establishing a stronger basis for the enforcement of correct definitions and descriptions of leather.

Recently, the EUROPEAN COMMISSION has published the results of a study on the feasibility of a leather labelling system at the European level and to identify the key issues relating to labelling of leather products¹. The focus of the study is on consumer labelling and is limited to final leather products liable to carry a label. A harmonised mandatory labelling regime at the EU-level specifically covering the labelling of leather goods (except footwear) is on a uniform composition label for leather products. The proposed EU legislation on the labelling of leather products is based on the model of the Footwear Labelling Directive (94/11/EC).

The proposed specific types of labelling covered by the study include:

- Country of origin labelling
- Traceability labelling
- Environmental labelling
- Social labelling
- Authenticity ('real leather') labelling and
- Animal species labelling

The European Commission will launch a final Impact Assessment before proceeding with the actual legislative procedure.

In AUSTRIA, leather clothing must comply with the Regulation of the Minister of Commerce, Trade and Industry of 9 July 1986 on the Identification of the Nature and Care of Leather Clothing (BGBl No. 407/1986)². According to the decree, leather clothing has to be labelled clearly, visibly and legibly in German and Latin letters by means of stamps, stickers or labels on the leather clothing as well as in the after purchase documents (invoice, accompanying writing, brochure or catalogue). The legislation does not apply to leather gloves, headgear, neckties, belts, suspenders and industrial protective clothing, and it only refers to those hides and skins with the original fibrous structure maintained.

The mandatory labelling requirements for leather clothing in Austria concern:

- The name of the corresponding animal (e.g. cow, calf, goat, sheep, lamb, horse, deer, male deer, antelope, pig)
- Material description (e.g. grain leather, splits leather – grain spalt, split leather - underpart)

- Type of leather (e.g. suede, nappa, nubuck, aniline, shammy)
- Type of tanning process

In FRANCE, imported leather garments must meet the Decree No. 2010-29 of 8 January 2010 of the Consumer Code for certain leather products and certain similar products³. Any articles manufactured completely or partly of leather or having the appearance of leather must have a legible and indelible label written in French with the following information in identical typeface. The legislation does not apply to personal protective equipment and footwear.

Labelling information must be provided for articles in leather, split leather or fake leather:

- Name of the materials
- Name of the animal or species

(only for leather) (e.g. calf, buffalo, goat, kid, horse, foal, sheep, lamb, pig)

- Types of surface finishing (only for leather furnishings – all visible parts) (e.g. full grain, corrected top-grain, nubuck)
- Types of finishing (for furnishings – all visible parts)(e.g. unfinished, full aniline, pigmented, velvet, coated, half aniline)
- If embossed, "façon" or "imitation" and the name of the imitated animal
- Pictograms (optional)
- Name or company type registered number

In the UK, the Consumer Protection from Unfair Trading Regulations 2008 (CPRs) implemented the EU framework of Unfair Commercial Practices Directive (2005/29/EC) for prohibiting the use of mislabelling, misleading labelling and misleading descriptions on most consumer products. For leather goods, a definition of leather is set out in the British Standard Glossary of Leather Terms (BS 2780) and this definition is used as a guide in applying consumer protection legislation such as the Sale of Goods Act and the Trade Descriptions Act. The term leather should be clearly labelled on products, where leather is hide or skin that has been preserved by tanning, should have its original fibre structure intact and should not have a surface coating that is more than 0.15mm thick. Leather with a coating thicker than this should be labelled as "Coated Leather".

The current national labelling systems concerning leather products in other EU countries are outlined in Table 1.

TABLE 1. OTHER EU COUNTRIES WITH SPECIFIC LABELLING REQUIREMENTS FOR LEATHER PRODUCTS (INFORMATION EXTRACTED FROM THE REPORT OF "STUDY ON THE FEASIBILITY OF A LEATHER LABELLING SYSTEM AT EUROPEAN LEVEL" - PAGE 34)

COUNTRY	LAW	CONTEXT
Belgium	Decree of 17 January 1983	<ul style="list-style-type: none"> • The 1983 Decree regulated the names of leather and raw hide products.
Italy	Law No. 1112 of 16 December 1966	<ul style="list-style-type: none"> • The Law regulates the name of leather products
Lithuania	Order No. 170 of 15 May 2002	<ul style="list-style-type: none"> • Requires specifically clothing of leather and fur to carry care and size labels.
Spain	Royal Decree 165.1988 Royal Decree 769/1984 Order of 15 February 1990	<ul style="list-style-type: none"> • Royal Decree 165/1988 amending Royal Decree 769/1984 regulates the name of leather products, tanned leather and fur during the phases of preparation, circulation and trade. The label must contain information in the Spanish language on the composition of the product, origin of leather, name of fabricants. • Order of 15 February 1990 establishes regulations for informative labelling of gloves.

[According to the Report, the source of the list has been cross-checked with information from the European Association of Tanners (COTANCE)]

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Reference:

¹ [EC – News on Result of Study](#)

[Read the Study](#)

² [Austria BGGI No 407/1986](#)

³ [France - Decree No. 2010-29 of 8 January 2010 implementing Article L. 214-1 of the Consumer Code for certain leather products and certain similar products](#)

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