

POSITION PAPER

**Submission on the Proposed Regulation to Enhance
Cross-Border UTP Enforcement (COM(2024) 576 final)**

10 March 2025

EXECUTIVE SUMMARY

Purpose and scope

AIM broadly supports the European Commission’s proposed Regulation to strengthen cross-border enforcement of unfair trading practices (“UTPs”). This initiative aims to address enforcement challenges arising when buyers and suppliers are located in different Member States—particularly in cases involving European retail alliances (“ERAs”).

Need for stronger enforcement

Recent marketplace shifts and crises have exposed supply-chain vulnerabilities, underscoring the need to enforce fairer and more uniform rules in the agri-food and consumer goods sectors. While the UTP Directive has shown its value, the patchwork of national implementations still leaves room for forum shopping and under-enforcement.

Key mechanism: mutual assistance

The proposal’s mutual assistance mechanism empowers national authorities to collaborate more seamlessly across borders. By standardising procedures and information exchange, it helps ensure that stricter rules in one jurisdiction can be effectively enforced when the buyer is located in another.

Challenges with European retail alliances

ERAs often operate across multiple jurisdictions, making them difficult to investigate under national UTP laws. AIM highlights the growing influence of ERAs and calls for more effective cross-border oversight to prevent practices that disrupt fair competition and product choice for consumers.

Further revision of the UTP Directive

Beyond supporting this proposed Regulation, AIM recommends a broader revision of the UTP Directive to:

- Add an internal market legal base to complement existing agriculture-focused competencies.
- Extend UTP protections to all suppliers, regardless of size.
- Clarify the extraterritorial application of national UTP laws.
- Prohibit self-preferencing on physical shelves, in line with the Digital Markets Act’s existing rules for online “shelves”.

Benefits for the EU market

A more harmonised and robust enforcement environment would help level the playing field, promote innovation and foster consumer choice. Through consistent application of UTP laws, brand manufacturers—ranging from SMEs to large multinationals—can focus on delivering quality, value, and sustainability across the Single Market.

Conclusion

AIM believes this Regulation is a timely and necessary step toward stronger, fairer cross-border enforcement. Coupled with targeted revisions of the UTP Directive, it will make Europe’s supply chain more resilient, bolster EU competitiveness and ensure that European consumers continue to benefit from a diverse, innovative marketplace.

Introduction

AIM, the European Brands Association, welcomes and supports the European Commission's proposed Regulation to enhance cross-border enforcement against unfair trading practices ("UTPs") in the EU. This initiative marks a significant step towards ensuring greater fairness and transparency in the consumer goods supply chain. However, we call on the Commission to investigate widening the scope of the UTP Directive as part of its ongoing evaluation to further reduce fragmentation and unlock EU's competitiveness.

AIM represents 2,500 brand manufacturers directly or indirectly through its corporate and national association members. These range from SMEs to leading European brand manufacturers in the food, beverages, personal care, home care, luxury, toy and apparel categories. As [AIM's 2024-2029 manifesto](#) states, €276 billion of FMCG goods are traded in the EU annually, with the sector representing €174 billion in EU exports, comprising 33% of the EU's trade surplus, with over €81 billion reinvested into innovation, sustainability and growth.

1. Leading brand manufacturers welcome stronger cross-border enforcement

- ✓ **Fairness for All:** For many years, AIM has [called](#) for *Fairness for All*, underlining that robust and effective measures to tackle unfair trading practices not only benefit small suppliers, but also foster a level playing field across the agri-food supply chain. The Unfair Trading Practices Directive ("the UTP Directive"), adopted in 2019, was a groundbreaking approach by the European Commission, recognising the absolute need for a fair and resilient supply chain.
- ✓ **Rising supply-chain challenges:** Recent shocks — COVID-19, the war in Ukraine and broader geopolitical tensions — have affected consumer goods production in Europe and underscored the fragility of European supply chains, as evidenced by AIM's [European Consumer Goods Barometer](#). Ensuring the integrity and fairness of trading practices in Europe is more critical than ever.
- ✓ **Closing enforcement gaps:** While the UTP Directive has already been helpful in addressing the unfair trading practices of buyers in Europe, enforcement has been hampered in the case of European retail alliances ("ERAs") and international retailers engaged in forum shopping — locating themselves in jurisdictions that are less strict and to avoid the application of other national UTP laws. Stronger rules on cross-border cooperation will help fill these gaps.
- ✓ **Ensuring fairer and more competitive markets:** With competitiveness at the forefront of the new EU mandate, it is a relevant time to strengthen and properly enforce existing UTP laws to ensure fair and competitive markets in Europe. The proposed Regulation will empower enforcement authorities to collaborate effectively across borders and fill enforcement gaps by introducing clear procedural rules and a mutual assistance mechanism. While authorities have been active in recent years on this front, as evidenced by this [list of cases](#), this Regulation will enable more cross-border cooperation and thus promote a level playing field for all operators in the European supply chain.

✓ **Examples of international retailers involved in numerous cases across the EU:**

- **AURA (Auchan/Intermarché/Casino)**
 - Poland – 12 December 2023, UOKiK, [Press release](#)
 - France – 28 June 2023, Cour d’Appel de Paris, n°[21/16174](#)
 - France – 15 March 2023, Cour d’Appel de Paris, n° [21/13227](#) and [21/13481](#)
 - Poland – 09 February 2023, UOKiK, [Press release](#)
 - France – 22 February 2022, DGCCRF, [Press release](#)
 - Poland – 23 December 2021, UOKiK, [Press release](#)
 - France – 19 February 2021, DGCCRF, [Press release](#)
 - Portugal – 21 December 2020, Autoridade da Concorrência, [Press release](#)
 - France – 22 October 2020, AdIC, [Decision](#)
 - Romania – 2019, Consiliul Concurenței, [Press release](#)
 - Italy – 27 September 2018, AGCM, [Press release](#)
 - France – 18 December 2017, DGCCRF, [Press release](#)
 - France – 13 April 2017, DGCCRF, [Press release](#)
 - Hungary – 23 March 2015, GVH, Case Vj/60/2012, [Press release](#)
- **Carrefour**
 - Spain – 08 November 2023, FACUA, [Press release](#)
 - Poland – 11 September 2023, UOKiK, [Press release](#)
 - Belgium – 28 April 2021, Autorité belge de la Concurrence, [Decision](#)
 - France – 12 March 2021, DGCCRF, [Press release](#)
 - France – 17 December 2020, Autorité de la Concurrence, [Press release](#)
 - Romania – 2019, Consiliul Concurenței, [Press release](#)
 - Italy – 27 September 2018, AGCM, [Press release](#)
 - France – 26 September 2018, Cour de Cassation, [LSA](#)
 - France – 18 December 2017, DGCCRF, [Press release](#)
 - France – 09 November 2016, DGCCRF, [Press release](#)
- **Kaufland**
 - Germany – 14 September 2023, BLE, [2023 Annual report](#) and [Case report](#)
 - Croatia – 09 March 2022, AZTN, [Press release](#)
 - Poland – 05 January 2022, UOKiK, [Press release](#)
 - Croatia – 02 November 2021, AZTN, [Press release](#)
 - Germany – 05 March 2021, Bundeskartellamt, [LZ.de](#) / [NW.de](#)
 - Bulgaria – 04 February 2021, CPC, [Schönherr](#)
 - Croatia – 17 July 2020, AZTN, [Press release](#)
 - Czechia – 6 September 2018, UOHS, [Press release](#)
- Other noteworthy recent cases include:
 - **France** – 22 November 2024, DGCCRF, [Press release](#) – in which **Eureca**, **Carrefour’s** international purchasing center based in Spain, has been fined €7.64 million for 12 violations of its obligation to finalise agreements with suppliers no later than January 15 and 31, 2024 under French UTP law rules.
 - **Germany** – 28 October 2024, BLE, [Press release](#), [Case report](#) – in which **Edeka** has been sanctioned for late payments and unsuccessfully argued that the companies of its Group should not be regarded as an “economic unit” because they are independent; instead, the BLE has found that Edeka Group’s companies form an economic unit due to their interdependencies, their uniform corporate strategic management, their predominantly central purchasing, their uniform brand strategy and external image, their division of labour within the three-stage structure and the mutualisation of ²costs.

- **Sweden** – September 2023, Konkurrensverket, [Dnr 593/2023](#) – in which the authority opened an investigation into ICA’s “central purchasing organisation” EPIC Partners based on allegations that ICA would “demand payments from a supplier for things that are not connected to the supplier’s sales” and engage in “commercial reprisals in connection with international purchasing alliances”.
- ✓ **Domino effects in an interdependent supply chain:** The supply chain is an interdependent system: inefficiencies or challenges in one part of the system have a “domino effect” on the whole chain. The imbalance of power has increased with the growth of European retail alliances, whose product delisting practices, which they orchestrate with their members across Europe, have a negative impact on both consumer product choice and the revenues of manufacturers and their suppliers who suffer from these UTPs, with negative consequences for employment and innovation.

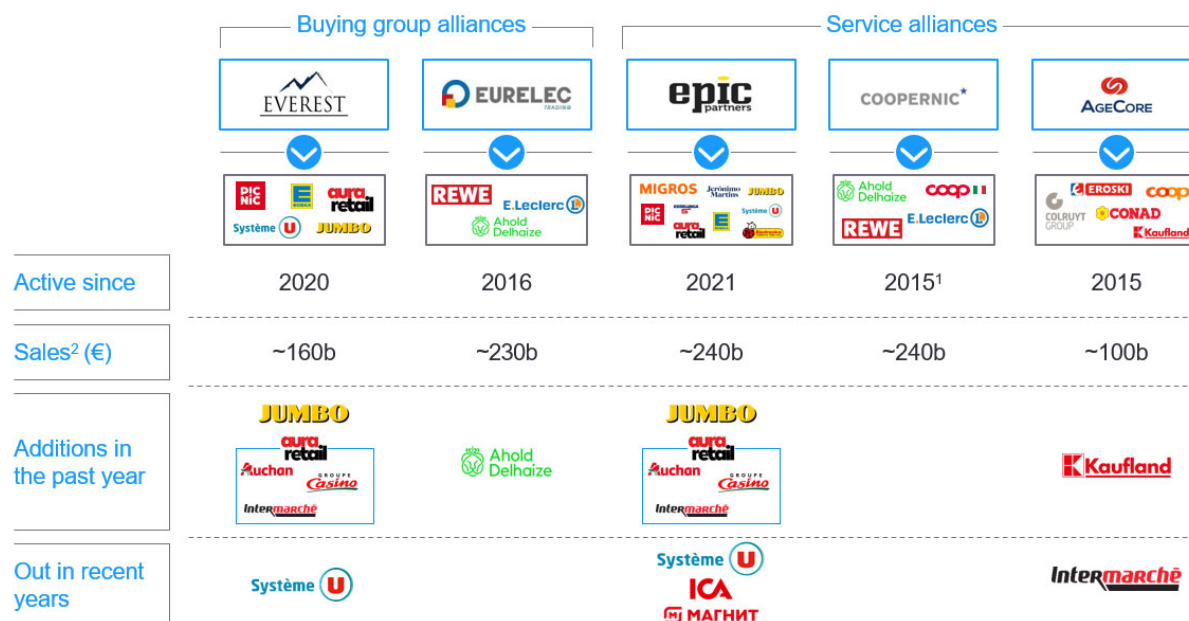
2. [European retail alliances’ impact on the European market](#)

European Retail Alliances are groups of market-leading retailers who pool their bargaining power to negotiate with suppliers. They are inherently transnational and should therefore be the subject of cooperation between national enforcement authorities. The current legal fragmentation poses practical challenges when national enforcement authorities seek to investigate or sanction them.

The economic footprint of ERAs is significant, with just five of the most prominent ERAs operating in Europe accounting for approximately EUR 580 billion of the EU’s total retailer footprint. The table below shows what each of these five key ERAs controls and highlights in yellow those ERA members that compete in the same national markets.

European Retail Alliance	Economic Footprint	Market Presence
Everest	~ €160 B	<ul style="list-style-type: none"> - AURA (24/09/2024 - present) – BE, FR, HU, LU, PL, PT, RO and ES - Edeka (founder - present) – DE - Jumbo (28/09/2023 - present) – NL, BE - PicNic (founder - present) – DE, FR, NL - Système U (04/10/2022 - 23/09/2024) – FR
Eurelec	~ €230 B	<ul style="list-style-type: none"> - Ahold-Delhaize (29/09/2023 - present) – BE, CZ, GR, NL, RO - Leclerc (founder - present) – ES, FR, PL, PT, SL - Rewe (founder - present) – AT, BU, CR, CZ, DE, HU, IT, LV, LT, RO, SK
EPIC Partners	~ €240 B	<ul style="list-style-type: none"> - AURA (24/09/2024 - present) – BE, FR, HU, LU, PL, PT, RO & ES - Edeka (founder - present) – DE - Esselunga (05/10/2022 – 06/03/2025) – IT - ICA (founder - 2024) – EE, LV, LT, SE - Jerónimo Martins (founder - present) – PL, PT (& CO) - Jumbo (28/09/2023 - present) – BE, NL - Magnit (founder - suspended in February 2022) – RU - Migros (founder - present) – CH - PicNic (founder - present) – FR, DE, NL - Système U (04/10/2022 - 23/09/2024) – FR
Coopernic	~ €240 B	<ul style="list-style-type: none"> - Ahold-Delhaize (01/01/2015 - present) – BE, CZ, GR, NL, RO - Colruyt (15/02/2006 - 31/12/2013) – BE, FR - Conad (founder - 31/12/2013) – IT, MT - Coop CH (15/02/2006 - 31/12/2013) – CH - Coop IT (01/01/2015 - present) – IT

		<ul style="list-style-type: none"> - Leclerc (founder - present) – ES, FR, PL, PT, SL - Rewe (15/02/2006 - 31/12/2013 + 08/06/2015 - present) – AT, BU, CR, CZ, DE, IT, HU, LV, LT, RO, SK
AgeCore	~ €100 B	<ul style="list-style-type: none"> - Colruyt (founder - present) – BE, FR, LU - Conad (founder - present) – IT, MT - Coop CH (founder - present) – CH - Edeka (founder - 31/10/2020) – DE - Eroski (founder - present) – ES - Intermarché (founder - 03/2021) – BE, FR, PL, PT - Kaufland (23/07/2024 - present) – DE & more



1. Actual year of foundation: 2006; 2015 represents the year Coopernic re-launched
 2. Cumulated turnover 2023 of members in EUR
 Source: Auchan website; ESM, Handelsblatt, Lebensmittelzeitung; EY-Parthenon

ERAs are structured in a way that exploits the fragmented landscape of national laws on unfair trading practices across the Single Market: by establishing their operations in jurisdictions where suppliers have limited protection from UTPs because UTP laws do not protect all suppliers (Eurelec and Coopernic are based in Belgium, and Everest and AMS Sourcing are based in the Netherlands) or no protection from UTPs (Epic Partners, AgeCore and EMD are based in Switzerland), ERAs effectively circumvent stricter national rules by freeriding on the uneven playing field across the EU.

At least four 2023 activity reports on UTPs have flagged this issue:

- Italian authority ICQRF [proceeded](#) to a “cognitive analysis of so-called international purchasing contracts” and concluded that they “**have inflationary repercussions because (of the) additional level of bargaining, which) raises the level of consumer prices**” and “contacted some of its counterparts in the main European countries in order to assess a joint action to bring to the attention of the European institutions the risk of unfair commercial behaviour through international contracts”.
- French authority DGCCRF [noted](#) that “**international purchasing groups based abroad are sometimes the source of practices that contravene French provisions.**”

- German authority BLE [made clear](#) that four of the six meetings of the European enforcement authorities that took place that year focused on: *“practically dealing with turnover thresholds and difficulties in calculating turnover, cross-border enforcement of the UTP Directive, cooperation in investigations and the exchange of information, dealing with purchasing alliances.”*
- Belgian authority [clarified](#) that, during the meeting that took place *“on 15 September 2023, the focus was on alliances in the retail sector. Different interpretations of the definition and national legislation were explained.”*

Given ERAs’ growing impact on European markets, national authorities responsible for enforcing the prohibitions laid down in Article 3(1) and (2) of the UTP Directive should seek to address their practices as a matter of priority, given the cross-border nature of their activities. Stricter UTP enforcement of ERAs’ UTPs would level the playing field, encourage cross-border activity and enhance competitiveness across the EU.

3. [The proposed Regulation’s key mechanism](#)

The explanatory memorandum to the proposed Regulation notes that gathering information, identifying an infringement, and enforcing penalties can be difficult when the buyer is located in another Member State, especially where national rules vary. Enforcement authorities themselves, in discussions facilitated by the Commission, have repeatedly highlighted the need for more robust legal bases to conduct cross-border investigations. As the memorandum states, they have *“acknowledged the challenges posed by cross-border enforcement against unfair trading practices and developed common guidelines, templates and procedures to ensure more effective coordination between them”*, yet significant cooperation challenges persist.

3.1. [Addressing different national approaches to close enforcement gaps](#)

In implementing the UTP Directive, some Member States have retained the €350 million supplier-turnover threshold while others have removed or modified it. These discrepancies can only impede the cross-border enforcement of the same underlying unfair trading practice when the buyer is established in a Member State with a threshold regime and the supplier is established in a Member State with a stricter regime. Many national enforcement authorities have highlighted practical challenges in dealing with cross-border cases due to the lack of harmonisation of national UTP laws, revealing a clear need for more robust legal bases to overcome them. Reports from and discussions among them have revealed that stronger cooperation tools are needed to ensure that the stricter enforcement of the same UTP prohibition in one Member State is enforced elsewhere in the EU, regardless of the location of the buyer.

3.2. [Mutual assistance under the proposed regulation](#)

The proposed Regulation specifically strengthens cooperation among enforcement authorities, establishing a mutual assistance mechanism. It provides that enforcement authorities in one Member State may request information or enforcement action from authorities in another Member State for a UTP *“with a cross-border dimension.”* Crucially, **“cross-border dimension” depends on whether the buyer and supplier are located in different Member States, not on whether national laws differ in terms of scope retained to prohibit a particular UTP.**

The proposed Regulation ensures that Member States cooperate fully within the more protective scope chosen by any of them to apply the same Directive-based UTP rule. For example, if State A has decided not to apply the €350 million supplier-turnover threshold, other Member States should still assist State A even if

their own national law retains that threshold, since, in any event, **the prohibitions remain “overriding mandatory provisions” pursuant to Article 3(4) of the UTP Directive**, irrespective of the scope that each Member State has chosen to sanction the same UTP. Through this provision, the European legislator made it clear that the rules prohibiting unfair trading practices in the agri-food supply chain must apply irrespective of any contractual choice of law or any geographical consideration.

3.3. [A cross-border enforcement example: diverging thresholds](#)

For instance, if State A has removed the threshold in implementing the UTP Directive, but State B enforces it, and the buyer (a retail alliance or an international retailer) is established in State B while the supplier is established in State A, the new Regulation will allow State A’s authority to seek information or enforcement cooperation from State B. This reflects the proposal’s overarching goal: making the mutual assistance mechanism functional for all UTP prohibitions recognised as overriding mandatory provisions, whether by Article 3(4) of the UTP Directive or by Article 9 of “Rome 1” Regulation (EU) 593/2008, regardless of diverging national implementations or supplier-turnover thresholds.

4. [Looking ahead: Leading brands call for further revision of the UTP Directive to reduce fragmentation](#)

In addition to supporting this cross-border Regulation, AIM also believes the UTP Directive should be improved to further reduce fragmentation, foster a more harmonised approach and prevent forum shopping within the EU.

To ensure a consistent approach and create a genuine level playing field, the European Union should strive for greater coherence and convergence between national UTP laws, which would help boost the EU’s growth and competitiveness, which is important for all operators, including farmers.

Harmonising national UTP laws through the upcoming revision of the UTP Directive could indeed ensure a higher EU-wide standard of protection by adding the Single Market legal base Article 114 TFEU to complement the current narrow base of Article 43 TFEU in order to align UTP rules with the Single Market’s broader objectives, thereby enabling the Commission to coordinate enforcement across Member States even better.

AIM’s key suggestions to update the UTP Directive are the following:

- **[Add the Single Market legal base Article 114 TFEU to complement the current legal base Article 43\(2\) TFEU](#)**, maintaining and enhancing protection of primary producers in the supply chain. This addition would ensure that UTP rules are fully harmonised as part of the Single Market framework, allowing suppliers to benefit from consistent and predictable conditions in every Member State, thereby supporting their growth, resilience, and capacity to innovate. Harmonised Single Market rules would offer suppliers a stable and fair marketplace in which their products can circulate without fear of exploitation by more powerful buyers, greater incentives to innovate and invest (since the same ground rules would apply to all market operators EU-wide) and long-term resilience (since uniform standards encourage broader supply-chain collaboration). By coupling agricultural policy under Article 43(2) TFEU with a Single Market dimension rooted in Article 114 TFEU, the EU would reaffirm its commitment to protecting farmers’ interests while also fostering the competitive, sustainable growth of Europe’s consumer goods sector, which represents 33% of the EU’s trade surplus.

- **[Extend UTP protections to all grocery suppliers, regardless of size](#)**: Rather than tying protection to turnover thresholds, the focus should be on targeting the unfair practice itself. Several Member States have already chosen not to differentiate by supplier size, ensuring no medium-sized (or even larger) business slips through a protection gap. Eliminating the threshold aligns with the core rationale behind the UTP rules—curbing abusive conduct—while promoting a more level playing field for all operators in the

grocery supply chain. It also removes the heavy administrative burden on enforcement authorities to assess which supplier falls within the threshold, allowing them to focus on swifter solutions and more agile administration to truly meet the objective of a fair trading environment for all.

- **Clarify the extraterritorial effect of national UTP laws in the EU:** Preventing circumvention of stricter national UTP rules requires that their effect extend beyond the Member State in which they are enacted. This principle echoes EU competition law, which likewise recognises the effects doctrine: if a practice produces substantial effects in the EU market, it falls under the extraterritorial scope of EU competition rules (cf. Regulation 1/2003, Wood Pulp, Intel). In the same vein, national UTP laws that are overriding mandatory provisions should apply not only to domestic transactions but also to cross-border dealings where the international buyer may be established elsewhere in the EU. Such an approach ensures that powerful market operators cannot sidestep stricter rules by choosing a particular legal seat or jurisdiction, thereby upholding a level playing field and safeguarding the integrity of the Single Market.

- **Prohibit self-preferencing practices:** Drawing on Article 6 of the Digital Markets Act (Regulation (EU) 2022/1925), we propose to create a more coherent trading environment in Europe, whether you trade offline or online, and explicitly prohibit buyers from unduly favouring their own private-label products over branded ones. Self-preferencing distorts competition by limiting consumer choice, reducing supplier revenues and stifling innovation. For instance, a retailer may give its private label products more favourable advertising, placement or promotional terms, or use data obtained from branded suppliers to boost its in-house products. To address these distortions, we recommend clear prohibitions on:

- **Unequal merchandising** – Systematically giving private label products better shelf space, promotions or commercial terms (e.g., reserving prime displays or marginalising branded products by listing fewer or demanding higher fees);
- **Misuse of data** – Using brand suppliers’ data to develop or promote private label products without proper consent or data-sharing safeguards such as firewalls.
- **Look-alike packaging** – Mimicking a branded product’s key visual elements (shape, design, color, etc.) to exploit the brand’s goodwill without legitimate authorization.

Prohibiting self-preferencing in this way would bring UTP rules into line with the EU’s broader approach to market fairness and innovation, paving the way for a coherent set of rules in line with the EU’s objective of simplification and reducing regulatory burdens, ensuring that consumers retain genuine product choice and that suppliers are not disadvantaged by unfair private label tactics.

5. Proposed Amendments

AIM respectfully submits that the following amendments would further enhance and solidify the proposed Regulation’s cross-border enforcement mechanism in cases where Member States apply UTP rules recognised as “overriding mandatory provisions” and require assistance from enforcement authorities in other jurisdictions.

RECITAL 4

(4) Given that Directive (EU) 2019/633 allows Member States to maintain or introduce stricter national rules against unfair trading practices, it should be clarified that this Regulation does not cover those rules, **unless they qualify as overriding mandatory provisions within the meaning of Article 9 of “Rome 1” Regulation (EU) 593/2008, just as are the prohibitions laid down in Articles 3(1) and (2) of Directive (EU) 2019/633 pursuant to Article 3(4) of that Directive.** However, the Regulation should allow the Member States to decide that their enforcement authorities can make use of the possibility to exchange information established under the mutual assistance mechanism set out by this Regulation in relation to such rules. In those cases, the enforcement authorities should still have the right to refuse to comply with

such a request, unless the stricter national rules are overriding mandatory provisions within the meaning of Article 9 of “Rome 1” Regulation (EU) 593/2008.

ARTICLE 2(1)

1. This Regulation applies to the enforcement of the prohibition of unfair trading practices in business-to-business relationships in the agricultural and food supply chain laid down in Article 3(1) and (2) of Directive (EU) 2019/633 and unfair trading practices covered by stricter national rules that qualify as overriding mandatory provisions within the meaning of Article 9 of Regulation (EU) 593/2008, where those practices have a cross-border dimension.

ARTICLE 3(d)

(d) ‘unfair trading practice with a cross-border dimension’ means any unfair trading practice within the meaning of Directive (EU) 2019/633 involving one supplier and one buyer that are located in different Member States or any unfair trading practice covered by stricter national rules that qualify as overriding mandatory provisions within the meaning of Article 9 of Regulation (EU) 593/2008;

ARTICLE 5(4)

Member States may decide that enforcement authorities can make use of the possibilities referred to in this Article in relation to national rules within the meaning of Article 9 of Directive (EU) 2019/633 that do not qualify as overriding mandatory provisions within the meaning of Article 9 of Regulation (EU) 593/2008.

Conclusion

AIM welcomes the Commission’s proposal to strengthen the cross-border enforcement of unfair trading practices and underscores that this Regulation can help level the playing field in Europe’s supply chain by closing enforcement gaps. Given the growing influence of European retail alliances and the fragmentation in national rules, a coordinated approach is critical to ensuring that all suppliers, regardless of size or location, receive consistent protection from unfair practices. AIM thus strongly supports the mutual assistance mechanisms introduced in the draft Regulation, while also calling for a broader revision of the UTP Directive to extend coverage to all suppliers, clarify extraterritorial effects, and prohibit self-preferencing practices. These measures would ultimately foster fairer, more competitive markets in the EU, sustain innovation and choice for consumers, and safeguard the interests of farmers and brand manufacturers alike.

About AIM

AIM (Association des Industries de Marque) is the European Brands Association, which represents manufacturers of branded consumer goods in Europe on key issues that affect their ability to design, distribute and market their brands.

AIM comprises 2500 businesses ranging from SMEs to multinationals, directly or indirectly through its corporate and national association members. Our members are united in their purpose to build strong, evocative brands, placing the consumer at the heart of everything they do.

AIM's mission is to create for brands an environment of fair and vigorous competition, fostering innovation and guaranteeing maximum value to consumers now and for generations to come. Building sustainable and trusted brands drives the investment, creativity and innovation needed to meet and exceed consumer expectations.

AIM's corporate members

AB InBev • Arla Foods • Bacardi Limited • Barilla • Beiersdorf • BIC • Carlsberg Group • Chanel • The Coca-Cola Company • Colgate-Palmolive • Coty • Danone • Diageo • Dr. Oetker • Essity • Essilor International • Estée Lauder • Ferrero • Freudenberg/Vileda • Groupe Lactalis • Haleon • Heineken • Henkel • HP Inc. • JDE Peet's • Kenvue • Kellanova • The Kraft Heinz Company • Lavazza Group • The LEGO Group • Lindt & Sprüngli • L'Oréal • LVMH • Mars Inc. • McCormick • Mondelēz • Nestlé • Nike • Nomad Foods Europe • Orkla • PepsiCo • Perfetti Van Melle • Pernod Ricard • Philips • Procter & Gamble • Puma • Reckitt • Red Bull • Savencia Fromage & Dairy • SC Johnson • Sigma • Signify • Sofidel • Unilever

AIM's national association members

Austria Markenartikelverband • Belgilux BABM • Czech Republic CSZV • Denmark MLDK • Finland FFDIF • France ILEC • Germany Markenverband • Ireland Food & Drink Federation • Italy Centromarca • Netherlands FNLI • Norway DLF • Portugal Centromarca • Spain Promarca • Slovakia SZZV • Sweden DLF • Switzerland Promarca • United Kingdom British Brands Group

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