


Swiss Regulatory Perspectives on Multilingual Packaging in Food & Cosmetics


AUTHORS Dr. Yury Makhankov^{1,2*} Dr. Avisek Ghose¹ Dr. Andrea Bocchio³ ¹Inferre Consulting, Switzerland, ²Makhankov Consulting, Switzerland, ³Inferre-Healthcare-Italia, Italy

Swiss Regulatory Framework: Beyond Multilingual

The Core Challenge: Mandatory Monolingual by Region



Mandatory information such as ingredients, usage, warnings, producer, importer’s detail etc. **must be in the official language(s) of the region of sale.***



The language must be **easily understood by the consumer.**[§]

This often leads to a package with multiple languages in small print to target multiple markets.

Make the label absolute clear to consumer: *The same products must be labeled in German for the Zurich region while French for the Geneva region.*

*Swiss Foodstuffs Act and Ordinance (FDHA) mandate

§European Union (EU) Mandate

The Hidden Hurdle: The Regulatory Divergence

Alignment

- Swiss law is aligned with the EU Cosmetics Regulation 1223/2009 and Food Supplement Directive 2002/46/EC.

Divergence

- Stricter Substance Controls - certain active ingredients have different maximal value and authorization in Switzerland.
- Detailed origin declarations is required for specific ingredients.
- Health and nutrition claims might be assessed differently in EU and Switzerland

The Legal Philosophy: Proactive Compliance & Self-Supervision	Supply Chain & Logistics	Operational Burden	Regulatory & Legal Risk	Strategic Blunders
<div><div>The Operator Primacy</div><div>No pre-market Authorization</div><div>Regular market surveillance by FSVO</div><div>The responsibility for safety and compliance lies entirely with the manufacturer.</div><div><small>FSVO: Federal Food Safety and Veterinary Office, Switzerland</small></div></div>	<div>→ Multiple Swiss SKUs - not one “Global” or “European” SKU.[#]</div> <div>→ Robust warehouse and distribution logistic management.</div> <div>» Increased risk, logistic cost and possible shipping-error.</div>	<div>→ Higher designing, printing cost.</div> <div>→ Smaller batch size could be less economical.</div> <div>→ Swiss-specific regulatory expertise absolutely needed.</div> <div>» High market entry cost</div> <div>» Reduced profit margin.</div>	<div>→ Technical terms must be accurately translated.</div> <div>→ Inconsistency free labelling required.</div> <div>→ Avoid substance of Non-Compliance.</div> <div>» Product recall leads to fine, reputational damage, legal liability.</div>	<div>→ Avoid “one-package-fits-all” approach.</div> <div>→ Underestimating the complexity and cost.</div> <div>→ Early engagement of FSVO guidance.</div> <div>» Failed market entry, financial loss, negative brand experience.</div>

[#]SKU: Stock Keeping Unit. 1 SKU per language or region is required. For 3 language (DE, FR, IT) packaging, 1 SKU is sufficient to cover the entire Swiss market.

“Regulation is not a roadblock - it’s the guardrail that keeps innovation aligned with integrity. It ensures quality and accountability.”

Business Case: From Italy to Switzerland (Omega-3 and Vitamin D3 Supplement)

To gain quicker market access

- ↓ Assumed EU-compliant product is compatible.
- ↓ Non-compliant labelling.
- ↓ Shipped cluttered, non-compliant packages for Swiss distribution centre.

Not the right way!

Lower maximum level for Vit. D3 for Swiss than the EU. The product is illegal due to its formulation.

Non-compliant products at the Swiss point of sales were recalled by the Federal Food Safety and Veterinary Office.

Result: Product recall, financial loss, damaged reputation and potentially lengthy ban from the market.

Follow this instead.

©Inferre Consulting GmbH, Basel, Switzerland

Swiss Consumer Demography – Basis of the Labyrinth

Age Group: 20 - 65 Years

German region 41% French region16% Italian region 4%

(Approximate % of total Swiss population) Data Source: STAT-TAB, Swiss Confederation as of 01 Jan. 2025

1 Regulatory Due-diligence

- **Action:** Discussion with Swiss regulatory expert.
- **Task:** Verifying ingredients and dosage. Adjustment as needed.
- » **Outcome:** A Swiss-specific product formulation.

2 Linguistic & Packaging Overhaul

- **Action:** Commissioning native speaker for technical translation
- **Task:** Combined three-language packaging with Swiss SKU/barcode.
- » **Outcome:** Compliant, professional packaging ready for the market.

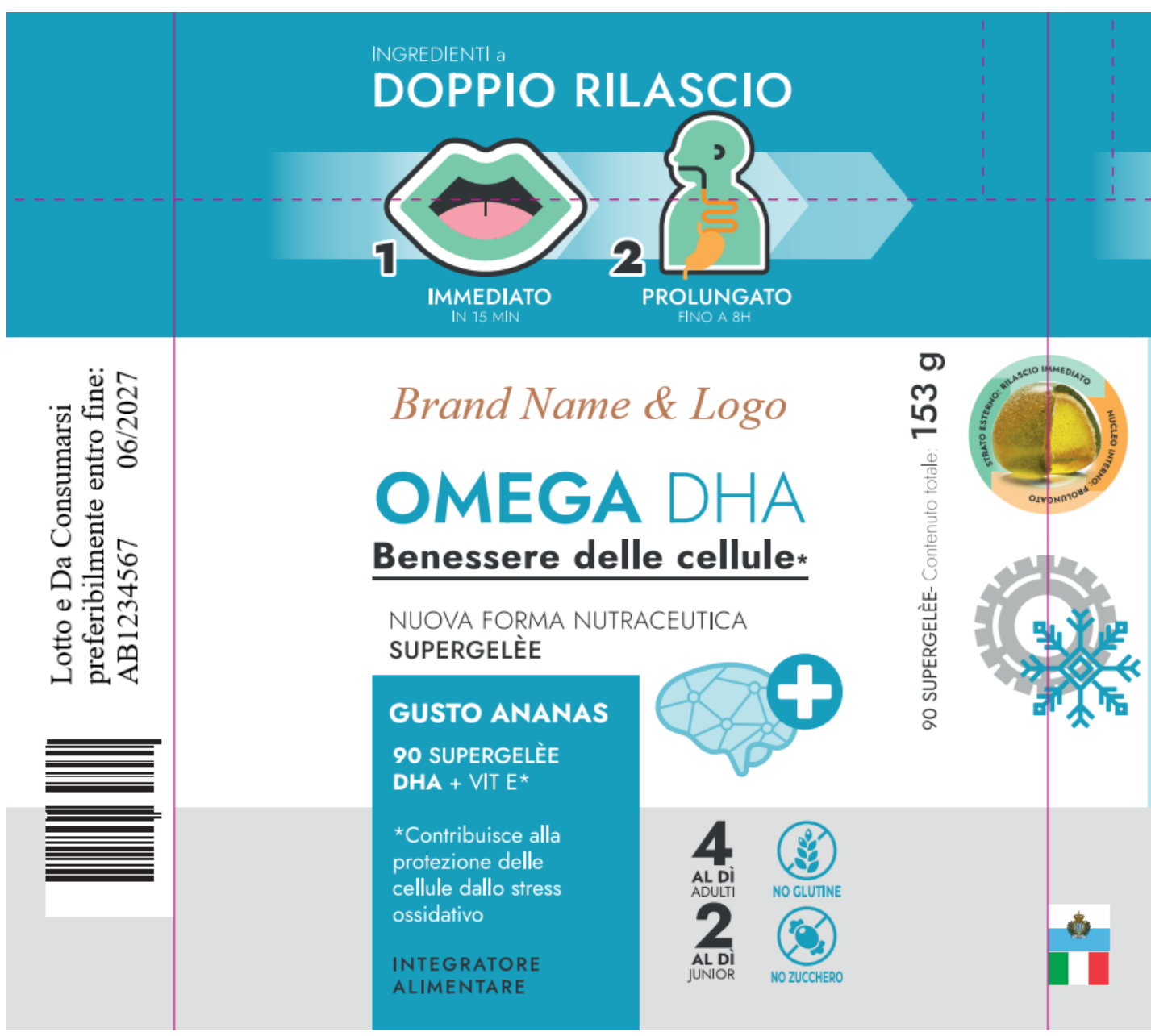
3 Smart Logistics and Distribution

- **Action:** Partnering with experienced distributors.
- **Task:** Implementing a distribution system that can manage maximum market reach.
- » **Outcome:** Efficient and compliant supply chain.

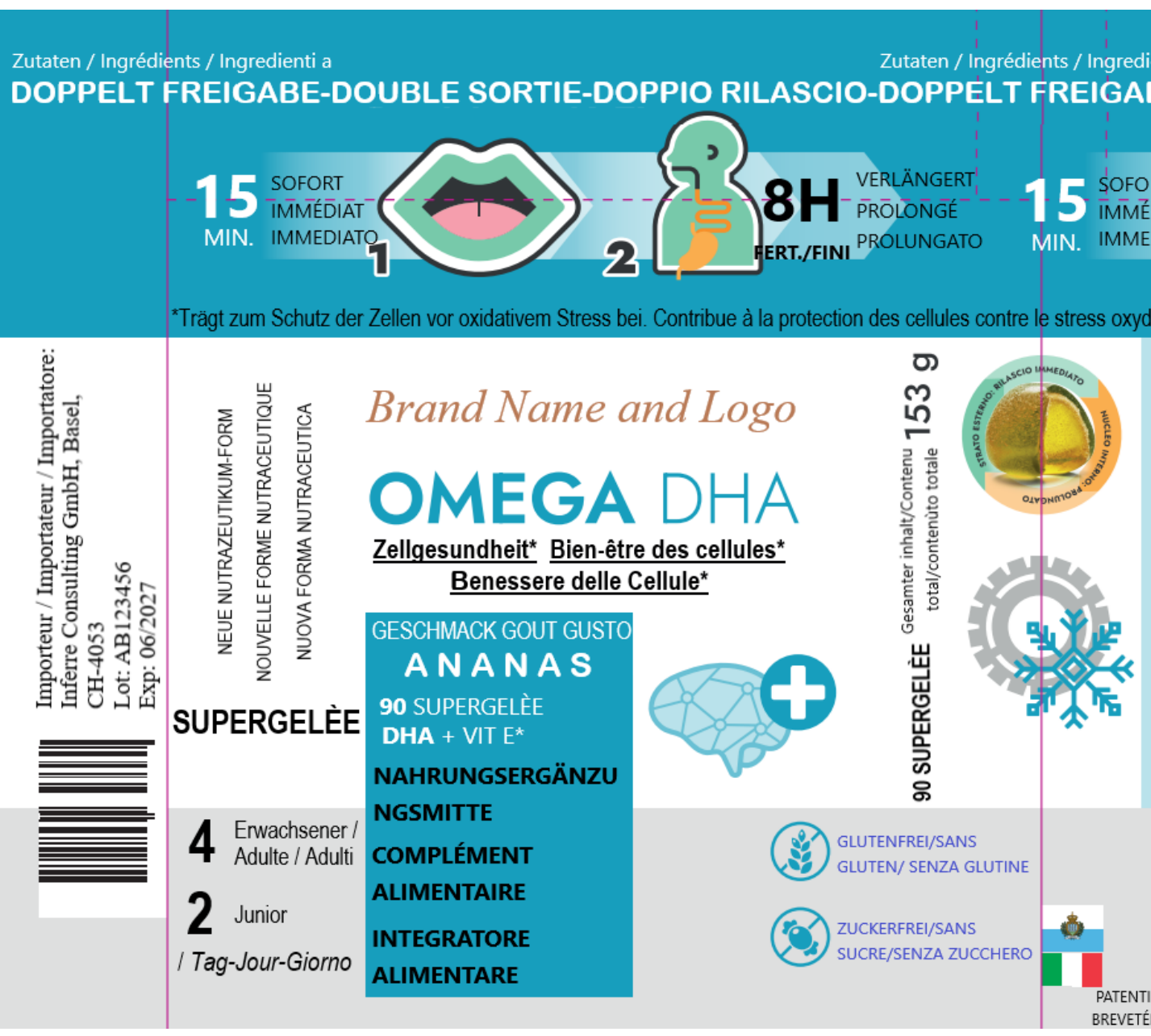
4 Proactive Compliance Documentation

- **Action:** Preparing a comprehensive compliance dossier.
- **Task:** Documenting every process – to respond to market surveillance inquiry.
- » **Outcome:** Demonstrable "due diligence," significantly reducing legal and financial risk.

Original Label for the Italian Market



Customized Label for the Swiss Market



Reprinted with permission. Due to the administrative reasons, some information has been deleted/modified for the presentation purpose. For more detail, please contact the corresponding author.

YES! we re-introduced 24 products via the right approach.