




Packaging marking



The provision of Act No. 477/2001 Coll., on packaging, as amended, reads newly as follows:

Section 6 Marking of packages

If a person marketing or putting into circulation a package or packed product indicates on the package or packed product the material from which the package is produced, this marking shall be in harmony with the European Communities law ^{9c)}.

^{9c)} **Annexes I to VII of Commission Decision 97/129/ES of 28 January 1997, establishing the identification system for packaging materials pursuant to European Parliament and Council Directive 94/62/EC on packaging and packaging waste.**

For the sake of clarification, it is necessary to mention one of the basic provisions of the Commission Decision 97/129/EC.

“The decision whether a marking system should be introduced as obligatory for a particular material (materials) can be made in accordance with the procedure set out in Article 21 of Directive 94/62/EC.”

So, what does this provision imply? In short, the following:

- a) If we intend to mark packaging from the point of view of the used material, we should adhere to the alphanumerical symbols contained in this Decision.
- b) The ČSN 770052-2 technical standard was prepared in accordance with this Decision and thus we can continue to follow it.
- c) In view of the Packaging Act, it is not necessary any more to inform the consumer on the method of packaging handling because this condition is contained neither in Directive 94/62/EC nor the Commission Decision. However, ATTENTION should be paid to the provisions of other regulations, such as the Wastes Act, the Chemicals Act or the Drugs Act, etc.! The requirements of these acts must be observed regardless of the Packaging Act.
- d) If we do not want to continue using material identification on the packaging or the so-called “basketball player” (the symbol of a figure throwing something to the basket), no sanctions may be imposed on us as in the past.
- e) Last but not least, it is necessary to note that a committee comprised of the representatives of the Member States can make this obligatory at any time pursuant to Article 21 - but it has never done so since 1997.



CSN 77 0052-2 – Identification Marking of Packages for Subsequent Packaging Waste Recovery

There is necessary to realize that former term “packaging“ used in previous version was essentially substituted by term “packaging component“ before we begin to pick out provisions of updated version of this Standard. Main purpose was a complicated definition of packaging unlike to a packaging component.

Note: If you realize bottle of mineral water, then only functional unit consisted of several components (container, closure and sticker), pieced together fulfils packaging functions (to protect, to contain, to inform, etc.) Unfortunately, extreme judgements still carry over (exist) that a container or a closure itself, even a sticker itself being considered as a packaging. **They are just components of a packaging, because these components themselves do not fulfil required packaging functions. Only, if we fit all of them (as well as the product) together, we originate a functional packaging from them!**

Now we will follow wording of the Standard itself. There is important to realize what matter of the Standard is, at the first. Two basic facts are premised already in the beginning.

At the first: **“The marking according to this Standard refers to any packaging component of consumer packages made from metals, plastics and composite materials“**. It means that this way of marking is OBLIGATORY for respective materials.

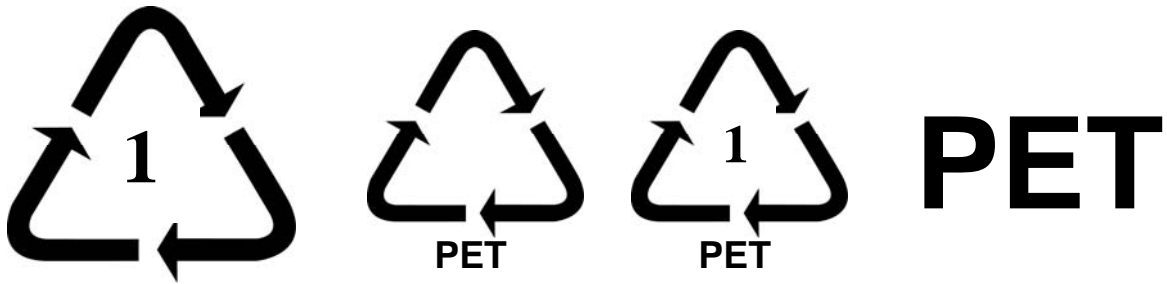
At the second: **“Marking of packaging components of consumer packages made from other materials (paper, glass, wood and textile) is voluntary“**. It means that we have two possibilities in such a case. **To apply** marking in recommended way or to take possibility and **don’t apply** marking, because the origin of used material is a quite evident. Consumers certainly recognize such a material as a paper, glass or wood. In case of textile packaging, the consumer could waver between natural material and plastics. In case of paper, the consumer shouldn’t waver in origin of packaging, but there are also cases that consumers consider packaging made from a plastic as a paper (for example: PP – polypropylene – bags for potatoes chips or sweets, with special mat surface dressing).

Fundamental chapter of this Standard are basic definitions and terms that being used in the text. We really “get lost“ within it’s structure of without their knowledge.

1. “Identification marking for the recovery of packaging waste (hereinafter, identification marking):

- mark consisting of an identification code and a graphic symbol;
- or an alphabetic identification code only“

Examples:



All four varieties have the same meaning and decision for any variety depends on filler or importer only. There is absolute freedom of a choice.

Important softening of marking requirement is wording **“or alphabetic identification code only”** (note: it could be for example pressed into bottom of bottle or pot). We should certainly avoid to present numerical code only without graphic symbol, **therefore following example shouldn't occur on packs!!**



2. “Identification code: numerical and/or alphabetic identification code of the type of material of which the packaging component is made“. The Standard also contains annex with abbreviations and numberings for all material groups. Usage of ISO Standards (for example ISO 1043-1) is recommended, in case that you won't find out respective material in the sheets of annex. It concerns mostly group of plastics, where the range of used types has broaden continuously out. In case of imports on Czech market, there isn't necessary to suspect that this way of marking is something artificial and local. Both types of codes come from EU Decision to material identification no. **97/129/EC**. Unfortunately, material identification is mandatory and requisite under threat of high fines in Czech Republic, but in the most of EU countries it is just voluntary and only recommended.

3. “Graphic symbol: a figure consisting of three arrows arranged in an equilateral triangle“. This is common sign „Ommius Loop“ generally used for emphasis that material itself or it's energy gain could be recovered. There isn't need of any other agreements or approvals regarding copyrights or licence for its usage or presentation on the packaging.

4. “Composite package: a package made of a different material groups (for example: paper, plastics, metals, glass, etc.) which cannot be separated manually (e.g. a package made of layered materials, or one whose bottom, lid or other part is made of different, manually inseparable materials); a material consists of a several materials, irrespective whether a material comes from one or several material groups, where one material reaches minimal 95% by the weight, doesn't considered as a composite and should be marked according to dominant material. (For example: vial of aerosol sprayer made from glass



covered by plastic with plastic cock; vial of aerosol sprayer made from metal with plastic cock etc.)“.

Other example of composite packaging could be so called “box for milk or juice“, “tetrapak“ – **beverage carton** that consists of liners of paper, plastic and/or aluminium in case of durable products and maybe plastic cap. These substances and components could not be separated by hand.

Next example could be foil used for foil for coffee bags or frozen food that consists of plastic and aluminium inseparable liners by hand.

BEWARE! In such a case we can see around something that it appears as a “aluminium foil“, but it could be just paint, coating or etc. that represents less than 5% of packaging by weight! Such a packaging isn’t composite in the sense of Standard and they will be marked by used plastic material identification.

Other term that could confuse readers is **combined packaging** - the term used for example in IATA or ADR provisions. What is it? How does it differ from a composite packaging? Difference is in wording: “made of a different material groups (for example: paper, plastics, metals, glass, etc.) **which “CAN” be separated manually**. Example of combined packaging could be packaging of toothpaste (paper box + plastic or ALU tube) or packaging of ready-to-eat cereals (paper box + plastic bag).


5. “Packaging component: part of packaging that can be separated by hand or by using simple physical means (EN 13193).“ This is important and fundamental definition, because it really effect obligation of marking when we shall apply and when it depends on our free consideration.

A. “The various systems may be used to identify material of packaging“. The Standard takes in to a consideration fact that other standardisation systems of material identification of products or packaging are used (for example ISO 1043-1 or EN 14311) globally or in Europe only. Therefore, the possibility to leaving present marks is expressly quoted. The only important is your ability to define used material identification standard different to this Standard in case of inspection of Czech respective control bodies (Retail Inspection, Environment Inspection).

B. “It is recommended to use preferably the alphabetic identification code for individual types of packaging materials as provided in Annexes B to H, which may be supplemented by a graphic symbol. The numerical identification code as provided in Annexes B to H shall be always supplemented by the graphic symbol.” Basically, it is just continuation of the previous requirement and it expresses just **RECOMENDATION** to use this system.

C. “There is recommended to apply (present) numerical identification codes into the middle of the graphic symbol and alphabetic identification codes below the graphic symbol“. Emplacement of alphabetic and numerical codes is not only recommended, but also generally fixed in production routine.

D. “The identification marking shall be applied (presented) directly on packaging components from those package consists, by printing, embossing or stamping or by any suitable way“.



E. “The identification marking of a packaging component can be applied (presented) on the label that is fit on the component“. Requirement of marking position on packaging remains quite general and allows to producer or filler number of possibilities as it been written.

Nevertheless it has elaborated on the following text, it accrue from this provision that material identification of such a component as a sticker could be proved misleading, because consumer isn't able to realize, if it refer to container or to sticker. But marking shall fulfil also following provision:

F. “Durability and resistant ability of marking on packages should respond to forecasted time of a recovery or a disposal of package“.

The mostly discussed topic in connection with marking obligation is the question of options; let us say the fact when the marking shall be provided and when is possible to abstain; which packaging component marks and which do not mark.

1. “The packaging components heavier that 5 g shall be marked by the material identification marking“. It means that it is impalpable if we waiver of marking of any packaging component **REGARDLESS OF ITS DIMENSIONS MEASURES** lighter 5g (for example sags, closures, caps, stickers etc.). If the material identification marking is already presented on such a component, it is certainly in order, but if it doesn't, we needn't to provide it additionally, for example on sticker.

2. “The identification marking hasn't to be presented on the following packaging components although the term of point 5.1 is met:

- labels, stickers, tags;
- closures, caps, lids, stopgaps;
- dosing and charging devices, applicators;
- inner fixing elements, interlayer, and inserts, unless marked by printing, embossing and/or stamping;
- packages whose nominal volume is 50 ml or less;
- packages made from shrink foil or extruded plastic foil, unless printed on and labelled“.

The fundamental change is amendment of statement right at the beginning of this paragraph. **If some upper listed components are heavier than of 5g, we needn't provide material identification of them.** Probably all of you realize material identification problem of (plastic or metal) closures or lids on the glass bottles. Material identification of glass was/is voluntary, but material identification of these components was obligatory, because they are slightly heavier than 5g sometimes. Therefore fillers or importers unfortunately had to add this good-for-nothing information into label in the past.

Identification Codes - Plastics

Material	Written code	Numeric code
Polyethylene terephthalate	PET	1
High density (linear) polyethylene	HDPE	2
Polyvinyl chloride	PVC	3
Low-density (branched) polyethylene	LDPE	4
Polypropylene	PP	5
Polystyrene	PS	6
Other		7

Identification Codes - Paper and cardboard

Material	Written code	Numeric code
Corrugated cardboard	PAP	20
Smooth cardboard	PAP	21
Paper	PAP	22

Identification Codes - Metals

Material	Written code	Numeric code
Steel	FE	40
Aluminum	ALU	41

Identification Codes - Wood

Material	Written code	Numeric code
Wood	FOR	50
Cork	FOR	51

Identification Codes - Textiles

Material	Written code	Numeric code
Cotton	TEX	60
Jute	TEX	61

Identification Codes - Glass

Material	Written code	Numeric code
White glass	GL	70
Green glass	GL	71
Brown glass	GL	72

Identification codes - Composite Materials

For composite materials, letter identification code consists of the letter C, which expresses that it is made of composite material and the broken line (/) from the

written material identification code, whose representation in the composition (expressed weighing) prevails. For example, letter identification code of beverage packaging is C / PAP, which corresponds to the code number 84, which is the predominant material folding cardboard.

Material	Written code	Numeric code
Paper and cardboard / various metals	C/*	80
Paper and cardboard / plastics	C/*	81
Paper and cardboard / aluminium	C/*	82
Paper and cardboard / steel tinplate	C/*	83
Paper and cardboard / plastics/aluminium	C/*	84
Paper and cardboard / plastics/aluminium/steeltinplate	C/*	85
Plastics / aluminium	C/*	90
Plastics / steel tinplate	C/*	91
Plastics / various metals	C/*	92
Glass / plastics	C/*	95
Glass / aluminium	C/*	96
Glass / steel tinplate	C/*	97
Glass / various metals	C/*	98

NOTE 1


*) Letter code identifying material relating to our weighing.

NOTE 2

In assessing the composite material may be adhered to the sequence of layers of material as to the number assigned identification code. The same numerical identification code can include the composite materials, even if any of the layers in the packaging material is repeated. For example, a composite material composed of plastic / aluminum / plastic can also include the identification code 90th

NOTE 3

Material or part of a package consisting of multiple materials where one material is given a minimum share of 95% by weight, for the purpose of marking according to this standard is not considered a composite material and identified according to the prevailing material. (For example, aerosol container made of glass-coated plastic with a plastic cap is not necessary to mark. Marking part of consumer packages made of glass is optional).



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