



SLOVENSKI STANDARD
SIST CR 14311:2002

01-september-2002

Embalaža - Označevanje in sistem prepoznavanja materialov

Packaging - Marking and material identification system

Verpackungen - Kennzeichnung zur Erkennung und Identifizierung des Verpackungsmaterials

Emballage - Marquage et système d'identification des matériaux

Ta slovenski standard je istoveten z: CR 14311:2002

ICS:

55.020 Pakiranje in distribucija blaga Packaging and distribution of
na splošno goods in general

SIST CR 14311:2002

en

CEN REPORT
RAPPORT CEN
CEN BERICHT

CR 14311

April 2002

ICS

English version

Packaging - Marking and material identification system

This CEN Report was approved by CEN on 16 June 2001. It has been drawn up by the Technical Committee CEN/TC 261.

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Foreword

This document (EN 14311:2002) has been prepared by Technical Committee CEN/TC 261, "Packaging", the secretariat of which is held by AFNOR.

This document has been prepared under a mandate given to CEN by the European Commission and the European Free Trade Association, and relates to articles 8 and 10 of the EU Directive 94/62/EC (Bibliography).

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Introduction

The purpose of specifically marking packaging and identifying materials would be to convey information to those in the packaging chain (from raw material manufacturers through converters, packer/fillers to retailers), to end-users (including consumers) of the packed products and to those in the waste management industry concerned with packaging waste.

A proposal for a Directive on the subject of marking (bibliography) and a decision relating to identification system (bibliography) have been issued both of which support the Directive 94/62/EC. The purpose of this report is to consider these supporting documents required by article 8 of the Directive (94/62/EC) and to investigate how they relate to the requirement in article 10 for the preparation of European standards relating to "criteria for the marking of packaging". This study has been based on work carried out over several years in TC 261 and particularly its working group SC 4/WG 1 and the various positions established by that working group, (bibliography).

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1 Scope

This CEN report examines the marking of packaging and the identification of packaging material as described in article 8 of the packaging and packaging waste Directive 94/62/EC, the supporting Decision and the proposal for a Directive on Marking and makes recommendations based on article 10 of that Directive 94/62/EC.

2 Discussion of legislative requirements

2.1 General

Article 8 of the Directive 94/62/EC draws a distinction between the "marking of packaging" and the "identification (of) the nature of packaging material(s) used".

This section of the report will deal with the issues separately in terms of the legislation being enacted.

2.2 Marking of packaging

The proposed Directive on marking does not contain a requirement for a CE mark to indicate that packaging placed on the market meets the essential requirements of the Directive 94/62/EC. The reasons given for this are fully endorsed.

Given the sound reasons for not requiring a CE mark, the European Commission could have proposed that no marking concerning essential requirements was necessary. It has however decided to single out two aspects of the essential requirements, "Reusable packaging" and "Recyclable packaging" on the basis of the Directive statement "until scientific and technical progress is made reuse and recycling should be considered preferable in terms of environmental impact". However this 8th "whereas" clause in the Directive 94/62/EC continues with a statement that, "life cycle assessments should be completed as soon as possible to justify a clear hierarchy between reusable, recyclable and recoverable packaging" TC 261 points out that scientific studies now available show that there is no clear hierarchy between reusable, recyclable and recoverable of packaging unless under very specific local conditions.

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In addition the apparent prioritisation of reusability and recyclability and the direct link of these aspects with a mark for essential requirements appears inconsistent.. This text takes into account only two essential requirements; packaging put on the market has to comply with all essential requirements defined by the Directive 94/62/EC including Annex II.

The consequence of this decision is that the absence of a mark on a particular packaging, for example a packaging recoverable by energy, could be interpreted as meaning that such packaging failed to meet the essential requirements as given in the Directive 94/62/EC including Annex II.

Additionally the symbols chosen to represent the two aspects are both new, would have no current consumer recognition and are not considered helpful to reach the aims of directive 94/62/EC.

Even with a widespread information directed at the consumer TC 261 suggests that it would be a very long time before a consumer would recognise the symbols and understand their precise meaning.

It appears that for the consumer there will be confusion between marking and material identification. The new marking does not avoid this confusion.

2.3 Identification of packaging material

The Commission Decision (bibliography) sets out numbers and abbreviations for packaging materials. With the exception of those for plastics, these have not been in use previously and their widespread use or comprehension by end-users is hard to envisage. Specific sectors of the packaging industry have already developed similar material identification systems including symbols which have widespread recognition. In previous work CEN has proposed the continuing use of these symbols and will continue to advocate their use for material identification purposes alongside the system given in the Decision (see bibliography).

CR 14311:2002 (E)**2.4 Other markings**

a) Recycled content

The explanatory memorandum to the proposed Directive on marking (bibliography) sets out the reasons why the marking of recycled content is not to be introduced. This decision is fully endorsed and CEN Report CR 13504 (bibliography) amplifies the reasons why indication of recycled content is not a useful concept in environmental terms and could be misleading particularly for consumers.

b) ISO work on environmental labelling

The "Möbius Loop" is the one symbol widely recognised by consumers as having environmental significance. The reasons the Commission did not choose to use existing symbols are given in the explanatory memorandum to the proposal on marking. Standardisation work in ISO (TC 207/SC 3 Environmental labelling) on this topic has now been completed with the publication of ISO 14021 which makes the Möbius Loop available for public usage as the symbol for a product, packaging, or associated component which is recyclable. The Standard also makes the Möbius Loop available as a symbol for Recycled Content when accompanied by a percentage value but as explained in Clause 2.4 (a) this is not considered to be a useful marking for packaging.

ISO 14021 also includes statements (section 3.1.9 note 1) that a material identification symbol is not considered to be an environmental claim.

3 Criteria for marking**3.1 General principles**

The use of symbols to indicate conformance with various requirements described in Annex II of the Directive 94/62/EC has been proposed including energy recovery and composting. However demonstrating conformance with the essential requirements of the Directive 94/62/EC does not just involve reuse and recovery since other strategies such as source reduction may be involved. Given the variety of routes by which conformance with the essential requirements will be demonstrated and the wide range of use and post-use strategies across Member States of the European Union, such "single strategy" marking is seen as imparting little useful information to end-users and would generally be misleading.

At the points where packaging is manufactured and packed or filled its final destination and the appropriate recovery options cannot be determined. A marking for a particular strategy is no guarantee that particular strategy will be carried out. Only at the final destination will the local waste management infrastructure determine the recovery strategy. Even at this stage this form of marking will not be of assistance since it is not used by the waste management industry as any form of aid to sorting.

Packaging can already carry many markings generally relating to the product it contains and usually of a statutory nature. Further marking may lead to increased consumer confusion over markings including those already in use. It should also be users including consumers. Annex A shows the consequence of applying the symbols given in the Commission proposal on marking (bibliography) in addition to all the other marks already required. Consumer confusion is considered to be the inevitable outcome of this approach.

3.2 Opportunities for harmonisation

Clause 3.1, has established that there is no opportunity for the marking of packaging related to essential requirements as envisaged by proposed marking directive (bibliography) in a harmonised system across the Member States. Standards work is for the purposes of harmonisation. Therefore the conclusion is that there is no need for symbols relating to specific aspects of the essential requirements and hence no need for CEN standards relating to this aspect of marking.

3.3 Application of marking

Paragraph 3 of article 8 of the Directive 94/62/EC includes the requirement that marking "shall be appropriately durable and lasting, including when the packaging is opened". Consideration was given to whether a CEN standard should be written to elaborate these requirements, for instance with respect to size, colour and placement of any required markings. Following a review of the requirements relating to the statutory labelling of products it was concluded that no further elaboration of the requirements given in paragraph 3 is necessary.

3.4 Identification of material

The issues discussed in clauses 3.1 and 2 relate to specific conformance aspects and to local operating conditions and strategies. However the issues relating to identification of material are global since the nature of the materials is independent of their particular usage. This report advocates the continuing use of the well established graphic symbols for material identification in parallel if appropriate with those in the Commission Decision (bibliography). The relevant symbols are shown in Annex A. It should be emphasised that these graphic symbols have no implication of recyclability/recoverability and are purely graphic representations of material type. However given their widespread application, they do of course represent a universal opportunity for "presorting" or sorting of materials prior to recycling operations when this is appropriate. Annex A shows the appearance of the marking as proposed by this report.

4 Conclusion




- a) This report proposes that the system of material identification for specific materials using widely known symbols is continued in parallel with the voluntary system described by the decision (bibliography).
- b) This report concludes that no CEN standards are required related to marking of packaging with respect to essential requirements.

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Annex A (informative)

Material identification

| | |
|------------------------|--|
| Aluminium |  |
| Steel |  |
| Glass | Specific material Identification is not required |
| Paper and Board | Specific material Identification is not required |
| Plastic |  |
| Composites | To be linked to the dominant material |

| | | | |
|---------------------------|-----|-------|----|
| Sequences of numbers | 01 | 02 | 19 |
| Types of plastic material | PET | PE-HD | X |