

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).

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).

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.

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).