



EU environmental labelling for packaging

FEFCO has become aware of a new environmental labelling in Italy due to the transposition of EU Directives 2018/851 (Waste Framework Directive) and 2018/852 (Packaging Waste Directive).

The issue

Italy requires additional labelling on packaging which goes beyond the requirement of the EU waste legislation. This implies additional burden for producers in Italy but it may also create issues when the packaging is destined for outside of Italy, since it is different from the requirements in other countries.

The new Italian requirements

A new legislation (legislative decree n.116/2020) regarding environmental labelling of packaging was issued in Italy on 26 September 2020.

CONAI, which is the private non-profit consortium in Italy responsible for the recovery of packaging, issued "Guidelines for environmental labeling of packaging", available in English on the link: <http://www.progettareciclo.com/en/docs/environmental-labeling-packaging>

According to CONAI interpretation of the new law:

- Producers must indicate the alphanumeric code provided for in Decision 97/129/EC on all packaging (primary, secondary and tertiary).
- All packaging must be labelled in the form and manner that the company considers most suitable and effective for achieving the goal.
- Packaging destined for the consumer must also bear suitable inscriptions aiding its disposal.
- The requirements for packaging are mandatory and optional, as follows:
 - Identification of the packaging composition material (mandatory)
 - Consumer instructions for separate waste collection (mandatory)
 - Additional information for efficient separate waste collection (optional)
 - Environmental labels and declarations (optional)
 - Specific requirements for plastic – also mandatory and optional

With a related decree approved on 31st of December 2020 Italian Legislative Decree no. 183 of 3 December 2020 - the so-called "Milleproroghe 2021" it was established that:

- The obligation of the indication to the consumer for the separate collection is suspended until 31/12/2021;
- The obligation to affix to packaging the alphanumeric identification codes of materials under Decision 129/97/EC is in force since 26 September 2020. Therefore, all packaging (primary, secondary, tertiary) must include codes with indication of the composition of the packaging material (e.g. PAP 20 for corrugated boxes). With regard to the affixing of identification codes of materials on the basis of Decision 97/129/EC, the obligation is expressly imposed on producers.

At the moment and until 31/12/2021 the only requirement is to put the symbol PAP 20 on all the corrugated packaging placed on the market in Italy.

The content of the environmental label may be applied/printed/embossed directly on the packaging or placed on a separate medium if this is made possible by the packaging system in question.

Follow up actions of the Italian industry

The Italian Association asked the Ministry of the Environment for a suspension time to comply also for the indication of the composition of the packaging material and complete exemption for many applications (e.g. transport packaging). The Italian Ministry of the Environment refused any changes.

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