



Ministero della transizione ecologica

**Labelling for packaging -
Guidelines according to
Art. 219 paragraph 5 of
Legislative Decree
152/2006 and subsequent
modifications and
integrations**

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Introduction

On September 11th 2020, issue no. 116 of the Official Journal of the Italian Republic published Legislative Decree no. 3 of September 2020, which implements EU Directive 2018/851 on waste and EU Directive 2018/852 on packaging and packaging waste.

In particular, Art. 3, paragraph 3, letter c) of said decree introduces some amendments to art. 219, paragraph 5 (*Criteria inspiring the management of waste packaging*) of Legislative Decree no. 152 (“Environmental regulations”) dated April 3rd 2006, as updated and amended, which incorporates and now reinforces the provisions of Art. 8 paragraph 2 of Directive 94/62 / EC¹. This document, related to “Labelling for packaging - Guidelines according to Art. 219 paragraph 5 of Legislative Decree 152/2006 and subsequent modifications and integrations”, was developed on the basis of the guidelines proposed by the CONAI (National Packaging Consortium). This guide aims at supporting companies with operational and management guidelines to address this regulatory obligation. The proposal drawn up by CONAI was formulated following a series of working groups, in particular with UNI, Confindustria and Federdistribuzione, tasked with analysing and managing the more technical aspects and the most frequent reports made by individual companies and associations of producers and industrial/commercial users. Furthermore, this document was subjected to a public consultation and it was updated many times, both in light of constant dialogue and discussions with companies and associations, as well as following regulatory developments on the subject.

This version of Guidelines may be updated or modified periodically, in light of new legal provisions (national and/or european), as well as new specific indications, technical simplifications and application methods of the labelling, deriving from subsequent consultations and comparisons with businesses, industry and trade associations.

¹ To facilitate collection, reuse and recovery including recycling, packaging shall indicate for purposes of its identification and classification by the industry concerned the nature of the packaging material(s) used.

Approach to labelling

Legislative Decree no. 116 of September 3rd 2020 states that all packaging shall be “appropriately labelled in accordance with the procedures laid down in the applicable UNI technical standards and in compliance with the decisions of the European Commission, in order to facilitate the collection, reuse, recovery and recycling of packaging, and to provide consumers with proper information on the final destination of packaging. For the purposes of identifying and classifying packaging, producers are also required to indicate the nature of the packaging materials used, on the basis of Commission Decision 97/129/EC.”

The subject of Article 219 paragraph 5 is the environmental labelling for packaging waste management, according to Article 8 of Directive 94/62/CE, and does not take into consideration any other product label to be displayed on the packaging.

Below is the interpretation of the various passages of the article, on which we have based the explanations and insights provided herein, supported by concrete examples. Let's see them together.

All packaging must be appropriately labelled in accordance with the procedures laid down in the applicable UNI technical standards.

- All packaging must be labelled “appropriately”, and therefore **in the form and manner that the company considers most suitable and effective for achieving the goal.**
- The reference to UNI standards is generic, especially if we consider their voluntary nature. Therefore, the regulations imply that, if a company wishes to state certain contents on the environmental label, then the reference UNI standards should be adopted. **But what information can be communicated through the UNI standards to which the regulations refer?**
 - **Identification of packaging materials for plastic packaging.** When Decision 129/1997 does not include a specific identification code for a specific polymer, the applicable standards are **UNI EN ISO 1043-1** for the identification of plastics **not included in Decision 129/1997** and **UNI EN ISO 10667-1** for the identification and recognition of recycled polymers.
 - **Identification of packaging materials for multi-layer plastic packaging.** Also in these cases, Decision 129/97/EC does not include specific identification codes: the **UNI EN ISO 11469** standard lends a helping hand in communicating the composition of structures made up of several polymers.
 - **Environmental self-declarations.** Where additional voluntary information concerning the environmental qualities of the packaging is to be provided (inscriptions, symbols/pictograms or other similar messages, environmental claims), reference should be made to **UNI EN ISO 14021**.

and in compliance with the decisions of the European Commission, in order to facilitate the collection, reuse, recovery and recycling of packaging

At present, among the “decisions” adopted by the European Commission in relation to labelling to facilitate the collection, reuse, recovery and recycling of packaging, as well as to provide correct information to customers about their final destinations, we find only Decision 129/1997/EC, which is later mentioned specifically.

and to provide consumers with proper information on the final destination of packaging.

Who are consumers?

According to the Consumer Code (art. 3, paragraph 1), the consumer or user is a *“natural person who acts for purposes extraneous to any business, commercial, artisanal or professional activity carried out...”*

In a similar fashion, art. 218, paragraph 1, letter v) of Legislative Decree 152/2006 refers to the consumer *as the party who, acting outside the exercise of a professional activity, buys or imports packaging or packaged articles or goods for his or her own use.*

What is the information on the final destination of packaging?

Information on *the final destination of packaging* is that which communicates its correct disposal at the end of its useful life (*e.g. separate waste collection. Check your local municipal guidelines*).

So, what packaging are covered?

Said information covers:

- packaging offered to the end consumer as is, for sale or even free of charge;
- packaging offered to the end consumer in the form of a pre-packaged product, for sale or even free of charge,

instead, said information excludes packaging destined for commercial and industrial channels, known as B2B channels (packaging assigned, as is or in the form of a pre-packaged product, to a “professional”, i.e. a *“natural or legal person, or an intermediary thereof, acting in the exercise of his business, commercial, artisanal or professional activity”* (art. 3, paragraph 1 of the Consumer Code).

For the purposes of identifying and classifying packaging, producers are also required to indicate the nature of the packaging materials used, on the basis of Commission Decision 97/129/EC.

- In their breakdown of identification codes per material, the lawmakers did not make explicit reference to packaging destined for “consumer” use, therefore there is no evidence to exclude packaging destined also for professional channels from the process of identification and classification under Decision 129/97/EC. All packaging, therefore, is subject to identification and classification.
- Only with regard to affixing identification codes of materials on the basis of Decision 97/129/EC is the obligation expressly imposed on producers.
- If Decision 129/97/EC does not require specific identification of plastic polymers in the packaging’s composition, voluntary use may be made of the UNI EN ISO standards described above.

How to fulfil the obligation: the possible options

Once that it has been analysed the text of the law, and that the necessary information for the environmental labelling of packaging has been identified, it is important to consider that it is possible to make available this information through digital channels to be chosen (e.g. App, QR code, website), as an alternative to the physical affixing of the labelling on packaging, in order to make easier the production,

operational and economical processes of the businesses that place packaging in different Countries of the European Union, and thus guaranteeing the compliance with the free movement of the goods principle, provided in the TFEU.

If digital channels are used as an alternative to the physical labelling, it is required to make clear and easily available to the final consumer the instructions to check the mandatory information described above.

Further insights about this topic are available in the dedicated box on page 19.

Moreover, in these guidelines, for specific cases for which physical and/or technological limitations exists, like neutral packaging, some alternatives to the physical affixing of the labelling on the packaging are provided, such as the use of external support. Further insights about this topic are available in the dedicated box on page 18.

THE POSSIBLE OPTIONS		PACKAGING	
		Domestic circuit	C&I circuit
Physical affixing of the labelling on packaging		X	
Digital channels (e.g. App, QR code, website)	<i>Proper instructions must be provided to the end consumer on how to find the mandatory information through the chosen digital channel.</i>	X	
Instruction/user manual	<i>These documents can refer to digital channels to make available the mandatory information.</i>	X	
Shipping document or similar			X
Information sheet made available to the end consumer in the point of sale		X	

To Recap

The interpretation of the decree gives rise to important observations:

- 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, for which it is always allowed the use of digital channels (e.g. App, QR code, website) as a complete or partial alternative to the physical affixing of the labelling on packaging;
- Packaging destined for the consumer must also bear suitable inscriptions aiding its disposal;
- For plastic packaging made from polymers or polymer combinations not expressly provided for in Decision 97/129/EC, reference may be made to the UNI EN ISO 1043-1 standards for the identification of plastics not included in said Decision, and to the UNI EN ISO 10667-1 standards for the identification and recognition of recycled polymers.

Applicable legislation and reference guidelines

Below are the review results carried out concerning the existing technical legislation to be taken as a reference.

ENVIRONMENTAL LABELLING OF PACKAGING					
<i>INFORMATION ON THE COMPOSITION MATERIAL AND FINAL DESTINATION OF THE PACKAGING</i>					
	<i>Information</i>	<i>Mandatory and optional information</i>	<i>Scope</i>	<i>References</i>	
1	Identification of the packaging composition material	Mandatory	All packaging	Decision 97/129/CE	The Decision establishes a system for the identification of packaging materials by means of alphanumeric codes, as set out in specific Annexes.
2	<i>Plastics – Symbols and abbreviated terms – Basic polymers and their special characteristics</i>	Optional (supplementing Decision 129/97/CE)	Plastic packaging	UNI EN ISO 1043-1	The standard confirms the identification system for plastic packaging established by Decision 129/97/CE.
3	<i>Primary – secondary plastics – Part 1</i>	Optional (supplementing Decision 129/97/CE)	Plastic packaging	UNI 10667-1	The standard states that, for recycled polymers, the letter “R” is to be inserted before the polymer’s identification code.
4	<i>Plastics – Generic</i>	Optional (supplementing Decision 129/97/CE)	Multi-layer plastic	UNI EN ISO 11469	Plastic products may be marked in accordance with this standard, which

	<i>identification and marking of plastic products</i>	Decision 129/97/CE)	packaging		requires that the material's identification code be placed between the two symbols ">" and "<". In the presence of more than one polymer or of additives and adjuvants, the characters "+" or "-" are placed respectively in between the abbreviations.
5	<i>Consumer instructions for separate waste collection</i>	Mandatory	Consumer packaging components that can be separated by hand	Handbook "Etichetta per il cittadino"	In order to provide clear and complete information, the Handbook suggest placing the following information on the packaging – or make it available through digital channels: - MATERIAL FAMILY - COLLECTION GUIDELINES Or - COLLECTION GUIDELINES BY MATERIAL FAMILY With instructions to check the local municipal guidelines.
6	<i>Environmental labels and declarations – Self-declared environmental claims (Type II environmental labelling)</i>	Optional	All packaging	UNI EN ISO 14021	One of the self-declared claims applicable to packaging is the Mobius loop, used to indicate that packaging is recyclable or that it is made from secondary raw material. Compliance with biodegradability and compostability requirements must also be declared in accordance with this standard. According to Legislative Decree, 152/2006 and subsequent amendments for packaging, detect the claim of recyclability, compostability, and reusability.
7	<i>Visual identification elements for urban waste containers</i>	Optional	All packaging collected separately (B2C)	UNI 11686 – Waste management - Waste visual elements	The standard defines specific information and colour code useful for the identification of the correct separate waste collection according to the composition material.



Let's explain

When is packaging considered recyclable?

Packaging considered recyclable in accordance with the technical standard UNI EN ISO 13430 meets the criteria of eligibility for existing recycling technologies, namely:

- existence of an efficient recycling technology for the type of packaging;
- existence of a critical mass so that an efficient recycling process may be managed;
- existence of a market for recycled materials.

These criteria must be assessed via specific surveys and studies.

(For more information, see the Design for Recycling Guidelines [Progettare Riciclo](#)).

When is packaging considered compostable?

An item of packaging is considered to be biodegradable and compostable when it complies with **technical standard UNI EN ISO 13432**. This is the harmonised European standard which, within the framework of packaging directive 94/62, sets out the “Requirements for packaging recoverable through composting (...)”. Biodegradability and compostability certifications are issued by accredited third-party bodies. The accreditation of these bodies takes the form of a procedure for certifying their independence and impartiality by the Single National Accreditation Body, which in Italy is Accredia. On the Accredia website it is possible to consult a database in which the accredited bodies and laboratories for issuing these certifications of compliance are listed (<https://www.accredia.it/banche-dati/>).

What packaging can be collected separately?

Packaging can be placed in separated waste collection, whether or not it is recyclable using existing technologies, provided it is separated efficiently (primarily, always emptying the packaging of its contents). In fact, through CONAI's system –, recyclable packaging will be recycled; otherwise it will be destined for energy recovery.

The assessment of the packaging recyclability is one of the additional information that a company may choose to display on the packaging; nevertheless the recyclability of the packaging has not necessarily an impact on the information regarding the correct disposal of the packaging.

The only exception to this rule concerns mainly paper-based composite packaging (and/or with non-manually separable components of different materials), with a percentage of cellulose material less than 60% of the total weight, a percentage that compromises the recyclability of the packaging, making it impossible, with obvious consequences in terms of environmental impact. In the recycling process, in fact, 100 kg of this packaging produces more than 85 kg of dry waste and almost 150 kg of wet waste to be disposed of in landfills, after consuming water and electricity. Therefore, since this packaging is not recyclable with paper and cardboard, the companies that produce and use it are asked to advise on the labelling that it is put in the mixed waste collection, in order to minimise the environmental impact linked to its end-of-life management.

The content of labels: some examples

The interpretation of the decree gives rise to **2 different scenarios regarding the minimum content to be stated on the label, based on the packaging final destination circuit: B2B (commercial/industrial) or B2C (consumer)**. Starting from this assumption, these guidelines provide specific explanatory diagrams not only for B2B or B2C destinations, but also for different packaging structures: single-component and multi-component packaging/packaging systems.

The following diagrams include 3 levels of information:

- Mandatory, to comply with the regulations
- Highly recommended, to make communication more effective
- Recommended, to provide additional information for efficient separate waste collection

Labelling of single-component B2C (domestic circuit) packaging

For single-component packaging destined for the end consumer, the following information should be given:

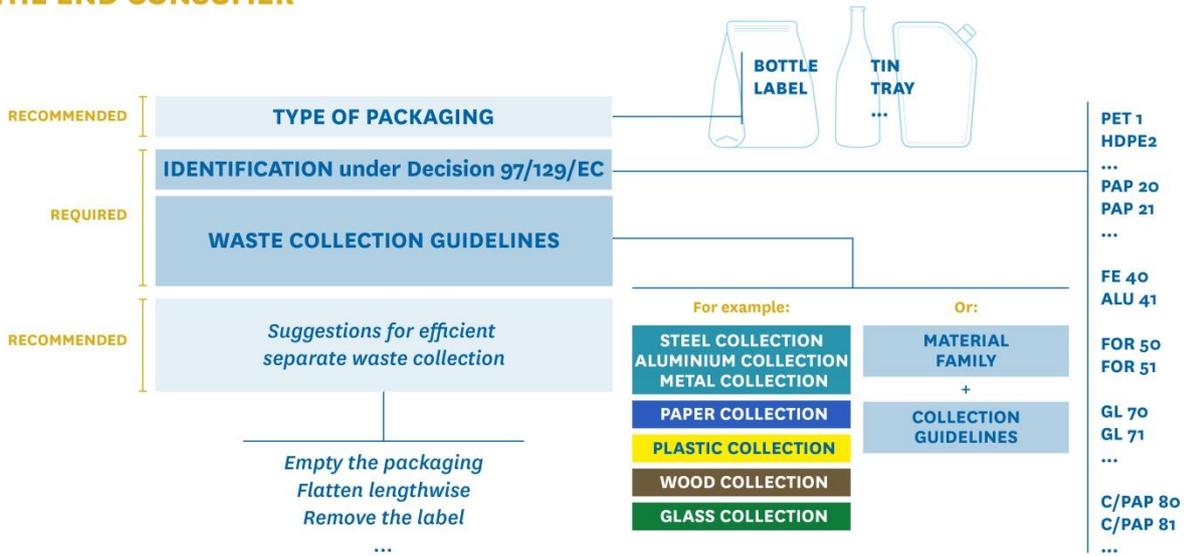
- a) The **packaging material's identification code under Decision 129/97/EC**;
- b) **Collection guidelines**. It is advisable:
 - to specify the wording "*Collection (main material family by weight)*"
 - or
 - to indicate the main material family by weight, accompanied by the wording "*Separate collection*",

and invite the consumer to check the provisions of his or her Municipality.

The legislation does not provide indications on using a specific wording, but recommends that the packaging is *appropriately* labelled, with a view to achieving the objective. In particular, the second option proposed is already in line with Article 11 of the Waste Directive, for which the Member States must establish separate waste collection at least for paper, metals, plastic, and glass and, by 1 January 2025, for textiles.

Other information that may be voluntarily added to labels relates to the type of packaging and instructions that will guide the consumer towards efficient separate waste collection.

INFORMATION FOR THE ENVIRONMENTAL LABELLING OF SINGLE-COMPONENT PACKAGING DESTINED FOR THE END CONSUMER



REQUIRED	<p>Information to be reported in accordance with art. 219, paragraph 5. The identification codes refer to Decision 129/97/EC.</p> <p>Disposal instructions may be communicated using the proposed formula or using any other method, provided it is effective.</p>
HIGHLY RECOMMENDED	<p>For multi-component packaging, identifying individual components through a written description or a graphical representation helps the consumer to separate and dispose of them correctly.</p>
RECOMMENDED	<p>Voluntary information that can be provided to help the consumer separate waste efficiently.</p>

Labelling of multi-component B2C (domestic circuit) packaging

For packaging consisting of several components, it is important to distinguish between components which cannot be separated by hand (for example, a paper label attached to a glass bottle) and components that can be separated by hand by the end consumer (for example, a snack multipack). This is because identification and classification under Decision 129/97/EC are envisaged **for packaging components that can be separated by hand**.

This means that for each packaging component that can be separated by hand, at least the following must be indicated:

- a) **The packaging material's identification code under Decision 129/97/EC**
- b) **Information on separate waste collection when this is not indicated on the outer presentation packaging.** It is advisable:
 - to specify the wording "*Collection (main material family by weight)*"
 - or
 - to indicate the main material family by weight, accompanied by the wording "*Separate collection*",

and invite the consumer to check the provisions of his or her Municipality.

The legislation does not provide indications on using a specific wording, but recommends that the packaging is *appropriately* labelled, with a view to achieving the objective. In particular, the second option proposed is already in line with Article 11 of the Waste Directive, for which the Member States must establish separate waste collection at least for paper, metals, plastic, and glass and, by 1 January 2025, for textiles.

When it is not possible to indicate the mandatory information on each individual component, for example due to a lack of space or other technological constraints, this may be stated on the main body or on the presentation packaging.

In such cases, the recommended format is the following:

- a) **Type of packaging** (full written description or graphic representation) of the various components that can be separated by hand;
- b) **For each type of packaging, specify identification code of the packaging material of each component that can be separated by hand under Decision 129/97/EC;**
- c) **For each type of packaging, specify collection guidelines, clearly specifying the material family of each component.**

Also in this case, voluntary information may be provided to help the consumer separate waste efficiently.

INFORMATION FOR THE ENVIRONMENTAL LABELLING OF MULTICOMPONENT PACKAGING (where components can be separated by hand) DESTINED FOR THE END CONSUMER



REQUIRED	<p>Information to be reported in accordance with art. 219, paragraph 5. The identification codes refer to Decision 129/97/EC.</p> <p>Disposal instructions may be communicated using the proposed formula or using any other method, provided it is effective.</p>
HIGHLY RECOMMENDED	<p>For multi-component packaging, identifying individual components through a written description or a graphical representation helps the consumer to separate and dispose of them correctly.</p>
RECOMMENDED	<p>Voluntary information that can be provided to help the consumer separate waste efficiently.</p>

For both cases of packaging destined to the final consumer, the information can be made available or physical affixing it on packaging, or through digital channels to be chosen (for further insights, read the dedicated box on page 19).

In some specific cases, for instance the neutral pre-wrapping packaging, the information can be delivered to the final consumer through information sheet made available in the point of sale (for further insights, read the dedicated box on page 18).

? Let's explain

Monomaterial, composite, multi-component packaging?

To effectively understand how to create the environmental labelling, especially for more complex packaging systems, it is worth going into detail on some definitions.

- *Single material packaging* → packaging consisting of only one material (for example a cardboard box, a plastic cap, an aluminium foil). A multilayer packaging, i.e. one whose structure consists of different plastic polymers that cannot be separated from each other (typically coupled or mixed), is also considered a single material packaging.
- *Composite packaging* → packaging structurally consisting of different materials that cannot be manually separated (they are mainly poly laminates or complex systems such as closures, consisting of several pieces of different materials).
- *Multi-component packaging* → a system consisting of a packaging called the main body (for example a bottle), and other packaging, called components (such as the cap or the label), which can be manually separable or non-separable from the main body.

What are packaging components that can be separated by hand?

A component is considered separable by hand when the final user can separate it completely (except for any minimal material residue that might remain stuck after separation), without any risk for his health or safety, from the main body, with the sole use of the hands and without the need for additional tools or instruments.

What to do with components that cannot be separated manually?

Packaging systems that envisage a main body and other ancillary components that cannot be separated manually (e.g. adhesive labels, non-separable caps and closures, windows), must indicate the identification coding of the main body material, and collection instructions (which follow the main body material).

Where possible, only the identification coding of the material can be affixed to the components that cannot be separated manually, as per Decision 129/97/EC, but the collection instructions must not be indicated on them.

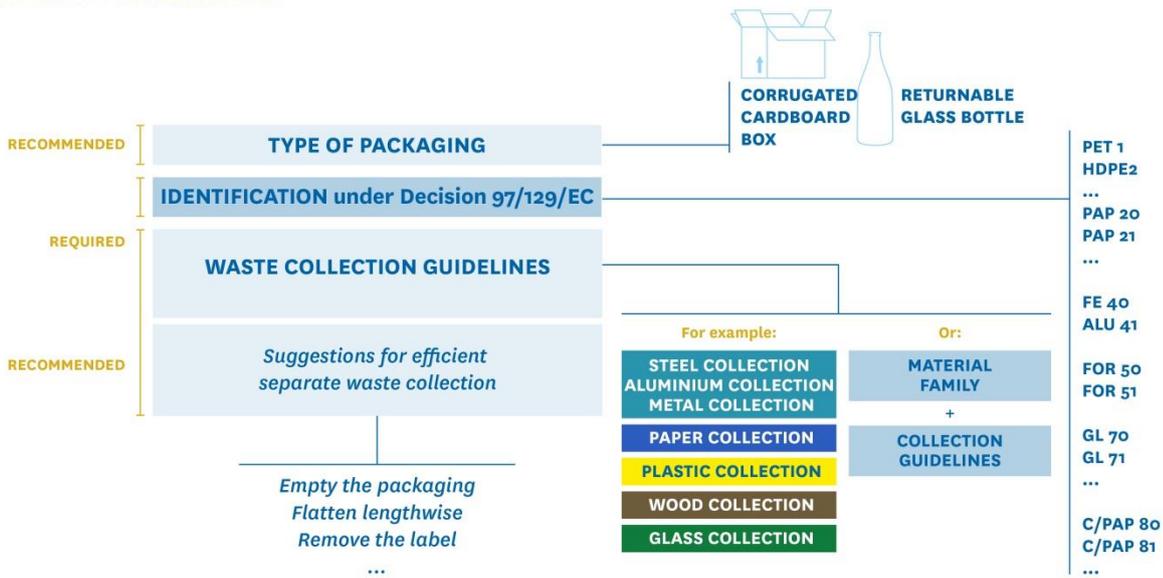
If the packaging system envisages components that can be separated manually from the main body, each of these must indicate the alphanumeric code as per Decision 129/97/EC and the collection instructions.

Labelling of B2B (C&I circuit) packaging

B2B packaging - for example packaging destined for professionals, or transport packaging, or packaging related to logistics or exhibition activities - do not need to provide information on the final destination of the packaging, but must mandatorily bear **the code of the composition materials in accordance with Decision 129/97/EC**.

Every other information, instead, remains voluntary.

INFORMATION FOR THE ENVIRONMENTAL LABELLING OF B2B PACKAGING



REQUIRED	<p>Information to be reported in accordance with art. 219, paragraph 5. The identification codes refer to Decision 129/97/EC.</p> <p>Disposal instructions may be communicated using the proposed formula or using any other method, provided it is effective.</p>
HIGHLY RECOMMENDED	<p>For multi-component packaging, identifying individual components through a written description or a graphical representation helps the consumer to separate and dispose of them correctly.</p>
RECOMMENDED	<p>Voluntary information that can be provided to help the consumer separate waste efficiently.</p>

Also in this case, as an alternative to the physical affixing of the labelling on packaging, the information can be made available through digital channel to be chosen (for further insights read the dedicated box on page 19), or through shipping documents or similar (for further insights read the dedicated box on page 18).

How to create a label?

Based on the above, this section of the Guidelines sets out the information that may contribute to the contents of the label:

- Alphanumeric code under Decision 129/97/EC
- Material family
- Collection guidelines

Below are the Annexes to Decision 129/97/EC, for every material and for poly laminates, inclusive of the codes to be used for identification of the material making up the packaging, together with examples of complete labels containing both the minimum information required by the lawmakers and additional optional information.

The examples provided **are merely indicative of the type of labelling solutions** that companies can adopt, and do not include every possible type of voluntary information. Companies may use **graphic and presentation methods of their own choice, provided these are effective and consistent with the goals set forth in art. 219, paragraph 5.**

For the graphic rendering of wordings and symbols, we suggest using, for packaging destined to the Italian market, the colour coding set forth by the UNI 11686 standard - Waste management - Waste visual elements.

In the following examples, we have adopted the colour coding provided for by said technical standard.

UNI 11686 standard

The standard defines the waste colours in the different materials and the visual identification elements to be shown on the bins to make it easier and more automatic for the final consumer to recognize the correct bin.

Increasingly often, citizens find themselves having to separate waste in different cities and municipalities: colour coding helps them to identify bins correctly, thus facilitating separate waste collection even outside their own home town.

By adopting the following specific colour codes, the standard allows for instant visual recognition on the part of consumers:





Let's explain

Laminating or processing: the > 5% rule

For the purposes of Decision 129/97/EC, “composite” packaging means packaging made up of different materials, which cannot be separated by hand.

Such packaging may be the result of processing (e.g. coating, metallic treatment, rolling, lacquering) or laminating techniques.

For such packaging, the alphanumeric coding of Decision 129/97/EC is provided in Annex VII, which includes different codes depending on the material family prevailing in weight and the secondary material family.

The 5% threshold

For the proper identification of composite or multilayer packaging materials, when the weight of the secondary material(s) is less than 5% of the total weight of the packaging, it is considered single-material packing and labelled based on the material prevailing in terms of weight. Otherwise it is classified as set out in Annex VII of Decision 129/97/EC if it is composite packaging, or as category “7” as per Annex I if it is multilayer plastic packaging. This specification also applies in the case of packaging containing several secondary materials and one of these weighs < 5%. Such material is not considered for the purposes of identification.

This simplification is based on the approach adopted in COMMISSION IMPLEMENTING DECISION (EU) 2019/665, according to which, for the purposes of calculating and verifying attainment of recycling targets, Member States are required to report composite packaging and other packaging composed of more than one material, but may “derogate from this requirement where a given material constitutes an insignificant part of the packaging unit, and in no case more than 5 % of the total mass of the packaging unit”.

How should glues, adhesives, ceramic, rubber and inks be treated?

If packaging is made up of one packaging material (steel, aluminium, paper, wood, plastic, glass), laminated or processed with a material other than the packaging material (e.g. glue, adhesive, ink, ceramic, rubber), it is to be considered as single-material packaging.

For example, HDPE packaging with a layer of ink and the use of glues weighing more than 5% of the total weight of the packaging will display the code for HDPE single-material packaging.

Special cases – Note issued on 17 May 2021 by the Ministry of Ecological Transition

For certain types of packaging, it may be extremely difficult, if not impossible, to affix full labelling directly on packaging; for this reason the Ministry of Ecological Transition issued a note, on 17 May 2021, that clarifies how to behave in these cases.

- **Neutral packaging in general, with particular reference to transport/commercial/industrial packaging and/or possible semi-finished products.**

For this type of packaging, which mostly belongs to the B2B channel, identification of the packaging material can be conveyed and communicated by the producer on the transport documents accompanying the goods, or on other external media or documents, including digital media.

- **Pre-wrapping and variable weight distribution packaging**

Pre-wrapping is defined, by Circular no. 165 of 31 March 2000 of the then Ministero dell'Industria, del Commercio e dell'Artigianato (Ministry for Industry, Trade and Crafts) published in the Official Journal no. 92 General Series of 19 April 2000, as a variable weight packaging, often used at the fresh food or self-service counter which is finalised once it contains the food product.

Also for this type of packaging, there are objective difficulties in physically affixing the environmental labeling to the packaging. This could be packaging intended for fresh foodstuffs (e.g. fishery products) which cannot be printed, or in other cases it could be a packaging for which, at the time of production and sale, the intended use is not known with certainty (i.e. whether it will be packaging or products for household use) or, in other cases, it could be packaging prepared/cut to size at the point of sale (e.g. aluminium or plastic film) and therefore not able to be immediately printed.

For these cases, the labelling obligation is considered fulfilled if the information on the composition of the packaging in accordance with Decision 129/97/EC and the information to support the consumer in the correct disposal of waste for collection, can be inferred from information sheets made available to end consumers at the point of sale (e.g., next to the information on allergens, or with special information sheets placed next to the counter), or through the provision of such information on websites with predefined standard forms.

It is possible to adopt this solution also for the labelling of other neutral packaging destined to the final consumer.

- **Small multilingual and imported packaging**

Small packaging is defined as follows:

1. Packaging with the largest surface less than 25 cm² - a definition which is taken from EU Reg. No. 1169/2011, which indicates the requirement to state the nutrition information of the contents on food packaging and which provides for the possibility of exemption from the requirement for small packaging that meets this definition;
2. Packaging with a capacity of up to 125 ml – a definition taken from the CLP Regulation (EC Regulation no. 1272/2008), Article 29, paragraph 2 and Point 1.5.2 of Part I of Annex I), which stipulates that substances classified as hazardous and contained inside packaging must be provided with a label listing specific elements, and considers certain exemptions to this requirement for small packaging that meets this definition.

For all these cases, the Ministry of Ecological Transition clarified that where actual physical and/or technological limitations to physically affixing environmental labelling to packaging are identified, such information may be conveyed through digital channels or, where this route is also not feasible, it must be made available through the company's and/or reseller's websites.

In order to make the mandatory environmental information on the composition and proper end-of-life management of packaging more easily available and consultable for the end consumer, it is suggested to provide, on the packaging or at the point of sale (physical or digital), clear indications on how the consumer can search for the mandatory information through digital tools or websites.

These solutions are also supported to overcome the problems related to multilingual and/or import packaging.

- **Use of digital channels**

The use of digital solutions to fulfil the obligation of environmental labelling of packaging (e.g. App, QR code, websites) is allowed, in line with the process of technological innovation and simplification, a fundamental aspect envisaged in the National Recovery and Resilience Plan (PNRR). Such digital channels can completely replace or supplement the information indicated directly on the packaging.

Digital channels can facilitate the transmission of mandatory information along the supply chain in commercial and industrial circuits and convey to the final consumer the composition and the correct management of the packaging at the end of its life. If the packaging is intended for the final consumer, the party subject to the obligation is required to provide, on the packaging or at the point of sale (that can be physical or digital), clear indications on how the consumer can search for the mandatory information through digital tools or websites (App, QR code, websites, etc.). Alternatively, these instructions can be shared and made available through traditional or digital communication channels, initiatives or campaign promoted by companies or with the collaboration and contribution of representative trade associations.

In order to make the environmental labelling information available, it is possible to use a digital channel that refers to a page specifically dedicated to conveying the contents on the environmental labelling concerning the specific packaging, as long as access to this information is simple and the information is precise and easy to interpret. It is advisable to show and differentiate as much as possible each specific packaging under consideration on these channels, in order to make it easier for the final consumer to find and consult the information about each specific packaging.

Steel packaging

<p>Type of packaging</p>	<p>TIN SPRAY CANISTER/CYLINDER BOX ...</p>																																	
<p>Decision 97/129/CE</p>	<div style="text-align: center; background-color: #e0f0f0; padding: 5px;"> <p>Annex III Numbering system and abbreviations* for metals</p> </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Material</th> <th style="width: 33%;">Abbreviations</th> <th style="width: 33%;">Numbering</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Steel</td> <td style="text-align: center;">FE</td> <td style="text-align: center;">40</td> </tr> <tr> <td style="text-align: center;">Aluminium</td> <td style="text-align: center;">ALU</td> <td style="text-align: center;">41</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">42</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">43</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">44</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">45</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">46</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">47</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">48</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">49</td> </tr> </tbody> </table> <p><small>* Only use uppercase letters</small></p>	Material	Abbreviations	Numbering	Steel	FE	40	Aluminium	ALU	41			42			43			44			45			46			47			48			49
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<p>Material family</p>	<p>Steel</p>																																	
<p>Collection guidelines</p>	<p>Separate collection Check your local municipal guidelines</p>																																	

STEEL SPRAY CANISTER WITH PLASTIC CAP



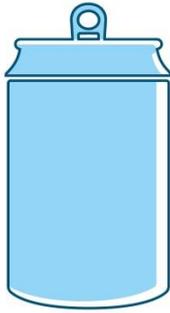
SPRAY CANISTER	CAP	HIGHLY RECOMMENDED
FE 40	PP 5	
Steel or metal	Plastic	REQUIRED
SEPARATE COLLECTION		
<i>Check your local municipal guidelines. Only dispose of empty containers.</i>		RECOMMENDED

Aluminium packaging

Type of packaging	TIN SPRAY CANISTER/CYLINDER SHEET ...																																	
Decision 97/129/CE	<p style="text-align: center;">Annex III Numbering system and abbreviations* for metals</p> <table border="1"> <thead> <tr> <th>Material</th> <th>Abbreviations</th> <th>Numbering</th> </tr> </thead> <tbody> <tr> <td>Steel</td> <td>FE</td> <td>40</td> </tr> <tr> <td>Aluminium</td> <td>ALU</td> <td>41</td> </tr> <tr> <td></td> <td></td> <td>42</td> </tr> <tr> <td></td> <td></td> <td>43</td> </tr> <tr> <td></td> <td></td> <td>44</td> </tr> <tr> <td></td> <td></td> <td>45</td> </tr> <tr> <td></td> <td></td> <td>46</td> </tr> <tr> <td></td> <td></td> <td>47</td> </tr> <tr> <td></td> <td></td> <td>48</td> </tr> <tr> <td></td> <td></td> <td>49</td> </tr> </tbody> </table> <p><small>* Only use uppercase letters</small></p>	Material	Abbreviations	Numbering	Steel	FE	40	Aluminium	ALU	41			42			43			44			45			46			47			48			49
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		48																																
		49																																
Material family	Aluminium																																	
Collection guidelines	Separate collection Check your local municipal guidelines																																	

Examples

ALUMINIUM CAN



CAN	RECOMMENDED
ALU 41	REQUIRED
ALUMINIUM OR METAL COLLECTION	
Check your local municipal guidelines. Reduce the volume of the can.	RECOMMENDED

Code 42: WHEN THE METAL IN NEITHER STEEL NOR ALUMINIUM

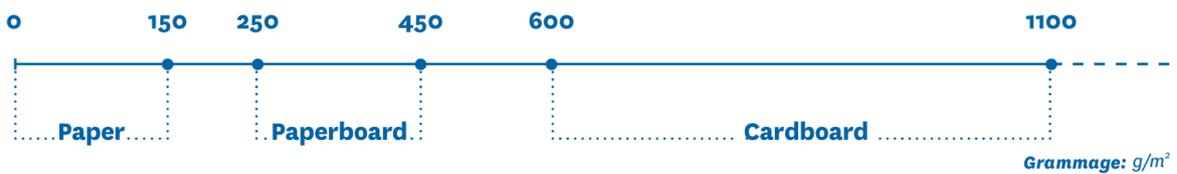
Whenever packaging consists of metal other than steel or aluminium, not associated with any specific code in Annex III to Decision 129/97/EC, we suggest adopting the number “42”, i.e. the first code in the table to which no material is associated, and therefore “available” for other types of metals not foreseen.

Paper packaging

Type of packaging	BOX TRAY	BAG CASE	...
Decision 97/129/CE	Annex II Numbering system and abbreviations* for paper and cardboard		
	Material	Abbreviations	Numbering
	Corrugated cardboard	PAP	20
	Non-corrugated cardboard	PAP	21
	Paper	PAP	22
			23
			24
			25
			26
			27
		28	
		29	
		30	
		31	
		32	
		33	
		34	
		35	
		36	
		37	
		38	
		39	
	* Only use uppercase letters		
Material family	Paper		
Collection guidelines	Separate collection Check your local municipal guidelines		

PAPER, PAPERBOARD OR CORRUGATED CARDBOARD?

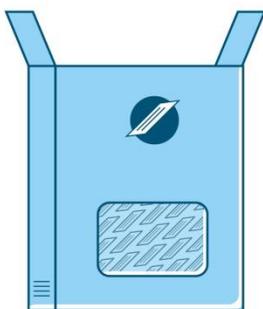
Proper paper has a grammage of up to 150 g/m², while cardboard features a grammage in excess of 600 g/m², and as high as 1100 g/m². Paperboard, on the other hand, is a paper-based material with a grammage that lies between paper and cardboard, identified by a grammage in the 250 to 450 g/m² range. If we look at the above figures, we can see that there are two apparently undefined ranges, namely between 150 and 250 g/m², and between 450 and 600 g/m²: within these ranges, the line between paper and paperboard (in the case of the former range) and between paperboard and cardboard (in the case of the latter) is a little blurred.



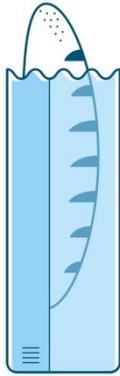
<https://www.comieco.org/glossario/>

Examples

PAPER CASE WITH PLASTIC WINDOW THAT CANNOT BE SEPARATED BY HAND

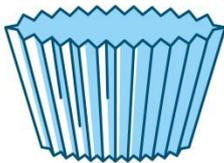


PAPER BAG WITH PLASTIC WINDOW THAT CAN BE SEPARATED BY HAND



BAG	WINDOW	HIGHLY RECOMMENDED
PAP 22	LDPE 4	REQUIRED
Paper	Plastic	
SEPARATE COLLECTION		REQUIRED
Check your local municipal guidelines. Separate the components and dispose of them correctly.		RECOMMENDED

FLUTED PAPER LINER



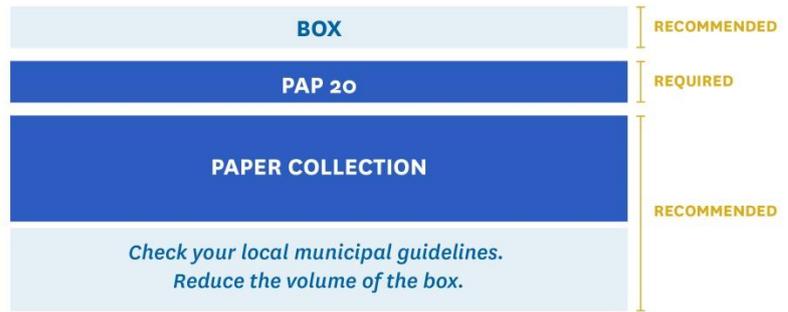
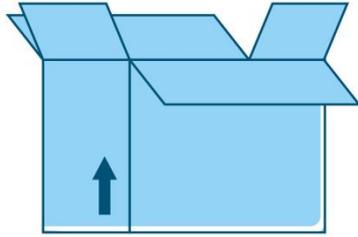
NB: Packaging with substantial food residues ideally should not be disposed of as paper. However, if your packaging complies with the UNI 13432:2002 standard, you may consider indicating that the packaging may be disposed of as food waste.

FLUTED PAPER LINER	RECOMMENDED
PAP 22	REQUIRED
PAPER COLLECTION	
Check your local municipal guidelines. Remove any product residue before recycling.	RECOMMENDED

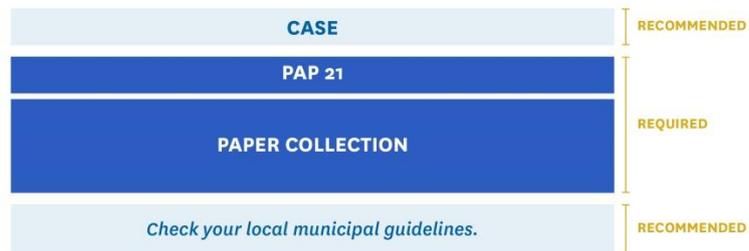
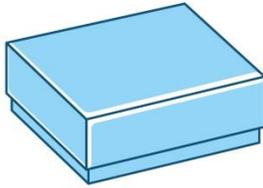
If **biodegradable and compostable** in accordance with technical standard UNI EN 13432

FLUTED LINER	RECOMMENDED
PAP 22	REQUIRED
PAPER	
SEPARATE ORGANIC COLLECTION	REQUIRED
Logo certification of biodegradability and compostability EN 13432 (with identification details of the certifier). Producer identification details.	SPECIFIC INFORMATION FOR COMPOSTABLE PACKAGING
Check your local municipal guidelines.	RECOMMENDED

CORRUGATED CARDBOARD BOX FOR B2B FREIGHT TRANSPORT



PLASTIC COATED PAPER CASE (plastic weighting < 5% of the total weight of the case)

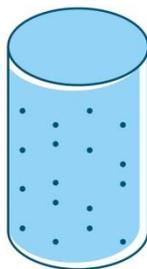


Wooden packaging

<p>Type of packaging</p>	<p>CORK STOPPER BOX ...</p>																																	
<p>Decision 97/129/CE</p>	<p style="text-align: center;">Annex IV Numbering system and abbreviations* for wood materials</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Material</th> <th style="width: 33%;">Abbreviations</th> <th style="width: 33%;">Numbering</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Wood</td> <td style="text-align: center;">FOR</td> <td style="text-align: center;">50</td> </tr> <tr> <td style="text-align: center;">Cork</td> <td style="text-align: center;">FOR</td> <td style="text-align: center;">51</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">52</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">53</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">54</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">55</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">56</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">57</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">58</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">59</td> </tr> </tbody> </table> <p>* Only use uppercase letters</p>	Material	Abbreviations	Numbering	Wood	FOR	50	Cork	FOR	51			52			53			54			55			56			57			58			59
Material	Abbreviations	Numbering																																
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		59																																
<p>Material family</p>	<p>Wood</p>																																	
<p>Collection guidelines</p>	<p>Separate collection Check your local municipal guidelines</p>																																	

Examples

CORK STOPPER

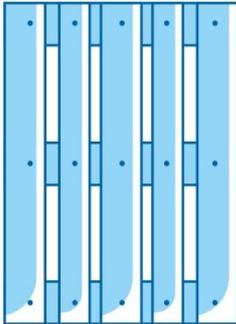


WOODEN FRUIT AND VEG BOX DESTINED FOR THE END CONSUMER



FRUIT AND VEG BOX	RECOMMENDED
FOR 50	REQUIRED
Wood	
SEPARATE COLLECTION	RECOMMENDED
<i>Check your local municipal guidelines for information on how to dispose of this packaging at a recycling centre.</i>	

WOODEN PALLET



PALLET	RECOMMENDED
FOR 50	REQUIRED
Wood	RECOMMENDED
SEPARATE COLLECTION	
<i>Check your local municipal guidelines for information on how to dispose of this packaging at a recycling centre.</i>	

Plastic packaging

Type of packaging	BOTTLE CAP LABEL	FLACON BAG MESH BAG	...																																																												
Decision 97/129/CE	<p style="text-align: center;">Annex I</p> <p style="text-align: center;">Numbering system and abbreviations* for plastic</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%;">Material</th> <th style="width: 30%;">Abbreviations</th> <th style="width: 30%;">Numbering</th> </tr> </thead> <tbody> <tr> <td>Polyethylene terephthalate</td> <td>PET</td> <td>1</td> </tr> <tr> <td>High density polyethylene</td> <td>HDPE</td> <td>2</td> </tr> <tr> <td>Polyvinyl chloride</td> <td>PVC</td> <td>3</td> </tr> <tr> <td>Low density polyethylene</td> <td>LDPE</td> <td>4</td> </tr> <tr> <td>Polypropylene</td> <td>PP</td> <td>5</td> </tr> <tr> <td>Polystyrene</td> <td>PS</td> <td>6</td> </tr> <tr> <td></td> <td></td> <td>7</td> </tr> <tr> <td></td> <td></td> <td>8</td> </tr> <tr> <td></td> <td></td> <td>9</td> </tr> <tr> <td></td> <td></td> <td>10</td> </tr> <tr> <td></td> <td></td> <td>11</td> </tr> <tr> <td></td> <td></td> <td>12</td> </tr> <tr> <td></td> <td></td> <td>13</td> </tr> <tr> <td></td> <td></td> <td>14</td> </tr> <tr> <td></td> <td></td> <td>15</td> </tr> <tr> <td></td> <td></td> <td>16</td> </tr> <tr> <td></td> <td></td> <td>17</td> </tr> <tr> <td></td> <td></td> <td>18</td> </tr> <tr> <td></td> <td></td> <td>19</td> </tr> </tbody> </table> <p style="font-size: small;">* Only use uppercase letters</p>			Material	Abbreviations	Numbering	Polyethylene terephthalate	PET	1	High density polyethylene	HDPE	2	Polyvinyl chloride	PVC	3	Low density polyethylene	LDPE	4	Polypropylene	PP	5	Polystyrene	PS	6			7			8			9			10			11			12			13			14			15			16			17			18			19
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Material family	Plastic																																																														
Collection guidelines	Separate collection Check your local municipal guidelines																																																														

How can the polymer of plastic packaging be identified if it is not provided for in decision 129/97/EC?

- **Polymers for which no specific coding is provided for in Decision 129/97/EC**

Decision 129/97/EC includes alphanumeric codes for the identification of just 6 different polymers. However, numerous polymers are used for the production of plastic packaging and this number is set to grow because this is a sector characterised by fast-evolving technology designed to satisfying many different needs.

So far, polymers other than those mentioned in Decision 129/97/EC have all been identified with the code "7". In order to provide more accurate information on the composition of plastic packaging, and given the significant number of existing polymers identified by the single code "7", we suggest accompanying the number "7" with:

- the abbreviation of the polymer's name as per technical standard UNI EN ISO 1043-1, where available.
For example, polyamide packaging may be identified as: PA 7
- the full name or acronym of the plastic material commonly used in market practice, in cases where no abbreviation exists.

For example, packaging in modified PET such as PETG may be identified as:

PETG 7

- Packaging made from biodegradable and compostable polymers, under UNI EN ISO 13432, is a separate case as no coding is foreseen for such polymers at the moment, even in the UNI technical standards. In such cases, it is highly recommend using the term "compostable plastic" to avoid confusion with traditional plastic packaging and to allow correct end-of-life management.

For example, polylactic acid packaging may be identified as: Compostable plastic 7.

- **Multi-layer packaging consisting of different polymers**

Packaging consisting structurally of two or more polymers are identified by the code "7" since, also in this case, Decision 129/97/EC does not include specific codes for these materials.

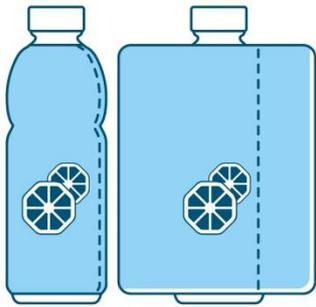
Anyone wishing to provide more accurate information on the composition of multilayer plastic packaging should follow the provisions of the UNI EN 11469 technical standard, according to which the abbreviations of polymers making up the packaging are written between the symbols ">" and "<", with the sign "+" placed in between.

For example, multilayer packaging made from PET and HDPE may be identified as follows:

>PET+HDPE< 7.

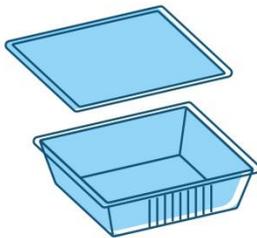
Examples

BOTTLE WITH PLASTIC CAP AND COVERING LABEL THAT CAN BE SEPARATED BY HAND



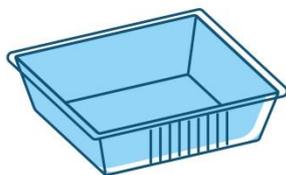
BOTTLE	CAP	LABEL	HIGHLY RECOMMENDED
PET 1	PP 5	PVC 3	
PLASTIC COLLECTION			REQUIRED
<p><i>Check your local municipal guidelines. Separate the label and dispose of it correctly. Crush the bottle lengthwise and do not remove the cap.</i></p>			RECOMMENDED

PLASTIC TRAY



TRAY	FILM	HIGHLY RECOMMENDED
PET 1	LDPE 4	
PLASTIC COLLECTION		REQUIRED
<p><i>Check your local municipal guidelines. Separate the film from the tray.</i></p>		RECOMMENDED

PLASTIC TRAY WITH A LAYER OF EVOH (weighing < 5% of the total weight of the tray)



TRAY	RECOMMENDED
PP5	
PLASTIC COLLECTION	REQUIRED
<p><i>Check your local municipal guidelines.</i></p>	RECOMMENDED

MULTI-LAYER PLASTIC BAG WITH PLASTIC CAP



BAG	CAP	HIGHLY RECOMMENDED
7*	PP5	
PLASTIC COLLECTION		REQUIRED
Check your local municipal guidelines. Empty the packaging of its contents before recycling.		RECOMMENDED

* Optional: > LDPE + PP <

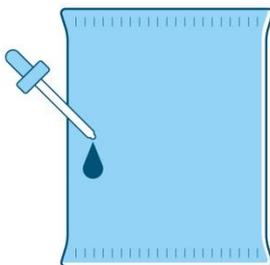
PLASTIC BOTTLE WITH PLASTIC CAP AND COVERED BY A LABEL THAT CANNOT BE SEPARATED BY HAND



BOTTLE	CAP	HIGHLY RECOMMENDED
PET 1	PP 5	
PLASTIC COLLECTION		REQUIRED
Check your local municipal guidelines. Crush the bottle lengthwise and do not remove the cap.		RECOMMENDED

In this case, since the label cannot be separated from the bottle by hand, it is not necessary to label it.

PLASTIC BAG WITH INK (> 5% OF TOTAL WEIGHT)

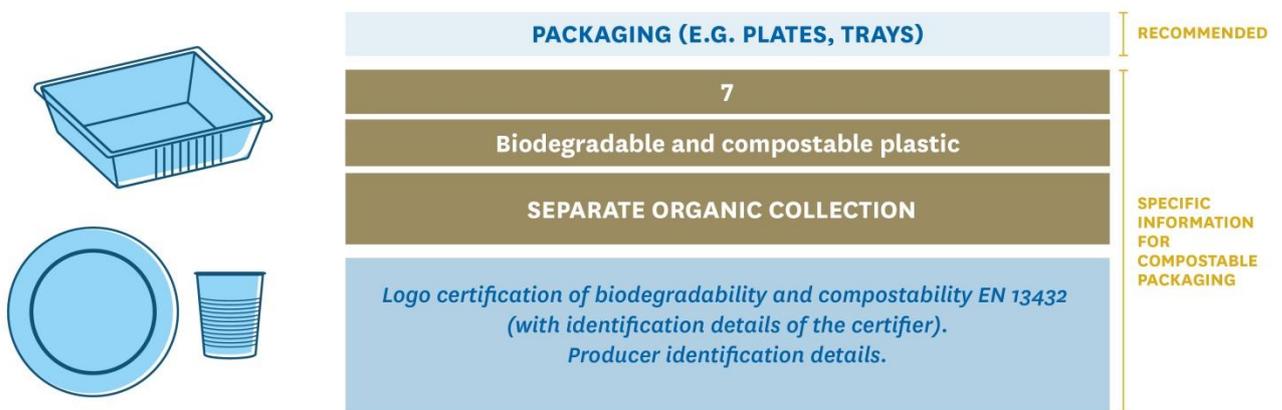


BAG	RECOMMENDED
PET 1	
PLASTIC COLLECTION	REQUIRED
Check your local municipal guidelines. Empty the packaging of its contents before recycling.	RECOMMENDED

Legislative Decree 116/2020 amended Article 182-ter of Legislative Decree 152/2006 on organic waste, establishing that waste, including packaging waste with similar biodegradability and compostability properties to organic waste, must be collected and recycled together with the latter if:

- a) it is certified by accredited bodies as conforming to the European standard UNI EN 13432 for packaging recoverable by composting or biodegradation;
- b) **it is appropriately labelled and includes, in addition to the mention of compliance with the above European standards, identification of the producer and the certifier, well as appropriate instructions for consumers to deliver such waste to the circuit for the separate collection and recycling of organic waste.**

BIODEGRADABLE AND COMPOSTABLE PLASTIC PACKAGING



Environmental labelling of plastic shopping bags

In 2017 the law (Italian legislative decree 152/2006, Article 219, paragraph 3-bis) introduced specific requirements for the marketing and labelling of biodegradable and compostable shopping bags for carrying goods, for ultra-light biodegradable and compostable plastic bags for hygienic and/or bulk food purposes (e.g. fruit and vegetable bags), which include also the labelling requirements set out in decree 116, both in relation to the amendments made to Article 219, paragraph 5 on environmental labelling of packaging and what is provided for in the amendments to Article 182-ter of Italian legislative decree 152/2006 on organic waste.

In fact, plastic bags with the following requisites may be sold:

- Reusable plastic bags with specific characteristics in terms of thickness and recycled material content, depending on the goods sold, and may not be distributed free of charge.
- Biodegradable and compostable plastic bags certified to EN 13432, for transporting goods.
- Plastic bags in ultra-light material certified as biodegradable and compostable and with minimal renewable raw material content (from 1 January 2021 not below 60 per cent). Manufacturers of biodegradable and compostable plastic bags in ultra-light material must also certify the percentage of renewable raw material content in their products according to standard EN 16640:2017.

All plastic bags referred to above may not be supplied/distributed free of charge with the aim of avoiding waste (“pricing”) and must state the identification information manufacturer (Article 219, paragraph 3 of Law no. 152/2006).

Labelling requirements already stipulated for these packaging materials with regard to disclosing their environmental characteristics must be provided with these under the new decree, both with reference to the amendment of paragraph 5 of Article 219, on environmental labelling of packaging materials, and – with regard to compostable shopping bags – the amendments made to Article 182-ter of Italian legislative decree 152/2006 on organic waste.



REUSABLE PLASTIC SHOPPING BAG



Glass packaging

Type of packaging	BOTTLE JAR	PHIAL ...																																	
Decision 97/129/CE	<p style="text-align: center;">Annex VI Numbering system and abbreviations* for glass</p> <table border="1"> <thead> <tr> <th>Material</th> <th>Abbreviations</th> <th>Numbering</th> </tr> </thead> <tbody> <tr> <td>Clear glass</td> <td>GL</td> <td>70</td> </tr> <tr> <td>Green glass</td> <td>GL</td> <td>71</td> </tr> <tr> <td>Brown glass</td> <td>GL</td> <td>72</td> </tr> <tr> <td></td> <td></td> <td>73</td> </tr> <tr> <td></td> <td></td> <td>74</td> </tr> <tr> <td></td> <td></td> <td>75</td> </tr> <tr> <td></td> <td></td> <td>76</td> </tr> <tr> <td></td> <td></td> <td>77</td> </tr> <tr> <td></td> <td></td> <td>78</td> </tr> <tr> <td></td> <td></td> <td>79</td> </tr> </tbody> </table> <p>* Only use uppercase letters</p>		Material	Abbreviations	Numbering	Clear glass	GL	70	Green glass	GL	71	Brown glass	GL	72			73			74			75			76			77			78			79
Material	Abbreviations	Numbering																																	
Clear glass	GL	70																																	
Green glass	GL	71																																	
Brown glass	GL	72																																	
		73																																	
		74																																	
		75																																	
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		77																																	
		78																																	
		79																																	
Material family	Glass																																		
Collection guidelines	Separate collection Check your local municipal guidelines																																		

What if the colour of glass packaging is neither clear, green nor brown?

Annex VI, which sets out identification codes for glass packaging, provides for the identification of clear, green and brown glass.

For glass packaging in a colour other than those referred to in Annex VI, we recommend using GL 73, i.e. the first number to which no specific colour is associated and therefore “available” to be adopted in such cases.

Examples

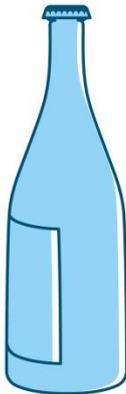
GLASS SPARKLING WINE BOTTLE WITH CORK STOPPER, ALUMINIUM CAP AND STEEL CAGE



BOTTLE	CAP	CAGE	CORK STOPPER	HIGHLY RECOMMENDED
GL71	ALU 41	FE 40	FOR 51	REQUIRED
Glass	Aluminium and metal	Aluminium and metal	Cork	
SEPARATE COLLECTION			Specific separate collection or separate organic collection	
Check your local municipal guidelines. Separate the components and dispose of them correctly.				RECOMMENDED

In this case, since the label cannot be separated from the bottle by hand, it is not necessary to label it.

RETURNABLE GLASS BOTTLE FOR THE HO.Re.Ca CHANNEL



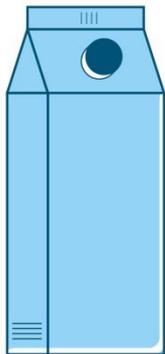
BOTTLE	CAP	RECOMMENDED
GL 70	FE 40	REQUIRED
Glass	Steel or metal	RECOMMENDED
Returnable glass bottle. SEPARATE COLLECTION at the end of its life.		
Check your local municipal guidelines.		

Polylaminate or composite packaging

Type of packaging	BAG POUCH	CONTAINER ...																																																															
Decision 97/129/CE	<p style="text-align: center;">Annex VII Numbering system and abbreviations* for composite waste</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Material</th> <th style="width: 33%;">Abbreviations</th> <th style="width: 33%;">Numbering</th> </tr> </thead> <tbody> <tr><td>Paper and cardboard + various metals</td><td></td><td style="text-align: center;">80</td></tr> <tr><td>Paper and cardboard + plastic</td><td></td><td style="text-align: center;">81</td></tr> <tr><td>Paper and cardboard + aluminium</td><td></td><td style="text-align: center;">82</td></tr> <tr><td>Paper and cardboard + tin</td><td></td><td style="text-align: center;">83</td></tr> <tr><td>Paper and cardboard + plastic + aluminium</td><td></td><td style="text-align: center;">84</td></tr> <tr><td>Paper and cardboard + plastic + aluminium + tin</td><td></td><td style="text-align: center;">85</td></tr> <tr><td></td><td></td><td style="text-align: center;">86</td></tr> <tr><td></td><td></td><td style="text-align: center;">87</td></tr> <tr><td></td><td></td><td style="text-align: center;">88</td></tr> <tr><td></td><td></td><td style="text-align: center;">89</td></tr> <tr><td>Plastic + aluminium</td><td></td><td style="text-align: center;">90</td></tr> <tr><td>Plastic + tin</td><td></td><td style="text-align: center;">91</td></tr> <tr><td>Plastic + various metals</td><td></td><td style="text-align: center;">92</td></tr> <tr><td></td><td></td><td style="text-align: center;">93</td></tr> <tr><td></td><td></td><td style="text-align: center;">94</td></tr> <tr><td>Glass + plastic</td><td></td><td style="text-align: center;">95</td></tr> <tr><td>Glass + aluminium</td><td></td><td style="text-align: center;">96</td></tr> <tr><td>Glass + tin</td><td></td><td style="text-align: center;">97</td></tr> <tr><td>Glass + various metals</td><td></td><td style="text-align: center;">98</td></tr> <tr><td></td><td></td><td style="text-align: center;">99</td></tr> </tbody> </table> <p style="font-size: small;">* Composite waste: C plus the abbreviation corresponding to the dominant material (C/.....)</p>		Material	Abbreviations	Numbering	Paper and cardboard + various metals		80	Paper and cardboard + plastic		81	Paper and cardboard + aluminium		82	Paper and cardboard + tin		83	Paper and cardboard + plastic + aluminium		84	Paper and cardboard + plastic + aluminium + tin		85			86			87			88			89	Plastic + aluminium		90	Plastic + tin		91	Plastic + various metals		92			93			94	Glass + plastic		95	Glass + aluminium		96	Glass + tin		97	Glass + various metals		98			99
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Material family	Steel, aluminium, paper, wood, plastic or glass - depending on the material prevailing in weight																																																																
Collection guidelines	Separate collection Check your local municipal guidelines																																																																

Examples

PAPER-BASED POLYLAMINATE LIQUID CONTAINER



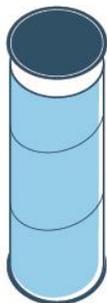
LIQUID CONTAINER	CAP	HIGHLY RECOMMENDED
C/PAP 84	HDPE	REQUIRED
Paper	Plastic	
SEPARATE COLLECTION		REQUIRED
Check your local municipal guidelines. www.tiriciclo.it/raccolta-e-riciclo/ Remove the cap from the container.		RECOMMENDED

COMPOSITE BAG, PAPER BASE + PLASTIC COATING (> 5% of total weight)



BAG	RECOMMENDED
C/PAP 81	REQUIRED
PAPER COLLECTION	
Check your local municipal guidelines. Empty the packaging of its contents before recycling.	RECOMMENDED

COMPOSITE TUBE, PAPER BASE + STEEL



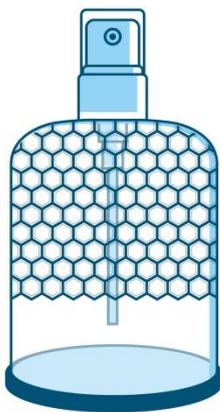
TUBE	RECOMMENDED
C/PAP 83	REQUIRED
UNSORTED	
Check your local municipal guidelines.	RECOMMENDED

**COMPOSITE BAG, PLASTIC BASE + ALUMINIUM
(40% LDPE, 30% PET AND 20% ALU)**



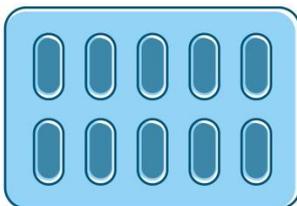
BAG	RECOMMENDED
C/LDPE 90	REQUIRED
PLASTIC COLLECTION	
<i>Check your local municipal guidelines. Empty the packaging of its contents before recycling.</i>	RECOMMENDED

GLASS AND STEEL PERFUME BOTTLE



BOTTLE	CAP	HIGHLY RECOMMENDED
C/GL 97	PP 5	REQUIRED
Glass	Plastic	
SEPARATE COLLECTION		RECOMMENDED
<i>Check your local municipal guidelines. Remove the cap from the bottle before recycling.</i>		

**COMPOSITE BLISTER PACK FOR FOOD SUPPLEMENTS
ALUMINIUM BASE + PLASTIC**



BLISTER PACK	RECOMMENDED
C/ALU 90	REQUIRED
ALUMINIUM OR METAL COLLECTION <i>Check your local municipal guidelines.</i>	
<i>Empty the packaging of its contents before recycling.</i>	RECOMMENDED

Textile packaging

Annex V		
Numbering system and abbreviations* for textile materials		
Material	Abbreviations	Numbering
Cotton	TEX	60
Jute	TEX	61
		62
		63
		64
		65
		66
		67
		68
		69

* Only use uppercase letters

For textile packaging, reference is made to Annex V to Decision 129/97/EC.

For textile materials not provided for in this table, i.e. materials other than “cotton” and “jute”, we recommend using TEX 62, i.e. the first available number to which no specific material is associated.

Such packaging does not fall within the scope of domestic waste collection but of specific waste collections. Therefore, in addition to the code, it is good practice to indicate the full material “fabric” and to invite the consumer to check their local municipal guidelines.

Entry into force of the obligation and use of inventory

On 28 February 2022, the law of 25 February 2022 n. 15 of conversion of the decree law 30 December 2021 n. 228 (so-called Milleproroghe).

The art. 11 of the provision provides for the suspension of the labelling obligation as of 31 December 2022, as well as the possibility of marketing stocks of products already placed on the market or labelled by 1 January 2023.

What is meant by “products”?

Since the requirements mentioned in the legislation refer to packaging, the term "products" refers to the packaging and not to the packaged products. It follows that companies will be able to use, while they last, stocks of finished packaging, even if empty, which do not comply with the labelling obligation as of 31 December 2022.

Which packaging can be marketed after 31 December 2022?

Packaging - even if empty - that has been labelled (e.g., already printed, or for which the label has already been produced/applied) before 31 December 2022 or packaging that has been purchased by packaging users from their suppliers before 31 December 2022 can be marketed.

With which documents is it possible to prove that this is stock that can be marketed?

Considering that the date of "putting on the market" of packaging can be traced by means of the purchase documents of the goods, if a user (on the basis of Art. 218, paragraph 1, letter s) of Legislative Decree 152/06, users are "traders, distributors, fillers, users of packaging and importers of filled packaging") purchases already labelled packaging (e.g., which has already been printed, or for which the label has already been produced/applied) from a supplier, the date of those documents is the decisive criterion (the actual physical transfer of the goods to the purchaser could also take place at a later date; the important thing is to be able to prove that the goods were purchased before 31 December 2022).

If a self-producer of packaging ("self-producers" are defined as entities that purchase raw materials and packaging materials in order to manufacture/repair packaging to package their own products (other than packaging). The self-producer is considered to all intents and purposes a user, also with reference to the raw material used for the repair of its own packaging) has in stock already labelled packaging (which has therefore already been printed, or for which the label has already been produced/applied) before 31 December 2022, it can make reference to the date of the production batch (in this case reference should be made to the production batch of the packaging or of the label, if the mandatory information is to be included on the label).

With reference to packaging producers (on the basis of Art. 218, paragraph 1, letter r), of Legislative Decree 152/06, packaging producers are "suppliers of packaging materials, manufacturers, processors and importers of empty packaging and packaging materials") that have stocks of packaging that do not meet the requirements, it is assumed they can:

- market the packaging purchased from the customer before 31 December 2022. In this case, the date of the purchase document of the goods by its customer will be the decisive criterion.

- market the stocks of neutral and unlabelled packaging - as already provided for in the clarification note of the Ministry for Ecological Transition dated 17 May 2021 - accompanied by documentation that contains the mandatory information to be conveyed to customers (composition of the packaging in accordance with decision 129/97/CE).

In the case of packaging that will undergo a printing process or the affixing of a label (through the different methods foreseen in the specific cases), it will be necessary to stipulate an agreement with the customer in which the point of the chain in which these operations will take place is defined.

Can packaging stocks held in other countries be marketed?

If the packaging was purchased before 31 December 2022, it can be marketed even if the stocks are held in another country. The date of purchase of the packaging is the decisive criterion in this case.

Labelling in a nutshell

The table below summarises the contents of these Guidelines with a breakdown of the issues of greatest interest: the contents of the label, split by mandatory and recommended; the position and format, which are suggestions but not binding; and the timing.

This information applies to all packages.

		PACKAGING DESTINED FOR THE END CONSUMER	B2B PACKAGING
CONTENTS	Required information	<p>Identification under Decision 129/97/CE</p> <p>Collection guidelines. The corresponding material family must be clear.</p>	<p>Collection guidelines. The corresponding material family must be clear.</p>
	Recommended/ optional information	<p>Instructions to consumers to check their local municipal guidelines</p> <p>Type of packaging</p> <p>For plastic packaging, reference to UNI standards for supplementary identification codes not provided for by Decision 129/97/EC, multi-layer packaging, mainly plastic composites</p> <p>Suggestions for efficient separate waste collection</p>	
WHERE?	Best choice	On each detachable component	
	...If it is not possible	Record the identification code provided for by Decision 129/97/CE on each detachable component, and the other information on the main body or presentation packaging, or on the label, or on the component that makes the information most visible to the consumer.	
	...If it is possible	Record the identification code provided for by Decision 129/97/CE and the other information on the main body or presentation packaging, or on the label, or on the component that makes the information most visible to the consumer	
FORMAT AND VISUAL DISPLAY (Linee Guida)	Font size	Greater than or equal to 1,2 mm	
	Colours	<p>Blue for paper</p> <p>brown for organic waste</p> <p>yellow for plastic</p> <p>turquoise for metals</p> <p>green for glass</p> <p>grey for unsorted waste</p>	
TIMING	The obligation has been postponed until 1 January 2023. In addition, industry operators will be able to market products without the new environmental labelling requirements that have already been put on the market or that already have a label, while stock last.		

The possible modality options

ALL PACKAGING			PACKAGING DESTINED TO C&I CIRCUIT	NEUTRAL PRIMARY PACKAGING	WHEN APPLICABLE
Physical affixing of the labelling on packaging		Digital channels	Supporti esterni		
<i>On each component</i>	<i>On the presentation packaging (or main body)</i>	<i>Proper instructions must be provided to the end consumer on how to find the mandatory information through the chosen digital channel.</i>	Shipping documents (or similar)	Information sheet on the point of sale	Instruction/user manual

Can refer to (with arrow pointing from Digital channels to Supporti esterni)

Glossary

SELF-PRODUCER

“Self-producers” are defined as any parties that purchase raw materials and packaging materials in order to manufacture/repair packaging for their own products (which are different from the packaging). For all intents and purposes, self-producers are considered users, also with reference to the raw material involved in repairing their own packaging.

BIODEGRADATION (Greene, J.P. (2014). Sustainable Plastics: Environmental Assessments of Biobased, Biodegradable, and Recycled Plastics. (1st Ed). John Wiley & Sons.)

Biodegradation is a thermochemical process that takes place in a specified time frame and under specific environmental conditions. During biodegradation, the materials/products are converted to biomass, water and carbon dioxide.

COMPOSTABILITY (Greene, J.P. (2014). Sustainable Plastics: Environmental Assessments of Biobased, Biodegradable, and Recycled Plastics. (1st Ed). John Wiley & Sons.)

Compostability is the property of a material to generate compost (biomass) through the composting process, namely an aerobic biological process that takes place under externally imposed environmental conditions. In industrial composting plants, the temperatures used usually range from 50 °C to 60 °C, with a moisture content in the 45% to 55% range.

The technical standard UNI EN 13432 states the requirements for packaging recoverable through composting:

- Packaging shall be designed, produced and commercialised in such a way as to permit its reuse or recovery, including recycling, and to minimise its impact on the environment when packaging waste or residues from packaging waste management operations are disposed of;
- Packaging waste processed for the purpose of composting shall be of such a biodegradable nature that it should not hinder the separate collection and the composting process or activity into which it is introduced;
- Biodegradable packaging waste shall be of such a nature that it is capable of undergoing physical, chemical, thermal or biological decomposition such that most of the finished compost ultimately decomposes into carbon dioxide, biomass and water.

PACKAGING SUPPLY CHAIN CONSORTIA

According to art. 223 of Italian Legislative Decree 152/06, packaging producers are required to join together in a Consortium for each packaging material (steel, aluminium, paper, wood, plastic and glass). The seven Packaging Supply Chain Consortia are as follows:

Ricrea – National consortium for the recycling and recovery of steel packaging;

Cial – National aluminium packaging consortium;

Comieco – National consortium for the recovery and recycling of paper-based packaging;

Rilegno – National consortium for the collection, recovery and recycling of wooden packaging;

Corepla – National consortium for the collection, recycling and recovery of plastic packaging;
 Biorepak – National consortium for the collection, recycling and recovery of biodegradable and compostable plastics;
 Coreve – Glass recovery consortium.

Instead of joining the Packaging Supply Chain Consortia, producers can opt instead, pursuant to art. 221, paragraph 3, of the same Decree: “a) to organise the management of their own packaging waste autonomously - even collectively - throughout the country; [...] c) to certify, under their sole responsibility, that a take-back scheme has been put in place for the return of their packaging, supported by suitable documentation demonstrating the scheme's self-sufficiency [...]”

CONSUMER

Packaging consumers are individuals who purchase or import packaging or packaged items or goods for their own use, and not for the purpose of carrying out their business.

WASTE MANAGEMENT

According to art. 183, paragraph 1, letter n) of Italian Legislative Decree 152/06, waste management refers to: “the collection, transport, recovery and disposal of waste, including the control of said operations and work following the closure of disposal sites, as well as operations carried out as traders or brokers.”

PACKAGING (Legislative Decree 152/06, Article 218 (April 3rd 2006))

According to Italian Legislative Decree 152/06, Art. 218, packaging means “the product, consisting of materials of any kind, used to contain certain goods, from raw materials to finished products, to protect them, allow their handling and their delivery from the producer to the consumer or user, ensure their presentation, as well as disposable items used for the same purpose.”

COMPOSITE PACKAGING (Decision 129/97/EC EUR-Lex)

“Composite” packaging is defined as packaging made up of different materials, which cannot be separated by hand.

MULTI-MATERIAL PACKAGING

This term is used to mean packaging consisting of a number of independent parts made from different materials. Unlike composite packaging, in this case the various materials making up the packaging can be separated. For example, the following qualify as multi-material packaging: chocolate box (paper for the box, plastic for the shaped insert), sweet bag (plastic for the bag, paper for the individual sweet wrappers), coffee tin (aluminium for the tin, plastic for the lid), etc...

FULL PACKAGING

The term “full packaging” means any packaged goods and, in particular, the packaging of these goods. For example, for an importer of cans of beer, “full packaging” means the aluminium in the cans as well as any other secondary and tertiary packaging used.

PRIMARY PACKAGING (OR SALES PACKAGING)

In art. 218, letter b) of Italian Legislative Decree no. 152/06, primary packaging is defined as “packaging conceived so as to constitute a sales unit to the end user or consumer at the point of purchase”. Generally speaking, primary packaging is used for an individual product ready for consumption.

SECONDARY PACKAGING (OR GROUPED PACKAGING)

In art. 218, letter c) of Italian Legislative Decree 152/06, secondary packaging is defined as “packaging conceived so as to constitute, at the point of sale, a grouping of a certain number of sales units, whether the latter is sold as such to the end user or consumer, or whether it serves only as a means to replenish the shelves at the point of sale. It can be removed from the product without affecting its characteristics”. Generally speaking, secondary packaging is used to group a certain number of individual products ready for consumption. Once removed from the secondary packaging, the product is unaltered and ready for use in its primary packaging.

TERTIARY PACKAGING (OR TRANSPORT PACKAGING)

In art. 218, letter d) of Italian Legislative Decree 152/06, tertiary packaging is defined as “packaging conceived so as to facilitate handling and transportation of goods, from raw materials to finished products, or of a certain number of sales units or grouped packaging to prevent physical handling and transport damage, excluding containers for road, rail, sea and air transport”. Generally speaking, tertiary packaging is used to protect and facilitate the handling of goods during transportation.

SECONDARY RAW MATERIAL (SRM)

(Italian Legislative Decree 205/10, Article 184-ter of December 3rd 2010)

Set of waste that ceases to be such if it is subject to recovery operations, including recycling, and if it meets specific criteria.

UNI STANDARDS

The letters UNI identify “voluntary regulatory documents (UNI standards, technical specifications, technical reports and reference practices) in all industrial, business and tertiary sectors.”

Technical standards are standards - compliance with which is voluntary - approved and published by an international, European or national standardisation body; they are basically regarded as “best practices”.

Compliance with same is not mandatory, and alternative, equivalent solutions are possible, provided they are proven to be effective.

PACKAGING PRODUCER

Based on art. 218, paragraph 1, letter r) of Italian Legislative Decree 152/06, packaging producers are “suppliers of packaging materials, manufacturers, processors and importers of empty packaging and packaging materials”.

SEPARATE WASTE COLLECTION

(Italian Legislative Decree 152/06, Article 183, paragraph 1, letter f) of April 3rd 2006)

Separation - performed according to cost-effectiveness, efficacy, transparency and efficiency criteria - designed to sort municipal waste into like fractions at source, when the waste is collected or, for the food waste organic fraction, even at the processing stage, and to separate packaging waste from other municipal waste, on condition that all the above-mentioned waste is actually sent for recovery.

RECOVERY OF PACKAGING WASTE

(Italian Directive 2008/98/EC, Article 3, paragraph 15 of November 19th 2008.)

The recovery of generated waste means any operation whose main result is to allow waste to serve a useful purpose by replacing other materials that would otherwise have been used to fulfil a particular function, or to prepare waste to fulfil that function, in the plant or in the wider economy.

ENERGY RECOVERY (WASTE-TO-ENERGY)

According to art. 218, paragraph 1, letter n) of Italian Legislative Decree 152/06, energy recovery from packaging waste is achieved where said packaging waste is combustible and is used to produce energy by means of waste-to-energy plants (with or without other types of waste).

PACKAGING RECYCLING

(Directive 2008/98/EC, Article 3, paragraph 17 of November 19th 2008)

Any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.

PACKAGING WASTE

(Directive 2008/98/EC, Article 3, paragraph 1 of November 19th 2008)

Any substance or object which the holder discards or intends or is required to discard.

PACKAGING USER

According to art. 218, paragraph 1, letter s) of Italian Legislative Decree 152/06, users are “traders, distributors, fillers, users of packaging, and importers of filled packaging.”