



Raising standards for consumers

POSITION PAPER

ANEC position on the Review of the EU requirements for packaging and other measures to prevent packaging waste

Contribution to EU initiative: Reducing packaging waste – review of rules



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ANEC is supported financially
by the European Union & EFTA



Ref: ANEC-SUST-2020-G-045

31/07/2020

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INTRODUCTION

In ANEC's view, the "essential requirements" of the Packaging Directive are vague, do not give clear instructions to business and cannot be enforced.

The associated CEN standards were intended to provide more detailed provisions and clarity, but the influence exerted by the European packaging industry in their drafting meant they do not contain the substantive requirements needed.

ANEC urges development of detailed legal requirements for packaging, using delegated acts, rather than relying on standardisation alone.

1 | PREVENTION – A TOP PROIORITY

Reduction goals: Goals for overall reduction of (various kinds of) single use packaging must be established.

Excessive packaging: It is key to set clear-cut and enforceable rules for prevention of excessive packaging (in certain areas) and to define measurable quantitative criteria for this. The criteria should be based on a maximum ratio between the volume of the packaging and volume of the packed product or, preferably, a maximum ratio between the surface of packaging and the volume of the packed product (see also annex). The aim is not just to minimise packaging material, but also to prevent deceptive packaging promising more content than is present. Such rules should also apply to the delivery of online sales where often excessive packaging is used for shipping goods.

Ban specific forms of packaging: In addition, specific forms of packaging - such as aluminium cans for beverages, complex multi-layer materials or secondary packaging in areas such as cosmetics - should be banned.

Prevention of hazardous chemicals: It is essential to prevent the use of hazardous chemicals to protect the consumer and prevent impediments to recycling. The current vague provision in the Directive, requiring only to minimise the presence of noxious and other hazardous substances and materials, needs to be replaced by clear-cut limits for hazardous chemicals which take not only into account end-of-life operation, but also protect the health of users and consumers. For instance, SVHC or CMR chemicals should be generally banned. The provisions should cover not only packaging materials but also imprints, perhaps setting separate rules for them. These provisions must apply equally to virgin materials and recycled materials.

2 | REUSE

We want systematic expansion of reuse systems at the expense of single use packaging, wherever possible and useful. This should include:

- product-specific reuse targets for (various kinds of) beverage containers and also other product groups, such as food preserves, yogurts, detergents, shipping or transport containers etc,
- use of reuse systems for certain product groups and ban on corresponding single-use product systems (e.g. for mineral water),
- standardising shapes and other features (such as materials, breaking resistance and refill number) of reuse containers to aid collection and reuse across Europe, based on industry specifications in some countries where bottles are used by a pool of fillers, or existing standards (such as the Austrian AF-standard bottle for soft drinks),
- encouraging Member States to grant tax incentives for prolonged use/reuse, and to introduce taxes for single use/ one-way systems.

3 | RECYCLING WITH PRECAUTION

Recycling must be promoted only when contamination with problematic chemicals can be excluded.

Increased recycling rates are possible only if homogenous and clean waste streams can be ensured. It follows the plethora of packaging material and their chemical composition must be cut severely. Hence, the material composition of packaging applications must be specified and conforming packages labelled as fit for recycling. Such materials should be separately collected (e.g. PET bottles or PE/PP containers).



ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and the use of standards, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 34 countries.

ANEC is funded by the European Union and EFTA, with national consumer organisations contributing in kind. Its Secretariat is based in Brussels.

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The annex below regards ANEC suggestions on how to tackle excessive packaging

As we mention in the feedback we provide, it is key to promote the establishment of clear-cut and enforceable rules for the prevention of excessive packaging (in certain areas) and to define measurable quantitative criteria for this. This should be based on either a maximum ratio between the volume of the packaging and the volume of the packed product or, preferably, a maximum ratio between the surface of packaging and the volume of the packed product.

A member of ANEC has commissioned a study many years ago which established a criterion for an acceptable surface/volume ratio and demonstrated the applicability for various product groups. Annex 2 in the brochure below explains and illustrates the quantitative prevention criterion.

The last page annexed here also shows as an example the Austrian AF-standard bottle for soft drinks. Further examples exist at the national level.

Packaging Waste



March 2005

The prevention of waste in general and the prevention of packaging waste in particular has been a political goal for many years. As early as 1975 the European Directive on Waste (75/442/EEC) declared the prevention of waste as a first priority of waste management. The European Directive on Packaging and Packaging waste (94/62/EC) adopted in 1994 stipulated: "Packaging shall be so manufactured that the packaging volume and weight be limited to the minimum adequate amount to maintain the necessary level of safety, hygiene and acceptance for the packed product and for the consumer." However, the Packaging Directive does not establish any detailed rules or guidance for the implementation of this provision. Hence, it is not surprising that it had little effect in practice.

In 1996 the European Commission mandated the European standardisation organisation CEN to elaborate various standards which were intended to complement the Packaging Directive and to provide the missing detailed specifications for prevention, reuse, recycling, composting and energy recovery. Due to a number of shortcomings these standards were objected by some Member States and the Commission judged that only the standard dealing with composting was in compliance with the Packaging Directive and the mandate. Another mandate was given in 2002. The revised standards were adopted in 2004 and were subject to harsh criticism from consumer and environmental organisations (ANEC-ECOS position paper on revised packaging standards prepared under the second standardisation mandate M317, January 2005) because the new standards were not significantly different from the old ones.

The standard dealing with prevention (EN13428: Requirements specific to manufacturing and composition – prevention by source reduction) offers no measurable criteria nor incentive to companies to reduce excessive packaging. In addition, the standard allows for the use of substances that are harmful for the environment. A description of the major elements of this standard and a critical review of its contents can be found in Annex 1 of this documentation.

The Consumer Council at the Austrian Standards Institute commissioned a study to review the prevention standard and to develop an alternative approach including a clear-cut quantitative criterion. In fact, this study built upon the results of an earlier study financed by the Austrian Ministry of Environment which was carried out in 1999 (CEN Standards Related to Packaging and Packaging Waste, Technical Office Hauer). The method suggested in the first study was further refined and tested in practice by evaluating about 70 different packages. The study (Part 1: Quantitative criteria for the prevention of packaging – an alternative to the European standard EN 13428, Part 2: Collection of examples, Technical Office Hauer) can be obtained from the Consumer Council.

This brochure contains a selection of the packages contained in the study report. It focuses on typical cases of waste packages and gives possible packaging alternatives which would be in conformity to the proposed limits. The quantitative criterion is based on a packaging surface to product volume ratio. Special provisions exist for certain types of products and packages falling below a certain minimum area are exempted. A summary of the approach is given in Annex 2.

The aim of this brochure is to promote the establishment of clear-cut and enforceable rules for the prevention of superfluous packaging.

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Product: Drive-in nut M4, 20 pieces

Company: LUX-Tools



Description

Dimensions: $h = 11,5 \text{ cm}$, $w = 7,5 \text{ cm}$, $d = 3 \text{ cm}$ (cuboid: $H = 8,5 \text{ cm}$, $w = 6 \text{ cm}$, $d = 3 \text{ cm}$)
 Product volume: $20,6 \text{ cm}^3$
 Packaging surface: $220,7 \text{ cm}^2$
 Packaging volume: 153 cm^3

20 pieces of nuts loosely poured

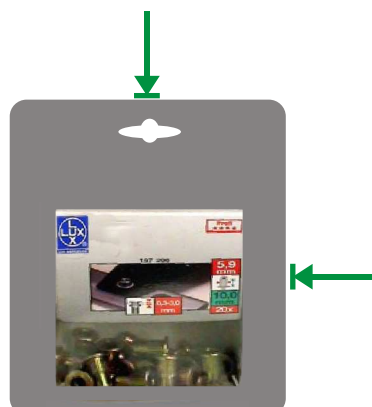
Possible Packaging

A reduction of the cuboid to $5 \text{ cm} \times 5 \text{ cm} \times 2 \text{ cm}$ and a reduction of the two-dimensional surface to $8 \text{ cm} \times 7 \text{ cm}$ would result in a total surface of about 120 cm^2 and would be in accordance with the proposed exception rule for small packages.

Existing packaging



Recommended alternative packaging



Product: Cross-over covers for skirting boards, 2 pieces

Company: Parador, Living systems



Description

Dimensions: $h = 8 \text{ cm}$, $w = 12 \text{ cm}$, $d = 3,5 \text{ cm}$
 Product volume: 55 cm^3
 Packaging surface: 332 cm^2
 Packaging volume: 336 cm^3

2 pieces of covers loosely poured

Possible Packaging

A reduction of the cardboard cuboid packaging to $7 \text{ cm} \times 5 \text{ cm} \times 3 \text{ cm}$ would be in accordance with the proposed limit.

Existing packaging



Recommended alternative packaging



Product: Gypsum plaster screws 3,9 x 25 mm, 200 pieces

Company: Parador, Living systems



Description

Dimensions: $h = 15,5 \text{ cm}$, $w = 8 \text{ cm}$, $d = 4,5 \text{ cm}$ (cuboid: $h = 13 \text{ cm}$, $w = 8 \text{ cm}$, $d = 4,5 \text{ cm}$)
Product volume: 180 cm^3
Packaging surface: $413,5 \text{ cm}^2$
Packaging volume: 468 cm^3

200 pieces of screws loosely poured

Possible Packaging

A reduction of the cardboard box height from 13 cm to 9 cm would be in accordance with the proposed limit.

Existing packaging



Recommended alternative packaging



Product: Day and night cream

Company: Juvena of Switzerland



Description

Dimensions: $h = 7,4 \text{ cm}$, $w = 19 \text{ cm}$, $d = 19 \text{ cm}$

Product volume: $61,82 \text{ cm}^3$

Packaging surface: $1.284,4 \text{ cm}^2$

Packaging volume: $2.671,4 \text{ cm}^3$

Day and night cream in containers, capsules in a glass tube

Possible Packaging

An elimination of the large gift cardboard box together with a slight adjustment at the area/volume ratio of the cream containers would be in accordance with the proposed limit.

Existing packaging



Recommended alternative packaging



Product: Eau de toilette vaporisation natural spray

Company: Ulric de Varens



Description

	<u>Cardboard packaging</u>	<u>Gift packaging</u>
Dimensions:	$h = 14,5 \text{ cm}$, $w = 11 \text{ cm}$, $d = 3,5 \text{ cm}$	$h = 19,5 \text{ cm}$, $w = 21 \text{ cm}$, $d = 3,8 \text{ cm}$
Product volume:	112 cm^3	140 cm^3
Packaging surface:	$497,5 \text{ cm}^2$	$1.126,8 \text{ cm}^2$
Packaging volume:	539 cm^3	1.556 cm^3

Eau de toilette in glass bottle covered by plastics parts and, in case of the gift packaging, a key fob.
Metering device is classified as part of the product

Possible Packaging

The bottle alone without the additional plastic wrapping of the bottle would be in accordance with the proposed limit. In addition, the surface/volume ratio of the glass bottle could be improved.

Existing packaging



Recommended alternative packaging



Product: After shave

Company: Mexx Star Perfume



Description

Dimensions: $h = 12,3 \text{ cm}$, $w = 7,2 \text{ cm}$, $d = 7,2 \text{ cm}$

Product volume: 75 cm^3

Packaging surface: $457,9 \text{ cm}^2$

Packaging volume: $637,6 \text{ cm}^3$

After Shave in a glass bottle

Possible Packaging

The glass bottle alone would be in accordance with the proposed limit.

Existing packaging



Recommended alternative packaging



Product: Detergents

Company: Calgonit



Description

Dimensions: $h = 29 \text{ cm}$, $w = 18,5 \text{ cm}$, $d = 9,2 \text{ cm}$

Product volume: 2000 cm^3

Packaging surface: 1.947 cm^2

Packaging volume: 3.600 cm^3

Powder, loosely poured

Possible Packaging

An increase of the content from 2.000 ml to 2.625 ml (+32%) would be in accordance with the proposed limit. Alternatively, the size of the container could be reduced.

Existing packaging



Recommended alternative packaging



Product: Adapter for headset

Company: MLine



Description

Dimensions: $h = 20 \text{ cm}$, $w = 10 \text{ cm}$, $d = 3 \text{ cm}$ (cuboid: $h = 9,3 \text{ cm}$, $w = 6 \text{ cm}$, $d = 3 \text{ cm}$)
 Product volume: $3,4 \text{ cm}^3$
 Packaging surface: $344,1 \text{ cm}^2$
 Packaging volume: $167,4 \text{ cm}^3$

1 piece of adapter loosely poured

Possible Packaging

A reduction of the transparent cuboid to $6 \text{ cm} \times 3 \text{ cm} \times 3 \text{ cm}$ (90 cm^2) and a reduction of the two-dimensional surface to $8 \text{ cm} \times 8 \text{ cm}$ would result in a surface of about 130 cm^2 and would be in accordance with the proposed exception rule for small packaging.

Existing packaging



Recommended alternative packaging



Product: Parallel cable matcher NC6502

Company: Hewlett-Packard Co.



Description

Dimensions: h = 22,2 cm , w = 15,3 cm , d = 5,8 cm

Product volume: 242,95 cm³

Packaging surface: 1.114,32 cm²

Packaging volume: 1.970 cm³

Printer plug and operation instructions

Possible Packaging

A reduction of the cardboard box to 18 cm x 12 cm x 3,5 cm would be in accordance with the proposed special provisions for this type of product. However, bigger savings could be achieved by using a smaller booklet.

Existing packaging



Recommended alternative packaging



Product: Nougat praline with chocolate "Ildefonso"

Company: Manner



Description

Small packaging
 Dimensions: $h = 10,4 \text{ cm}$, $w = 10,4 \text{ cm}$, $d = 1,9 \text{ cm}$
 Product volume: $156,8 \text{ cm}^3$
 Packaging surface: $295,3 \text{ cm}^2$
 Packaging volume: $205,5 \text{ cm}^3$

Big packaging
 $h = 18 \text{ cm}$, $w = 18 \text{ cm}$, $d = 2,6 \text{ cm}$
 147 cm^3
 $835,2 \text{ cm}^2$
 $842,40 \text{ cm}^3$

Nougat cubes (16 and 15 pieces)

Possible Packaging

Whilst the smaller packaging is in accordance with the proposed limit, the big package is not. However, even the small package could be reduced by arranging the nougat cubes in several layers resulting in a more cubic shape.

Existing packaging



Recommended alternative packaging



Product: Sweets, Echinacea, 30 g (33 pieces)

Company: Bretti's Naturkost KG



Description

Dimensions: $h = 11,4 \text{ cm}$, $w = 9,1 \text{ cm}$, $d = 2,1 \text{ cm}$

Product volume: 63 cm^3

Packaging surface: $293,58 \text{ cm}^2$

Packaging volume: $217,8 \text{ cm}^3$

Not counted number of sweets loosely poured

Possible Packaging

A reduction of the cardboard cuboid to $7,5 \text{ cm} \times 2,1 \text{ cm} \times 6 \text{ cm}$ would be in accordance with the proposed limit. Alternatively the content could be increased by 150% using the same package.

Existing packaging



Recommended alternative packaging



Product: Pralines filled with chocolate, 170 g (16 pieces)

Company: Productos J. Jiménez, S.L.



Description

Dimensions: $h = 21 \text{ cm}$, $w = 21 \text{ cm}$, $d = 8,9 \text{ cm}$

Product volume: 360 cm^3

Packaging surface: $1.629,6 \text{ cm}^2$

Packaging volume: $3.924,9 \text{ cm}^3$

Sweets, orderly arranged

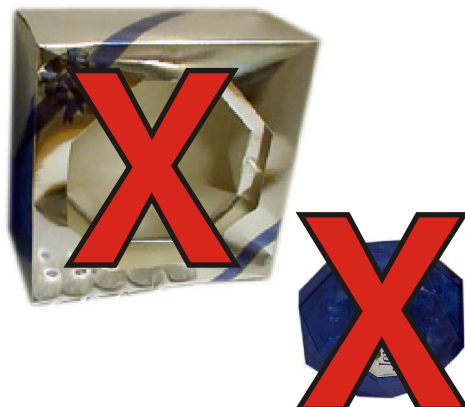
Possible Packaging

A cuboid with the dimensions $13 \text{ cm} \times 7 \text{ cm} \times 6 \text{ cm}$ (sweets in 2 layers arranged) would be in accordance with the proposed limit.

Existing packaging



Recommended alternative packaging



Product: CD recording software

Company: Roxio, digital media company



Description

Dimensions: $h = 25,5 \text{ cm}$, $w = 40 \text{ cm}$, $d = 6,5 \text{ cm}$
 Product volume: $680,4 \text{ cm}^3$
 Packaging surface: $2.891,5 \text{ cm}^2$
 Packaging volume: 6.630 cm^3

CD-software + booklet + CDs for recording

Possible Packaging

An elimination of the transparent part of the package and the reduction of the cardboard to $22 \text{ cm} \times 16 \text{ cm} \times 4 \text{ cm}$ would be in accordance with the proposed special provisions for this type of product.

Existing packaging



Recommended alternative packaging



Product: Foto Edition Software

Company: Microsoft



Description

Dimensions: $h = 24,3 \text{ cm}$, $w = 20 \text{ cm}$, $d = 6 \text{ cm}$

Product volume: $101,3 \text{ cm}^3$

Packaging surface: $1.503,6 \text{ cm}^2$

Packaging volume: 2.916 cm^3

4 CDs (software) + booklet

Possible Packaging

A reduction of the cardboard cuboid to $22 \text{ cm} \times 24 \text{ cm} \times 1 \text{ cm}$ would be in accordance with the proposed special provisions for this type of product. However, much bigger savings could be advised by using a smaller booklet.

Existing packaging

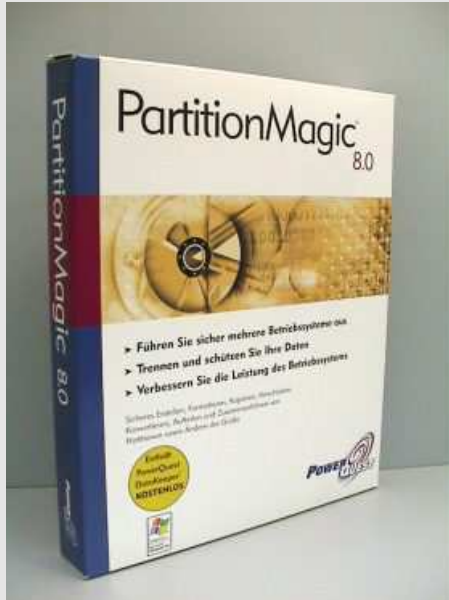


Recommended alternative packaging



Product: Partition Magic Software

Company: Power Quest



Description

Partition Magic
 Dimensions: $h = 24 \text{ cm}$, $w = 20 \text{ cm}$, $d = 3 \text{ cm}$
 Product volume: $137,2 \text{ cm}^3$
 Packaging surface: 1.224 cm^2
 Packaging volume: 1.440 cm^3

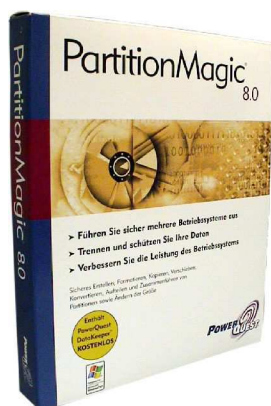
Drive Image
 $h = 23 \text{ cm}$, $w = 17,8 \text{ cm}$, $d = 0,5 \text{ cm}$
 $137,2 \text{ cm}^3$
 $859,60 \text{ cm}^2$
 $\sim 200 \text{ cm}^3$

CD + booklet

Possible Packaging

Whilst the package of *Drive Image* (= recommended package) is in accordance with the special provisions for this type of product the package for *Partition Magic* is not.

Existing packaging



Recommended alternative packaging



Product: Toy front line truck

Company: Mattel



Description

Dimensions: $h = 15 \text{ cm}$, $w = 10,5 \text{ cm}$, $d = 5 \text{ cm}$ (cuboid: $h = 9 \text{ cm}$, $w = 8 \text{ cm}$, $d = 5 \text{ cm}$)
 Product volume: $51,75 \text{ cm}^3$
 Packaging surface: $399,5 \text{ cm}^2$
 Packaging volume: 360 cm^3

Lorry

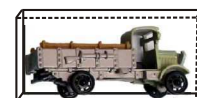
Possible Packaging

A cuboid with the dimensions $8 \text{ cm} \times 3,5 \text{ cm} \times 3 \text{ cm}$ would be in accordance with the proposed limit.

Existing packaging



Recommended alternative packaging



Product: Toy "Robot Wars Minibots"

Company: Robot Wars



Description

Dimensions: $h = 18 \text{ cm}$, $w = 21 \text{ cm}$, $d = 9 \text{ cm}$

Product volume: 81 cm^3

Packaging surface: $719,58 \text{ cm}^2$

Packaging volume: $871,40 \text{ cm}^3$

3 toy vehicles

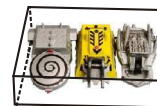
Possible Packaging

A cuboid with the dimensions $10 \text{ cm} \times 5 \text{ cm} \times 3 \text{ cm}$ results would be in accordance with the proposed limit.

Existing packaging



Recommended alternative packaging



Product: Lego

Company: Lego System



Description

Dimensions: $h = 14,3 \text{ cm}$, $w = 9,7 \text{ cm}$, $d = 3,9 \text{ cm}$

Product volume: 99 cm^3

Packaging surface: $464,6 \text{ cm}^2$

Packaging volume: 541 cm^3

Several different items

Possible Packaging

A reduction of the cardboard cuboid to $8 \text{ cm} \times 6 \text{ cm} \times 3 \text{ cm}$ would be in accordance with the proposed limit.

Existing packaging

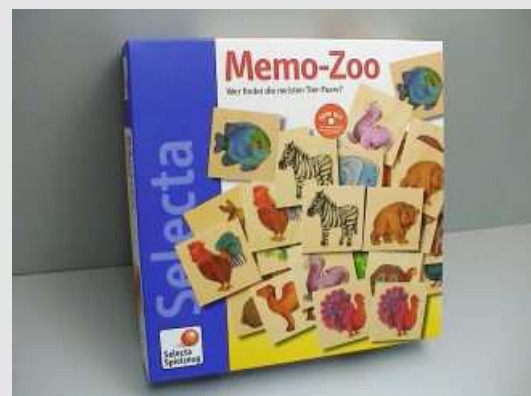
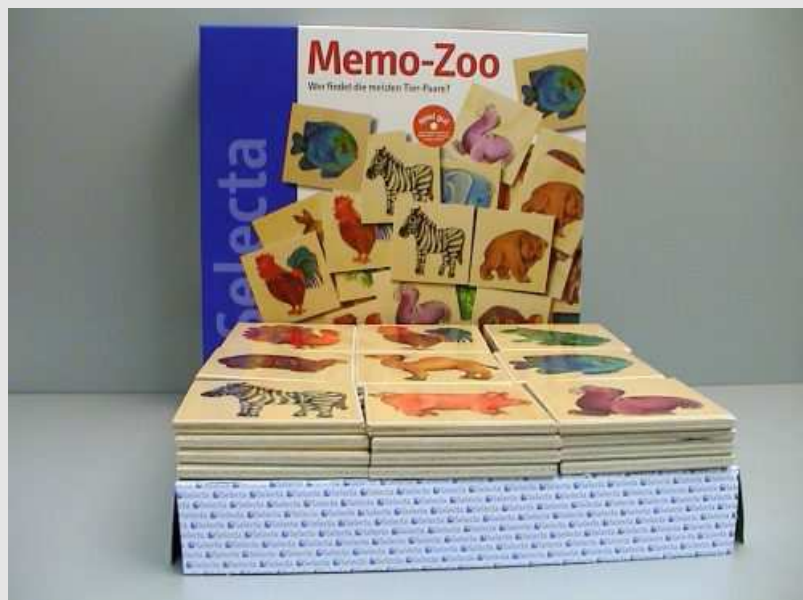


Recommended alternative packaging



Product: Memory game "Memo-zoo"

Company: Selecta Toys



Description

Dimensions: $h = 5,4 \text{ cm}$, $w = 20 \text{ cm}$, $d = 20 \text{ cm}$

Product volume: $731,65 \text{ cm}^3$

Packaging surface: 1.232 cm^2

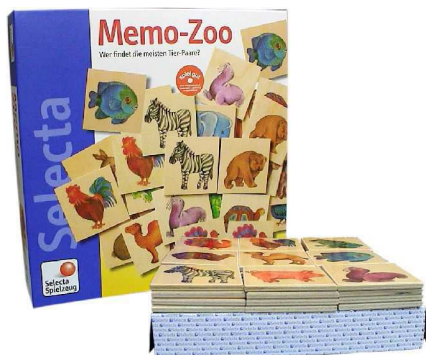
Packaging volume: 2.160 cm^3

36 elements, orderly arranged

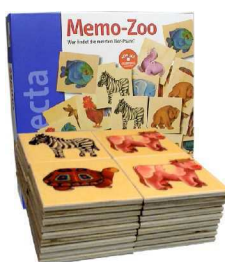
Possible Packaging

An elimination of the double base and another arrangement of the elements as shown would enable a package which is in accordance with the proposed limit.

Existing packaging



Recommended alternative packaging



Product: "Duplo" elements

Company: LEGO



Description

Dimensions: $h = 28,5 \text{ cm}$, $w = 19 \text{ cm}$, $d = 7 \text{ cm}$

Product volume: $755,8 \text{ cm}^3$

Packaging surface: 1.748 cm^2

Packaging volume: 3.790 cm^3

3 elements

Possible Packaging

A cuboid with the dimensions $17,5 \text{ cm} \times 11 \text{ cm} \times 8 \text{ cm}$ would be in accordance with the proposed limit.

Existing packaging



Recommended alternative packaging



Product: Fertilizer rods 20 pieces

Company: Auchan



Description

Dimensions: $h = 24,5 \text{ cm}$, $w = 14,5 \text{ cm}$, $d = 0,6 \text{ cm}$ (cuboids: $h = 3,5 \text{ cm}$, $w = 5,2 \text{ cm}$, $d = 0,6 \text{ cm}$)

Product volume: 36 cm^3

Packaging surface: $615,41 \text{ cm}^2$

Packaging volume: $43,7 \text{ cm}^3$

20 pieces of fertilizer orderly arranged

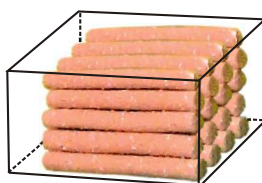
Possible Packaging

An elimination of the two-dimensional surface and also the arrangement of the fertilizer rods in 5 layers with 4 pieces each arranged in a cardboard with the dimensions $6 \text{ cm} \times 4 \text{ cm} \times 4 \text{ cm}$ would be in accordance with the proposed limit.

Existing packaging



Recommended alternative packaging



Product: Flower fairy, hand painted

Company: Flower fairies



Description

Dimensions: h = 65 cm , w = 50 cm , d = 8 cm (cuboid: h = 17 cm, w = 11 cm, d = 8 cm)
 Product volume: 722,25 cm³ (doll + rack + booklet)
 Packaging surface: 4.646,76 cm²
 Packaging volume: 1.496 cm³ (box for doll + rack)

A doll, a rack and a booklet

Possible Packaging

An elimination of the two-dimensional surface and the attachment of the doll with rack directly on the booklet would enable a package which is in accordance with the proposed limit.

Existing packaging



Recommended alternative packaging



Annex 1 - EN 13428:2004

Contents of the standard:

The standard EN 13428:2004 "Packaging - Requirements specific to manufacturing and composition - Prevention by source reduction" lays down provisions for the most economical use of packaging materials. The standard is based on an assessment of the packages and provides instructions for its implementation. Basically, this procedure resembles that of the standard series ISO 9000 and ISO 14000.

The individual or organization placing a packaging on the market should be able to demonstrate that the criteria specified for the packaging are complied with using a minimum of packaging weight or packaging volume while safeguarding

- functionality of the entire distribution chain;
- safety and hygiene for products and consumers;
- acceptance by consumers.

"Prevention by source reduction" is defined as follows:

Process for the achievement of a minimum adequate weight and/or volume for identical requirements, of primary, secondary and/or tertiary packaging, when performance and user acceptability remain unchanged and/or adequate, thereby minimizing the impact on the environment.

The required performance criteria for packaging that basically are of equal importance are:

- product protection;
- packaging manufacturing process;
- packing/filling process;
- logistics (including transport, warehousing and handling);
- product presentation and marketing;
- consumer/user acceptance;
- information;
- safety;
- legislation;
- other issues.

The assessment should state for each relevant criterion whether this is a so-called "critical area", which means that no reduction of the packaging weight and/or packaging volume is possible under this criterion. If no critical area has been identified, it is assumed that there may be potential for further reduction at source.

The priority ranking of the performance criteria and the evaluation of a criterion as "critical area" shall be the task of the individual or organization placing the packaging on the market.

Critical review of the standard (excluding the treatment hazardous substances) :

All performance criteria listed above are given priority over the reduction of packaging weight and/or packaging volume. Under the assessment procedure it is determined whether these requirements could have been achieved with a reduced resource input. The requirements concerning packaging primarily identified by the individuals or organizations placing the packaging on the market are not questioned at all. For this reason, reduction at source ranks below all (even subjective) performance criteria in the hierarchy of priorities.

For example, the criteria of marketing and product presentation, too, are ranked above source reduction. Thus, it would be possible to place excessive packaging on the market, without infringing the standard, by emphasizing the subjective importance of product presentation.

The procedures taken from the standard series EN ISO 9000 ff and EN ISO 14000 are unsuitable for achieving verifiable results towards packaging reduction. These standard series were developed to document processes and, if necessary, identify weak points of such processes. However, in the present case it is less important to ascertain which process was used to develop a specific packaging than to render transparent in how far a packaging corresponds to the requirements of the EU Packaging Directive for minimum material input. However, a clear-cut quantifiable criterion for packaging prevention is not contained in the standard. This is a serious omission. Hence, the standard will not lead to significant packaging savings in practice.

Annex 2 The proposed approach for packaging reduction (short summary)

Basic concept:

A limit value is defined for the ratio between the **packaging surface** and **product volume**. This ratio is calculated according to the following formula (1):

$$\frac{\sqrt[2]{\text{surface of packaging [cm}^2\text{]}}}{\sqrt[3]{\text{volume of packed goods [cm}^3\text{]}}}$$

The suggested limit of 3,2 for this ratio has been empirically established based on an assessment of a number of packages for a variety of different products. The limit is considered to be "reasonable" and constitutes the line between acceptable and non-acceptable (see examples below).

The reason for using the above formula is:

- to cover 2-dimensional packaging components
- to encourage suitable geometric shapes of packaging

A simple volume product to volume packaging ratio would ignore these aspects.

Example 1: Energy saving lamp



The energy saving lamp is offered in 2 different types of packaging. For the blister pack on the left a value of 3,96 can be calculated using the above formula. This means that the package would have exceeded the proposed limit value of 3,2 and would therefore have failed due to the large 2-dimensional component. By contrast, the cardboard box on the right gives a value of 2,64 which would be in conformity to the proposed limit.

Example 2: Chocolate bananas



Both packages contain 24 chocolate bananas, but in different arrangements: 2 layers in case of the left package and 4 layers in case of the right one. Whilst the left package achieves a value of 3,26 and fails the criterion narrowly, the right package passes with a value of 2,59.

Packaging saving: about 40%

Special provisions:

a) Small packages

Packages with a surface area of up to 150 cm² are exempted from complying with the limit value.

This ensures the handling and identification of very small products, particularly for self-service markets.

b) Flat or lengthy solid products

The limit given above does not work for flat or lengthy solid products. Even for optimised packages the limit would be exceeded. For this type of product a slightly different approach was chosen. The ratio of the **product surface** to **product volume** of the product is determined according to the formula (2):

$$\frac{\sqrt[2]{\text{surface of the packed good [cm}^2\text{]}}}{\sqrt[3]{\text{volume of the packed good [cm}^3\text{]}}}$$

If this ratio exceeds a value of 2,8 (which is the case for lengthy or flat products) an individual limit value for this package is calculated and used instead of the 3,2 value given above. This is done by multiplying the result of the calculation using formula (2) by a factor of 1,15.

In other words: formula (2) can be seen as a special case of formula (1). It represents the ideal or minimum packaging where the surface of the good and the surface of the packaging are identical. This ideal ratio may be exceeded by 15%.

Example 3: Fluorescent lamp



The calculation of the packaging surface to product volume ratio according to formula (1) gives a value of 3,94 which is above the permissible value of 3,2. However, the product surface to product volume ratio according to formula (2) gives a value of 3,84 which exceeds the value of 2,8. Hence, an individual limit is calculated: $3,84 \times 1.15 = 4,42$. As this latter value is higher than the value of 3,94 calculated using formula (1) the package is acceptable.

For further details including the methods for the determination of volumes and areas the reader is referred to the study report.

Exceptions

The proposed limit value can be exceeded if justified in case of:

- Products with special protection requirements (e.g. fragile electronic appliances or glassware, hazardous substances);
- Legal provisions;
- The need to ensure the safety of the consumer and the carrier.

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