



# Guide for companies to comply with GfaW requirements Packaging

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## CONCEPTION

The requirements for packaging are divided into two parts. The first part relates to the integration of packaging into your sustainability strategy, the second to the concrete purchase, i.e.: which materials are used.

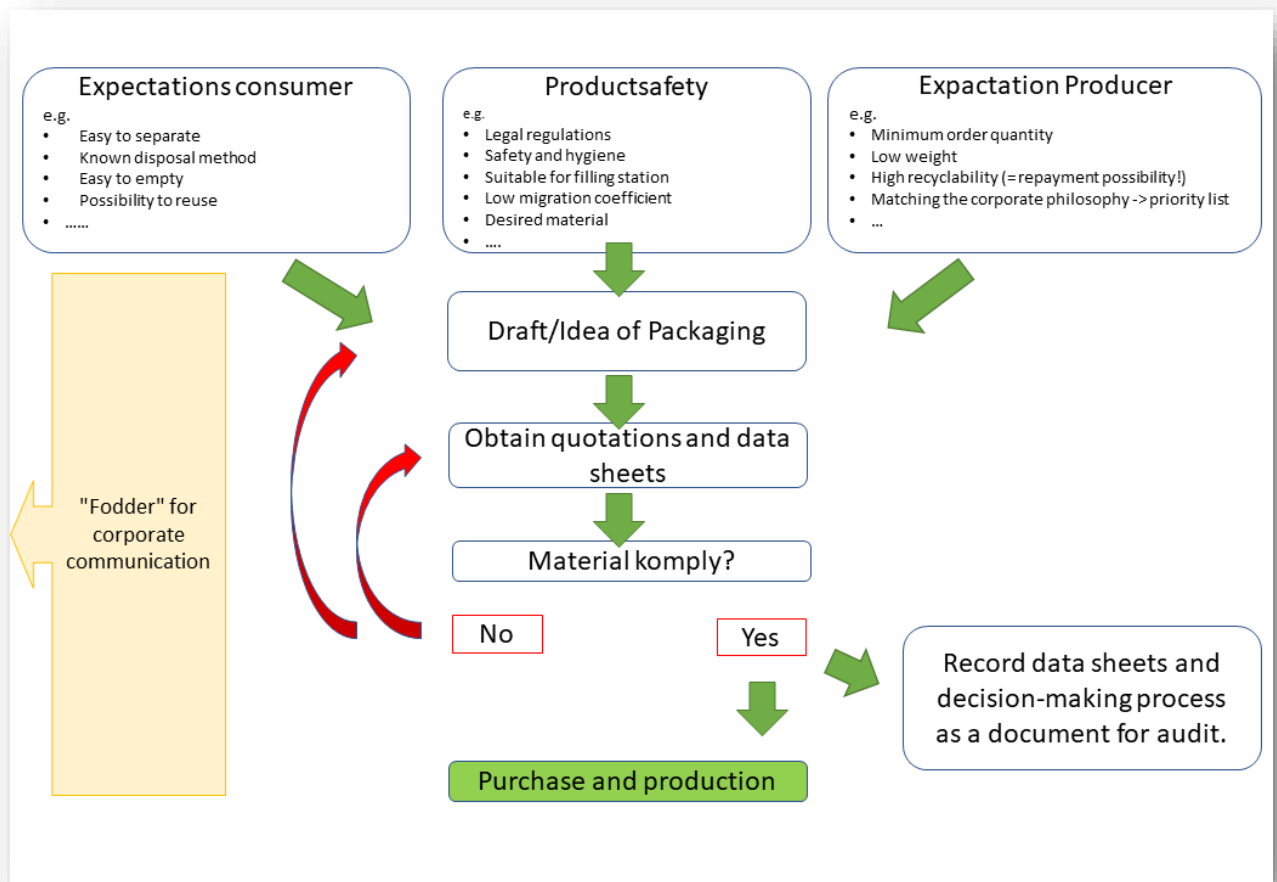
In the conception, it is first necessary to consider the priorities of the first part. Of course, the materials are already included here. However, they are not only the basis of the considerations. The decision-making process for the choice of packaging should be part of your quality management.

It can be proceeded in the mentioned priority order.

- 1. Avoid**
- 2. Reduce**
- 3. Reuse**
- 4. Drainability**
- 5. Recyclability**

Helpful questions are, for example: What is our sustainability strategy with regard to packaging? Is a life cycle analysis performed? If so, how should packaging be designed to provide consumers with a simple solution? What kind of packaging does the product need to arrive safely and well to the consumer? What type of packaging is the consumer already comfortable with? How many packaging units do we need?

This chart describes one possible method for determining your own compliant packaging:



## MATERIALS

In developing the criteria for packaging materials, we are looking more closely at the last item on the list of priorities. Our focus here is therefore on recyclability.

The legislator plans to provide financial incentives for high recyclability. This would then have to be proven in order to receive reimbursement for placing the packaging on the market. So you would do well to set up a system of documentation now and get suppliers used to being asked about recyclability.

Our positive list reflects the current state of knowledge about the technology and recyclability of individual materials. **So you do NOT need to have an expensive recyclability analysis of your packaging, just comply with the material specifications.** Unless you want to advertise the degree of recyclability. In that case, you should also have this statement scientifically confirmed in the course of the Green Claims Regulation.



The positive list is divided into different sheets, each of which refers to a type of packaging. For each type of packaging, the closures, barriers, labels and printings are also taken into account. The conformity levels of the materials are indicated in color.

**Green = Use preferentially**

**Orange = tolerated, but are under observation**

**Red = not tolerated: material does not comply**

When using the positive list, it is best to proceed as follows:

### **1. define type of packaging.**

=> outer packaging made of paper = observe the requirements from the "Paper packaging" sheet

=> primary packaging

E.G.

- a) Tube made of plastic with plastic closure = observe requirements from sheet "Plastic packaging".
- b) Jar made of glass with plastic lid = observe requirements from "Glass packaging" sheet
- c) Tube made of aluminum with plastic cap = observe requirements from "Aluminum" sheet
- d) Bag made of paper = observe requirements from the sheet "Paper packaging".

### **2. observe requirements for individual components:**

1. Material of packaging
2. Barriers
3. Closures
4. Labels / sleeves

## **INQUIRIES TO SUPPLIERS**

They are embarking on a pioneering path similar to the beginnings of certified natural cosmetics or certified organic foods, when proof of quality had to be painstakingly requested from raw material manufacturers. Currently, the fact is that many packaging units, especially plastics, come from China and the proofs are not so easy to obtain. Fortunately, the legislator is playing into our cards here, as the legal provisions for the labeling of plastics are picking up speed in the wake of the Packaging Act. Therefore, GfaW asks for patience



and persistence. In the end, you will benefit from this, as it is only a matter of time before mandatory verification of packaging materials becomes compulsory.

Our tip here is to remain persistent and keep asking the question: What material is the packaging made of? And don't be satisfied with collective terms like "plastics". It may help to suggest whether the material is PET, PP or LD-PE.

## APPLICATION AND AUDIT

For product registration, we ask for a general statement that the criteria have been met. The verification will then take place in the audit.

Please collect the following documents to demonstrate the compliance of your products at the audit:

1. documentation of your design in line with your sustainability strategy (see chart).
2. documentation of product data sheets showing the following information:
  - a. Type of packaging (jar, tube, bottle...).
  - b. Material
  - c. Barriers/ closures, etc.
  - d. Material of barriers, closures, etc.
  - e. Printing/labels material, covering area, etc.
3. batch traceability documents for the packaging used.
4. completed checklist for the audit review.

An example of possible documentation can be found as the last sheet in the material list:



Sampleform Documentation Packaging																	
Product Art. Nr.	Prio 1- 4			Prio 5													
	Evidence	Material	Art. Nr. and Evidence	Barriers	Art. Nr. and Evidence	Disclosures	Art. Nr. and Evidence	Etikett / Sleeves	Art. Nr. and Evidence	additional components	Art. Nr. and Evidence	print	Art. Nr. and Evidence	checked	approved		
Exampel Shampoo "Hair-Beauty"	Packaging is indispensable, but we do not use paper outer packaging. The information should be placed on a roll label. The shape allows complete emptying of the residue through the pump dispenser.	Minutes of the "Sustainability" team meeting on the topic of "Packaging", see Protokolle WXY Folder XYZ	HD-PE	Supplier confirmation from XX.XX.XXXX	none		PP pump dispenser and metal spring, unscrewable	Datasheet XYZ, page Z	Roll label made of the same material as the main packaging: HD-PE with density of 0.7 g/cm <sup>3</sup> , Hot water removable (from 70°), but not water soluble adhesive (Attention: Shampoo!)	Datasheet an supplier confirmation XY and XW	none	EuPIA compliant printing inks		Shortcut a	Shortcut b		



## EXPLANATION OF THE CRITERIA AND RECOMMENDATION FOR ACTION

Section 21 of the Packaging Act provides for the implementation of financial incentives for the use of recyclable packaging. No recyclability will result in a payment by the distributors, but the use of at least 90% recyclable packaging provides for a reimbursement.

The standard setter therefore recommends, both from a financial and environmental point of view, not only to adhere to the minimum requirements in this standard, but to follow the recommendations.

Particularly in the case of fibrous materials, it is often assumed that these are naturally recyclable. However, this can already be undermined by the wrong or too thick varnish, by hotmelts in folding cartons or by coatings and finishes. Information on the recyclability of pulps can be found in the standard PTS-RH 021 97. In the case of pulps, the origin should also be checked, as around half of cellulose comes from Latin America and from eucalyptus monocultures. In order not to support this trend, it is important not only to see the certificate number of the producing company in the FSC supply chain tracking, but also to list the numbers of the incoming raw materials.

The recyclability of composite materials, plastics, glass and metal packaging is confirmed by companies such as HTP-cylcos, Interseroh or Clover. The EU is working to build a Circular Economy, so it makes sense to use as much recyclate, scrap or cullet in packaging as possible. The use of recyclate, for example in the fiber sector, also ensures that raw materials come from domestic collections rather than sources from other continents.

### Definition

**NIR:** Near Infrared. NIR (near infrared) refers to a spectrum in a range between 760 and 2,500 nm that is not visible to humans. **In this wavelength range, material-typical patterns based on molecular vibrations can be detected after excitation with light.** This technology is used for sorting packaging.

**Recyclability:** Recyclability is the individual gradual suitability of a packaging or a product to actually substitute material-identical virgin material in the post-use phase; "actually" here means material-identical virgin material in the post-use phase; "actual" in this context means that collection and industrial scale are a prerequisite.

**Recycled content:** Proportion of recycled raw materials in relation to the total of raw materials.

**Foreign materials:** Material composition other than that of the basic packaging - e.g. sleeves or labels.



**Impurities:** Substances that interfere with or prevent the recycling process according to the current state of the art.

**Composite packaging:** Packaging consisting of different types of material that cannot be separated manually, none of which exceeds a mass proportion of 95% of the total packaging.