



Guidelines for the environmental labeling of packaging

CONAI approach

October 2022





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GOALS OF THE DOCUMENT

This document intends to describe the pathway pursued by CONAI to conceive the ***Guidelines for the environmental labeling of packaging*** and the connected tools and initiatives aimed at supporting enterprises in the interpretation and implementation of the legal requirements about the environmental labeling introduced by the Legislative Decree n. 116 of the 3rd of September 2020.

The storytelling of this pathway allows us to identify the elements that contributed to making this one a successful experience: in particular, strong emphasis is focused on the importance of teamwork and the system approach that has been adopted, and that allowed us to identify the key points of the approach to the environmental labeling of packaging.

ABSTRACT

Since September 2020, Italian enterprises have been facing a new and important responsibility with the environmental labeling of packaging.

For the industrial and commercial industries to comply correctly with technical regulation requirements like this, time is a crucial factor, not only because enterprises need to cope with the consequent internal operational processes.

In fact, in such a context, it is fundamental to implement a structured pathway that guarantees the indications and guidelines be coherent with the regulatory requirements, and that, at the same time, be concretely applicable. Furthermore, to assure sustainability, intended not only from an environmental point of view, but also as durability over time of these behaviours coming from enterprises, it is essential to accompany them appropriately and to track the results over time.

The effort carried on by CONAI about environmental labeling has been pursued to meet the goals described above. From this perspective, it is possible to identify some elements as fundamental factors that have made this one a successful experience, that can be replicated on other technical and environmental topics.

1. **Experience, know-how, and competencies** are core characteristics for those involved in the development of technical guidelines for enterprises.
2. **Public consultation** with all the players of the industry is, not only an important way to recognize, collaborate and communicate, but allows also us to identify the existent issues, which is the starting point for an extraordinary boost for proactiveness and innovativeness.
3. **Supporting enterprises**, especially the small and medium, in meeting compliance with the technical and environmental guidelines, is very important for the circular economy. In this regard, simplified tools, best practices, FAQs, and specific skills development among those who ensure direct consultancy to enterprises, are very useful means.
4. Finally, **tracking the results** allows us to monitor what is going on and understand if the used means and the approach are appropriate or not.

THE REGULATORY FRAMEWORK AND THE ANSWER FROM CONAI

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

The Decree made important changes, introducing mandatory environmental labeling for all packaging placed on the Italian market. It states that all packaging shall be *“appropriately labelled by the procedures laid down in the applicable UNI technical standards and compliance with the decisions of the European Commission, to facilitate the collection, reuse, recovery, and recycling of packaging, and to provide consumers with proper information on the final destination of packaging. To identify and classify packaging, producers are also required to indicate the nature of the packaging materials used, based on Commission Decision 97/129/EC.”*

The decree law 30 December 2021 n. 228 (so-called Milleproroghe) provides for the suspension of the labeling obligation as of 31st December 2022, as well as the possibility of marketing stocks of products already placed on the market or labelled by 1st January 2023.

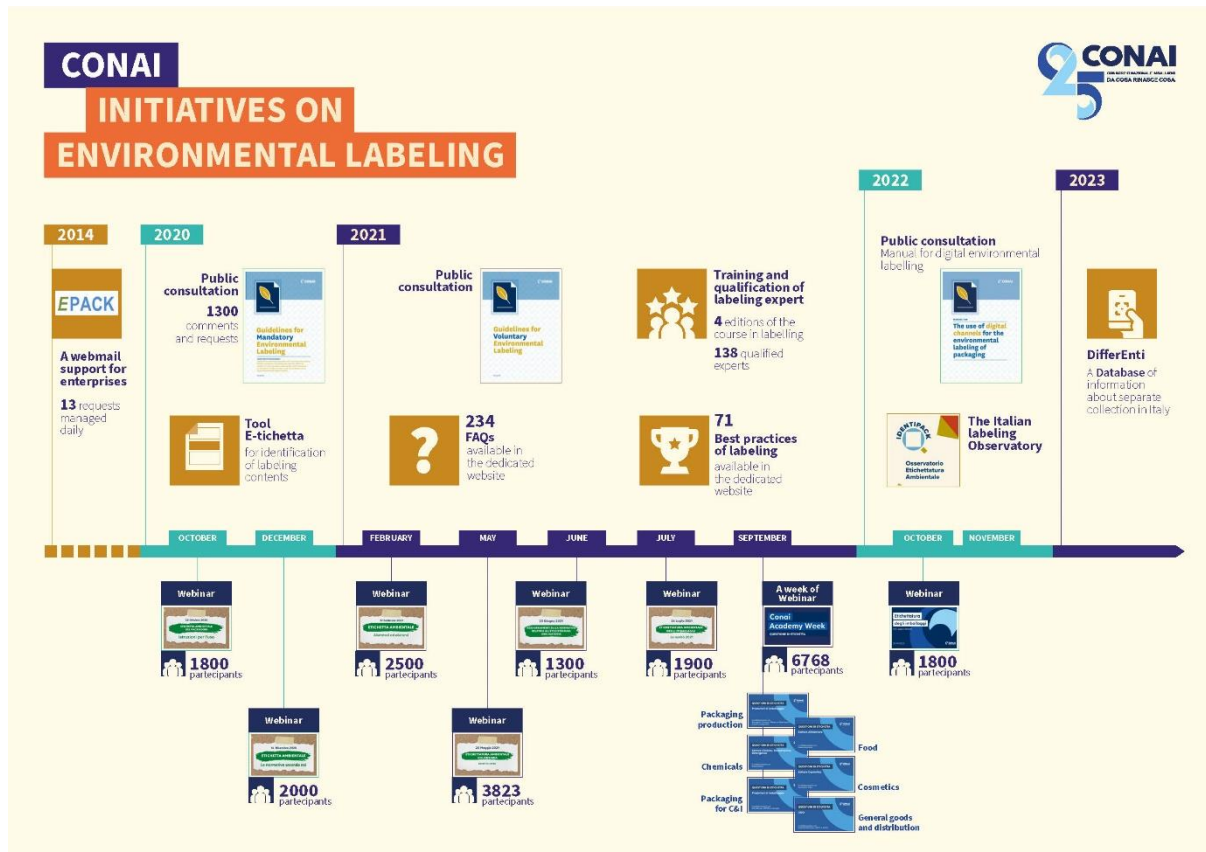
Nevertheless, the introduction of the new labeling obligation has left room for interpretation doubts, both for technical and organizational aspects, and led enterprises to deliver many requests to CONAI. To clarify this subject and to give support to enterprises, CONAI promoted specific tools and initiatives.

CONAI'S PATHWAY ON ENVIRONMENTAL LABELING OF PACKAGING

Since October 2020, CONAI has promoted several initiatives aimed at guaranteeing information and adequate tools for enterprises, which can be classified in:

- **Guidelines,**
- **Tools** to support enterprises,
- Specific **skills development and qualification,**
- **Dissemination of information** through many webinars organized with the CONAI Academy, and in collaboration with trade and local Associations.

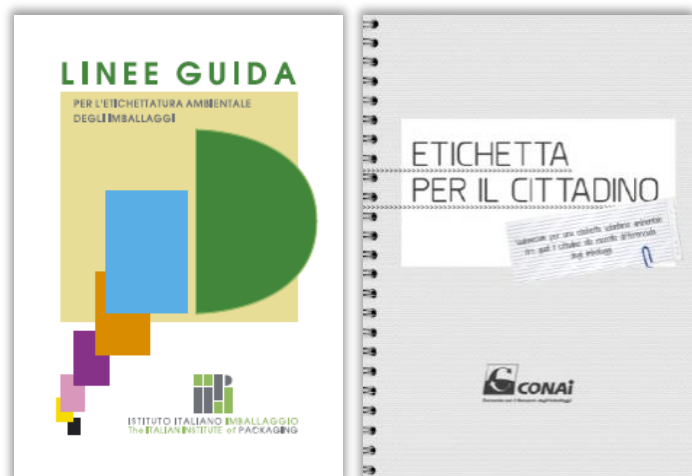
Thus, CONAI has readily answered to support enterprises, and this has been possible thanks to a deep experience in this subject, started in 2013, that has facilitated unique and considerable **know-how**.



2013

The work of CONAI on environmental labeling of packaging started in 2013, with the implementation of the first guidelines and the creation of Epack, thought to give support to enterprises that voluntarily wished to label their packaging.

Epack, which is included in a wider project called *Pensare Futuro* (see the following box), is an online service that provides enterprises with a dedicated email address, epack@conai.org, to support enterprises in ecodesign of packaging through the dissemination of information and documents about the environmental labeling of packaging, and other topics, on top of which packaging recyclability. As early as 2014, two guidelines about environmental labeling of the packaging had already been published to give information to enterprises about both existing voluntary labels and how to



communicate efficiently to consumers the indications concerning the correct sorting of packaging. Since October 2020 Epack service has been strongly improved and broadened to guarantee, as soon as possible, immediate answers to the large number of questions asked by enterprises and the necessary dissemination of information.

PENSARE FUTURO: ECODESIGN TOOLS FOR ENTERPRISES



CONAI's strategy for reaching the circular economy goals is based on the inclusion of the whole industry chain, from the ones who design and produce the packaging, to whom is involved in the valorisation and transformation of waste into a new resource.

This strategy starts from the ecodesign, which is a phase with an important effect on all the other stages of the packaging lifecycle. In fact, in this phase, the most relevant part of the environmental impact of packaging in its lifecycle is determined, as well as its potential to become the second raw material for the downstream industry, whose existence is critical to close the loop.

To let a design be "eco", the knowledge about what happens among the industry chain, thanks to effective dialogue and discussion between the involved players, is the key aspect.

Starting from these considerations, it has been thought "**Pensare Futuro**", the set of initiatives promoted by CONAI to arise awareness and inform enterprises about packaging ecodesign issues. The project provides enterprises with guidelines and tools that consider the inputs from all the players in the packaging industry, from the ones involved in the design process to those involved in the transformation of packaging into secondary raw material at its end of life.

Public consultation of Guidelines for the environmental labeling of packaging

After a bit more than a month since Decree 116 had been published, CONAI promoted the first CONAI Academy webinar, which launched the **public consultation** of the first draft of the **Guidelines for the environmental labeling of packaging**.

During the drafting of the document, CONAI involved UNI, Confindustria and Federdistribuzione in a working group dedicated to the management of the most critical and complex issues. In this phase, it has been important to guarantee a punctual study of the subject, starting from the existing regulations and guidelines.

THE ASPECTS CONSIDERED FOR THE PREPARATION OF THE GUIDELINES

- ✓ **Compliance with the existent regulations**
For the definition of the necessary and voluntary contents of environmental labeling, the Guidelines map the existent European and Italian (i.e., UNI) regulations and guidelines, to systematize and enhance what has been already developed and adopted by enterprises over time. At the same time, the Guidelines confine the obligations to what is strictly required by the law, providing guidelines based on technical standards or market practice for the voluntary information.
- ✓ **Clear information for the final consumer**
This is the basic rule of any information destined for a large audience. To let the final consumer be in the appropriate conditions to do his part with the separate collection of packaging, aimed at reaching environmental common goals, these indications must be clear and easily understandable. For this reason, labeling based on textual indications and not misleading has been considered the most suitable.

The draft of the document has been submitted to **public consultation**, to which all the players of the industry have been called to participate, from packaging producers, fillers, and distributors to the trade and local Associations that daily face the needs and doubts of the small, medium, and big enterprises.

Public consultation has been widely participated, with **hundreds of interactions** and more than a **thousand clarification and support** requests coming from enterprises in a few months and collected through epack@conai.org. The dialogue and communication with enterprises and Associations have kept going on till now after the end of the consultation.

This approach has been essential to deeply know the specific characteristics of the different types of packaging of the diverse markets and sectors, with the aim of:

- providing approaches and solutions that can be implemented by all the companies in the industry,
- identifying the main critical issues to provide alternative and implementable solutions.

In this sense, communication with the commercial and industrial industries has been fundamental to identifying approaches and indications that are economically and operationally sustainable for enterprises, and that at the same time comply with the regulation requirements.

WHICH ASPECTS RAISED FROM THE PUBLIC CONSULTATION: THE MOTIONS OF THE INDUSTRIES

The cardinal principles that constitute the indications available in the Guidelines have been raised from the public consultation.

✓ No constraints on the labeling layout

Given the fact that the indication to the final consumer must be textual and clear, it is considered appropriate to leave to the enterprise's scope of choice about the labeling layout, so that can be coherent with the shape, the colour, the dimension of the packaging and nevertheless to the communication style of the company.

The environmental information that enterprises convey to consumers is a fundamental part of their values; they need flexibility in complying with the obligation, in order to present, at their best, their values, and no strict rules about the graphic characteristics.

Besides this aspect, it is important to also consider that, in some cases, imposing specific graphic indications such as colours, can represent an added economic and operational charge with a relevant impact on enterprises.

Since the chosen approach is intended to balance all the sustainability levels, it is considered that graphic characteristics represent an excessive cost for the enterprises compared to the goal to be reached.

✓ Flexibility is an opportunity

Thanks to the interaction with the players of the different industry sectors, a list of main cases for which a certain grade of complexity or impossibility in affixing the label on the packaging, has been mapped.

It is important to undelight the word "main" because the sector of packaging is extremely varied and wide, which is why it is impossible to provide strict and punctual rules for specific clusters of products and/or packaging. Furthermore, always considering the importance of sustainability, not only environmentally but also economically and

operationally, it is considered imperative to assure a certain level of flexibility to enterprises.

Based on the flexibility principle, alternative approaches to the affixing of labeling on the packaging, have been suggested, such as the adoption of digital solutions or the use of external documents for specific cases.

December 2021

Closed the public consultation, the document has been reviewed based on the comments and recommendations received. In December 2021, during a CONAI Academy webinar, the consolidated document has been presented as a result of a relevant collaboration among all the participants of the public consultation.

THE APPROACH OF THE GUIDELINES IN BRIEF

Clear information for the final consumer

No constraints on the labelling layout

Flexibility is an opportunity

Textual indications

NO constraints about specific colours, but only a guideline

Chance of using, in any case, digital channels

Readability

NO constraints on dimensions, but only guidelines

Different possible ways to lead consumers to the chosen digital channels

Simplicity

NO constraints on the position of the label

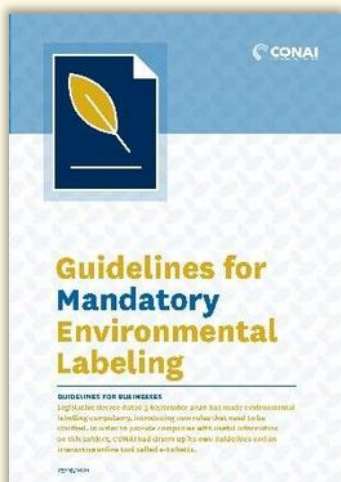
Chance to use external documents for some specific cases

Comprehensibility

YES to free expression of the enterprise's sustainability values

Using models to which the consumer is already used of

CONAI GUIDELINES: THE MAIN CONTENTS



Contents of the environmental labeling

Concerning the contents of the labeling, two cases have been identified.

- Packaging destined for final consumers, that must bear:
 - Identification of the packaging material according to **Decision 129/97/EC**, and
 - Indication about the correct **separate collection** of packaging.
- Packaging destined for commercial and industrial circuits, must bear only the identification of the packaging material according to **Decision 129/97/EC**.

Visual and layout

There are **no constraints** on the visual and layout of the labeling; the Guidelines just give some suggestions on how to make the labeling the clearest possible.

The modalities

Guidelines clarify that the contents of the packaging, other than being affixed directly on the packaging, can be conveyed:

- In any case also through **digital channels**, such as Apps, QR codes, websites, etc.
- On **transport documents**, technical sheets, or other documents that accompany the goods, in case of neutral packaging destined for commercial and industrial circuits.
- Through **information boards** made available at the point of sale, in case of pre-wrapping, variable weight distribution packaging, and in general neutral primary packaging.

On the **instruction/user manual**, if any.

E-tichetta tool

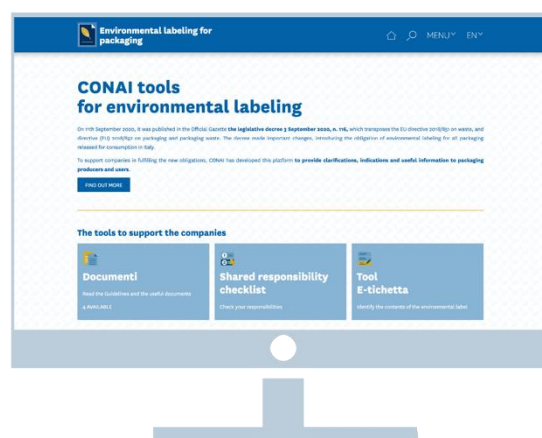
Because of the relevant importance of the subject given by enterprises, already before the introduction of the new obligation, CONAI had started working for a while on the development of a dedicated tool, **e-tichetta**, available at the website <http://e-tichetta.conai.org>, useful to identify the contents of the mandatory and voluntary environmental labeling of packaging.

The registered users are currently more than **12.800**.

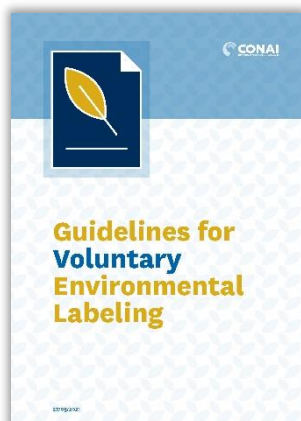
February 2021

In February 2021, CONAI presented a new online space completely dedicated to the environmental labeling of packaging, available at the website www.etichetta-conai.com. The website is aimed at supporting enterprises through a set of diverse tools, in particular:

- some useful documents,
- more than 240 **FAQs**,
- a **checklist** about the shared responsibility of the labeling obligation,
- the library of the CONAI Academy **webinars** about environmental labeling,
- dozens of **good practices** of concrete environmental labeling, that can be examples and inspirations for enterprises that are currently designing their labeling,
- a list of **experts** in environmental labeling to whom enterprises can refer for getting direct support.



 May 2021



Many enterprises facing this new important regulation, are taking this opportunity to reconsider the environmental information set on their packaging to also enhance sustainability aspects. For this reason, CONAI has also developed **Guidelines for the voluntary environmental labeling of packaging**, intending to support enterprises in making clear and not misleading communication, to lead clients and consumers to be aware of their procurement choices and to conduct a correct and high-quality separate collection of packaging.

 September 2021

CONAI Academy Week

To encourage even more sharing and joint work with trade Associations which, over time, collected many specific cases, each one for its industry, in September 2021, CONAI promoted the initiative **CONAI Academy Week dedicated to environmental labeling**, a week of deepening of the topic, organized with 21 partners, among trade Associations and Packaging Material Consortia. The initiative provided 9 webinars, each one about a specific industry sector (food, chemical, general goods and distribution, packaging producers). At the same time, CONAI launched the **Call for good ideas**, an initiative aimed at collecting best practices about the environmental labeling of packaging that enterprises have already designed, and that represent virtuous examples, both from an environmental and operational point of view.



These two initiatives have been the starting point for the development of a series of documents, each one dedicated to a specific industry sector, that collects practical and application-oriented examples of environmental labeling of packaging.

Skills development and experts qualification

Over the months, an increasing number of enterprises have shown the need of getting direct support from experts on the topic.

To fulfill this need, CONAI promoted, in partnership with TuttoAmbiente, a recognized training institution, some courses aimed at developing specific skills among company technicians, consultants, and representatives from trade and local Associations or Chambers of Commerce.



SEPTEMBER 2021 – OCTOBER 2022: THE DIALOGUE WITH STAKEHOLDERS KEEPS GOING ON

CONAI Academy Week, an initiative that has seen an important involvement of trade Associations, has given a bigger impulse to the interaction and the search for practical solutions for environmental labeling, together with the commercial and industrial industries.

Therefore, the initiative has kicked off a year full of interactions, which ended up with the publication of some application-oriented Guidelines for each of the main sector industries.

Meanwhile, CONAI kept collaborating with trade and local Associations for the organization and promotion of webinars for companies: **16** webinars in the year between September 2021 and September 2022, interesting opportunities for direct dialogue and interaction.

Besides the continuous support to enterprises through Epack, which, on average, answers **13** questions from enterprises daily, the work of CONAI for the development of specific skills kept going on with **4** editions of the course promoted in collaboration with TuttoAmbiente.



October 2022

Application-oriented guidelines on environmental labeling of packaging

One year after the CONAI Academy Week, CONAI published a set of application-oriented guidelines about the environmental labeling of packaging used in the main industry sectors, developed in collaboration with the Packaging Material Consortia and trade Associations, thanks to the dialogue carried on for a year. The documents are related to packaging used in the following industry sectors:

- Packaging production (in collaboration with, CiAI, Biorepack, Comieco, Rilegno, Federlegno, Corepla, Coreve);
- Food;
- Chemicals (in collaboration with Federchimica);
- Cosmetics (in collaboration with Cosmetica Italia);
- Goods and distribution (in collaboration with Federdistribuzione, CNA, Confartigianato, Confcommercio);
- Tobacco products (in collaboration with Unindustria);
- Tapes (in collaboration with Assogomma);

- Electrical and electronic products (in collaboration with Erion);
- Wine products (in collaboration with UIV).

IdentiPack

To assess the effectiveness of the information conveyed to enterprises or, eventually, information/training lack to fulfil, tracking is fundamental.



For this reason, to monitor the implementation of environmental labeling on packaging destined for large consumption, CONAI launched [IdentiPack](#), the Observatory on the environmental labeling of packaging developed by CONAI and GS1 Italy. It is a study aimed at monitoring every six months the presence of environmental information about the packaging, the mandatory and the voluntary, such as labels, certifications, or suggestions for a high-quality separate collection.

 November 2022

Manual for the use of digital channels for the environmental labeling of packaging

CONAI has created a **Manual for the use of digital channels for the environmental labeling of packaging**. The document is aimed at clarifying especially the requirements for digital labeling and at collecting some concrete examples.

The document has been submitted for public consultation.

Qualification of competencies

CONAI has made available, on the website www.etichetta-conai.org, a dedicated area in which it is possible to test and assess your competencies about the environmental labeling of packaging, and to get a certificate from CONAI. Those participating in this initiative and passing successfully the test, can choose to be included in the list of “Qualified labeling experts” to which enterprises can refer in case they need direct support.

 **2023: the next steps**

From the next year, CONAI will make available the website ***DifferEnti***. It is a database containing information about the different existing systems and modalities of separate collections in Italian municipalities. The database will be available for enterprises or service providers interested in developing digital channels to convey geolocated information about the separate collection of packaging.

LESSONS LEARNED

As well as many topics and goals concerning sustainability, environmental labeling is related to the responsibility of the industry, and at the same time, to a public objective that, in this case, is aiming at a higher level of awareness and information to consumers in terms of a separate collection of packaging.

It is about complex topics, not only to understand and convey but also - and especially - to translate into punctual indications for the production and commercial industries, which are extremely heterogeneous and wide.

The experience that CONAI has carried on with all the other players of the industry about the labeling of packaging, has highlighted how it is extremely necessary to define the elements that allow us to define indications, that need to be practicable and sustainable both environmentally and over time.

In this context, CONAI's multiannual experience, and its specific **know-how** developed over the years with Epack, have been crucial to identify the contents and the approach of the Guidelines.

Specific competencies and deep knowledge of the industry are key elements in the creation of technical Guidelines about complex topics.

At the same time, the inputs from Associations, enterprises, and all the players involved first in the **working group**, and then in the **public consultation**, have been fundamental to highlight the critical factors, the technological and physical limitations for some cases, and all those context elements that are to be considered when the commercial and production industries come to a new obligation.

Public consultation and interaction have allowed CONAI to identify the troubles and limitations that companies face in responding to the new mandatory label requirements.

Nevertheless, those limitations and troubles have switched in a remarkable boost to proactivity and innovativeness, turning into an important opportunity for enterprises.

This is what happened, for instance, with the possibility to use **digital channels** for environmental labeling. This option has first raised as a highly innovative alternative for some specific packaging characterized by some technological and physical limitations to direct affixing. Since the reaction of the industry to this hint was very positive, the digital option has been opened to any type of packaging, beyond the technical and operational restrictions.

That is how the suggestion about digital labeling, first thought to overcome a technical issue, has become an option appreciated also by the European Commission, that in the comments about the Guidelines delivered through the TRIS procedure, encouraged Italy to clarify this aspect more strongly, as the digital channels are recognized as a solution ensuring the free movement of goods, and at the same time,

providing punctual indications to consumers in line with the modality of separate collections existing at the national level.

It is clear, thus, how the background and the know-how, together with the promotion of public consultation and interaction with the industry players, are crucial elements for the development of technical Guidelines destined for enterprises.

Nevertheless, it is important to consider the relevance of **consolidating and strengthening this pathway supporting enterprises** with services and tools available for their autonomous use, such as simplified tools, examples, best practices, and FAQs.

We are talking about simple and clear tools aimed at enabling first – but not only – the work of small and medium enterprises which represent a relevant part of the Italian industrial sector, thus leading actors of the transition to a circular economy of the Country.

In this perspective, another major initiative is about the **development and qualification of competencies** among people that daily are professionally involved in supporting and giving direct support to the enterprises.

Finally, once the indications and tools supporting enterprises have been defined, it is important to **track and measure the results**. This stage is crucial to understand if and how what has been done is effective and, otherwise how to take action to fulfil any possible gaps in terms of information or support.



About CONAI

CONAI, CONSORZIO NAZIONALE IMBALLAGGIO, is the main PRO, Producer Responsibility Organisation, for packaging in Italy. A non-profit private Consortium of over 750 thousand companies among packaging producers and packaging users (fillers), committed to prevent the environmental impact of packaging and packaging waste and to achieve the recycling targets of all packaging placed on the Italian market.

In 2021 it guaranteed the recycling of 73.3% of packaging waste puts on the market in Italy.

According to a recent study by the Bocconi University and the Wuppertal Institute, the Italian packaging management system is among the most effective and efficient in Europe.

Contact: international@conai.org

