



EASY CONAI

October 2018 edition

**Short Guide
to membership and to the application
of the Environmental Contribution**

CONAI and the Consortium system



CONAI, Consorzio Nazionale Imballaggi (National Packaging Consortium), is the private, non-profit Consortium, established by packaging producers and users (approximately 830,000 companies) to pursue the objectives of recovery and recycling of packaging materials envisaged by European and national legislation (Legislative Decree 152/2006, as amended and supplemented).

CONAI guides the activity of *6 Consortia for Packaging Materials* representing the materials that are used for the production of packaging: steel, aluminium, paper, wood, plastic and glass.



The CONAI System represents a model of management, by a private entity, of a public interest: environmental protection, within a framework of shared responsibility among companies, Public Administration and citizens, ranging from production of the packaging to its end-of-life management.

The CONAI System guarantees compliance with the principle of extended responsibility of the producer, determining the value of the Environmental Contribution - paid by companies - which is mainly used to cover the higher costs of collection, organised by Municipalities, and for recovery, recycling and increasing the value of packaging waste.

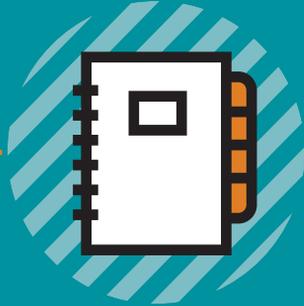
CONAI has exceeded the legal objectives in packaging recovery and recycling and has been the driving force for the growth of separate waste collection. Since the start-up of the system: 78% of packaging recovered and 67.5% of packaging recycled.

In 20 years of activity, 50 million tonnes of packaging waste have been recycled, avoiding the disposal of 130 million cubic metres of packaging in landfills and the construction of 130 new medium-sized plants.

CONAI promotes the environmental sustainability of packaging: companies respond with an increasingly mature and responsible design. The prevention actions promoted by CONAI in the last four years have enabled savings of:

- 25% in water consumption
- 23% in energy consumption
- 23% in CO₂ emissions

Obligated parties: definitions



Packaging producers are “suppliers of packaging materials, manufacturers, processors and importers of empty packaging and packaging materials” (Art. 218, paragraph 1, letter r) of Legislative Decree 152/06).

Producers:

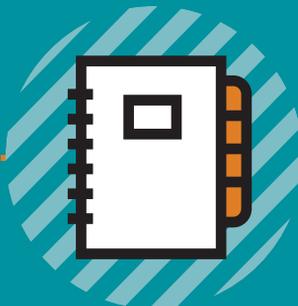
1. *A Producer/Importer of raw materials/semi-finished products for packaging* is a company that, producing/importing raw materials/semi-finished products for packaging, is “upstream” of the various processes that lead to the production of the packaging itself and the corresponding waste.
2. *A Producer/Importer of empty packaging* is a company that manufactures (using one or more of the six reference materials)/ imports finished packaging ready to contain the goods.

Packaging users are “traders, distributors, fillers, packaging users and importers of filled packaging” (Art. 218, paragraph 1, letter s) of Legislative Decree 152/06).

Users:

1. *A buyer - filler of empty packaging* is a company that buys empty packaging and fills it with the goods that are the purpose of its business.
2. *A filled-packaging trader* is an operator that buys packaged goods in Italy and resells them, operating as a mere commercial broker.
3. *An importer of filled packaging* is an operator that buys packaged goods from abroad and sells them in Italy, thus putting the packaging that contains the goods on the national territory.
4. *An empty packaging trader* is an operator that buys and sells empty packaging on the national territory, without carrying out any processing of the packaging itself, operating as a mere commercial broker.
5. *A self-producer* is a company that buys raw materials or semi-finished products to produce/repair packaging intended to contain the goods it produces.

Exempt parties: definitions



End users of packaging, i.e. those parties that, even if they buy goods packaged for the purpose of carrying out their business or for their own consumption, do not carry out any marketing and distribution of the packaged goods purchased (for example, a hairdresser that purchases packaged beauty products and uses them in the exercise of its professional activity), are generally exempt from the obligation to join CONAI.

This exemption does not apply in the following three cases:

- when these parties carry out, with the goods purchased, a commercial activity with respect to their main activity (for example, a hairdresser that resells the packaged beauty products to its customers);
- when such parties purchase packaged goods or empty packaging directly from abroad for the exercise of their business (for example, a hairdresser that purchases the beauty products packaged abroad);
- when such parties purchase empty packaging on the national territory for the exercise of their business (a hairdresser that purchases paper bags from domestic suppliers to deliver the beauty products sold to its customers).

Also exempt from the obligation to join CONAI are companies that only use packaging belonging to one of the **autonomous systems** – provided for by Art. 221, paragraph 3, letter a) and c) of Legislative Decree 152/2006 - which have obtained the corresponding recognition.

Finally, pursuant to Art. 11, paragraph 2 of Law 154/2016, **agricultural enterprises** are not obliged to join CONAI or pay the corresponding membership fee. They are free to join voluntarily and independently.

Such companies, even if not members of CONAI:

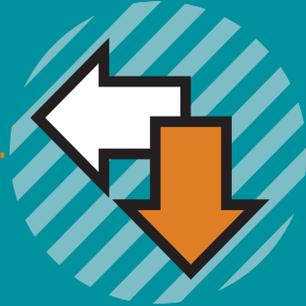
- remain subject to payment of the Environmental Contribution on empty and/or filled packaging purchased in Italy;
- are required to declare the Environmental Contribution on imported empty and/or filled packaging;
- may request exemption/refund of the Contribution paid on exported empty and/or filled packaging or for other special cases.



WARNING

For the purposes of the CONAI requirements, by "import" is meant purchase from abroad (both EU and non-EU).

The Environmental Contribution



The Contribution is levied at the time of the so-called **“first transfer”**, i.e. the time of transfer, even temporary and for whatever reason, in the national territory of the finished packaging performed by the **last producer** or **empty packaging trader** to the **first user**, other than the empty packaging trader or of the packaging material performed by a **producer of raw material or semi-finished products** to a **self-producer** who is or claims to be such.

As a result of some recent amendments to the Consortium Articles of Association and Regulations, as from 1 January 2019:

- ▶ the historical wording “Conai Environmental Contribution paid” will refer exclusively to filled packaging (packaged goods);
- ▶ for the sole purpose of application of the Conai Environmental Contribution, the empty packaging trader therefore equates to the last packaging producer, thus transferring the levy of the Contribution at the time of transfer of the packaging to the first actual “user” (i.e., the entity that purchases/receives the packaging to pack their own goods).

In the case of importing into the national territory empty or filled packaging* coming from abroad or in any case not involving a “first transfer”, the CONAI Environmental Contribution is due, declared and paid by the company that carries out such import, at whatever time and for whatever reason such packaging was purchased, except in the case in which such a Contribution has already been paid by the foreign company, if a voluntary member of CONAI.

** including those of raw materials/semi-finished products or finished products used in the context of its industrial activity, commercial activity, etc.*

Foreign companies have the possibility to take the place of Italian customers in compliance with the consortium provisions (paragraph 2.4 of the CONAI Guide).

Contribution Diversification for plastic and paper and cardboard packaging

From 1 January 2018, **Contribution diversification for plastic packaging** came into force, with the introduction of 3 different Contribution levels:

- Level A** → Sortable and recyclable packaging from the Commerce & Industry circuit
- Level B** → Sortable and recyclable packaging from the Household circuit
- Level C** → Packaging not yet sortable/recyclable with current technologies

From 1 January 2019, the distinction between sorted and recycled packaging solutions and those that are not yet so will be clearer, starting from the segmentation of Level B packaging types into:

Level B1 (more facilitations) packaging from the “Household” circuit with an effective and consolidated sorting and recycling chain

Level B2 other sortable and recyclable packaging from the “Household” circuit and placing in Level C (no facilitations) packaging solutions that cannot be sorted/recycled previously in Level B.

From 1 January 2019, the ***Contribution diversification for polylaminated packaging with a prevalence of carton suitable for containing liquids*** will also be introduced.

The project, through the application of an additional Contribution (equal to € 20.00/t compared to the unit Contribution for paper and cardboard of € 20.00/t) on the specific packaging type, is aimed at improving the effectiveness of the value creation process through the consolidation and development of collection and sorting activities for dedicated recycling.

Main CONAI obligations for packaging producers

A1 Do I produce or import raw materials/semi-finished products for packaging?

NO



YES

- ▶ I join CONAI in the Producers category, I also join one or more Consortia for Packaging Materials in relation to the materials produced or imported.
- ▶ If I supply a self-producer, I declare and pay the CAC* applied on the invoice for the quantities sold to the self-producer.
- ▶ I declare and pay the CAC* for the packaging of raw materials/ semi-finished products imported.

A2 Do I produce or import empty packaging?

NO



YES

- ▶ I join CONAI in the Producers category, I also join one or more Consortia for Packaging Materials in relation to the materials produced or imported.
- ▶ I apply the CAC* on the invoice on the packaging supplied to national users.
- ▶ I declare and pay the CAC* on packaging that is supplied to national users or otherwise put on the market for consumption as a result of imports.

* CAC: CONAI Environmental Contribution.



WARNING

Some obligations also apply to so-called "subcontractor" producers/processors.

Main CONAI obligations for packaging users

B1 Do I trade empty packaging?

NO



YES



- ▶ I join CONAI in the Users category (traders and distributors).
- ▶ I apply the CAC* on the invoice on the packaging supplied to national users, other than empty packaging traders.
- ▶ I declare and pay the CAC* on packaging that is supplied to national users, other than empty packaging traders.

B2 Do I purchase and fill empty packaging?

NO



YES



- ▶ I join CONAI in the other Users category (food, chemicals or other).
- ▶ I pay the CAC* applied on the invoice by my supplier for each packaging material.
- ▶ I include the envisaged wording on my sales invoices (e.g. CAC paid).

B3 Do I trade filled packaging?

NO



YES



- ▶ I join CONAI in the Users category (traders and distributors).
- ▶ I check that my supplier has included on the invoice the indications relating to the CAC* (e.g. CAC paid).
- ▶ I include the envisaged wording on my sales invoices (e.g. CAC paid).

B4 Do I import filled packaging?

NO



YES



- ▶ I join CONAI in the other Users category (food, chemicals or other).
- ▶ I declare and pay the CAC* on all packaging that, following imports, is put on the market for consumption.
- ▶ I include the envisaged wording on my sales invoices (e.g. CAC paid).

B5 Do I self-produce packaging to pack my products?

YES



- ▶ I join CONAI in the other Users category (food, chemicals or other).
- ▶ I declare and pay the CAC* on packaging and raw materials that I import to produce the packaging to pack my products.
- ▶ I pay the CAC* applied on the invoice by my national suppliers of raw materials that I purchase to produce the packaging to pack my products.
- ▶ I include the envisaged wording on my sales invoices (e.g. CAC paid).

Main CONAI obligations for agricultural enterprises - other exempt parties

C Am I an agricultural enterprise?

NO



YES



- ▶ I am exempt from the obligation to join CONAI. I can nevertheless join voluntarily.
- ▶ I pay the CAC* applied on the invoice by my supplier for empty packaging purchased in Italy.
- ▶ I check that my supplier has included on the invoice the indications relating to the CAC* (e.g. CAC paid) for filled packaging purchased in Italy.
- ▶ I declare and pay the CAC* on all packaging that, following imports, is put on the market for consumption.
- ▶ I include the envisaged wording on my sales invoices (e.g. CAC paid).

D Am I a packaging end user?

YES



▶ I am exempt from the obligation to join CONAI, if I do not trade the packaged goods (see B.3) that I purchase for the exercise of my business or for my consumption, I do not import filled (see B.4) or empty (see A.2) packaging and I do not purchase empty packaging on the national territory (see B.2).

NO



E Am I a consumer?

YES



- ▶ I am exempt from the obligation to join CONAI.
- ▶ I dispose of packaging waste sorted from household waste via the separate collection service organised by the Public Administration.

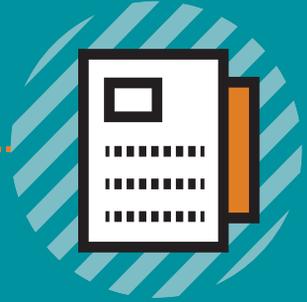


WARNING

Some obligations also apply to so-called "subcontractor" users/fillers.

Consumer: the person that, outside the exercise of a professional activity, purchases or imports packaging or packaged items or goods for his own use.

Useful information



Online membership application

The “Online Membership application” service lets you submit the application to join CONAI via the impresainungiorno.gov.it * portal which can be accessed from the website www.conai.org by clicking on “Login” in the “Online Membership application” banner (at the bottom of the page).

This service also lets you communicate changes in personal data that occurred after joining, including withdrawal.

** Users who are not already registered on the portal impresainungiorno.gov.it must have a CNS (national service card) digital certificate, with an active pin or SPID (Public Digital Identity System) credentials.*

Online Declarations

The “Online Declarations” service lets you fill in and send the forms through a secure Internet connection, which can be used directly at <https://dichiarazioni.conai.org> or from the home page of the website www.conai.org.

Forms

The facsimile of the forms, together with the instructions for their compilation, are available on the CONAI website in the Document download/Forms section.

What is packaging

In the “Businesses” section of the CONAI website, by clicking on “What is packaging” you can consult two reference lists, by way of example and not limited to, of the items that are considered “packaging” and “not packaging”.

Other information

The CONAI website contains detailed information as well as the “Document download” section with circular letters, publications and notes on various topics of interest.

To request information, ask questions on specific topics or send reports, you can fill in the online form of our website in the “Contact us” area, selecting the reference topic among those proposed.

Amount of the CONAI Environmental Contribution from 1.1.2019

Steel	€ 3.00/t	
Aluminium	€ 15.00/t	
Paper	€ 20.00 40.00 ¹ /t	<i>¹ Poly laminated packaging with a prevalence of carton suitable for containing liquids</i>
Wood	€ 7.00/t	
Plastic	Level A: € 150.00/t	<i>Sortable and recyclable packaging from the “Commerce & Industry” circuit</i>
	Level B1: € 208.00/t	<i>Packaging from the “Household” circuit with an effective and consolidated sorting and recycling chain</i>
	Level B2: € 263.00/t	<i>Other sortable and recyclable packaging from the “Household” circuit</i>
	Level C: € 369.00/t	<i>Packaging not sortable/recyclable with current technologies</i>
Glass	€ 24.00/t	

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www.conai.org

This leaflet is the English translation of the short Guide "Easy Conai". In cases of disputes, the original Italian text shall prevail.



On the institutional website www.conai.org the CONAI Guide to membership and to the application of the Environmental Contribution is available, to which reference should be made for all details for the purpose of joining CONAI and/or the Consortia for Packaging Materials, as well as the procedures for application, exemption, declaration and payment of the CONAI Environmental Contribution.

For information, the CONAI toll-free number is available.



RICREA
National Consortium for Recycling and
Recovery of Steel Packaging

Via G.B. Pirelli, 27 - 20124 Milan
Tel 02.3980081 - Fax 02.40708219

www.consorzioricrea.org

CIAL
Aluminium Packaging Consortium

Via Pompeo Litta, 5 - 20122 Milan
Tel 02.540291 - Fax 02.54123396

www.cial.it

COMIECO
National Consortium for Recovery and
Recycling of Cellulose-based Packaging

Via Pompeo Litta, 5 - 20122 Milan
Tel 02.550241 - Fax 02.54050240

www.comieco.org

RILEGNO
National Consortium for the collection,
recovery and recycling of wooden packaging

Via L. Negrelli, 24/A 47042 Cesenatico (FC)
Tel 0547.672946 - Fax 0547.675244

www.rilegno.org

COREPLA
National Consortium for the Collection,
Recycling and Recovery of Plastic Packaging

Via del Vecchio Politecnico, 3 - 20121 Milan
Tel 02.76054.1 - Fax 02.76054320

www.corepla.it

COREVE
Glass Recovery Consortium

Piazza G. D. Bande Nere, 9 - 20146 Milan Tel
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www.coreve.it