

# Italy: new, environmentally relevant labeling of packing

TÜV Rheinland LGA Products

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At the start of this year, Italy issued standards for the material labeling of packaging materials. Ultimately, this is an implementation of the 1994 EU DIRECTIVE 94/62/EC on packaging and packaging waste.

According to Article 8, the “marking for identification and classification of the material” should follow a well-known form (Decision 97/129/EC):

## Numbers and Abbreviations (1) for Plastics

Substance	Abbreviation	Number
Polyethylene Terephthalate	PET	1
High-density Polyethylene	HDPE	2
Polyvinyl Chloride	PVC	3
Low-density Polyethylene	LDPE	4
Polypropylene	PP	5
Polystyrene	PS	6
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(1) Use only capital letters

e.g:

In Germany, for instance, this has been implemented as an “optional provision” in the Packaging Act:

§ 6 ... packaging can ... be marked.

[https://www.gesetze-im-internet.de/verpackg/\\_6.html](https://www.gesetze-im-internet.de/verpackg/_6.html)

In Italy, this provision has been legally binding since September, 2020. In Portugal, there are relevant considerations according to the information available to us

## LEGAL SITUATION IN ITALY

There are two Italian decrees (“decreto”) on this subject:

### 1. DECREE NO. 116/2020

Article 3 Paragraph 3 Point C states that “for the purpose of identifying and classifying packaging, manufacturers must specify the type of packaging materials used in accordance with the European Decision 97/129/EG”.

According to Article 3 - Paragraph 3, manufacturers must specify the **alphanumeric Code on all Packaging (primary, secondary and tertiary packages)** provided for in the Decision 97/129/EG. The symbols and abbreviated terms specified in UNI EN ISO 14021 as well as eco-labels (e.g. the Möbius loop, which states that the packaging is recyclable or made of secondary raw materials) are optional.

- Where the Decision 129/1997 does not include any specific identification code for a particular polymer, the applicable standards are **UNI 1043-1** for identifying plastics, which are not included in Decision 129/1997, **UNI 10667-1** for identifying and detecting recycled polymers and **UNI 11469** for composite materials.
- If additional voluntary information about the environmental characteristics of the packaging is to be provided (labels, symbols/pictograms or other similar notifications, environmental statements), reference should be made to UNI EN 14021.

- The **font size must be  $\geq 1.2$  mm** (based on the x height). If, instead, the largest surface of the packaging has an area of less than 80 cm<sup>2</sup>, the x height of the font must be equal to or larger than 0.9 mm.
- With regard to the design and color scheme, there are no mandatory provisions. CONAI suggests basing the colors used on the UNI 11686 standard for visual waste elements. It prescribes the following color codes: blue for paper, brown for organic waste, yellow for plastic, turquoise for metals, green for glass and gray for unsorted waste.

The regulation came into force on September 26, 2020.

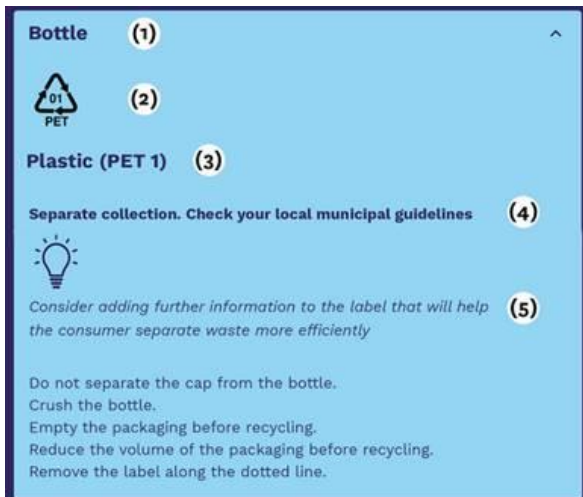
### 2. DECREE NO. 183/2020 = LAW NO. 21/2021

Article 15 Section 6 of the law stipulates that the obligation to label packaging according to the relevant UNI standards (national Italian standards published by the Ente Nazionale Italiano di Unificazione = UNI) is to be deferred until December 31, 2021.

In addition, packaging intended for the consumer, must also include appropriate instructions on separate waste collection for the consumer (collection, recycling, use and packaging recycling):

- a. **Type of packaging** (e.g. “bottle”)
- b. **Complete material family** (e.g. “plastic (PET 1)”), to make it easier for the consumer to correctly identify the packaging material, which is not always clearly evident with just the alphanumeric code.
- c. **Note on disposal**: “Separate collection. Check local municipal guidelines.”

An example from the official guide on labels with the required information:



- (1) Type of packaging,
- (2) Identification code of the packaging material
- (3) Material family
- (4) Information on disposal
- (5) Additional voluntary information that can help the consumer to separate waste efficiently

The regulations do not include any exceptions for small packaging.

The label can be directly applied/printed/embossed to/on the packaging or placed on a separate medium, if this is possible with the respective packaging system.

The Italian Packaging Consortium – CONAI has an online platform with guidelines and FAQs on environmental labeling requirements for packaging, which is also available in English: <https://www.etichetta-conai.com/>

The guidelines for voluntary eco-labeling are also available and are currently under public consultation on the following website: [www.progettarericiclo.com/en](http://www.progettarericiclo.com/en)

The platform has also implemented an online tool called e-tichetta, which can determine all the information required for creating the symbol. This can be accessed here via the registration: <http://e-tichetta.conai.org/#/login>

It starts with the guideline for mandatory environmental labeling, the result of collaboration with the Italian Packaging Institute and the participation of many stakeholders from the world of industry and professional associations, who have proposed a common interpretation of the standard, as a useful technical reference. Available for download and browsing in Italian and English.

The guideline contains many examples of packaging for different products e.g. for a spray can with plastic cap.

#### NOTE:

We recommend you check to what extent the label required in Italy can be used for products that are also sold in other EU countries.

The Italian labeling regulations date back to an EU directive, the use of which should also not be wrong in other EU countries.

Further technical information can be obtained from:

**TÜV Rheinland LGA Products GmbH**

Retail Technical Competence Center

Dr. Ansgar Wennemer

[Wennemer@de.tuv.com](mailto:Wennemer@de.tuv.com)

Tel. +49 221 / 806-2062

Am Grauen Stein

D-51105 Köln

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