

EPR and Packaging

According to Victor Bell, the President of Environmental Packaging International, “The centerpiece of the environmental movement in Europe is a set of new packaging standards being developed; they are called the “Essential Requirements” and all packages must meet them before they can be sold in Europe.”⁹ The Essential Requirements as presently drafted, include the following six standards:

1. Requirements for packaging recoverable through recycling: This standard will require that the person responsible for placing the packaging on the market ensure that the design of the packaging includes consideration for the recycling of the materials from which it is produced and that the selection of raw materials used ensure that recycling processes are not negatively affected i.e. PVC labels on PET containers. Additionally, this standard will require that the design of the packaging is compatible with the available recycling technology and that the environmental impact cause by recycling is taken into account.¹⁰
2. Requirements for packaging recoverable through composting and biodegradation B Test scheme and evaluation criteria for final acceptance of packaging: This Standard requires that constituents known to be harmful to the environment during biological treatment not deliberately introduced into packaging or packaging materials. The Standard establishes tests and guidelines for packaging and packaging materials to be designated as organically recoverable.¹¹
3. Requirements for packaging recoverable in the form of energy, including specification of minimum calorific value: This Standard defines and specifies the requirements for packaging to allow the overall optimization of energy recovery.¹²
4. Reduction of waste (prevention by source reduction): This Standard require that the person responsible for placing the packaging on the market demonstrate that the minimum adequate amount of packaging has been used, taking into account the critical functions of the packaging (protection, safety, storage, application and marketing).¹³
5. Reuse: This Standard outlines the requirements for packaging to be deemed to be recoverable.¹⁴
6. Requirements for measuring and verifying heavy metals present in packaging (CEN report): This report addresses the environmental impact from heavy metals in packaging after incineration or land filling. The report confirms the heavy metals limits outlined in the Packaging Directive i.e. packaging must contain less than 100 ppm of the sum of the concentration levels of lead, cadmium, mercury, and hexavalent.¹⁵

As presently structured, all packaging will be required to meet the standard for heavy metals and other hazardous substances requirements (CEN report). If you claim that your

⁹ Greg Erickson, IoPP Manager of Education, “Trash Wars: The Continent Stands Ready: News and Views from the Institute of Packaging Professionals,” in *Packaging Technology and Engineering*, March 1999.

¹⁰ Victor Bell, “Complying with Essential Requirements,” *Environmental Packaging International*,” in *Recycling Laws International*, Oct. 1998, p. 1-4.

¹¹ *Ibid*, p. 2.

¹² *Ibid*, p. 2.

¹³ *Ibid*, p. 3.

¹⁴ *Ibid*, p. 3.

¹⁵ *Ibid*, p. 4.

packaging is reusable, than you will be required to meet the reuse standard. Finally, you will be required to meet at least one of the recovery standards (Material, Energy and/or Organic).¹⁶ Taken together, it is important for producers to take the Essential Requirements into consideration in the design phase and establish a paper trail documenting how each standard was incorporated into their packaging design protocol.¹⁷

¹⁶ Ibid, p. 4.

¹⁷ Ibid, p. 4.