

Regarding packaging material on the Italian market

With reference to Decree no. 360 of 28 September 2022, “Guidelines on labeling of packaging pursuant to art. 219, paragraph 5, of the legislative decree no. 152 of 3 April 2006”, regarding packaging material on the Italian market

On 11 September 2020, Legislative Decree no. 3, which transposes EU Directive 2018/852 on packaging and packaging waste was published in Italy. The decree made important changes, introducing the obligation of environmental labelling for all packaging released for consumption in Italy. In addition, on 21 November 2022, Ministerial Decree no. 360 of 28 September 2022 was published, which adopt the Guidelines on environmental labelling pursuant to art. 219, paragraph 5, of the legislative decree no. 152 of 3 April 2006, for the correct fulfilment of packaging labelling obligations by the responsible parties.

Paragraph 5 of article 219 of decree no. 152 of 3 April 2006 states that all packaging circulating on the Italian market must be appropriately in alignment with the decisions adopted by the Commission of the European Union, to facilitate the collection, re-use, recovery, and recycling of packaging, as well as to give correct information to consumers on the final indications of the packaging. The producers also have the obligation to indicate, for the purposes of identification and classification of the packaging, the nature of the packaging materials used, according to the Commission decision 97/129/EC.

There are significant technological limitations that do not allow for the physical affixing of environmental labelling on our packaging. In the clarification note conveyed by the Ministry of Ecological Transition on 17 May 2021, it is explicit that for transport packaging materials, which are mostly part of the B2B channel, the identification of the packaging composition material can be conveyed and communicated by the manufacturer on external media, including digital- hence this statement.

All transport packaging materials of products manufactured by Holmen Paper, regardless if produced at Braviken or Hallsta, that circulates on the Italian market are listed in table 1, each with their corresponding identification code according to the Commission Decision 97/129/EC.



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