

BRCGS Standard for Packaging and Packaging Materials

P553: Position statement: Clarification on Declaration of Compliance for paper packaging industry

Scope

The following Position Statement has been agreed to clarify the use of post-consumer recycled fibre in paper packaging, for example in corrugated cases.

Change log

Version no.	Date	Description
1	March 2018	First Issue
1.1	November 2018	Correction of status
2	26/07/2019	New BRCGS logo and footer changed

Effective from date of issue.

Declaration of Compliance (DoC)

The Standard states:

3.4.3 A declaration of compliance shall be maintained which enables users of the packaging materials to ensure compatibility between those material and the product with which they may be in contact.

The declaration of compliance shall contain as a minimum:

- the nature of the materials used in the manufacture of the packaging
- confirmation that the packaging materials meet relevant legal requirements
- the inclusion of any post-consumer recycled materials.

This shall identify any limitations of use of the product and the usable life of the packaging material (where relevant).

Products shall meet at least minimum legal requirements in the country of manufacture, and use, where known.

The purpose of the Declaration of Compliance (DoC) is to describe the nature of the materials, confirm that the material meets all relevant legal requirements, and list any post-consumer recycled content.

In paper manufacturing, the site typically uses industry standards, customer information, and risk assessment to determine the composition based on the final intended use of the product, and it is normal for this to contain post-consumer recycle.

It is satisfactory for the manufacturer to state that the product contains post-consumer recycled materials in a variable quantity. A range may be stated (e.g. 30-50%). Subject to compliance with EN643, there is no objection to the use of 'post-consumer' recycled fibre. There will be a range of technical reasons to determine why a manufacturer chooses a certain level of recycled fibre; the manufacturer is free to set this level as they consider most appropriate and to have the option to change that level from time to time.

Background

Post-consumer waste is defined in ISO 14021 as waste produced by the end consumer, typically through municipal recycling facilities. It is different from pre-consumer waste, which is manufacturing excess or waste that is reintroduced to the production process and this is not considered recycling in the commonly known sense.

Grades of recycled fibre are regulated by EN643*. If appropriate grades are used then 'post-consumer' does not imply that it is of lower quality than 'pre-consumer'.

*EN 643 "European List of Standard Grades of Paper and Board for Recycling"

http://www.cepi.org/system/files/public/documents/publications/recycling/2013/CEPI_EN%20643_brochure_FINAL_0.pdf

(The current version of the British Standard, BS EN 643:2014, is available for purchase from BSI)