

TO ALL THOSE CONCERNED

Milan, 05 March 2021

Subject: Conai Environmental Contribution - “bundle handle straps”. Conai BoD resolution of 25 February 2021.

Following a request for clarification from an association representing packaging producers and users, Conai carried out an analysis of the correct application of the Environmental Contribution on so-called “bundle handle straps”. These are accessories strapping (usually) plastic bundles that in turn contain one or more product units. They generally consist of a plastic adhesive tape inseparably coupled to a cardboard strap applied to facilitate handling of the bundle.

In light of the studies conducted and considering the definitions of the law¹ and the specific consortium regulations² on the issue, the Conai Board of Directors’ meeting of 25 February 2021, **with exclusive reference to bundle handle straps, since these are poly laminated (or composite) packages that cannot be separated manually, clarified that for the purposes of the Environmental Contribution the procedure to be adopted is as follows:**

- **application of the Conai Environmental Contribution on the entire weight of the packaging and related to the prevalent material (by weight) among the cardboard and plastic components (handle straps currently on the market are almost entirely cardboard-prevalent in terms of weight);**

¹ Pursuant to interpretation criterion iii) of annex E, point 2 of Legislative Decree 152/2006: “packaging components and ancillary elements integrated into packaging shall be considered to be part of the packaging into which they are integrated [...]”;

Pursuant to art. 218, paragraph 1, point e-bis) of the aforementioned Decree: composite packaging is defined as “packaging consisting of two or more layers of different materials that cannot be separated manually and form a single unit [...]”.

² For composite/poly laminated packaging (i.e. not manually separable), the Conai Environmental Contribution is applied to the weight of the entire packaging but with reference to the Contribution of the prevalent material by weight (Conai Guide, vol. 1, par. 4.2.1, in line with art. 4, paragraph 7 of the Conai Regulations);

For adhesive tapes and gummed paper, application of the CAC to 50% of the weight is envisaged. Adhesive tapes are in fact subject to the CAC limited to the backing, thus excluding the adhesive mass, conventionally defined as 50% of the total weight of the adhesive tape (Conai Guide, vol. 1, par. 8.1);

For the purposes of the application of the Conai Environmental Contribution, the same packaging cannot be given different contribution treatments depending on whether it is sold “finished” or as a semi-finished product to be assembled for self-production (Conai Guide Vol. 1, Terminology).

- **calculation of the weight of the adhesive tape (which contributes to the total weight of the packaging to be subjected to the CAC) net of the adhesive mass** and, therefore of **50% of its overall weight**, and 100% of the weight of the cardboard³;
- **issue of a self-certification** (form 6.4) by the user to the supplier, **for dubious cases only⁴ upon the “first transfer”**.

In order to allow companies to organise themselves, the Board also determined that **the obligation to apply the Conai Environmental Contribution** on “first transfers” of bundle handle straps **with the procedure indicated above will take effect as from 1.04.2021**.

In the meantime, **current practice will be valid until 31.03.2021**: until that date, therefore, Conai will accept any different methods of application/declaration of the Environmental Contribution on bundle handle straps.

All other consortium procedures also envisaged for other types of packaging, as described in the Conai Guide, remain valid.

For further information, please contact the Conai Toll-free number 800337799 or write to infocontributo@conai.org, referring to the subject line.

This document is the English translation of a Conai circular. In cases of disputes, the original Italian text shall prevail.

³ **Example**: weight of adhesive tape including adhesive mass: 1000 kg; weight of cardboard 2000 kg. Application of the CAC on the entire weight of the cardboard (prevalent material) and on 50% of the adhesive tape. So application of the cardboard CAC on the invoice on a weight of 2500 kg.

⁴ For example, when the supplier sells adhesive tape intended for residual cases of coupling with plastic film and not with cardboard.