

USE OF FULL BODY SLEEVED CONTAINERS FOR HOUSEHOLD AND MAINTENANCE PRODUCTS

A.I.S.E. Position paper

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1. Introduction and scope

Plastics are key in today's society and provide many benefits, such as light weight packaging. Yet, their recovery is still very low compared to their potential. In addition, littering and recent forms of leakage into the environment make us all - whether citizens, manufacturers or politicians - part of the problem, but also part of the solution.

In January 2018 the European Commission published its European Strategy for Plastics in a Circular Economy, following the broader 2015 EU Action Plan for a circular economy.

A.I.S.E. is committed to achieving sustainable development through a circular economy¹.

This can only happen when all the phases of a product lifecycle are considered, seeking continuous improvement in efficient design, use and sorting/disposal of packaging materials, as well as education of consumers on sustainable consumption. A.I.S.E. supports the development of a strong market for secondary raw materials that will ensure the availability and highest quality for such materials. To be successful, it is key that the whole value chain is engaged in the process.

In a context of fast-paced innovation, infrastructure development and industry proactive engagement to deliver effective solutions to improve products' recyclability, A.I.S.E. issues this position paper to address the sector view on the use of perforated, tear-off full body sleeved containers for household and maintenance products. This position answers the questions raised on the impact on the overall product sustainability when using this labelling solution.

2. Issue at stake

A **full body sleeve** is a printed film of plastic, unsupported by liner or adhesive, that is placed around a container, heated or elastically deformed to adhere exactly to the shape of the container.

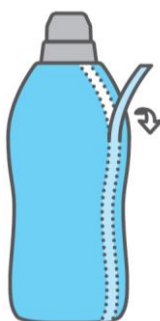


Figure: Full body sleeve with double perforation. This image is purely illustrative of the concept; the design of the sleeve and of the perforation (if present) might vary based on the container's shape and on the brand.

¹ A.I.S.E. initiatives contributing to a circular economy of packaging: www.aise.eu/packaging

2.1. Contribution to circular economy

The use of this labelling solution has increased substantially over the last years, both for household and other market segments, due to its substantial contribution to **increase containers recyclability**. If compared to other labelling solutions, full body sleeves allow to:

- Use a higher content (%) of recycled plastic as the small defects, e.g. irregular colouring of the material, are covered by the label and do not impact the container's appearance;
- Avoid the use of glues, thus saving on amounts of materials used and avoiding residues of glues on the container that could negatively impact its recyclability;
- Avoid the use of plastic colourants that are difficult to recycle when mixed to the container's plastic, since the visible aspect of the product depends solely on the label;
- Have a larger printing surface per container;
- Use a lower number of bottle types, later differentiated by the label.

2.2. Current obstacles to deploy full potential

The advantages of implementing a similar solution are clear per product unit, as explained under 2.1. However, for this solution to deliver its full contribution to circular economy there are some **obstacles existing at infrastructural level** that require further development. In fact, a full body sleeve might shield containers from recognition by optical detectors and it might prevent them from being correctly identified and/or sorted into the appropriate stream for recycling.

To overcome this obstacle, a series of actions can be put in place by both industry and by consumers, including the use of **sleeve perforations to facilitate the sleeve removal once the product has been used up**.

3. A.I.S.E. views on the use of full body sleeved containers

A.I.S.E. considers that full body sleeves can be a valuable labelling option for household and maintenance products containers provided that the following practical implementation aspects and boundaries of applicability are considered in the label design.

3.1. Practical implementation aspects

A.I.S.E. encourages its members to strive for a harmonized design of sleeves in a way that facilitates consumers' education, sorting processes adaptation and ease of applicability among different product categories, within and outside the A.I.S.E. portfolio.

In all cases where a full-body sleeves is used as a container's labelling option, it should be designed taking into account the **ease of removal by consumers when the product has been used up or by downstream waste manufacturing operations** (e.g. garbage pickup, sorting centres, recyclers, ...) to ensure the label doesn't hinder the container recyclability. In most cases, sleeve perforation is the optimal solution to facilitate the removal process. In those cases where the packaging shape allows for it, the sleeve should be equipped with double perforations (rather than single) – specifically designed to be easily identified and removed by consumers, e.g. by colour coding or printed dots/lines.

A dedicated work-stream and a conditional approval for this technology has already been granted for the PET value chain (EPBP specifications available [here](#)). However, the high-level concepts on disposal covered by this paper apply regardless of the material of the container and/or of the label even if the technical requirements might differ. With this in mind, the sleeve design (materials and inks) must allow it to easily separate from the container flakes, e.g. in a sink/float separation step for PET. Material-specific technical requirements for the application of this labelling solution are currently also being developed for PP and HDPE streams.

A.I.S.E. will engage to the extent possible with the packaging value chain stakeholders to ensure that its members are aware of the existing specifications and to support, where relevant, streamlining the harmonization efforts that are already taking place on the market.

Should a concept for the **design of a standardised perforation** – aiming at visual immediate recognition - be developed by relevant partners in the packaging industry, A.I.S.E. encourages its members to consider whether this may be the optimal solution towards harmonization. This will facilitate harmonization and, hence, education of consumers and workers handling full-body sleeved containers.

A.I.S.E. encourages striving for a **harmonized communication towards consumers**, instructing them to **remove the sleeve from the container after the product has been used up and before its disposal**. Both the container and the sleeve should be placed in the correct collection bin or bag for recycling; instructions might vary based on the municipality rules. It is essential that the message doesn't differ based on product type or brand to facilitate consumers' educations.

The use of a perforation for a full-body sleeve is also recognized by the EPR scheme in some countries as a criterion to grant a reduced fee, e.g. in Italy when the perforation is complemented by a communication to consumers². This bonus fee is given on the basis that this labelling option is recognized as an improvement of the recyclability of the whole container.

3.2. Boundaries of applicability

It is noted that one of the primary functions of the product label is to inform the end user of hazard and safe use information in accordance with the Classification Labelling and Packaging Regulation (Regulation (EC) 1272/2008). Hence, the implementation of this solution should be fully in line with the labelling requirements of CLP.

In cases where the CLP label is applied to the product container via a perforated full body sleeve, which is specifically designed to be removed by the consumer when the product has been used up, consideration of CLP Article 31 is highly recommended to ensure compliance with current regulatory requirements.

3.3. Remarks

While some cross-sector harmonization activities at industry level might be proactively initiated in the coming months due to the mobilisation of industry on this topic, the concepts in this paper should be already considered by all actors in the household supply chain when working on related label design activities.

A.I.S.E. encourages brand owners implementing this solution to verify its acceptance by the EPR scheme in the country where the container is expected to be disposed, with a view to an even better sortability and recyclability of the container and its label. Also, the industry network as well as authorities in charge of waste management should join efforts to deliver educational campaigns and to further develop the infrastructure needed.

It should be noted that this remains one of the options available on the market for product's labelling and it remains the responsibility of companies producing and placing products on the market to decide what is the best solution, based on the specificity of each product.

A.I.S.E. is not recommending this solution *per se* over other commercially available technologies/best practices. Moreover, the considerations presented in this paper are valid in light of the current state of the art; technological and legislative developments might impact the content of the current position.

² <http://www.conai.org/imprese/contributo-ambientale/contributo-diversificato-plastica/>