



EPEAT Clarification #13
Definition of plastic protective and stretch wraps

This Clarification applies to the following IEEE Standards and criteria:

Applicable Standards:	Applicable Criteria (enter here):
<input checked="" type="checkbox"/> IEEE 1680.1 – Computers and Displays	4.8.2.2
<input checked="" type="checkbox"/> IEEE 1680.2 – Imaging Equipment	4.8.2.3
<input checked="" type="checkbox"/> IEEE 1680.3 – Televisions	4.8.2.3

PVC Determination:

The standard specifically states that the labeling requirements do not apply to plastic protective or stretch wraps. The PVC has determined the following as it applies to wraps and bags:

A wrap is formed from a sheet or roll of plastic film that is wrapped or fitted to a product or accessory for the purpose of containing or protecting the part or accessory, but not permanently altered through further manufacturing other than cutting.

All other use of plastic packaging to enclose or encase a product that does not meet the above description of a wrap is not considered to be a wrap and is thus subject to the labeling requirements of this optional criterion. In determining the applicability of the labeling requirements to such packaging, the presence of a visible mechanism for closure (e.g. a zip lock) or a heat seal will be evidence that such packaging is NOT a protective wrap, and thus labeling requirements shall apply.

This latest clarification is consistent with Clarification 7.1, which among other things established that a part is defined by its form at the time of sale, rather than its raw material constituents.

Background Analysis:

During a Level 3 investigation in Verification Round 2011-05, an issue was identified with respect to optional criterion 4.8.2.2, Optional – Packaging 90% recyclable and plastics labeled. Upon visual inspection, multiple products were determined to contain plastic that was insufficiently labeled for recycling, as required in 4.8.2.2, specifically in the form of a protective bag used to contain parts. As such, the PVC ruled these instances to be in non-conformance, since the packaging exceeded the weight and surface area requirements of the criterion. The PVC ruling was challenged by a manufacturer, claiming that the plastic in question was a wrap, not a bag, and thus specifically exempted from the labeling requirements of 4.8.2.2.

The 1680.1 standard, criterion 4.8.2.2 specifies the following:

“All plastics shall be identified by material type (SPI, DIN, or country specific) and 90% of the packaging (by weight) consists of readily recyclable materials that are commonly accepted in

most recycling programs (and for which, on a regional basis, a recycling infrastructure is present) or can be composted or disposed of in municipal sewage programs. This includes: cardboard, boxboard, newsprint, and cornstarch. Pallets are excluded from the weight calculation.”

The applicability of the criterion is further defined in the standard as follows:

“Labeling requirement does not apply to plastic parts weighing less than 25 g or with surface area less than 50 cm²; plastic protective and stretch wraps and labels; or plastic pieces when due to shape affixing a label is not possible.”

As written, the standard does not provide a definition of plastic protective or stretch wraps. Further complicating this issue is the ability to use sheet plastic to form sealed pouches that perform the function of a bag. This raises the question of how to determine if the packaging is a plastic bag which must be labeled under the standard, or a protective plastic wrap which is exempt from the labeling requirements.

The form in which the packaging is delivered to the customer was determined by the PVC to be the critical determinant of whether the packaging item is a bag (covered by the criterion) or a wrap (exempt from the criterion), and NOT the initial form in which the Subscriber obtains the packaging material.

A “bag” is a packaging construction generally sealed on all sides except one, which forms an opening for insertion of a product/accessory that may be sealed after filling. A “wrap” is formed from a sheet or roll of plastic film that is wrapped or fitted around a product/accessory for the purpose of containing or protecting the product/accessory, but not permanently altered through further manufacturing other than cutting or the application of heat to shrink the film. In addition, a “wrap” can be unwound to access the product/accessory, while the contents of a “bag” are accessed either through the bag opening or breaking the seals.

Some manufacturers may purchase plastic bags to package the product or accessories such as cables and manuals, while other manufacturers may purchase plastic film and heat seal the film on at least 3 sides around the part. Whether a packaging manufacturer or the product manufacturer actually makes the “bag,” is not relevant to conformance to this criterion.

Change History:

Created: March 2012

Updated: February 2013