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For BT people

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Packaging Essential Requirements

*Guidance on compliance with the Packaging
(Essential Requirements) Regulations 2015 (as
amended)*

About this document ...

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Content approval

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by Yvonne Bagnall-Lyon, Lawyer - Property and Environment

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Issue 7	01-Aug-2019	Veronica O'hanlon	Approver updated
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Issue 5	13-Oct-2016	Veronica O'hanlon	Annual review - minor change
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Issue 3	16-Sep-2015	Simon Paul	The Packaging (Essential Requirements) Regulations 2003 (as amended) revoked and replaced with 2015 regulations
Issue 2	06-Mar-2015	Document Manager T	Document migrated onto new platform with no content change
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Issue 1	13-Aug-2013	Simon Paul	New ISIS Document

Table of Content

1 INTRODUCTION ----- 5

2 SCOPE ----- 5

3 ESSENTIAL REQUIREMENTS ----- 5

4 HEAVY METAL LIMITS ----- 6

5 TECHNICAL DOCUMENTATION ----- 6

6 ENFORCEMENT ----- 6

7 FURTHER INFORMATION ----- 6

8 REFERENCES ----- 7

1 ***Introduction***

This document has been produced to explain what actions BT (which for these purposes includes its lines of business, subsidiaries, joint ventures and enterprises) must take to comply with the requirements of the Packaging Essential Requirements Regulations 2015 as amended.

The main requirement of the regulations is that no organisation which is responsible for packing or filling products into packaging or importing packed or filled packaging into the United Kingdom, may place that packaging on the market unless it fulfils the Essential Requirements as summarised below, and complies with the heavy metal concentration limits.

This document is part of BT's Environmental Management System (EMS).

2 ***Scope***

This ISIS applies to all parts of BT operating in the UK that perform any of the following activities:

- Imports packaged goods or packaging materials into the UK
- Places products on the market where the packaging is marked with a BT brand (BT, EE or Plusnet) or the brand of a subsidiary,
- Places finished products inside packaging i.e. performs a packer/filler activity.

3 ***Essential Requirements***

The regulations require BT to ensure that:

The packaging volume and weight is the minimum amount necessary to provide adequate protection for the product, while maintaining the necessary levels of safety, hygiene and consumer acceptance.

The packaging is designed, produced and commercialised so that, when discarded, it can be reused or recovered in line with the waste hierarchy and its impact on the environment is minimised. The term 'recovered' means any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function.

Note: Oxo-degradable plastics must not be used in BT as they are NOT biodegradable. They quickly fragment into smaller and smaller pieces, called

microplastics, but don't break down at the molecular or polymer level, so they present a serious risk to the environment.

In BT the policy is to clearly label our packaging to state how it should be disposed of.

Noxious or hazardous substances in packaging must be minimised in packaging with regards to their presence in emissions, ash or leachate when packaging or residues from management operations or packaging waste are incinerated or landfilled.

The regulations also transpose definitions for 'plastic' and 'plastic carrier bag' from the EU Plastic Bags Directive 2015/720/EU

4 *Heavy Metal Limits*

The aggregate heavy metal limits apply to cadmium, mercury, lead and hexavalent chromium in packaging or packaging components. The total by weight of such metals must not exceed 100 parts per million (ppm).

There are some exemptions, for instance, for glass packaging and plastic crates/pallets.

5 *Technical Documentation*

Technical documentation, which shows that the packaging complies with the essential requirements and the heavy metal limits, must be kept for a period of four years from the date the packaging is placed on the market. On request from the enforcement authority, BT must provide this technical documentation to the enforcement authority within twenty eight days.

6 *Enforcement*

Local Weights and Measures Authorities are responsible for enforcing these regulations in Great Britain. The enforcement authority in Northern Ireland is the Department of Enterprise, Trade and Investment.

Failure to comply with the regulations may lead to a fine.

7 *Further Information*

For further advice on compliance with these regulations, contact the author of this ISIS.

8 ***References***

The Packaging (Essential Requirements) Regulations 2015 is available at:
Statutory Instrument [SI 1640 of 2015](#).

END OF DOCUMENT
