

## Rules for membership in Grønt Punkt Norge (GPN rules)

### Table of Contents

Rules for membership in Grønt Punkt Norge (GPN rules) .....	1
Contact information for the material companies and Grønt Punkt Norge .....	3
1 Introduction.....	4
1.1 About Grønt Punkt Norge (hereinafter GPN).....	4
1.2 What is packaging?.....	5
1.3 Recycling schemes.....	5
2 Reporting packaging .....	6
2.1 Roles – the position of our members in the packaging chain .....	7
2.1.1 Role: Goods manufacturer (packing/filling) .....	7
2.1.2 Role: Goods importer .....	7
2.1.3 Role: Packaging manufacturer .....	7
2.1.4 Role: Packaging importer .....	7
2.1.5 Role: Export company .....	8
2.2 What reports are required from the different roles .....	8
2.3 Rules regarding fee and reporting for special packaging materials.....	10
2.3.1 Bio-plastic .....	10
2.3.2 Other paper/cardboard packaging.....	10
2.3.3 Wooden packaging.....	10
2.3.4 EPS (expanded polystyrene).....	10
2.4 Other special regulations regarding reports .....	10
2.4.1 Beverage packaging liable for fee .....	10
2.4.2 Beverage cartons.....	10
2.4.3 Screw-on tops and caps made from plastic on beverage packaging liable for fee .....	11
2.4.4 Combination packaging .....	11
2.4.5 Laminates .....	11
2.4.6 Raw materials .....	11
2.4.7 Scrap packaging .....	11
2.4.8 Service packaging .....	11
2.4.9 Carrier bags made from plastic, Kraft paper or packaging carton .....	12
2.4.10 Gardening and agricultural packaging.....	12
2.4.11 Sleeves/bobbins .....	13
2.4.12 Pallets .....	13
2.4.13 Short-lived foil .....	13

2.4.14	Agricultural foil .....	14
2.4.15	Packaging for chemicals and hazardous substances .....	14
2.4.16	Reusable packaging .....	15
2.4.17	Certain packaging products are exempt from the obligation to issue reports .....	15
2.4.18	Producer payment .....	15
3	How to issue reports?.....	15
3.1	The actual packaging use six times per year .....	16
3.2	On account reporting .....	16
3.3	Annual reports.....	17
3.4	Fixed annual fee – simple system for small users of packaging.....	17
3.5	Automatic declaration – quarterly declaration for importer of goods .....	17
3.6	Method of reporting.....	18
3.7	Confirmation by auditor .....	18
3.8	Failure to comply with reporting obligation.....	18
4	How to make payment? .....	18
4.1	Packaging fees .....	18
4.2	Paying the packaging fee.....	18
4.3	Due date for invoices.....	18
5	Control systems .....	19
5.1	Control membership .....	19
5.2	Audit of reported quantities.....	20
5.3	Breach.....	20
6	Membership benefits .....	20
6.1	Certificate of membership.....	20
6.2	Member searches.....	20
6.3	"My pages" .....	20
6.4	Grønt Punkt® and labelling of packaging .....	21
7	Obligations for Grønt Punkt Norge .....	21
7.1	Confidentiality .....	21

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# 1 Introduction

The GPN rules for membership in Grønt Punkt Norge provide a description of the rules to follow, whether you as a user of packaging have the role of goods manufacturer (packing/filling), goods importer, packaging manufacturer or packaging importer. They also provide practical examples which describe the problems faced by most members. The GPN rules were previously known as the "Compensation Regulations".

This translation of the GPN rules has been made to remedy the availability for companies with affiliations to foreign countries. There may be inaccuracies in relation to the Norwegian original text, and in such cases the Norwegian text shall prevail. If there is any uncertainty regarding the understanding of rules, we recommend that the Company contacts Grønt Punkt Norge AS.

## Reader's guide

The procedure to issue reports to Grønt Punkt Norge may seem complicated but does not have to be so. GPN recommends all readers to start out with the *short version* of the rules: *Rules for membership in Grønt Punkt Norge (GPN rules)*. These quickly provide an overview of the different aspects of membership, your roles (packing/filling, goods importer, packaging manufacturer/importer) and the types of packaging which require reports.

Everyone should read these rules. As a minimum, we recommend that everyone reads the table of contents to find the chapters which are most relevant. Take a few minutes and read the text. Members are responsible for ensuring compliance at all times with the membership rules.

## 1.1 About Grønt Punkt Norge (hereinafter GPN)

Commerce and industry have a particular responsibility to ensure that their use of packaging does not represent an unnecessary burden on the environment. In order to avoid a governmental fee on packaging, commerce and industry signed industry agreements with the authorities in 1994/1995, whereby they committed to taking on a greater level of responsibility as manufacturers of packaging. Material companies for packaging were founded to ensure compliance with the authorities' requirements within the areas of material recycling and energy exploitation, information on separation at source and optimisation of packaging. The recycling results are reported once a year to the Norwegian Environment Agency. These reports are then forwarded to the EU and are monitored in relation to Directive 94/62 EC on packaging and packaging waste. This directive is the principle document for similar recycling schemes throughout the EU/EEA.

The recycling schemes are financed by means of a fee charged to the manufacturers and importers for the packaging they utilise. The funds collected are paid in full to the material companies and reflect the costs of recycling the packaging. The recycling schemes have nationwide coverage and all enterprises can take part. By signing up as members of the material companies' collective recycling schemes, enterprises are able to take on responsibility for the manufacture of packaging in a cost-efficient and eco-friendly way.

As a main rule, the material companies are owned by the packaging manufacturers, goods manufacturers and trade, with one third each. GPN (formerly named Materialretur) was founded in 1997 in order to coordinate and increase the efficiency of financing for recycling schemes by providing members with one central body to which they could report. GPN was also assigned responsibility for ensuring a high level of support for the recycling schemes.

Since 2008, GPN has been involved in the collection and recycling of plastic packaging, packaging cartons and beverage cartons according to the agreement with Plastretur AS and Norsk Returkartong AS. The collection and recycling schemes for brown paper (mainly corrugated cardboard and solid board) and glass and metal packaging are operated by Norsk Resy AS, Norsk Glassgjenvinning and Norsk Metallgjenvinning AS respectively.

## 1.2 What is packaging?

All products made of any materials of any nature to be used for the containment, protection, handling, delivery and presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer (EU Directive 94/62 on packaging and packaging waste).

This Directive is the principle document for recycling schemes for packaging and for the GPN rules. For the entire directive, go to [http://ec.europa.eu/environment/waste/packaging\\_index.htm](http://ec.europa.eu/environment/waste/packaging_index.htm).

## 1.3 Recycling schemes

The material companies for packaging were founded by the packaging chains (trade) in order to ensure compliance with the authorities' goals and requirements. GPN uses the term *recycling scheme* to describe the totality of information, infrastructure and activities performed to ensure recycling of packaging material.

- Information
  - Campaigns to motivate trade and consumers to separate waste at source
  - Enhance the knowledge of members, collection companies and waste disposal sites
- Infrastructure
  - Collection system available for parties in possession of waste
  - Equipment used throughout the recycling chain
- Activities
  - All those who contribute towards the separation at source, collection, transport, sorting and recycling of packaging

Table: The material companies and their packaging recycling schemes

Recycling scheme	Glass packaging	Metal packaging
Company	Norsk Glassgjenvinning as	Norsk Metallgjenvinning as
Operated by	Norsk Glassgjenvinning as	Norsk Metallgjenvinning as
Comprises	<ul style="list-style-type: none"> <li>• All types of glass packaging with the exception of beverage packaging with a deposit (*)</li> </ul>	A. Metal packaging for chemicals and hazardous substances (**) B. All other metal packaging, with the exception of: <ul style="list-style-type: none"> <li>• beverage packaging with a deposit (*)</li> <li>• packaging which cannot be disposed of in the collection container because it is larger than the hole</li> </ul>
The material	Glass	Steel and aluminum

Recycling scheme	Beverage cartons	Packaging cartons
Company	Norsk Returkartong AS	Norsk Returkartong AS
Operated by	Grønt Punkt Norge AS	Grønt Punkt Norge AS
Comprises	All types of beverage cartons	All types of packaging cartons

The material	Produced from sulphate celluloses and possibly CTMP which weights from approx. 150-400 g/m <sup>2</sup> and which is laminated with thin barriers of polyethylene plastic, aluminum etc. (liquid packaging board).	Formed when wet and with a weight from 150 g/m <sup>2</sup> . The method of production distinguishes packaging carton from solid solid board. There are no limitations on weight.
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Recycling scheme	Plastic packaging	Corrugated cardboard	Solid board
Company	Plastretur AS	Norsk Resy AS	Norsk Resy AS
Operated by	Grønt Punkt Norge AS	Norsk Resy AS	Norsk Resy AS
Comprises	All types of plastic packaging, short-lived foil, agricultural foil, EPS and packaging for chemicals and hazardous substances (**), with the exception of beverage packaging with a deposit (*)	All corrugated cardboard packaging	All solid board packaging
The material	Plastic is ductile polymer produced from fossil raw materials such as oil and gas or renewable raw materials such as biomass.	One or more layers of corrugated cardboard glued onto or in between flat paper	Paper laminate made from several layers of paper or cardboard with a weight from 600 g/m <sup>2</sup> .

(\*) For more detailed information, ref. item 2.4.1 regarding beverage packaging liable for fee.

(\*\*) For more detailed information, ref. item 2.4.15 regarding packaging for chemicals and hazardous substances.

## 2 Reporting packaging

The members of GPN shall report all packaging and foil liable for fee which are supplied to the Norwegian market. Such reports are issued by members who make use of packaging for own production, import packaged goods or manufacture/import empty packaging. The regulation has been worded to avoid more than one report being issued per piece of packaging. Exported packaging (empty or filled) does not require a report in Norway.

The members shall report all packaging: consumer packaging, distribution packaging and transport packaging. Packaging shall be reported even if not utilised to transport goods to the consumer. Examples of the above are packaging utilised for raw materials for production, scrap from the production of goods, recycled goods and goods which are re-packaged. The exception to this rule is scrap from the production of packaging at packaging manufacturers, as it is assumed that this will be re-utilised in production.

All members must determine the type of packaging for which they are obliged to issue reports. This can be done by answering two questions:

### 1. What **ROLE(S)** does the member play?

- The term "role" is defined as the activity of the member within the value chain.
- The different roles are described in item 2.1.

### 2. **WHAT reports** are required from the different roles?

- Principle: Packaging fee shall only be paid once.
- The reports required depend on the role of the individual member.
- The roles are described and listed in item 2.2.
- Packaging which does *not* require a report is described in item 2.4.17

## **2.1 Roles – the position of our members in the packaging chain**

The value chain for packaging comprises packaging manufacturers, packaging importers, goods manufacturers (packing/filling), importers of packaged goods, wholesalers, transport companies, retailers, consumers, collection companies and recycling companies. The obligation to issue reports is assigned to the roles of goods manufacturer/importer and packaging manufacturer/importer in the value chain. This sub-chapter provides a definition of the different roles. Item 2.2 goes on to describe the packaging materials and types of packaging which require reports from the different roles.

Below is a description of the roles defined in the report form. One company may have several roles.

### **2.1.1 Role: Goods manufacturer (packing/filling)**

These are companies which package goods. They could also be companies (e.g. wholesalers) which re-pack goods, gather goods into larger packages etc. at a later stage of the value chain. The decisive factor is whether the packaging is added to the goods or if the goods are already packaged. A packaging manufacturer who packages their products is defined as a goods manufacturer (packing/filling).

In situations where packaging of goods is outsourced to another company than the owner of the goods, e.g. hire of packaging service or packaging for transport, it is the party which owns the packaging that shall issue the report to GPN.

- If the owner of the goods purchases packaging but outsources the actual packaging work, the owner of the goods shall issue the report.
- If a company purchases packaging and carries out the packaging work themselves, it is the packaging company that shall issue the report and not the owner of the goods.

### **2.1.2 Role: Goods importer**

Goods importers shall always report packaging in Norway. Goods importers are companies that are the initial owners of packaged goods in Norway.

For the import of goods, the obligation to report lies with the initial owner of the goods in Norway. The term "initial owner" is defined as the party that pays VAT upon import of the goods to Norway.

Agents are classified as importers if they are the initial legal owner of the goods in Norway (even if they are not physically in contact with the goods or packaging). Agents who only act as mediator for goods shall therefore not register for the scheme. In such a situation, the agent's customer is defined as the importer.

Certain situations may require foreign companies not registered in Norway to issue reports on behalf of their customers in Norway. More detailed information on registration for membership for such companies can be obtained by contacting GPN.

### **2.1.3 Role: Packaging manufacturer**

Packaging manufacturers are companies which manufacture packaging. A packaging manufacturer also plays the role of goods manufacturer (packing/filling) when they package their own goods.

### **2.1.4 Role: Packaging importer**

In this context, a packaging importer is a company that imports packaging as it is (empty packaging). A packaging importer is a company that is the initial owner of the packaging in Norway. A packaging importer that re-packages packaging prior to sale also plays the role of goods manufacturer (packing/filling). If the imported packaging product is packaged for transport, the company also plays

the role of goods importer (see above). Import of packaging by agents is governed by the same regulations as for goods importers, see above.

**2.1.5 Role: Export company**

Member companies that export packaged goods or packaging from Norway shall not pay fee for the packaging which follows with the exported goods. The packaging fee charged by GPN is only intended for financing of Norwegian recycling schemes, and packaging which is exported becomes the responsibility of the country to which it is exported.

Export is reported separately for glass and metal packaging. For other packaging materials, exported packaging is deducted from the figures reported for manufacturer and importer.

Norwegian manufacturers of corrugated cardboard report and pay charges on behalf of their Norwegian customers. Goods manufacturers that export goods in corrugated cardboard/solid board may take over the reporting obligation from the manufacturer, so that exported packaging is not reported to GPN. In such a situation, the goods manufacturer must primarily send confirmation to the corrugated cardboard manufacturer that they take over responsibility for paying the fees along with confirmation of valid membership in GPN.

All companies, including non-members, that export packaged goods or empty packaging, are entitled to issue a written application to GPN for compensation if the company is able to document that the utilised packaging has been purchased from a supplier that is a member of GPN and that payment has been made to GPN for the packaging.

**2.2 What reports are required from the different roles**

Packaging shall only be reported once, and the rules have been worded to ensure this. Once the members are familiar with their roles, see above, they can refer to the tables below to find out which packaging materials/packaging types have to be reported.

**Which tables do you have to read?**

Manufacturers	Importers and exporters
<ul style="list-style-type: none"> <li>• <b>Goods manufacturer (packing/filling) (Table 1)</b> Reports packaging which is added to a product (inner and outer packaging, including stretch film).</li> <li>• <b>Packaging manufacturer (Table 3)</b> Applies when the packaging is the actual product i.e. when the packaging is not filled with a product.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Goods import (Table 2)</b> Reports all packaging around the products which are imported.</li> <li>• <b>Packaging importer (Table 3)</b> Applies when the packaging is the actual product i.e. when the packaging is not filled with a product.</li> <li>• <b>Goods and packaging export (Table 4)</b></li> </ul>

**Table 1. Goods manufacturers (packing/filling)**

Reports packaging which is added to a product or load carrier.
<b>Plastic packaging</b>
All types, as included in the table in item 1.3, with the exception of:
✓ Pallet film, foam foil, bubble wrap, ref. item. 2.4.13
✓ Carrier bags, ref. item 2.4.9
✓ Service packaging, ref. item 2.4.8
✓ Gardening and agricultural packaging, ref. item 2.4.10
✓ Agricultural foil, ref. item 2.4.14
✓ EPS (for example Isopor®), ref. item 2.3.4
<b>Beverage cartons</b>

✓ All types
<b>Packaging cartons</b>
✓ All types, as included in the table in item 1.3, with the exception of service packaging and gardening and agricultural packaging, ref. items 2.4.8 and 2.4.10
<b>Metal packaging for chemicals and hazardous substances ("Empty &amp; Dry").</b>
✓ All packaging for paint, lacquer, glue, filler and printing ink, ref. item 2.4.15
<b>Corrugated board, Glass- and metal packaging</b>
✓ No reporting for goods manufacturers (packing/filling), ref. table 3

### Table 2. Goods importer

<b>Reports all packaging around the products which are imported.</b>
<b>Plastic packaging</b>
✓ All types, as included in the table in item 1.3
<b>Beverage cartons</b>
✓ All types
<b>Packaging cartons</b>
✓ All types, as included in the table in item 1.3
<b>Corrugated cardboard and solid board</b>
✓ All types but currently exempt from the reporting obligation ref. item 2.3.2
<b>Glass packaging</b>
✓ All types, as included in the table in item 1.3
<b>Metal packaging</b>
✓ All types, as included in the table in item 1.3, except for chemicals and hazardous substances, ref. item 2.4.15
<b>Metal packaging for chemicals and hazardous substances ("Empty &amp; Dry").</b>
✓ All packaging for paint, lacquer, glue, filler and printing ink, ref. item 2.4.15

### Table 3. Packaging manufacturer and importer

<b>Reports when the actual product is packaging</b>
<b>Plastic packaging</b>
✓ Pallet film, foam foil, bubble wrap, ref. item. 2.4.13
✓ Carrier bags, ref. item 2.4.9
✓ Service packaging, ref. item 2.4.8
✓ Gardening and agricultural packaging, ref. item 2.4.10
✓ Agricultural foil, ref. item 2.4.14
✓ EPS (for example Styrofoam), ref. item 2.3.4
<b>Packaging cartons</b>
✓ Service packaging and gardening and agricultural packaging, ref. items 2.4.8 and 2.4.10. These types of packaging are reported on the same line in the report form for packaging carton.
<b>Corrugated cardboard and solid board</b>
✓ All types but currently exempt from the reporting obligation ref. item 2.3.2
<b>Glass packaging</b>
✓ All types, as included in the table in item 1.3
<b>Metal packaging</b>
✓ All types, as included in the table in item 1.3, except for chemicals and hazardous substances, ref. item 2.4.15

### Table 4. Goods and packaging exporters

<b>Reports when export is not deducted from production and import, ref. item 2.1.5</b>
<b>Glass packaging</b>
✓ All types, as included in the table in item 1.3
<b>Metal packaging</b>
✓ All types, as included in the table in item 1.3, except for chemicals and hazardous substances, ref. item 2.4.15

## **2.3 Rules regarding fee and reporting for special packaging materials**

### **2.3.1 Bio-plastic**

All types of plastic packaging are liable for fee. This also applies to plastic materials which are biodegradable and/or manufactured from renewable raw materials (corn etc.).

### **2.3.2 Other paper/cardboard packaging**

Sacks and bags, wrapping paper, brown kraft paper rolls, gift wrap, tissue paper, roll covers, sleeves etc. are covered by the recycling scheme for corrugated cardboard and solid board, although the current charge is NOK 0/kg and volume is not reported.

### **2.3.3 Wooden packaging**

Not covered by the recycling scheme and does not require reporting.

### **2.3.4 EPS (expanded polystyrene)**

EPS (such as Styrofoam) and similar packaging materials (EPE, EPP, EPX) are liable for fee as plastic packaging with a separate charge. The liability for fee also applies to shock-absorbing packaging materials such as chips.

## **2.4 Other special regulations regarding reports**

It is most beneficial for both GPN and its members that reports are correct when they are first issued. The paragraphs below provide an explanation of common misunderstandings and describe the reporting rules for certain "difficult" types of packaging.

### **2.4.1 Beverage packaging liable for fee**

A set of special regulations apply for inner packaging for beverages. The Norwegian Storting adopts environmental taxes for this area every year.

GPN members who have a supplementary agreement for beverage packaging liable for fee shall report all beverage packaging made from glass, metal, beverage cartons and plastic that does not have a deposit. Once such a supplementary agreement has been signed, the member is entitled to a reduction in the environmental tax which corresponds to the share of recycling (estimated recycling percentage) which can be documented by the relevant material company to the authorities. The percentage of recycling is established every year by the Norwegian Environment Agency and applies for the period from 1 July to 30 June the following year. Normal fee shall be paid for the part of the packaging which is liable for environmental tax.

A reduction in environmental taxes is allowed for beverage packaging which is covered by the following recycling schemes: Norsk Glassgjenvinning, Norsk Metallgjenvinning, Norsk Returkartong and Plastretur. Information on prevailing environmental taxes and recycling percentages can be found on the GPN website: <http://www.grontpunkt.no/drikke> (Norwegian only).

Beverage packaging with a deposit is not covered by the GPN schemes and is administered as a separate recycling scheme, owned by Infinitum and the Norwegian association of brewers and beverages (Bryggeri- og drikkevareforeningen).

### **2.4.2 Beverage cartons**

Cartons which contain beverages liable for packaging fee are reported on a separate report form for beverages. Beverage cartons with contents not covered by the definition of beverages in the

regulation, such as cream, desserts, sauces, breast milk substitutes, chopped tomatoes and chick-peas are reported on a separate report form for beverage cartons.

#### **2.4.3 Screw-on tops and caps made from plastic on beverage packaging liable for fee**

Reporting of screw-on tops and caps is determined by the recycling scheme for the beverage packaging:

- **GPN:** Reported on standard report form. Remember to report wine bottle corks made from plastic.
- **Norsk Resirk (Resirk)** (disposable, recyclable plastic bottles and beverage packaging made from metal with a deposit):  
According to Resirk's regulations (ref. [www.resirk.no](http://www.resirk.no)). Reports to GPN not required.
- **Reuse system at brewers** (reusable packaging with deposit):  
All tops on reusable bottles (glass and plastic bottles) are reported to GPN. According to their own set of regulations, brewers are entitled to apply for a reduction to the fee for purchased tops, based on their own recycling of returned tops which is verified by an auditor.

#### **2.4.4 Combination packaging**

Defined as packaging solutions where several packaging materials are combined and which can be easily separated, such as a glass jar with a metal screw-on lid. Separate reports shall be issued for the different packaging materials.

#### **2.4.5 Laminates**

Defined as packaging made up of several materials which cannot easily be separated, e.g. soup packets. The weight of the entire packaging shall be reported as the dominant packaging material. If no one packaging material is dominant, the entire weight of the packaging shall be reported as the packaging material with the highest fee.

#### **2.4.6 Raw materials**

Packaging around imported raw materials shall be reported by the importer. For raw materials manufactured in Norway, the main rule is that the party to manufacture the raw material shall report the packaging to GPN. However, in certain cases, the report has to be issued by the packaging manufacturer (ref. item 2.2).

#### **2.4.7 Scrap packaging**

Scrap packaging includes, but are not limited to cuts, surplus stock, misprints and other production errors. Scrap packaging from packaging manufacturer, goods manufacturer (filling/packing), goods importer and packaging importer is reportable. Scrap from production of packaging at a packaging manufacturer is exempt from the reporting obligation if the scrap packaging is used as raw material in the packaging manufacturer's own production.

#### **2.4.8 Service packaging**

Packaging mainly used to package goods for small companies involved in trade and service, or by customers in a shop. The manufacturer/importer of the packaging which has to be reported subscribes to membership in GPN, so as to avoid numerous small companies of this type having to take out membership (producer payment). The packaging manufacturer/importer's duty to report also applies when these types of packaging are sold for industrial packaging or directly to consumers. Ref. item 2.4.18 Producer Payment.

Additional users of service packaging:

- Retailer: Groceries, bakers/confectioners, convenience/service trade, kiosk, petrol stations
- Restaurants etc.: Fast food restaurants and snack bars, commercial kitchens, canteens, catering
- Other service companies: Transport of luggage by plane, laundry/dry cleaning, users of night safes, bank/post (dispatchers of plastic envelopes)

Below is a list of examples of service packaging. The list is intended as a guide and is not complete. Contact GPN if you have questions about the different packaging types and products.

<b>PACKAGING TYPES/PRODUCTS</b>	<b>EXAMPLES OF USE</b>
PLASTIC - carrier bags including reusable bags ("bag-for-life") and shopping bags	all product types
<b>PLASTIC - Other service packaging</b>	
bags and sacks	
✓ bread bags	bread and other bakery products
✓ tie bags/tear-off bags	fruit/vegetables, bakery products, other fresh produce
✓ Norwegian Resirk sacks	return of metal and plastic beverage packaging with deposit
✓ other special bags	dry cleaners, skis, carpets, posters, prams
boxes, cups, cases, bowls, trays, bottoms, foil, lids	
✓ fresh produce and ready-made food (all packaging products + food film and plastic sheets)	commercial kitchens (including home help), canteens, restaurants, catering, shop packaging (sandwich fillers, cheese, meat)
✓ takeaway/fast food (box, foil, cups, bowls)	wraps, dressing (cups with lid), sandwiches, baguettes, lunch, salads, sushi
✓ confectionery (box, tray, bottom)	cakes (whole and slices), open sandwiches
Disposable plates, beverage cups and/or lids	If intended to be filled at the point of sale (not home). Disposable cutlery is not packaging
gift wrap	trade/service
plastic and laminate envelopes	Nets (former BBS), bank, post and other private and public enterprises
<b>CARDBOARD PACKAGING</b>	<b>AREAS OF APPLICATION</b>
disposable plates, beverage cups and/or lids	If intended to be filled at the point of sale (not home). Disposable cutlery is not packaging
boxes, trays, bottoms	commercial kitchens, bakery/confections, restaurants, catering, canteen food
carrier bags	all product types
carrying trays	for beverage cups (coffee, soft drinks)
takeaway/fast food	pizza, calzone, pizza slices, bowl for fries, soup bowls, food bowls, hamburgers, children's spoons

#### **2.4.9 Carrier bags made from plastic, Kraft paper or packaging carton**

- Carrier bags made from plastic are defined as packaging liable for packaging fee. Bags also designed for multiple uses (reusable bags), such as "bag-for-life" and shopping bags are covered by the recycling schemes and are liable for packaging fee.
- Carrier bags made from Kraft paper are covered by the recycling schemes for packaging, but the packaging fee on such bags are set as zero and reports are not required.
- Carrier bags made out of carton is defined as packaging and is reported as service packaging.

#### **2.4.10 Gardening and agricultural packaging**

Packaging used to package unprocessed agricultural products in Norway. Below are examples of plastic or cardboard packaging regarded as gardening and agricultural packaging. The list is intended as a guide and is not complete. Contact GPN if you have questions about different packaging types or products.

<b>PACKAGING MATERIAL/TYPES</b>	<b>EXAMPLES OF USE</b>
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## PLASTIC

tray, cups and baskets	tomatoes, carrots, salad, berries, grapes, nectarines
bags (open or closed at the top)	open: herbs, celery, cos lettuce, iceberg lettuce, flowers closed: tomatoes, carrots, salad, bananas, apples
bags (flow pack - welded at both ends)	carrots, tomatoes, peppers, avocado
film (on products and around cups/trays)	cucumber, cauliflower, broccoli, carrots, apples
cellophane	cut flowers and potted plants
string bags (possibly with paper/foil)	wood, potatoes, onions
sacks (foil or with paper)	wood, potatoes
Flower pots intended to stay with the plant throughout its lifetime	plants
plant trays, sheets, sleeves/hoses/roles	plants
boxes/lids	honey
<b>PACKAGING CARTON</b>	
cups, trays and baskets	apples, berries, tomatoes
cartons and trays	eggs
inserts for boxes	apples, nectarines

On a rare occasion, goods are imported which are already packaged in service packaging, for example the import of potted plants and bread in plastic bags. This packaging is reported under the role of goods importer and as Foil or Hard plastic.

### **2.4.11 Sleeves/bobbins**

If made of plastic, they are liable for packaging fee, including sleeves in rolls of agricultural foil. Sleeves made from brown paper/cardboard are not liable for packaging fee.

### **2.4.12 Pallets**

If made of plastic and corrugated cardboard, then this type of packaging is liable for packaging fee. For pallets covered by the reuse scheme, the regulation for the reuse system applies (ref. item 2.4.16).

### **2.4.13 Short-lived foil**

Short-lived foil is liable for packaging fee. The term short-lived foil implies all types of plastic foil except products such as tarpaulins, damp coursing and other long-life building foil.

The short-lived foil which is mainly used as outer packaging, filling material and for protection is producer paid, ref. item. 2.4.18, and reported by the packaging producer / -importers.

Producer Payment of "Plastic sheeting, fillers and protection" includes but is not limited to:

- \* Shrink wrap (film and foil)
- \* Stretch wrap (film and foil)
- \* Pallet hoods and pallet spacers
- \* Top cover and films
- \* Foil for packaging waste in bales
- \* Cover and winter foil, for example. for lumber
- \* Cushioning foam, bubble wrap and air filled cushions
- \* Profiles, cushions and sheets in PE or PP foam for protection during storage and transport

All other films is to be reported and liable for fee for the producer of goods (packer/filler).

Importer of goods report and pay fee for any kind of short-lived foil supplied products.

#### 2.4.14 Agricultural foil

Liable for packaging fee and includes round bale net wrap, silage pit foil, round bale foil, solar collector foil, fibre mesh and plastic sleeves inside the rolls. Exempt from the packaging fee is biodegradable foil supposed to be plowed into the soil.

The reporting procedures for agricultural foil are different. Please contact GPN for more detailed information on these procedures.

#### 2.4.15 Packaging for chemicals and hazardous substances

Includes packaging for products that when discarded classifies as hazardous waste. The packaging of these products are liable for packaging fee regardless of the danger mark:

- Windshield washer fluid
- lubricating oil
- cleaning, washing, rinsing and dishwashing products sold as groceries
- lighter fluid, white spirit and methylated spirits
- lamp oil, heating oil and kerosene
- (bio) ethanol
- Drain cleaner

From 1 June 2015, new regulations for the classification and labeling of dangerous chemicals. The schemes for packaging includes packaging that is marked **health hazards, environmental hazards or corrosive**. Additionally, the schemes also include packaging marked **chronic health hazards** and **flammable** with the signalword **warning**.

				
Health hazard	Corrosive	Environmental hazard	Flammable-warning	Serious health hazard-warning

Packaging is liable for fee if it is made of plastic or metal.

- For plastic, this applies to all types of packaging up to and including 100 litres.
- For metal, this applies to all types of packaging up to and including 20 litres which is used for paint, lacquer, glue, filler and printing ink.
- All aerosol cans in metal with a hazard label are exempt and shall not be reported.

Packaging for hazardous waste which is labelled as **acute toxicity, oxidising, gas under pressure, explosive** are not included in the recycling schemes for packaging and are therefore not liable for fees. Packaging labelled **flammable** and **serious health hazard** with the **signal word danger** is not included in the schemes.

					
Acute toxicity	Oxidising	Gas under	Explosive	Flammable-	Serious health

		pressure		danger	hazard- danger
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Up-to-date information on old and new hazard symbols (CLP pictograms), the hazard symbols covered by the material company's recycling schemes and what has to be handled as hazardous waste will be made available on the GPN website, ref. <http://www.grontpunkt.no/fa>.

#### **2.4.16 Reusable packaging**

This is packaging used several times for the same purpose.

The main rule is that the goods manufacturer (packer/filler) is obliged to report all new production of reusable packaging. However, reports are not required for reuse of the same packaging.

Packaging manufactured for recycling and reuse but which is nonetheless not covered by a separate recycling and reuse scheme is defined as disposable packaging. The same rules therefore apply for reporting and packaging fee.

No reduction of the packaging fee is awarded if reusable packaging is made from recycled raw materials.

Companies which make use of and dispose of reusable packaging may apply for a reduction to fees for the purchase of new reusable packaging, provided that the recycled and disposed reusable packaging is recycled by the company itself. The principle is that reports and packaging fee are only required for waste from the reuse scheme.

#### **2.4.17 Certain packaging products are exempt from the obligation to issue reports**

1. Packaging products which are not defined as ordinary sales or transport packaging. This includes e.g. waste sacks, waste bags, freezer bags and disposable cutlery used in households for packaging products, dog bags, clothes hangers, cachepots, covers for CDs/DVDs with digital music/films/games, music/video cassettes and storage material for games and instruments.
2. Packaging utilised to store goods such as barrels, buckets, basins, baskets, cassettes, folders etc.
3. Packaging for chemicals and hazardous substances with the "most hazardous" symbols are not covered by the recycling schemes and shall not be reported, ref. item 2.4.15 and <http://www.grontpunkt.no/fa>.

#### **2.4.18 Producer payment**

Some types of packaging is reported by packaging producer / -importer, see item. 2.2, Table 3, so-called producer payment. Members of GPN shall ensure that their suppliers of these types of packaging is a member of GPN. If this is not the case, the member is obligated to report the packaging to GPN.

### **3 How to issue reports?**

GPN sends notification via email when the form for reporting is ready for use. The member companies report their actual consumption of packaging. The most common types of packaging are reported on the standard report form. One exception is beverage packaging which is liable for environmental tax and is reported on a separate form. Reports are issued online, unless otherwise agreed.

The reporting period is either two months or one year, and is chosen based on the member company's size and packaging use. Reports are issued in arrears in that the report forms are distributed to the members immediately after each report period. The deadline for reports is the 22nd of each month after the end of the reporting period. Reports for January and February therefore have a deadline of 22 March. The annual reporting deadline is 22 January. The methods of reporting are described in brief below.

NB! Different reporting procedures apply for agricultural foil. Please contact GPN for more detailed information on these procedures.

### **3.1 The actual packaging use six times per year**

Members with at least one unit of packaging more than that listed below are obliged to report every second month.

- 500 tons corrugated cardboard
- 200 tons plastic packaging
- 200 tons glass packaging
- 20 tons beverage cartons
- 100 tons packaging carton
- 100 tons metal packaging

The reporting period is two months<sup>1</sup>, and the report forms are compiled in arrears. Consumption of packaging in January and February (1st period) is reported on the form compiled on 1 March with deadline 22 March. Consumption of packaging in March and April (2nd period) is reported on the form compiled on 1 May with deadline 22 May etc.

### **3.2 On account reporting**

Offered to members who report more packaging than members who report only once a year (ref. item 3.3) and less than members who have to report actual packaging use six times per year (ref. item 3.1).

Reports are divided into two:

1. Forecast: After the first period (January and February), the member reports their annual forecast for use of packaging. The forecast form is compiled on 1 March and the deadline for reports is 22 March.
2. Account settlement: After the end of the calendar year, the member reports their actual consumption of packaging for the year. The report form is compiled on 1 January and the deadline for reports is 22 January.

Invoices are issued six times a year. The five first invoices are on account and 1/6 of the forecast figure, while the sixth covers the last 1/6 of the forecast figure plus any adjustments resulting from final settlement of the account.

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<sup>1</sup> Two-monthly periods are referred to as period or "term" as this terminology is recognisable from the filing of VAT returns.

### **3.3 Annual reports**

Offered to smaller members with packaging volumes less than

- 50 tons corrugated cardboard,
- 20 tons plastic packaging,
- 20 tons glass packaging,
- 4 tons beverage cartons,
- 10 tons packaging carton and
- 20 tons metal packaging

The reporting period is one calendar year. The report form is compiled on 1 January and the deadline for reports is 22 January. Members that manufacture or import empty packaging or beverage packaging liable for fee must report packaging volumes every year.

Other members that have a stable consumption of packaging are offered a reporting frequency of every three years. In the interim years, the use of packaging will be estimated by making use of the most recent reports and an index for economic developments in Norway. Information on which index to use is distributed to members together with the estimated report. Members that experience a significant change in their activities must contact GPN or rectify the automatic reports.

### **3.4 Fixed annual fee – simple system for small users of packaging**

Companies with little consumption of packaging are exempt from having to report actual volumes and rather pay a fixed annual fee. The actual volume of packaging is estimated on the basis of industry, turnover and conversations with the member in question. As of 1 January 2012, the following apply:

- Actual packaging fee of less than NOK 1,000 are invoiced as NOK 750.
- Actual packaging fee of between NOK 1,000 and NOK 3,000 are invoiced as NOK 2,000.
- Actual packaging fee of between NOK 3,000 and NOK 5,000 are invoiced as NOK 4,000.

Regarding the scheme for fixed annual fee:

- Not valid for members who manufacture/import empty packaging or who are obliged to report beverage packaging liable for fee or service packaging.
- Invoices are issued on 1 October and cover the current year.
- Members must individually notify GPN if their activities change in a manner that has a significant impact on their consumption of packaging.
- If members prefer, they can estimate their actual consumption of packaging.

### **3.5 Automatic declaration – quarterly declaration for importer of goods**

Companies that import goods to Norway can gain estimated packaging quantities related to imported goods automatically. GPN receives monthly import statistics from SSB (Statistisk Sentralbyrå) for companies that have signed a consent (Consent for disclosure of import statistics). The system does not include:

- Imported beverage packaging
- Imports of empty containers

A consent for disclosure of import statistics can be signed and sent GPN before a standard membership is drawn. GPN can thus make an estimate of the cost associated with membership.

Companies that have packaging data per article, is offered automatic packaging declaration based on sales or import statistics.

Packing declaration based on import data and sales statistics replaces previous templates.

### **3.6 Method of reporting**

The member companies decide which method is best suited for estimating their volume of packaging. It is important to ensure that the method chosen generates a correct result. The company's auditor shall be able to approve the method, check that the estimates have been carried out correctly and that the reports submitted are correct. Companies with a large number of articles with varying packaging material may consult with their auditor and GPN to apply for solutions whereby one or more key figures are utilised to estimate the actual consumption figure as accurately as possible.

### **3.7 Confirmation by auditor**

GPN is entitled to demand confirmation by the company's external auditor of the packaging figures specified by a company.

### **3.8 Failure to comply with reporting obligation**

All companies which subscribe to membership are bound by the membership terms and conditions. If reports are not issued in accordance with prevailing rules, GPN will estimate the member company's volume of packaging, based on the current activities of the company, its turnover and any former reports. In addition, GPN will carry out an inspection every year of the packaging reports made by a certain number of members (ref. item 5.2).

## **4 How to make payment?**

### **4.1 Packaging fees**

The packaging fee covers the material companies' costs for recycling packaging, and is stipulated by the Board of Directors of the individual material companies. The packaging fee may be changed by the individual material companies' Board of Directors, and members shall be provided with minimum three month's written notice of such changes, ref. terms of agreement.

### **4.2 Paying the packaging fee**

The packaging fee is calculated by multiplying the reported volume of packaging (kilo or units) with the related packaging fee.

### **4.3 Due date for invoices**

On the basis of the reported volume of packaging and prevailing packaging fee for the period in question, GPN will compile an invoice which is dispatched to the member company with a due date of 10 days.

## 5 Control systems

GPN cooperates with the grocer's trade and different interest groups regarding control systems set up to prevent free riders. Total support for the material companies' schemes is required in order to secure fulfilment of the industry agreements and prevent distortion of competition. A member certificate is issued to all new members of GPN, so that all members can easily present this to their customers as documentation of their participation in the schemes. The most important control systems are control membership, audit of reported quantities and member search.

### 5.1 Control membership

Control membership in GPN implies that the member carries out control and follow-up to ensure that all the Norwegian suppliers of goods are members of GPN or similar schemes. This membership has been introduced in order to ensure that the enterprises that, according to the rules, are obliged to report packaging liable for fee, actually make payment to the industry's collection and recycling schemes. By making such requirements, the control members help reduce the number of free riders.

Control membership implies two obligations: firstly to require GPN membership from Norwegian suppliers of goods that are not members of GPN; and secondly to deliver upon registration a list of the company's Norwegian suppliers of goods with business register number. This list must be subsequently updated and resubmitted within the specified deadline, every three to five years. GPN checks the list of suppliers against their own member list and provides feedback as to which suppliers are/are not members of the schemes.

The control members receive every fall a reminder from GPN of which Norwegian suppliers of goods are not members. Moreover, the control members receive a status report of what has to be done to fulfil the member's obligations. If everything appears to be in order, the control member's membership will be renewed on 1 February and a new certificate of control membership issued. Control members can use "My pages" on the GPN website to view a fully updated list of Norwegian suppliers of goods that are not members.

GPN has developed several tools to simplify the function of control member. On the control member's "My pages", they can edit their contact information, download membership certificates and receive access to tools such as:

- status of list of suppliers
- correspondence
- letter of recruitment to suppliers that are not members
- proposed text for supplier terms and conditions
- address list for mail merge

A user name and password are allocated once the control members have delivered a list of their Norwegian suppliers of goods.

In order to ensure simple follow-up of own suppliers, the requirement for GPN membership may be included in requests for tenders.

Example:

In order to protect the environment, Norwegian suppliers (manufacturers or importers) that make use of packaging shall present documentation (membership certificate), at the latest upon signing the contract, of membership in GPN or a similar scheme which requires reports to the Norwegian Environment Agency. Suppliers shall contact Grønt Punkt Norge to clarify which type of membership

is required.

Telephone: + 47 22 12 15 00 Email: medlem@grontpunkt.no

## **5.2 Audit of reported quantities**

In order to control that member companies report in compliance with the membership agreement, GPN can audit the members' procedures and reported quantities. GPN is entitled to randomly request statements confirmed by an auditor from the member companies. Moreover, GPN or GPN's auditor is entitled to perform random tests of the packaging volume within the past three years of the membership period. Lists of suppliers for control members may also be checked.

## **5.3 Breach**

If the obligations pursuant to the current agreement are not met and the breach of agreement is not rectified at the latest within 14 days of receipt of written notification by registered post of such breach, the opposite party is entitled to terminate the agreement with immediate effect.

# **6 Membership benefits**

## **6.1 Certificate of membership**

Membership certificates are issued once a year for the period from 1 February to 31 January to all members who have issued updated reports and made all payments. Control membership certificates are issued for the same period to all control members who have submitted updated supplier lists and are in compliance with other requirements stated in the agreement.

## **6.2 Member searches**

All standard and control members can be found using our search function on our website: [www.grontpunkt.no](http://www.grontpunkt.no). Persons can search by company name or business register number. Control members are encouraged to make use of the search function when investigating new Norwegian suppliers of goods.

## **6.3 "My pages"**

All GPN members, both standard and control members, have access to "My pages". A user name and password will be allocated upon registration for membership. "My pages" is currently under development and comprises:

- valid member certificate and control member certificate
- list of report forms which have not been filled in and sent
- full historical data of submitted forms and invoices received with payment status
- statistics regarding reported and invoiced volumes of packaging
- set of climate accounts based on member's reported volumes of packaging
- support page for control members with list of suppliers grouped according to membership status
- profiling material for companies that want to advertise their membership and label packaging with Grønt Punkt® and information about correct source separation
- member contact information which can be edited

GPN aims to communicate the value of the voluntary work carried out by members with regards to packaging, and offers added value which fulfils the member's goals and needs. As the members themselves are most aware of their needs, we encourage members to send in suggestions to how the "My pages" function can be further developed.

## **6.4 Grønt Punkt® and labelling of packaging**

Der Grüne Punkt or the Green Dot (hereinafter referred to as Grønt Punkt® or the trademark) is an international licence symbol and trademark for which the main licence is owned by PRO Europe s.p.r.l. (Packaging Recovery Organisation Europe). Grønt Punkt® is a registered trademark in a number of countries, including Norway. Grønt Punkt® is only utilised to denote that the user is affiliated with an approved system for collection and recycling of packaging, in accordance with the EU directive 94/62/EC and the regulations stipulated by the authorities in Norway. GPN is the main licence owner of Grønt Punkt® in Norway, on behalf of the material companies. This implies that all parties which supply packaging to the Norwegian market must contribute toward financing an approved recycling scheme if they wish to make use of the Grønt Punkt® trademark. Use of the trademark in Norway is reserved for enterprises which are members of GPN or another approved recycling scheme for packaging which requires annual reports to the Norwegian Environment Agency. Members of GPN are obliged to pay fee for all packaging, irrespective of whether they carry the Grønt Punkt® trademark or not. As GPN members, you are also entitled to make use of the trademark on packaging for all products sold to end users in Norway.

Use of the Grønt Punkt® trademark is illegal for companies that purchase goods with this trademark and where payment has not been made. This is to avoid confusing use of the Grønt Punkt® trademark in relation to the market. Companies that purchase goods in Norway with the Grønt Punkt® trademark must therefore ensure that the packaging is covered by GPN's schemes. In relation to the sale abroad of products with the trademark, it is important to comply with the national licence owners and regulations in the respective countries.

For information on the correct use of the trademark, ref.  
<http://www.grontpunkt.no/emballasjemerking/>.

## **7 Obligations for Grønt Punkt Norge**

### **7.1 Confidentiality**

Information on companies which are members of the schemes is available to the public upon request to GPN, and GPN's website provides a search function on the list of members - go to [www.grontpunkt.no](http://www.grontpunkt.no). All other information, such as the reported consumption of packaging by members, is confidential and will only be provided by GPN to the material company in charge of the relevant type of packaging. Data regarding packaging that involves other material companies will therefore be treated confidentially between material companies. Company-specific data provided to the individual material companies regarding the material companies' own members will be treated confidentially within the material company and will not be made available to the owners (Board of Directors) of the company. The same applies to supplier lists in connection with control membership.