



INTRODUCTION TO RESPONSIBLE PACKAGING MANAGEMENT (RPM) -

A PROCESS PROVIDING PACKAGING CONTROL FROM "CRADLE TO GRAVE"

Responsible Packaging Management is a process that follows the entire lifecycle of packaging. Its purpose is to address economic, legal & regulatory concerns associated with packaging use.

Today we live under challenging standards of environmental responsibility and conservation of natural resources. All forms of packaging are being re-examined to enhance reuse and recyclability. Environmental damage resulting from improper disposal of used packagings - including, often, their residues - is no longer tolerated. Increasingly, it is packaging producers and users who are expected to see that these standards are met.

Used steel and plastic packagings have three environmentally acceptable fates:
to be reprocessed, reconditioned and reused for original purpose, or
to be processed for scrap and or recycle of material, or
to be used for energy recovery.

In all cases, the residues of prior contents must be removed, neutralised and disposed of in compliance with all applicable regulations. The reconditioning industry has the information and equipment to accomplish this. Using the *Responsible Packaging Management* programme for steel and plastic drums, and IBC's, both the producers and users of this time-tested, economic programme can ensure compliance with today's high legal standards.

The *Responsible Packaging Management* programme has several **key elements**:

- Selection
- Disposition
- Empty Packaging Certification
- Management Checklist and Audit
- Plant Review :
 - Site Regulatory Compliance
 - Transport Compliance.

A. SELECTION

Responsible Packaging Management begins with the fillers selection of the proper industrial packaging for the job. Here a variety of needs must be accommodated, including technical knowledge of the properties of the material to be packed, the type of journey and handling to be expected and the mode of transport (to confirm modal regulations). Essential is the recognition of the influence original selection requirements exert upon used packaging disposition options. Manufacturers, reproducers, reconditioners and dealers should provide useful, practical information to assist buyers in enhancing the value of their packaging after initial use.

UN approved packaging is a legal requirement for all UN designated products and can be used for non UN products, it is "preferred" as meets performance standards and therefore has more value for re-use.

B. DISPOSITION

The process of packaging disposition begins during the period when the packaging's status changes from full to empty. Persons responsible for empty packaging management have several crucial responsibilities. These include: proper emptying and completion of a **Nominally Empty Certificate - NEC**; maintenance of labels; preparation for transport; control procedures and selection of a **Compliant Registered** reproducer, reconditioner or dealer to accept the emptied packaging.

RESPONSIBLE PACKAGING MANAGEMENT ASSOCIATION OF SOUTHERN AFRICA



C. EMPTY PACKAGING CERTIFICATION – NEC as per SANS 10406

Certification of empty container status is an indispensable, core requirement of *Responsible Packaging Management*. A Nominally Empty Certificate is required by the Dept of Transport – refer SANS 10406 It is therefore essential to all parties ie the emptier, the transporter and the reprocessor to ensure regulatory compliance and prevent assumption of unwanted liability exposure. It develops an added benefit by reducing wasted raw material or products.

D. MANAGEMENT CHECKLIST AND AUDIT

Companies using the *Responsible Packaging Management* programme especially if ISO 9001 and / or 14001 certified should have written Policies and Quality Management Systems in place to assure that their Company achieves and maintains full compliance with this RPM programme.

The RPM “Management Check-list” also assists packaging users to review the essential aspects of packaging selection, use, management and disposition.

An independent Audit by a registered Auditor using the Associations Assessment and Audit Protocol assists the Reprocessor to measure compliance and improve their business as well as assist users to choose a responsible service provider.

Industry users should now demand a copy of the Audit report to see compliance and improvement plans to assist them with choice of service provider.

E. PLANT REVIEW - SITE REGULATORY COMPLIANCE

Responsible Packaging Management ends for the emptier with a review of the packaging reprocessing plant where used packagings are cleaned, and then reprocessed, reconditioned for reuse or recycled as scrap. Several areas of plant operations should be consulted to confirm regulatory compliance including :

- Compliance with the RPM Codes of Operating Practice
- Compliance with UN packaging performance standards for use with dangerous goods
- Compliance with transport regulations
- Compliance with environmental and waste regulations.

F. PLANT REVIEW - TRANSPORT COMPLIANCE

Buyers of reprocessed packaging for use with dangerous goods and hazardous materials should also review plant operations for compliance with the UN and Department of Transport requirements - refer Ch VIII Road Traffic Act and SANS 10228, 10229, 10406 & 10232 and insist on seeing the Audit report of the Reprocessor or waste disposal facility to be used.

SUMMARY

Using the *Responsible Packaging Management* programme, packaging emptiers can maximise value of their used packaging, ensure transport and environmental regulatory compliance, and eliminate serious liability exposures. Buyers of reprocessed packaging can also assure themselves that they are purchasing a reliable product whilst dealing with a reputable organisation and encouraging legal compliance and global best practice.

Responsible Packaging Management incorporates new approaches to the long-standing concerns surrounding the disposition of used packaging, and meets the challenge of today's strict new environmental and waste regulations and heightened standards of environmental and **Extended Producer Responsibility – EPR**.