

Primary marking of one-way packaging

Manual for importers and producers of beverages on which deposits are payable.

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1 Introduction

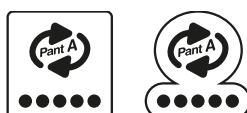
One-way packaging on which deposits are payable that are marketed in Denmark must be deposit marked. Deposit marking ensures that one-way packaging is easily recognizable and is part of the technical information that ensures the refunding of deposits in all sales channels. It also contributes to correctly calculating deposits and maximizes the return of one-way packaging to benefit the environment.

Importers or producers of beverages in Denmark are responsible for deposit marking their products. Deposit marking may be either primary marking, with the mark being printed directly on the packaging, or printed on the original label of the packaging. Deposit marking may also be secondary marking, which involves manual marking using a self-adhesive deposit label that importers and producers purchase from Dansk Retursystem A/S and attach to the packaging. This manual deals with primary marking. The appropriate manual provides information about the rules covering secondary marking.

If you have read this manual and would like further information about deposit marking, please contact the Vendor and Quality Department of Dansk Retursystem A/S at +45 43 32 32 32 or emballageilmelding@dansk-retursystem.dk.

2 About primary marking

Importers and producers receive permission to use the Danish deposit mark on packaging to be marketed in Denmark that the importers or producers have registered as one-way packaging with Dansk Retursystem A/S. The deposit mark may not be used on one-way packaging other than the packaging registered with Dansk Retursystem A/S, and the product may only be marked with the type of deposit mark allocated to the product. If you want to use primary marking, you are required to provide a bank guarantee or another form of collateral.



Examples of deposit marks

2.1 The Danish deposit mark is a registered trademark

Both the Danish deposit mark and the self-adhesive deposit label are registered trademarks® owned by Dansk Retursystem A/S. This means that when you register packaging with primary marking, you will be granted a license to use the trademark and to print the deposit mark directly onto the packaging: typically, directly onto the can or onto the original label of the packaging.

For producers based in Denmark, this means that products sold in Denmark must be marked with the Danish deposit mark. The license to use the trademark granted by Dansk Retursystem A/S does not extend to products to be exported abroad. Products exported are prohibited from being marked with the Danish deposit mark.

For imported products, you must ask the producer to create a label incorporating the Danish deposit mark for the products you intend to import. You are not permitted to print your own deposit mark and place it over the foreign label. If you cannot get the producer abroad to agree to print a label incorporating the Danish deposit mark, you can use secondary marking: manual marking using a self-adhesive deposit label combined with the producer's original label.

As an importer, you are also responsible for informing your producers abroad about the scope of the trademark license granted by Dansk Retursystem A/S. Thus, producers abroad will only be granted a sub-license to use the Danish deposit mark. This means that they are only licensed to print the Danish deposit mark on packaging sold to the relevant importer registered with Dansk Retursystem A/S. The producer may therefore not sell products with the Danish deposit mark to others, either abroad or to other importers in Denmark, unless these importers also have a trademark license from Dansk Retursystem A/S. Producers abroad therefore cannot obtain an independent trademark license allowing them to print the deposit mark.

The Danish deposit mark may therefore not be used on products or packaging that are marketed outside Denmark. Thus, the deposit mark of Dansk Retursystem A/S may not be used on products that are sold outside Denmark or together with labels that also cover several other countries: for example, the Nordic countries.

The print files you receive from Dansk Retursystem A/S may solely be used for the primary marking of registered products and packaging. They may not be distributed to others and must be deleted after use. If you use a subcontractor, such as a graphic artist, to lay out your labels or packaging, you are still responsible for ensuring that the print files with the deposit marks are not distributed or used for purposes other than those permitted.

2.2 Importers and producers are responsible for deposit marking their products

Importers and producers are responsible for registering and deposit marking packaging and products. This must take place before the packaging and products are marketed in Denmark, meaning before the importer or producer sells or otherwise transfers or supplies the packaging and products. Thus, this responsibility cannot be assigned to subsequent sales channels.

It is important that you have a certificate of packaging registration before you import goods (as an importer) and before you sell or otherwise supply packaging or products (as an importer or producer). One-way packaging may be imported without the deposit mark attached, but the packaging must be registered with Dansk Retursystem A/S and the certificate of packaging registration, or a copy of it, must accompany the goods over the border. The marking rules only need to be applied when the importer sells or supplies the imported packaging.

Read more about the rules covering when and how the packaging must be registered at or contact the Vendor and Quality Department of Dansk Retursystem A/S at +45 43 32 32 32.

Please be aware that the Danish Customs and Tax Administration (SKAT) may confiscate one-way packaging that has not been correctly marked or registered with Dansk Retursystem A/S. If, as an importer or producer, you also have a sales outlet that sells directly to consumers, all your one-way packaging must be deposit marked within a radius of 1 kilometer from the sales outlet. This also means that deposit marking must take place in warehouse premises or the like that have no direct link with the sales outlet and at least 1 kilometer from it.

2.3 Deposit marking categories

- ▶ a deposit mark with a global barcode and GTIN (Global Trade Item Number) (marking category M1); and
- ▶ a deposit mark with a unique barcode and GTIN – exclusively for Denmark (marking category M2).

Regardless of the marking category chosen, both are unique Danish labels that may not be used on products sold in other countries, including the Faroe Islands and Greenland. The reason is that the Danish deposit mark is a registered trademark, and that producers and importers are only permitted to use the trademarked Danish deposit mark on products that are sold in Denmark.

Marking with a global barcode and GTIN (marking category M1)

For marking category M1, the complete deposit mark is printed directly onto the original label of the product or onto the packaging itself. Marking comprises the deposit mark together with a global barcode and GTIN.

This category gives the importer and producer the option to use the same barcode and GTIN in Denmark and elsewhere. However, the deposit mark is still unique to Denmark, and you may still not use the same label for any subsequent sales abroad since the deposit mark may only be used on products sold in Denmark.

Producers can thus use the same barcode for Denmark and for export, but the Danish deposit mark may not be used on products that are exported. Two different labels must therefore still be used: one with the deposit mark and one without the deposit mark. Since different labels must be produced anyway, we recommend using marking category M2 for Denmark.

One possible consequence of marking category 1 is that several importers may import the same product to Denmark with the same barcode and GTIN. This means that Dansk Retursystem A/S cannot differentiate between the importers of the same product, and this may mean that users of the same barcode and GTIN are jointly and severally liable to Dansk Retursystem A/S.

To avoid the risk of joint and several liability, we therefore always recommend that importers register their products for marking category M2. This means that you get the producer in the country of origin to use a dedicated barcode that is unique to the relevant importer when selling the product in Denmark.

Please contact Dansk Retursystem A/S for further advice if you have any questions about choosing between marking categories 1 and 2.

Marking with a unique barcode and GTIN (marking category M2)

For marking category M2, the complete deposit mark is printed directly onto the original label of the product or onto the packaging itself. Marking comprises the deposit mark together with a unique barcode and GTIN. The barcode and GTIN are unique to the individual product and the individual importer or producer and may only be used on products that are marketed in Denmark.

Several importers of the same product may thus not use the same barcode and GTIN.

The Statutory Order requires you to use a GS1 barcode. You may not create your own barcode. You are responsible for requesting a barcode and GTIN from a GS1 organization such as GS1 Denmark. Nevertheless, you are not required to use a Danish barcode and GTIN, and you may therefore use a GS1 organization in another country – if the barcode and GTIN are still unique to you and the specific product in Denmark.

Switching from one marking category to another

If you want to switch from marking category M1 to M2 or the other way round, or from primary marking to secondary marking or the other way round, you must register the product again. In this situation, you need to change the barcode and GTIN. The same applies if you want to switch from one-way packaging to refillable packaging or the other way round.

3 Printing and positioning primary marking

Primary marking, unlike secondary marking, is printed directly onto the original label of the product or directly onto the packaging. Products must be marked individually. The mark may not be placed on a peel-off label or on multipack packaging. Importers and producers are responsible for ensuring that the deposit mark or the complete label cannot fall off the product, which would prevent consumers from getting their deposits refunded.

Dansk Retursystem A/S is available for advice and testing when you start to develop new products to minimize the risk of encountering problems when you register your product.

3.1 The original label

The original label means the label you use to market the product. It must thus always be possible to identify by reading the label that it belongs to the relevant product. For example, it is not permitted to produce a standard label that can be affixed on several different products or a label on the back of the product that solely comprises the deposit mark and barcode. The same principle applies to printing directly on the packaging.

Choosing a labelling material other than paper may in sometimes require higher fees if this results in special handling in the subsequent processing of the packaging by Dansk Retursystem A/S. If you mix materials, such as a plastic label on metal, this may influence the size of the fee. Dansk Retursystem A/S has another approval process for plastic labels in which the label is embossed on the packaging. If you use this type of label, Dansk Retursystem A/S requires you to submit individual items of test packaging, since marking of this type cannot be approved simply based on a final layout. Dansk Retursystem A/S knows from experience that conforming to the requirements for specific sizes of deposit mark needed to ensure the refunding of deposits can be difficult. Dansk Retursystem A/S therefore recommends that, for this type of marking, you contact us well in advance before you plan to market the product.

3.2 Printing the deposit mark

You can order the print files from Dansk Retursystem A/S, either by downloading them at www.emballageregistrering.dk or by contacting our Vendor and Quality Department.

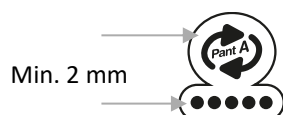
We supply the print files to the importers and producers registered in the system that need to use the deposit mark to lay out labels for the products that are or must be registered as primary marked with the Danish deposit and return system.

Section 2.1 explains more about the deposit mark, which is a registered trademark®. The mark consists of the arrow-shaped deposit logo of Dansk Retursystem A/S, five black dots and the words Pant A, Pant B or Pant C, depending on the rate of deposit for the mark:

- ▶ Pant A: DKK 1.00 – all bottles and cans of less than 1 liter (except plastic bottles);

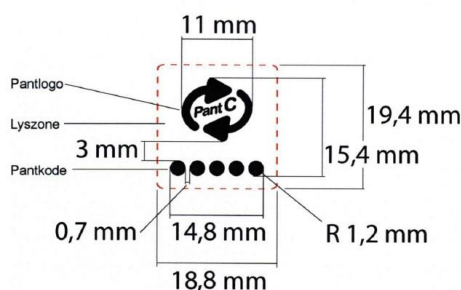
- ▶ Pant B: DKK 1.50 – all plastic bottles of less than 1 liter; and
- ▶ Pant C: DKK 3.00 – all bottles and cans from 1 liter to 20 liters.

The deposit mark must be printed on a white background (white clear zone), with a border of minimum 2 mm around the black deposit mark. The clear zone may be either rectangular or follow the contours as shown in the figure below. Nothing else may be printed in the white clear zone.



In exceptional circumstances, Dansk Retursystem A/S can temporarily dispense from the requirements of a white background. In this situation, Dansk Retursystem A/S will specify another light background color that its technical department has assessed does not cause problems with the electronic scanning of the deposit code. Smooth and shiny surfaces may also create problems for the electronic scanning of the deposit code, so you therefore may have to switch to another type of surface if problems occur in scanning the deposit code, even though Dansk Retursystem A/S has approved the size of the mark during the layout approval process. The deposit mark may not be embossed on the one-way packaging because the overall print surface needs to be flat.

The deposit mark must be 11 mm wide, and the total height must be 15.4 mm. The total size of the deposit mark graphic, including the clear zone, must be 18.8 mm wide and 19.4 mm high.



It is not permitted to change the size or format in any way or to otherwise distort the deposit mark. This will not be approved because it will cause problems with the electronic scanning of the deposit.

The use of embossed labels or the like may create difficulty in calculating the final size of the mark. A distorted mark, or the wrong size mark, may cause problems with the electronic scanning and may require withdrawing the product.

Please be careful in positioning the deposit mark and barcode on the label when affixing them by vacuum. The deposit mark and the barcode may not be able to be read if the surface follows the grooves in the packaging itself. Section 3.5 explains more about layout approval.

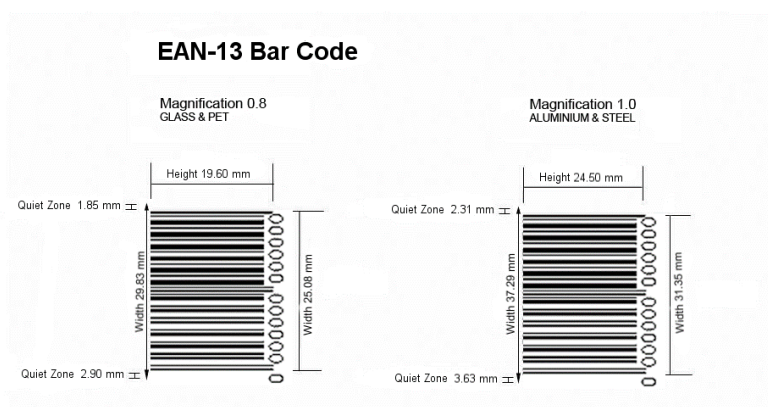
3.3 Barcode requirements

Primary marking also includes a barcode. This can be an EAN-13, EAN-8 or a UPC barcode. You need to contact GS1 Denmark or another GS1 organization to receive the necessary GTIN before registering the one-way packaging.

It is important that you comply with several requirements on printing and barcodes to ensure the electronic scanning of your products in the reverse vending machines.

For cans, the EAN barcode must be printed in accordance with size factor of 1.0 or greater specified by the EAN standard.

For one-way packaging in glass or plastic, the EAN barcode must be printed onto the original product label in accordance with the size factor of 0.8 or greater specified by the EAN standard. The size requirements (minimum values) specified must always be complied with, as shown below:



The background color and the quality of the printing of the barcode and GTIN must be in accordance with the GS1 standards currently in force. The current GS1 handbook published by GS1 Denmark explains this in detail.

The barcodes must not be smaller than the measurements shown in the illustrations. Remember that the clear zones must be respected.

If the barcode does not comply with the size requirements, the one-way packaging will not be able to be registered with primary marking in principle. Always contact Dansk Retursystem A/S if the barcode you have printed is too small, or if, in a later production run, you have produced an incorrect mark. In this situation, withdrawing the product may be necessary. If Dansk Retursystem A/S is not able to grant a dispensation, you may register the product with secondary marking. Dansk Retursystem A/S may occasionally grant a temporary dispensation for the use of smaller barcodes, if it is sure that the product can be accurately scanned. Dansk Retursystem A/S will decide this through a technical test.

Section 3.5 provides further information about layout approval.

3.4 Positioning the deposit mark, barcode and GTIN

Several guidelines must be followed to ensure the electronic scanning of the deposit mark and barcode.

- ▶ If possible, the deposit mark and barcode with GTIN must be positioned in the middle of the one-way packaging relative to the top and bottom.
- ▶ The top of the deposit mark and the top of the barcode must never be positioned more than 180 mm from the bottom of the packaging.
- ▶ Depending on the size of the packaging, Dansk Retursystem A/S may require that the distance from the lowermost edge of the deposit mark to the bottom of the one-way packaging be at least 50 mm. This is especially relevant for packaging larger than 50 cl.
- ▶ The deposit mark must always be positioned so that the five dots of the mark are horizontal when the packaging is upright.
- ▶ The bars in the barcode must be horizontal when the one-way packaging is upright.
- ▶ The barcode should be positioned as close as possible to the deposit mark.
- ▶ All the clear zones on the deposit mark and the barcode must be complied with.

In certain situations, Dansk Retursystem A/S may also require that the deposit mark be positioned in another location on the one-way packaging than you initially want. This is to ensure the electronic scanning and may be necessary for unusually shaped bottles such as round bottles or extremely short or extremely tall bottles.

You should note that marking bottles on their necks may lead to the deposit mark not being scanned. Dansk Retursystem A/S therefore does not approve this type of marking. Marking on angled surfaces almost always causes problems on both small and large packaging. Marking on the necks of large bottles results in the barcode and deposit mark exceeding the 180 mm from the bottom and can therefore typically not be scanned. The use of vertical barcodes is not permitted in principle because these typically also cause problems in relation to electronic scanning.

Section 3.5 provides more information about layout approval.

3.5 Approval and printing errors

Dansk Retursystem A/S always tries to offer guidance on printing packaging and labels to avoid errors and the subsequent problems with electronic scanning. However, we cannot be held responsible for the use of print files of deposit marks, and we accept no liability for any printing errors of labels and one-way packaging in accordance with the current rules.

The size of the deposit mark and the barcode is a key factor for the correct refunding of deposits, and the specified dimensions of the deposit mark and the barcode must therefore always be complied with – see sections 3.2 and 3.3. Failure to comply with the specified dimensions on the packaging produced and/or on the labels may result in the one-way packaging having to be withdrawn from the Danish market because the product thus cannot be scanned electronically.

To ensure correct marking, we recommend that you send us information on the printing and layout with fixed dimensions and in the final size before you finally print the one-way packaging or label. **Please note that products cannot be registered if the packaging does not comply with the marking requirements.**

Dansk Retursystem A/S cannot check the quality of the barcode when approving the layout of the label. If it turns out subsequently that the barcode cannot be scanned electronically, despite approval, the product may need to be re-marked. You should therefore be extremely careful to follow the standards and the correct dimensions as well as the guidelines in the EAN handbook.

Marking that is off center or a shape of the bottle creating difficulty in scanning the mark cannot always be checked either in approving the layout.

If a printing error occurs in which the barcode is too small, you may apply for dispensation to market the product. In practice, dispensation will only be given if it is a genuine printing error, and the error does not influence the ability to correctly refund the deposit. The dispensation will only cover the items printed in error and only for a limited period. You may apply for dispensation from Dansk Retursystem A/S. Dansk Retursystem A/S can only register the product once you have received dispensation.

Once the product is registered, you are responsible for ensuring that the label is identical in quality and size to the layout, or the label approved by Dansk Retursystem A/S. If you make any alterations, you must check whether the registration is still valid or whether you need to register again. Please contact Dansk Retursystem A/S if you are in doubt.

4 Need help?

You are welcome to contact the Vendor and Quality Department.

Tel.: +45 43 32 32 32

E-mail: emballagetilmelding@dansk-retursystem.dk