

Eco Mark Product Category No.140

“Containers and Packaging for Food and Beverages, Cosmetics, Household Goods
Version 1.16” Certification Criteria

A-1. Refill Containers

Japan Environment Association

Eco Mark Office

1. Purpose of establishing criteria

Omitted

2. Applicable Scope

Containers filled with refill content designed to refill the content of the product and repeatedly use the product container. The product containers refilled from refill containers shall be included in the applicable scope (can be applied together with the refill containers) only when it complies with 4-2.D

The products whose content deemed significantly inappropriate from the viewpoint of environmental conservation at the Eco Mark Committee for Product Certification, however, shall not be deemed within the applicable scope.

3. Terminology

Omitted

4. Certification Criteria and Certification Procedures

To show conformance to the criteria items, the Attached Certificates and related documents shall be submitted.

4-1. Environmental Common Criteria and Certification Procedures

(1) In manufacturing the applying product, related environmental laws and regulations and pollution control agreement (hereinafter referred to as the “Environmental Laws, etc.”) must be followed with respect to air pollution, water contamination, noise, offensive odor, and emission of hazardous materials in the area where the plant performing the final manufacturing process is located.

In addition, the state of compliance with the Environmental Laws, etc. for the last five years from the date of application (whether there is any violation) must be reported. If there is any violation, it is necessary that proper remedies and preventive measures have been already taken, and the related Environmental Laws, etc. must

thereafter be followed appropriately.

[Certification Procedure]

With respect to the compliance with the Environmental Laws, etc. in the area where the plant performing the final manufacturing process is located, a certificate issued by the representative of the manufacturer of the applying product or the manager of the relevant plant (entry or attachment of the list of names of the Environmental Laws, etc.) must be submitted.

In addition, it is necessary to report whether there is any violation during the last five years, including a violation subject to administrative punishment or administrative guidance, and if there is, the following documents in a and b must be submitted:

- a. With respect to the fact of violation, guidance documents from administrative agencies (including order of correction and warning) and copies of written answers (including those reporting causes and results of correction) to such documents (making a series of progress clear);
- b. Following materials (copies of recording documents, and so on) concerning the management system for compliance with the Environmental Laws, etc. in 1)-5):
 - 1) List of the Environmental Laws, etc. related to the area where the plant is located;
 - 2) Implementation system (organizational chart with entry of roles, etc.);
 - 3) Document stipulating retention of recording documents;
 - 4) Recurrence prevention measures (future preventive measures);
 - 5) State of implementation based on recurrence prevention measures (result of checking of the state of compliance, including the result of onsite inspection).

- (2) Substances regulated by “Voluntary Regulation on Printing Ink (NL regulations) by the Japan Printing Ink Makers Association shall not be added to printing ink used for the container (labels, etc.) as a prescription constituent.

[Certification Procedures]

Conformance to the NL regulations shall be stated in the Attached Certificate.

- (3) Adhesives to be used for containers shall not be added materials forbidden in “Voluntary Regulation on Adhesive for Food Packaging Materials (NL regulations)” by the Japan Adhesive Industry Association as a prescription constituent.

[Certification Procedures]

Conformance to the NL regulations shall be stated in the Attached Certificate.

- (4) The Applicant shall state on the container, package, manual, brochure, etc. that the refillable product is available for purchase.

[Certification Procedures]

The Applicant shall report the content of statement as well as submit photographs of the container or package, manual, brochure, etc., specifications or the explanatory document that indicate the corresponding statement.

- (5) Plastic materials used in the container shall not be added plastics that contain halogen in polymeric backbone as a prescription constituent.

[Certification Procedures]

For plastic materials used for the container, whether any halogen element is added or not in polymeric backbone shall be stated in the Attached Certificates.

4-2. Criteria for Material and Certification Procedures

With respect to refill containers that use either plastic materials or paper materials not less than 70% in weight to the whole product as a major material, the Applicant shall choose either corresponding A or B below to apply. With respect to other products, C shall apply

When applying refill containers and product containers as a set, D shall be applied to product containers.

A. Refill containers using a plastic as a key material

- (6) Weight of a refill container shall conform to the criteria in Table 1 or weight of a refill container shall be 5g or less regardless of the interior content of the refill container.

Table 1 Weight of Container against Content

Content	Interior Content of Container	Weight of Container per 1L (or 1000g) of Content
Liquid, granule, powder	Interior content of refill container \leq Interior content of product	25 g or less
	Interior content of refill container $>$ Interior content of product	40 g or less
Others	—	50 g or less

[Certification Procedures]

The weight of refill container: A (g), the volume of content: B (L) and the weight of

container per 1L of content (A/B) shall be stated in the Attached Certificates. Additionally, if the content is a particulate/powder body, the volume of content shall be expressed in dimensions [volume] before product shipment. In addition, if the content is “Others”, it would also be acceptable if the volume (B) could replace the weight (g), and the vessel weight (A/B x 1000) per 1000g of the content could satisfy a reference value. However, in case of being refilled into the product container after being diluted, weight of container per 1L of content can be calculated by applying the interior content of refill container multiplied by the dilution rate.

- (7) For containers in which plastic materials are used, the plasticizers, color materials, stabilizers, lubricants and other plastics additives shall conform to the positive list system of food utensils, containers and packaging, etc. In case of using the plastic additives which are not listed in the positive list for the products which are not intended as containers for food, the plastic additives shall meet the requirements described in ISO 8124-3, etc.

[Certification Procedures]

The Applicant shall submit certificates that plasticizer, color materials, stabilizers, lubricants and other plastic additives conform to the Positive List system of food utensils, containers and packaging, etc. With respect to plastic additives not included in the Positive List, the results of tests to show the conformance to the requirements stipulated in ISO 8124-3, etc. shall be submitted.

- (8) If recycled plastic materials are used in food containers, the measures to ensure the safety shall be taken based on “Regarding “Guideline for the Use of Recycled Materials as Raw Materials for Synthetic Resins Used in the Manufacture of Food Utensils and Containers/Packaging”” (issued on March 28, 2024 as Food Safety Standards and Evaluation Division 0328 No.7 and Food Inspection and Safety Division 0328 No.7 under the joint names of chiefs of above both divisions of Pharmaceutical Safety and Environmental Health Bureau, the MHLW) of Ministry of Health, Labour and Welfare.

[Certification Procedure]

The written document shall be submitted which shows the ensuring the safety based on “Guideline for the Use of Recycled Materials as Raw Materials for Synthetic Resins Used in the Manufacture of Food Utensils and Containers/Packaging” of Ministry of Health, Labour and Welfare.

- (9) The product whose content is food, cosmetic, or medical related products shall meet the requirement described in the Standards for Foods, Food Additives, etc. (Ministry of Health and Welfare Notice No. 370, 1959).

[Certification Procedure]

The Applicant shall submit test results to certifying that the product meet the corresponding requirements.

B. Refill containers using paper as a key material

- (10) Weight of a refill container shall conform to the criteria in Table 2 or weight of a refill container shall be 10g or less regardless of the interior content of the refill container.

Table 2 Weight of Container against Content

Content	Interior Content of Refill Container	Weight of Container per 1L (or 1000 g) of Content
Liquid, granule, powder or Others	Interior content of refill container \leq Interior content of product	30 g or less
	Interior content of refill container $>$ Interior content of product	50 g or less

[Certification Procedures]

The weight of refill container: A (g), the volume of content: B (L) and the weight of container per 1L of content (A/B) shall be stated in the Attached Certificates. Additionally, if the content is a particulate/powder body, the volume of content shall be expressed in dimensions [volume] before product shipment. In addition, if the content is “Others”, it would also be acceptable if the volume (B) could replace the weight (g), and the vessel weight (A/B x 1000) per 1000g of the content could satisfy a reference value. However, in case of being refilled into the product container after being diluted, weight of container per 1L of content can be calculated by applying the interior content of refill container multiplied by the dilution rate.

- (11) For refill containers using virgin pulp in the material, the timber used for material must be harvested in legally appropriate manner consistent with the forest laws of timber producing countries.

[Certification Procedure]

A certificate shall be submitted to prove that the timber whose legality has been verified* in accordance with “Guideline for Verification on Legality and Sustainability of Wood and Wood Products” of Forestry Agency has been in custody to be separated by the applicant or the paper manufacturer and is

supplied to the applied products. At the same time, the applicant or the paper manufacturer who issues the above certificate shall submit any of the following certificates:

- 1) Certificate that the applicant or the paper manufacturer has been assessed and authenticated by the CoC (Chain of Custody) Certification System;
- 2) Certificate of the authorized company (that guarantees the association member's adequate way of supplying wood and wood products verified with legality, etc.); and
- 3) Code of management practice which stipulates the way of custody to manage wood and wood products verified with legality (the method in the case that the timber verified with legality only is handled. The same applies to hereunder), retention of certificates for a predetermined period, etc.

In the event that Item 2) or 3) above is chosen and the certificate is submitted, the applicant, paper manufacturer or material supplier who issues the above-mentioned certificates shall publicly announce through its web site the code of management practice prescribed by the association concerned in the case of Item 2) and shall prescribe and publicly announce through its Web site the code of management practice concerning the scheme to assess and guarantee the system for separative management, document management for retention of certificates for a predetermined period, etc. in the case of Item 3).

*Confirm the certificate issued by the related company closest in commercial process, which at least verifies that wood and wood products they supply are with legality and under separative custody management.

- (12) With respect to the colorants used in the base paper, no azo colorants (dyes or pigments) that are likely to generate one or more of the amines listed in Table 3, or if it is used, one or more of the amines listed in Table 3 shall not be detected more than 30 mg per 1 kg of the base paper.

Table 3 Amines that should not be generated by reduction decomposition of azo radicals

		CAS No
1	4-amino diphenyl	92-67-1
2	Benzidine	92-87-5
3	4-chloro-o-toluidine	95-69-2
4	2-naphthyl amine	91-59-8
5	σ amino azo toluene	97-56-3
6	2-amino-4-nitrotoluene	99-55-8
7	<i>p</i> -chloroaniline	106-47-8

8	2,4-diamino anisole	615-05-4
9	4,4'-diamino diphenyl methane	101-77-9
10	3,3'-dichloro benzidine	91-94-1
11	3,3'-dimethoxy benzidine	119-90-4
12	3,3'-dimethyl benzidine	119-93-7
13	3,3'-dimethyl-4,4'-diamino diphenyl methane	838-88-0
14	<i>p</i> -cresidine	120-71-8
15	4,4'-methylene-bis-(2-chloroaniline)	101-14-4
16	4,4'-oxydianiline	101-80-4
17	4,4'-thiodianiline	139-65-1
18	σ toluidine	95-53-4
19	2,4-toluidine diamine	95-80-7
20	2,4,5-trimethylaniline	137-17-7
21	σ anisidine	90-04-0
22	4-aminoazobenzene	60-09-3

[Certification Procedures]

The Applicant shall submit either 1), 2) or 3) certificate below issued by a paper manufacturer.

- 1) Certificates that corresponding azo coloring agents have not added exceeding 30 mg per 1 kg of base paper
- 2) Certificate that in calculation, over all possible cases, one or more of amines in Table 1 does not detected exceeding 30 mg per 1 kg of base paper
- 3) Certificate that one or more of amines in Table 1 are not detected exceeding 30 mg per 1 kg of base paper by the analytical method stipulated under the official test method corpus based on Article 35 of the German Food Stuff and Consumer Goods Law.

- (13) No chlorine gas shall be used in the pulp bleaching process.

[Certification Procedures]

The Applicant shall submit certificates issued by the paper manufacturer.

- (14) The product whose content is food, cosmetics, or medical related products shall contain no fluorescent material and PCB. When the content contacts any material other than paper, the requirement described in the Standards for Foods, Food Additives, etc. (Ministry of Health and Welfare Notification No. 370, 1959) shall be satisfied.

[Certification Procedures]

Test results of the following three items shall be submitted:

1. An inspection method for an apparatus or containers/packages using fluorescent material (Kanshoku No.244, May 8, 1971)
2. An inspection method for an apparatus or containers/packages using fluorescent material (PFSB/DFS/SED Notification No.0107001 / PFSB/DFS/ISD Notification, No.0107001, January 7, 2004)
3. A method of analyzing PCB in containers/packages (Kanshokuka No.385, October 26, 1972)

If the content contacts any material other than paper, test results stating that the corresponding requirements have been satisfied shall be submitted.

C. Refill containers not applicable to “A” or “B”

With respect to products not applicable to “A” or “B”, plastic-used part shall conform to 4-2-A and paper-used part shall conform to 4-2-B.

- (15) Weight of a refill container shall conform to the criteria in Table 4 or weight of a refill container shall be 10g or less regardless of the interior content of the refill container.

Table 4 Weight of Container against Content

Content	Interior Content of Refill Container	Weight of Container per 1L (or 1000 g) of Content
Liquid, granule, powder	Interior content of refill container \leq Interior content of product	25g or less
	Interior content of refill container $>$ Interior content of product	40g or less
Others	—	50g or less

[Certification Procedures]

The weight of refill container: A (g), the volume of content: B (L) and the weight of container per 1L of content (A/B) shall be stated in the Attached Certificates. Additionally, if the content is a particulate/powder body, the volume of content shall be expressed in dimensions [volume] before product shipment. In addition, if the content is “Others”, it would also be acceptable if the volume (B) could replace the weight (g), and the vessel weight (A/B x 1000) per 1000g of the content could satisfy a reference value. However, in case of being refilled into the product container after being diluted, weight of container per 1L of content can be calculated by applying

the interior content of refill container multiplied by the dilution rate.

D. Criteria on product containers

- (16) Product containers applied with refill containers as a set shall conform to Category I. “Multiple containers and packaging using plastics”.

[Certification Procedures]

Certificates in accordance with the procedure defined in the category I shall be submitted.

4-3. Quality Criteria and Certification Procedures

- (17) Quality of containers shall conform to the industrial voluntary standards or the manufacturer’s own standards.

[Certification Procedures]

With respect to the industrial voluntary standards or the manufacturer’s own standards, certificates by the Applicant shall be submitted.

5. Considerations

In the process of manufacturing products, it is desirable to consider the following items, although they are not requirements for certification.

- (1) Refill container shall be designed as compact (improvement of container shape, size change, etc.) and thin as much as possible.
- (2) For refill containers, recycled plastics or bio-based plastics, etc. shall be used and those percentage of mixing is indicated.

6. Product Classification, Indication and Others

- (1) Product shall be applied by brand name and by A/B/C.
- (2) When indicating the Eco Mark on the packaging or container, it should be indicated so as to clearly show that refill containers or product containers are the Eco Mark certified products and also show that the product content has nothing to do with the Eco Mark
- (3) In principle, the Eco Mark shall be indicated on the product, the catalog, etc. The licensees of Eco Mark Utilization Contract who own the Eco Mark products shall also

be allowed to use the indication and the certification number as before.

Example)



(Note for the indication)

*For indicating the logo, Eco Mark certification number (eight-digit number) or the name of the licensee using the logo shall be appeared.

* Such expression as “Eco Mark product” can be used following the 2.(2) of the Guide to Eco Mark Usage.

“Eco Mark product”, “#Eco Mark”, “www.ecomark.jp”, “Eco Mark Certificate”

*In accordance with “Environmental Labeling Guidelines” of the Ministry of the Environment of Japan, etc., the environmental claims of certified products may be indicated in association with Eco Mark.

(<https://www.env.go.jp/policy/hozen/green/ecolabel/guideline/>)

*The Guide to Eco Mark Usage shall be followed for any cases not listed above.
(<https://www.ecomark.jp/office/guideline/guide/>)

July 2, 2007	Established (Version 1.0)
December 13, 2007	Revised (Category A 2-1 (4))
August 21, 2008	Revised (Category A 2-1 (1)(2), Category B 2-1 (3))
March 15, 2010	Extension of Expiration
July 1, 2010	Revised (Category A [Table 2] added, Interpretation A-1)
March 1, 2011	Revised (Version 1.5)
July 13, 2012	Revised (Version 1.6)
October 1, 2013	Revised (Category C, D and E added Version 1.7)
June 1, 2015	Revised (Category A-D, Version 1.8)
June 1, 2016	Addition of Category G and H (Version 1.9)
September 16, 2016	Addition of Category F (Version1.10)
February 1, 2017	Revised (Category D 4-1-1(1) and 5, Category E 5, and Category H 3: Version1.11)
April 1, 2019	Revised (5.(2)(3))
November 28, 2019	Revised (Category A, 4-2.(18) added Version1.12)
November 1, 2020	Revised (Version1.13), Extension of Expiration
December 15, 2022	Revised (Version1.14)

February 1, 2023	Revised (Version1.15, Category K added, I, J, etc. revised)
August 1, 2024	Revised (Version1.16, Category A-1:4-2(8), A-2:4-1(8), B:4-2(12), C:4-1(7), D:4-1-2(6), G, I and J:4-1(6)
June 30,2027	Expiration

The Certification Criteria for the Product Category will be revised when necessary.