

## Nitto Belgium NV

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## Alphanumeric recycling code under Commission Decision 97/129/EC

With reference to the position of Nitto Belgium NV on the implementation of an alphanumeric recycling code under Commission Decision 97/129/EC, we would like to inform you as follows.

At this moment the use of an established identification system for packaging materials under Commission Decision 97/129/EC is not mandatory, the use of the numbering and abbreviations of the identification system is voluntary. A decision whether to introduce it on a binding basis may be adopted later. On a member state level, the regulations that are applicable for our products, are still under development.

The goal of the European regulation is an improved sorting of waste streams to avoid incineration of waste and landfill. This is also the main objective of Nitto.

In view of this, we would like to share with you our strategy to comply with the Commission Decision 97/129/EC.

Nitto has many products in critical applications. Labelling, embossing or printing with a recycling code and/or text might affect the application. (E.g. discoloration of the substrate, ink transfer, reduced flexibility, leakage, etc.)

The possibility to recycle our products at the end of their lifecycle depends on several factors.

In general our products are complex or non-homogenous materials that cannot be separated by mechanical means.

Recycling an adhesive tape (E.g. LDPE + adhesive) might be no problem in recycling facility X but it might be impossible to recycle the same material in facility Y (due to requirements of higher purity, or other scope of use of the recyclate).

Labelling such product as 'code 7 Mixed plastics' will result in throwing away a product that can be recycled in facility X.

Labelling such product as 'code 4 LDPE' might pollute an entire batch of recyclate at facility Y.

In view of the above we will not communicate a specific alphanumeric recycling code or abbreviation, and we will not label, emboss or print our products with such a code.

Instead we will provide declarations that contain compositional data, which you can discuss with your waste handlers.

This will allow you to investigate your recycling options and to determine the best way to handle the waste product in order to obtain the highest possible recycled fraction.

Also for the packaging material of our products, we will provide information to allow you to investigate the most appropriate way of handling the packaging waste.

In the meantime, if you have further queries in connection with Nitto's approach on packaging and packaging waste, please feel free to contact us at <a href="mailto:nbe.regulatory.affairs@nitto.com">nbe.regulatory.affairs@nitto.com</a>.

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