

REPORTING AND CLASSIFICATION OF SINGLE-USE PLASTIC PRODUCTS

DATA REPORTING

Under Article 21a paragraph 1 Austrian Packaging Ordinance 2014, businesses that place packaging on the market in Austria are obligated to submit annual data reports on single-use plastic products (in addition to their usual packaging data reports). The reports go to a packaging collection and recovery scheme, the reporting deadline is 15 March of the following year (15 March 2023 for 2022). In the first year in which the obligation applies, 2022, the data reports only state the amount of single-use plastic products placed on the market in Austria (free of charge). From 2023, packaging collection and recovery schemes must collect standardised surcharges for single-use plastic products in accordance with the Packaging Ordinance.

Our clients use the ARA online reporting system to submit their data reports and provide mass data (in kg) on the following single-use plastic products.

- Beverage cups (including a breakdown by the number of cups made wholly from plastic and partly from plastic)
- Food containers (including a breakdown by the number of containers made wholly from plastic and partly from plastic)
- Packets and wrappers made from flexible material
- Beverage containers (separate data for PET bottles, other beverage bottles and other beverage containers, e. g. composite beverage cartons)
- Wet wipes
- Balloons
- Tobacco products
- Fishing gear
- Very lightweight plastic carrier bags (for which reporting of unit data has been mandatory since 2019 and of mass data from the reporting period 2023)

For an overview of all obligations with regard to single-use plastic products, please refer to the ARA fact sheet [Requirements for single-use plastic products](#).

CLASSIFICATION CRITERIA

What are single-use plastic products? The classification criteria provided below are based on the provisions of the EU Single-Use Plastics Directive and the laws and regulations transposing it into national law, i. e. the Austrian Packaging Ordinance and the Austrian Waste Management Act, the guidelines on the application of the EU Single-Use Plastics Directive and a study commissioned by the Austrian Federal Ministry for Climate Action on the classification of single-use plastic products.

SCOPE

The provisions cover single-use plastic products that are made wholly or partly from plastic (including chemically modified natural polymers). This includes articles or packaging with plastic coatings or linings, such as those found in composite beverage cartons, as well as articles or packaging made from bioplastics.

The provisions do not cover plastic-based paints, inks and adhesives or natural polymers that have not been chemically modified, such as regenerated cellulose (viscose, lyocell, cellulose film, but not cellulose acetate).

FOOD CONTAINERS AND PACKETS AND WRAPPERS

This category includes packaging that meet the following **criteria**:

Rigid or partly rigid food packaging made wholly or partly from plastic	Packets and wrappers made from flexible material made wholly or partly from plastic
1) for food that is intended for immediate consumption, either on-the-spot or take-away, ¹ AND	1) ---
2) is typically consumed from the receptacle AND	2) containing food that is intended for immediate consumption from the packet or wrapper AND
3) is ready to be consumed without any further preparation, such as cooking, boiling or heating.	3) is ready to be consumed without any further preparation

Additional criteria for single-use plastic products under the EU Single-Use Plastics Directive are the products' volume/size and tendency to become litter.

The Austrian Federal Ministry for Climate Action has specified the following **additional criteria** for the classification of rigid and flexible food packaging based on a study on the classification of single-use plastic products:

1. Service packaging containing food OR
2. Take-away packaging, e. g. for meals, sandwiches, sliced fruit, ready-made salads, unless service packaging OR
3. Small portion packaging with a filling weight of up to 50 g (e. g. ketchup, mustard, butter, jam and cream cheese, spreads) OR
4. Other rigid packaging with a filling weight of up to 400 g OR
5. Other flexible packaging with a filling weight of up to 400 g; including flexible grouped packaging that contains several portions in flexible packaging with a filling weight of up to 400 g (e. g. total weight of individually wrapped muesli bars in flexible grouped packaging)

A non-exhaustive list of product categories and products covered in the Austrian Abgrenzungs-VO (ordinance on the classification of packaging) is provided under **Examples 1A** and **1B** below.

For **combinations** of rigid and flexible packaging, the packaging component which is in direct contact with food determines whether the entire packaging is classified as rigid or flexible.

The only exemption from this rule is when the packaging component in direct contact with food is not a single-use plastic product (e. g. flexible paper bag in rigid plastic packaging).

A non-exhaustive list of such combinations is provided under **Examples 2**.

Not included:

- Nets made of plastic
- Single-use plates containing food, single-use beverage containers, single-use beverage bottles and single-use beverage cups belong to other categories. For some of them, different requirements apply. Please refer to the ARA fact sheet **Requirements for single-use plastic products**.

¹ This criterion applies to food packaging used in the hospitality industry, specifically packaging of food consumed on site, e. g. in restaurants, and food packaging that is used in the take-away sector (take-away or delivery). It also applies to food packaging purchased from food retailers.

SINGLE-USE BEVERAGE CONTAINERS, BOTTLES AND CUPS

The EU Single-Use Plastics Directive distinguishes between single-use beverage containers made entirely or partly of plastic and single-use beverage cups made entirely or partly of plastic.

Beverage containers are defined as receptacles used to contain liquid with a capacity of up to 3 litres, including their caps and lids. This category includes **beverage bottles**, plastic multilayer beverage pouches and composite beverage packaging, such as composite beverage cartons. It does not include beverage containers intended and used for foodstuffs for medical purposes and glass or metal beverage containers that have caps and lids made from plastic. Caps or lids with plastic seals as the only plastic component are not considered to be made of plastic.

Cups for beverages, including their covers and lids, sold empty or filled, are a separate category of single-use plastic products. Examples: Beverage cups used as service packaging, industrially filled beverage cups (e. g. for milkshakes), cups for household use (party cups).

Beverages include products in liquid form that are consumed by drinking, such as beer, wine, water, liquid refreshments, juices and nectars, instant beverages (even if the addition of e. g. water or milk is necessary before consumption) or milk-based drinks such as milk, milkshakes, drinkable yogurt or buttermilk. The following products are not included in this definition:

- foods such as soups, yoghurts (unless they are drinkable), fruit purees or ready-to-eat desserts, and
- certain products in liquid form such as vinegar, lemon juice, soy sauce, edible oils and products requiring dilution before consumption such as fruit syrups or concentrates.

(Data on their packaging may have to be reported under 'food containers' or 'packets and wrappers'.)

To help distinguish between beverage containers and food containers, the Commission guidelines also refer to the unit in which the quantity of the food or beverage product is expressed (beverages: volume (e. g. millilitres), food: weight (e. g. grams) and the shape of the container. When single-use plastic cups with lids are placed on the market and it is not yet clear whether they will be used as beverage cups or as food containers, e. g. for sliced fruit, they must be labelled as single-use beverage cups (see also ARA fact sheet [Requirements for single-use plastic products](#)).

SINGLE-USE PLATES

Single-use plates, as defined by the EU Directive on Single-Use Plastic Products, refer to dishes from which food is eaten or served. It does not matter whether they are sold with or without food and whether they are covered by foil or film at the point of sale. While being predominantly flat, plates typically have a slightly bevelled or raised perimeter to stop food rolling or spilling off them.

In contrast, food containers such as boxes (with or without lids) are typically used to facilitate transport of food and/or the immediate consumption of food. They are usually sold with printed information regarding contents, ingredients and product weight.

Examples 1A: Product categories covered, by product groups specified in the Abgrenzungs-VO

This (non-exhaustive) list includes products intended for immediate consumption, typically consumed from the receptacle and ready to be consumed without any further preparation

PRODUCT GROUPS	CLASSIFICATION/SIZE CRITERION	
AT01 Agricultural products	Fresh fruit	up to 400 g only fresh fruit that can be eaten raw
	Fresh vegetables	up to 400 g only fresh vegetables that can be eaten raw, e. g. - fresh salad leaves, cut and portioned, with dressing - tomatoes - peppers - carrots - cucumbers, snack cucumbers
	Dried fruit	up to 400 g
	Nuts	up to 400 g
AT04 Dairy products	Sliced cheese	up to 400 g
	Whole cheese	not a single-use plastic product
	Cream cheese, spreads	portion-sized food containers only
	Ready-to-eat desserts	up to 400 g
	(Fruit) Yogurt	up to 400 g
	Fruit quark	up to 400 g
AT05 Preserved food	Quark	not a single-use plastic product
	Pickled vegetables, antipasti	up to 400 g
	Pureed fruit (cooked) in a pouch	up to 400 g
AT06 Frozen food	Pureed fruit (raw) in a pouch	up to 400 g
	Ice cream in a bowl	up to 400 g
	Popsicles	up to 400 g
AT07 Confectionery, snacks	Frozen desserts	up to 400 g
	Confectionery	up to 400 g
	Snacks	up to 400 g
	Biscuits	up to 400 g
	Chewing gum	up to 400 g
	Chocolate products	up to 400 g
	Sugar confectionery	up to 400 g
Other confectionery	up to 400 g	
AT09 Bakery products	Bakery products	up to 400 g
	Rusk	up to 400 g
	Bread, unsliced	not a single-use plastic product
	Bread, sliced	up to 400 g
	Crispbread	up to 400 g
	Cake slices, sweet pastries	up to 400 g
Cake	not a single-use plastic product	

PRODUCT GROUPS		CLASSIFICATION/SIZE CRITERION
AT10 Meat, sausage, fish, poultry	Snack sausages	up to 400 g
	Cold cuts (sausage, ham, bacon as well as sliced smoked salmon etc.)	up to 400 g
	Other meat, sausage, fish, poultry products	not a single-use plastic product
AT12 Dry products and miscellaneous food products (not listed elsewhere)	Eggs, boiled	not a single-use plastic product
	Liquid food	up to 400 g
	Food supplements	up to 400 g except tablets and powdered food supplements
	Potato salad, deli salads	up to 400 g
AT33 Service packaging	Ice cream cups	single-use plastic product
	Cups for food, such as soups, smoothies, muesli, popcorn etc.	single-use plastic product
	Salad bowls, menu bowls (with or without lids)	single-use plastic product
	Menu and snack boxes, e. g. lunch boxes, pasta boxes	single-use plastic product
	Pouches, wrappings, blanks, cones etc. for hot food, e. g. thermal pouches, wrappings, French fries cones etc.	single-use plastic product
	Pouches, wrappings, blanks, cones etc. for cold food, e. g. sandwich pouches, wrappings etc.	single-use plastic product
	Service packaging for sausage products, cheese etc. (e. g. wrapping paper with plastic content)	single-use plastic product
	Service packaging for confectionery or snacks	single-use plastic product
	Bread bags with clear window	single-use plastic product
	Portion-sized containers	Ketchup, mayonnaise, mustard
Other sauces		up to 50 g
Butter, jam, spreads etc.		up to 50 g
Spreads, cream cheese		up to 50 g
Salt, sugar, sweetener, spices etc.		up to 50 g
Other portion-sized containers		up to 50 g

Weight specifications refer to the filling weight of the packaging.

Examples 1B: Products covered, by product groups specified in the Abgrenzungs-VO

This (non-exhaustive) list includes products intended for immediate consumption, typically consumed from the receptacle and ready to be consumed without any further preparation

RIGID FOOD CONTAINERS		
PRODUCT GROUP	EXAMPLES	SINGLE-USE PLASTIC PRODUCT
AT01	Fruit salad in a bowl, 250 g	Yes
AT01	Fresh salad leaves, cut, in a plastic bowl with dressing, 300 g	Yes
AT01	Tomatoes in a plastic bowl, 250 g	Yes
AT01	Tomatoes in a plastic bowl, 500 g	No
AT04	Butter in a tin, 250 g	No
AT04	Butter in single-portion packs, 17 g	Yes
AT04	Quark, 250 g	No
AT04	Fruit quark, 250 g	Yes
AT04	Yogurt, 125 g	Yes
AT04	Yogurt, 500 g	No
AT06	Ice cream in a cup, 300 ml	Yes
AT06	Ice cream in a container, 1000 ml	No
AT07	Pretzel sticks in deep-drawn packaging, 175 g	Yes
AT07	Snack mix, 300 g	Yes
AT07	Fruit gums in a plastic box, 1 kg	No
AT07	Chocolate teacakes, 300 g	Yes
AT12	Potato salad, 250 g	Yes
AT12	Potato salad, 750 g	No
AT33	Cup for 2 scoops of ice cream	Yes
AT33	Cup for 5 scoops of ice cream	Yes
AT33	Menu bowl without a lid	Yes
AT33	Menu bowl with lid	Yes

PACKETS AND WRAPPERS MADE FROM FLEXIBLE MATERIAL		
PRODUCT GROUP	EXAMPLES	SINGLE-USE PLASTIC PRODUCT
AT01	Grapes in a bag, 400 g	Yes
AT01	Cucumber in film packaging	Yes
AT01	Bag with head of lettuce	No
AT01	Bag with cut lettuce leaves	No
AT01	Carrots in a flat bag, 1 kg	No
AT01	Peppers in a bag, 400 g	Yes
AT01	Peppers in a bag, 500 g	No
AT01	Apples in a bag, 2 kg	No
AT04	Mozzarella in a bag	No
AT04	Feta cheese in a bag	No
AT05	Fruit puree 90 g	Yes
AT06	Popsicle in a wrapper	Yes
AT06	6 individually wrapped ice cream cones with secondary packaging	Yes
AT06	Frozen fruit in a bag	No
AT07	Crisps in a bag, 75 g	Yes
AT07	Crisps in a bag, 200 g	Yes
AT07	5 strips of chewing gum in secondary packaging	Yes
AT07	Gumdrops, 250 g	Yes
AT07	12 lollipops in secondary packaging, 120 g	Yes
AT07	10 bars in secondary packaging	Yes
AT07	Biscuits in a bag, 500 g	No
AT09	Sliced bread in a bag, 250 g	Yes
AT09	Sliced bread in a bag, 500 g	No
AT10	Snack sausages, 135 g	Yes
AT33	Coated cone for French fries	Yes
AT33	Sandwich bag	Yes
AT33	Bread bag for 3 bread rolls	Yes
AT33	Bread bag for 10 bread rolls	Yes
AT33	Wrapping paper with plastic content for sliced cheese or cold cuts	Yes

Examples 2: Packaging combinations

	COMBINATION	CLASSIFICATION
1	Rigid plastic packaging + sealing film	All components are classified as rigid food packaging.
2	Rigid plastic packaging + plastic film	All components are classified as rigid food packaging.
3	Rigid packaging with secondary packaging made from a material other than plastic (e. g. cardboard box)	- Rigid packaging: food container - Secondary packaging: not a single-use plastic product
4	Rigid packaging made from a material other than plastic + plastic film	- Plastic film: flexible packaging - Rigid packaging: not a single-use plastic product
5	Cardboard box with clear window	Classified as a rigid food container.
6	Rigid sales packaging, flexible inner packaging/portion packs. Example: Plastic box with fruit gums in flexible portion packs (plastic packets containing several gums)	All components are classified as flexible packaging, provided that the box has a filling weight below 400 g. If the box has a filling weight above 400 g, only the flexible portion packs are taken into account.
7	Multi-piece packaging (collective packaging) made of cardboard or tinfoil with several products in flexible plastic packaging	The inner packaging is classified as flexible packaging, the cardboard or tinfoil packaging is not a single-use plastic packaging product.
8	Individually foil-wrapped products in a cardboard blister pack	The inner packaging is classified as flexible packaging, the cardboard blister is not a single-use plastic packaging product.
9	Multipack or collective packaging (plastic packets) with several individually foil-wrapped sweets	All components are classified as flexible packaging, unless the collective packaging has a filling weight above 400 g – in this case, only the flexible portion packs are taken into account.
10	Pouch with spout cap	All components are classified as flexible packaging.