

From: ECMA [mailto:ecma.org]
Sent: mardi 7 décembre 2010 11:44
To: CAB DALLI WEBPAGE
Cc: CAB TAJANI WEBPAGE; CAB SEMETA COMMISSAIRE; DE GUCHT Karel (CAB-DE GUCHT); VERRUE Robert (EMPL); BARNIER Michel (CAB-BARNIER)
Subject: Stakeholder consultations Tobacco Products Directive (TPD) and comments ECMA on potential changes to the TPD
Attachments: 10-016 ECMA TPD Consultation Submission FINAL.pdf; 10-016 ECMA Memberlist 2010 - Converters.pdf

To:
Commissioner John Dalli, European Commissioner for Health and Consumer Policy

Copy:
Antonio Tajani (DG of Industry & Entrepreneurship)
Algirdas Šemeta (DG of Taxation and Customs Union, Audit and Anti-Fraud)
Karel De Gucht (DG of Trade)
Robert Verrue (DG of Employment, Social Affairs And Equal Opportunities)
Michel Barnier (Commissioner for Internal Market and Services)

Dear Commissioner Dalli,

The European Carton Makers Association (ECMA) is the established forum and officially approved umbrella organisation for national carton associations throughout Europe. Our association represents some 500 carton producers in nearly all countries in the European Economic Area. This corresponds with around 70% of the total carton market volume in Europe and a current workforce of about 50,000 people. Further information relating to the organisation can be found at www.ecma.org.

As suppliers of the vast majority of the folding carton packaging to the European tobacco industry, ECMA and its members are a significant stakeholder group which will be significantly affected by the possible introduction of plain packaging. In the past, ECMA has been consulted by the European Commission and invited to contribute its views and packaging industry expertise, as was the case for example when graphical health warnings were introduced. In spite of this, neither ECMA nor, so far as we are aware, any of its members were invited by DG SANCO to participate in the stakeholder consultation process nor the meeting on 20 October 2010.

Please find therefore attached letter explaining in more details our association's comments and concerns. We kindly request the opportunity to meet with DG SANCO and, also, participate in all future stakeholder consultations affecting possible revision of the TPD, particularly, consultations relating to plain packaging.

Best regards,

Jules Lejeune
Secretary-General

ECMA - the European Carton Makers Association
C/o LEJEUNE Association Management
P.O. Box 85612
NL-2508 CH The Hague
The Netherlands
T: +31 (0)70 312 39 11
F: +31 (0)70 363 63 48
E: mail@ecma.org
URL: <http://www.ecma.org>



Cabinet DALLI						
ATTRIB:	COM	HoC	NB	RD	ED	Spk
	HV	PDG	HK	FZ	PM	ALL
08. 12. 2010						
COPY:	COM	HoC	NB	RD	ED	Spk
	HV	PDG	HK	FZ	PM	ALL
ARES /						

raw material suppliers, European Commission officials, the packaging trade press, and related industry associations. ECMA monitors and addresses issues relevant to the European carton industry. It provides a platform for the exchange of knowledge and expertise among member associations and companies.

This e-mail and the information it contains, is for the use of the addressee(s) only and may be legally privileged. Any unauthorized use or dissemination of this message in whole or in part is strictly prohibited. If you have received it by mistake please notify the sender by return e-mail and delete this message from your system. ECMA has taken all reasonable care during the editing and sending of this e-mail. Nevertheless it might happen that information is incomplete or incorrect. Please note that ECMA does not guarantee that this message or any attachment is virus free or has not been intercepted and amended. ECMA does not accept any liability for this.

This email has been scanned by the MessageLabs Email Security System.
For more information please visit <http://www.messagelabs.com/email>



**EUROPEAN
CARTON MAKERS ASSOCIATION**

Secretariat:

P.O. Box 85612, 2508 CH The Hague

The Netherlands

Tel. +31 – (0)70 – 312 39 11

Fax +31 – (0)70 – 363 63 48

E-mail: mail@ecma.org

Commissioner John Dalli
European Commissioner for Health
and Consumer Policy
European Commission
B-1049 Brussels
Belgium

*The Hague, 7 December 2010
Our Reference: JL//EE10-016*

SENT BY EMAIL

RE : Request to participate in future stakeholder consultations regarding the possible revision of the Tobacco Products Directive (TPD) and comments on potential changes to the TPD

Dear Commissioner Dalli,

1. ECMA

The European Carton Makers Association (ECMA) was founded in 1960 to promote the interests of one of the most diverse sectors of the packaging industry. Today, ECMA is the established forum and officially approved umbrella organisation for national carton associations throughout Europe.

ECMA is widely recognised as the association securing the sustainable development of the whole European folding carton industry. ECMA represents 500 carton producers in nearly all countries in the European Economic Area. ECMA represents around 70% of the total carton market volume in Europe and a current workforce of about 50,000 people. Further information relating to the organisation can be found at www.ecma.org.

2. Possible revision of the Tobacco Products Directive

As suppliers of the vast majority of the folding carton packaging to the European tobacco industry, ECMA and its members are a significant stakeholder group which will be significantly affected by the possible introduction of plain packaging. In the past, ECMA has been consulted by the European Commission and invited to contribute its views and packaging industry expertise, as was the case for example when graphical health warnings were introduced.

ECMA is disappointed and concerned that neither ECMA nor, so far as we are aware, any of its members were invited by DG SANCO to participate in the stakeholder consultation process nor the meeting on 20 October 2010. We, therefore, request the opportunity to meet with DG SANCO and, also, participate in all future stakeholder consultations affecting possible revision of the TPD, particularly, consultations relating to plain packaging.



3. Impact of potential changes to the TPD, in particular the implementation of plain packaging

ECMA's concerns primarily relate to the following:

a. Increase in counterfeit goods and illicit trade

Plain packaging is likely to significantly lower the barriers to counterfeiting folding carton tobacco packaging.

Existing packaging is typically printed using high-quality printing with enhanced design features such as embossing, debossing, hot-foil stamping and UV varnish, to name a few. These high quality printing features are inherently much more difficult and expensive to counterfeit than copying plain packaging. Therefore, it becomes simpler to manufacture and sell counterfeit goods which will increase the problem of counterfeit tobacco products and illicit trade in the EU. Such counterfeit cigarettes were highlighted by the European Commission as one of the two main sectors for large seizures of counterfeit goods, accounting for 34.35% of the total seized articles.¹

The high-quality finish achieved by these current printing technologies and design features assist consumers to determine if the cigarettes they purchase are genuine products, rather than counterfeits. Such unregulated counterfeit cigarette products potentially pose a greater risk to public health through for example, higher emissions of heavy metals indicated in counterfeit cigarettes.² Illicit cigarettes are estimated to cost approximately 50% less than legal cigarettes and, as such, increases in the level of illicit trade will cause average market prices to decline.³ It is likely that such lower average market prices will lead to an increase in consumption since plain packaging is more likely to encourage a price driven market, with a significant increase in down trading, resulting in cheaper products being more accessible.

Finally, illicit trade in counterfeit cigarettes already today represents a huge challenge to law enforcement agencies throughout Europe. The European Commission's own estimates of lost revenues resulting from illicit trade in tobacco products in the EU are €10 billion. Counterfeit cigarettes are unregulated and untaxed. With illicit trade in tobacco products (and specifically counterfeit cigarettes) representing such a significant fiscal, financial, public health and law enforcement agency challenge to Europe, ECMA believes the Commission should not introduce plain packaging, since this will simply serve to considerably exacerbate these challenges.

b. Printing and packaging market impact

Given the concerns raised in paragraph 3a above, the implementation of plain packaging will have significant consequences not only for ECMA members', but also many other suppliers to the tobacco industry such as cylinder and embossing makers, packaging and design agencies, and ink suppliers.

The tobacco industry is served by specialist printing companies which have made significant investments to purchase and upgrade colour printing presses specifically designed to meet the evolving legislative requirements relating to graphical health warnings. As you will be aware, such warnings are currently required by law in four EU countries, and will be implemented in a further three EU countries in 2011. To enable our members to print the multicoloured graphical health warnings, many of our members' upgraded existing colour printing presses and made significant, long-term investment decisions to purchase additional print units. Such decisions were made on the basis of anticipated financial returns in a stable regulatory environment.

¹ European Commission Taxation and Customs Union Report on Community Customs Activities on Counterfeit and Piracy – http://ec.europa.eu/taxation_customs/resources/documents/customs/customs_controls/counterfeit_piracy/statistics2007.pdf

² Stephens E., Calder A. et al. (2005). 'Source and health implications of high toxic metal concentrations in illicit tobacco products', *Environmental Science Technology*, 39(2), pp. 479, 488

³ Joossens, L., Merriman, D., Ross, H., et al, How eliminating the global illicit cigarette trade would increase tax revenue and save lives, Paris, International Union Against Tuberculosis and Lung Disease, 2009



Therefore, the proposed implementation of plain packaging is inconsistent with the earlier legislative approach. If plain packaging is introduced in the EU, ECMA members will be in the position of having to write-off recent significant investments.

c. Brand value impact

Packaging is key to building brand value and integrity. The potential implementation of plain packaging is inconsistent with existing European legislation and policies such as those outlined by the World Trade Organisation, Paris Convention, TRIPs⁴ and the Charter of Fundamental Rights of the European Union.

A move to plain packaging has the potential to destroy brand value and undermines the basis of brand protection – for example, does the implementation of plain packaging for tobacco products set a precedent for the packaging of other consumer goods such as alcohol and fast food?

By preventing the use of tobacco brands and trade marks, plain packaging legislation will remove the single most effective measure of protection against unfair competition and, specifically, counterfeiting. Eliminating brands will further motivate consumers to switch to cheaper unbranded alternatives and will exacerbate the existing problem of illegal trade by removing the incentive to purchase legal, premium quality products and removing a means of verifying that tobacco products are genuine and legal.

4. Conclusion

ECMA and its members are opposed to the potential changes to the TPD regarding the implementation of plain packaging since, in our view, introduction of this legislation will:

- i. increase illicit trade and counterfeit products - which would not only affect ECMA's members but also potentially pose a greater risk to public health in Europe, and elsewhere;
- ii. have a significant adverse affect on the printing and packaging market;
- iii. discriminate against trademarks - this is not only in breach of European Commission's obligations to the WTO but provides a precedent for other consumer goods, increasing uncertainty and impacting employment and investment in other industries.

In conclusion, as industry stakeholders, please advise when ECMA can meet with DG SANCO to share its views and confirm ECMA will be invited to participate in all future stakeholder consultations affecting possible revision of the TPD, particularly, consultations relating to plain packaging.

Yours sincerely,

Jan Cardon, ECMA Executive Director
On behalf of European Carton Makers Association

Jules Lejeune, ECMA Secretary General

Copy to:

Antonio Tajani (DG of Industry & Entrepreneurship)
Algirdas Šemeta (DG of Taxation and Customs Union, Audit and Anti-Fraud)
Karel De Gucht (DG of Trade)
Robert Verwieë (DG of Employment, Social Affairs And Equal Opportunities)
Michel Barnier (Commissioner for Internal Market and Services)

Appendix – List of ECMA members

⁴ Trade Related Aspects of Intellectual Property Rights

Company	City	Country
Interpack S.A.	Lomas del Mirador	Argentina
Ratt GmbH	Dornbirn	Austria
Alfred Wall GmbH	Graz	Austria
Ernst Schausberger & Co. Gesellschaft m.b.H.	Gunskirchen	Austria
W. Goerner Kartonagen Ges.m.b.H.	Klagenfurt	Austria
Josef Bayer GmbH	Lustenau	Austria
Neupack Gesellschaft m.b.H.	Reichenau	Austria
Schwab Druck Kartonagen Ges.m.b.H.	Rietz/ Tirol	Austria
Offsetdruckerei Schwarzach	Schwarzach	Austria
Harland Print & Packaging	St. Pölten - Harland	Austria
Eberle Druck GmbH	Vienna	Austria
Mayr-Melnhof Packaging Austria GmbH	Vienna	Austria
Mayr-Melnhof Packaging International	Vienna	Austria
PPV Austria, Verband der Faltschachtelindustrie	Wien	Austria
Rembrandt Verpakking	Aarschot	Belgium
ECMABEL	Brussel	Belgium
Autajon Packaging Belgium	Brussels	Belgium
Imprepack N.V.	Brussels	Belgium
LGR Packaging - VTK	Deurne	Belgium
Du Caju Printing nv-sa	Erpe-Mere	Belgium
Chesapeake Pharmaceutical & Healthcare Packaging	Gent	Belgium
Goldprint NV-SA	Huizingen	Belgium
Cartonnage Soenen	Lichtervelde	Belgium
Bruggeman & Desouter	Meulebeke	Belgium
Van Grasdorff NV	Sint Amands	Belgium
Mayr-Melnhof Belgium	Sint-Katelijne-Waver	Belgium
Smurfit Kappa Van Mierlo N.V.	Turnhout	Belgium
Van Genechten Biermans N.V.	Turnhout	Belgium
Van Genechten Packaging N.V.	Turnhout	Belgium
Impritex S.A.	Wavre	Belgium
Cartonnage P. Van De Velde nv-sa	Wetteren	Belgium
Istragrafika d.d.	Rovinj	Croatia
Danish Carton Makers Associations (DCMA)	Copenhagen	Denmark
Mammens Emballage A/S	Højbjerg	Denmark
Schur International A/S	Horsens	Denmark
Schur Pack Denmark a/s	Horsens	Denmark
A.C. Schmidt A/S	Hvidovre	Denmark
Beck Pack Systems A/S	Rønne	Denmark
Eson Pac ApS	Skovlunde	Denmark
Søren Berggreen	Vejle	Denmark
Alliora	Ancenis Cedex	France
Cartonnages d'Auch	Auch Cedex	France
Chambre Syndicale des Fabricants de	Auxerre	France
Weyga	Bagnolet	France
S.B.C.I.	Baume-les-dames Cedex	France
Larre (Cartonnages)	Bayonne	France
Siegwald (Cartonnages)	Bennwhir-Gare	France
Thiolat	Blois Cedex	France
Pastour Imprimeur Cartonier	Bondues Cedex	France
Hanser et Associes	Bonneuil sur Marne Cedex	France
Cap Emballages	Cergy Pontoise Cedex	France
Packetis	Chazelles	France
AR Carton	Cholet Cedex	France
Cartona Pack	Clermont Ferrand	France
Debrez	Comines Cedex	France
Palleul - B'Pack	Couches	France
Covepa Michels	Deols	France
S.N.C.A.	Ecquevilly	France
Cartonnerie Moderne	Entraigues	France
I.N.E. (Imprimerie Nouvelle de L'Est)	Esches	France
Hernas (Cartonnage)	Feuquieres en Vimeu	France
L.G.R. Emballages - Leguay	Fleury les Aubrais Cedex	France
Carre (Imprimerie)	Fressenville	France
Bes (Cartonnages)	Grignan	France
L.G.R. Emballages - Cartonex	Iliers - Combray	France
C.P.C. Saint-Etienne	La Talaudiere	France
Lacroix Emballages	Le Bois d'Amont	France
Masurel Pollet Cartonnages	Le Fosse	France
L.G.R. Emballages - Cartonnages Girard	Le Teil	France
Sav-Pen (Cartonnages)	Limoges	France
C.G.F.C.I.	Limoux Cedex	France
Le Cartonnages Industriel Packaging	Ludres-Nancy	France
TPG Packaging	Malville	France
L.G.R. Emballages - Rey	Mamers	France
Soproform	Marseille Cedex	France

Company	City	Country
Graphic Packaging	Masnieres	France
Imprimerie de Ponthierry	Menecy	France
M.M. Packaging France	Monetau	France
Balluteaud Emballages	Montmoreau	France
C.P.C.	Montreuil	France
Thibault-Bergeron	Muzillac	France
Ileos	Nanterre	France
Cartonnages C.P.	Nanteuil les Meaux	France
Etna S.A.	Nantua	France
S.C.A. Packaging	Neuilly sur Seine	France
L.G.R. Emballages - Reine	Oyonnax Cedex	France
Eymard	Paris	France
FFC - Fédération Française du Cartonnage	Paris	France
Unicarton	Paris	France
Edelmann - La Spic	Pointoise	France
Gourio (Cartonnages)	Pommeret	France
Gaultier (Cartonnages)	Pont de Briques	France
Posson	Sable sur Sarthe	France
Franche (Cartonnages)	Saint Amand Montrond	France
Alliora	Saint Hilaire du Harcouet	France
Roset (Cartonnages)	Saint Julien en Genevois Cedex	France
Jurembal S.A.	Saint Lucipin Cedex	France
Nove Rhone Emballages	Sainte Foy L'Argentiere	France
L.G.R. Emballages - C.F.L.	Saint-Eusebe	France
Martinet et Hirondelle	Saint-Martin sur Oust	France
Carto Est	Strasbourg	France
Graphidecor	Thal-Drulingen	France
Gault et Fremont	Tours Cedex	France
Bourdeau Cartoplasti	Treillieres	France
C.P.C. Valenciennes	Valenciennes	France
Packetis	Valreas	France
Bouzerot Perrier Emballages	Vaux les Saint-Claude	France
Cartonnages de Verdun	Verdun	France
Tallineau Emballage	Vertou Cedex	France
Wauters et Fils	Villebon sur Yvette	France
Prapack	Vougy	France
HEINRIGS DRUCK + VERPACKUNG	Aachen	Germany
MM Packaging Behrens	Alfeld	Germany
Cosack GmbH & Co. KG Druck + Verpackung	Arnsberg	Germany
odd GmbH & Co. KG Print + Medien	Bad Kreuznach	Germany
colordruck Baiersbronn W. Mack GmbH & Co KG	Baiersbronn	Germany
Kroha GmbH PharmaPackmittel Verpackungslösungen	Barleben	Germany
Gundlach Display + Box GmbH	Berlin	Germany
Karl Knauer KG Verpackungen Werbemittel	Biberach	Germany
E. Gundlach Holding GmbH & Co. KG	Bielefeld	Germany
Friedrichs Druck + Verpackung GmbH & Co.KG	Bielefeld	Germany
MM Graphia Bielefeld GmbH & Co. KG	Bielefeld	Germany
August Faller KG Binzen	Binzen	Germany
Braun Pharmadruck Bitterfeld GmbH	Bitterfeld	Germany
A&R Carton Bremen GmbH	Bremen	Germany
Schur Pack Germany GmbH	Büchen	Germany
Reinhard Ostermöller Offsetdruck GmbH & Co.KG	Bünde	Germany
Reinhard Ostermöller Offsetdruck GmbH & Co.KG Verpackungen - Werbedrucke	Bünde	Germany
Gebr. Knauer GmbH & Co. KG Druck-Verpackung-Display	Dettingen	Germany
Karl Rädisch GmbH & Co. KG	Emskirchen	Germany
FFI - Fachverband Faltschachtel-Industrie e.V.	Frankfurt am Main	Germany
Gebr. Schmidt GmbH & Co. KG	Garbsen	Germany
Friedrich Freund GmbH	Georgsmarienhütte	Germany
Gebr. Frank GmbH & Co. KG	Gera	Germany
Casimir Kast Verpackung und Display GmbH	Gernsbach	Germany
Schiettinger KG Verpackungen aus Voll- u. Wellpappe	Göppingen	Germany
STI Schröder Verpackungen GmbH	Greven	Germany
topac GmbH	Gütersloh	Germany
Model-Kramp GmbH	Hanau/Klein-Auheim	Germany
Hannoversche Kartonagenfabrik GmbH & Co. KG	Hannover	Germany
ric packaging group LEUNISMAN GMBH	Hannover	Germany
Edelmann GmbH	Heidenheim	Germany
Hermann Höhing Kartonagenfabrik GmbH	Heilbronn	Germany
Martin Spiegel Kartonagenfabrik GmbH & Co. KG	Höchberg	Germany
Friedr. Serong GmbH & Co. KG Großdruckerei & Faltschachtelwerk	Höxter	Germany
Boldt GmbH Faltschachtelwerk	Isernhagen/OT Kirchhorst	Germany
C. P. Schmidt Verpackungs-Werk GmbH & Co. KG	Kaiserslautern	Germany
VG Nicolaus GmbH	Kempten	Germany
HAGER PAPPRINT GmbH	Kirkel	Germany
A&R CARTON GmbH Faltschachtelwerk Augsburg	Königsbrunn	Germany

Company	City	Country
Friedrich Freund GmbH	Krefeld	Germany
Chesapeake Düren GmbH	Kreuzau-Stockheim	Germany
A&R CARTON GmbH Faltschachtelwerk Frankfurt	Kriftel	Germany
Siemer Kartonagen GmbH	Laatzen	Germany
Kamphausen & Felsing GmbH & Co. KG	Langenfeld	Germany
STI Gustav Stabernack GmbH	Lauterbach	Germany
Pfäffle GmbH & Co. KG Verpackungs-Werk	Lorch	Germany
HAMMER-LÜBECK FALTSCHACHTELWERK	Lübeck	Germany
Rack & Schuck GmbH & Co. Kartonagenfabrik Displaywerk	Mannheim	Germany
Triple-d GmbH	Mannheim	Germany
Chesapeake Melle GmbH	Melle	Germany
Kroha GmbH Pharma Packmittel Faltschachtelwerke	Miesbach	Germany
CARTONIC Packaging GmbH & Co. KG	Minden	Germany
GEBEKE Verpackungen GmbH	Moorrege	Germany
NEUDEL Verpackungen GmbH	Neckarbischofsheim	Germany
A. Landerer GmbH & Co. KG	Neckarsulm	Germany
Chesapeake Frankfurt GmbH	Neu-Isenburg	Germany
Smurfit Kappa Verpackungswerk Neuss	Neuss	Germany
H.O. Persiehl GmbH	Norderstedt	Germany
Wesche Pharmaverpackung GmbH	Norderstedt	Germany
CD CARTONDRUCK AG	Obersulm	Germany
Gundlach Verpackung GmbH	Oerlinghausen	Germany
Druckerei Bauer GmbH	Pfedelbach	Germany
Windbiel Verpackungen GmbH	Pforzheim	Germany
Dörr Kartonagen- u. Hinterkappenfabrik	Pirmasens	Germany
VG Nicolaus GmbH Werk Köln	Pulheim-Brauweiler	Germany
Ladegast GmbH Pharma-Packaging	Reichenau-Waldsiedlung	Germany
LAGO PRINT GmbH	Rielasingen	Germany
Seufert Transparente Verpackungen GmbH	Rodgau	Germany
Strobel AG	Roth	Germany
rlc packaging group COLORPACK GMBH	Rüdersdorf	Germany
Friebel-Druck GmbH	Saalfeld	Germany
Hoffmann & Schelle GmbH & Co. KG Druck & Verpackung	Schalksmühle	Germany
Otto König GmbH	Solingen	Germany
Carl Kaestner GmbH Graphischer Betrieb	Steinau	Germany
Chesapeake Deutschland GmbH	Stuttgart	Germany
Chesapeake Stuttgart GmbH	Stuttgart	Germany
MM Packaging Caesar GmbH & Co. KG	Traben-Trarbach	Germany
Höhn Displays + Verpackungen GmbH	Ulm	Germany
GC Graphic Consult GmbH	Unterschleißheim	Germany
SCHAAF-PACKUNG Kartonverarbeitungs-GmbH	Velbert	Germany
WS Quack + Fischer GmbH	Viersen	Germany
Kartonagenfabrik Schwenningen GmbH	VS-Schwenningen	Germany
August Faller KG Waldkirch	Waldkirch	Germany
Wanfried-Druck Kalden GmbH	Wanfried	Germany
Edelmann GmbH	Weilheim	Germany
Smurfit Kappa Baden Packaging GmbH	Weisenbach	Germany
Kocherscheid Faltschachtelproduktion und Verpackungsentwicklung	Wermelskirchen	Germany
Horn Verpackungen GmbH	Wertheim	Germany
THIMM Display GmbH	Wörrstadt	Germany
Papierwerk Landshut Mittler GmbH & Co. KG	Wörth	Germany
Artur Theis GmbH & Co KG Faltschachtelfabrik	Wuppertal	Germany
Styl. S. Koskinidis S.A	Athens	Greece
FIMI Packaging Panagiotopoulos Bros S.A.	Spata - Attica	Greece
STI Petöfi Nyomda Kft.	Kecskemet	Hungary
Zalai Nyomda Zrt.	Zalaegerszeg	Hungary
TCPL Packaging Limited	Worli, Mumbai	India
Boxpak Limited	County Antrim, Belfast	Ireland
Marchmont Packaging Ltd.	Dublin	Ireland
Frenkel C.D.	Industrial Park Caesarea	Israel
Industrial Box S.r.l.	Argelato (Bo)	Italy
I.P.I. S.p.A.	Arzano - Naples	Italy
I.C.B. Industria Cartotecnica Bergamasca S.r.l.	Azzano S. Paolo (BG)	Italy
La Litografica di F. Fornaroli S.p.A.	Boffalora Ticino (MI)	Italy
Industria Grafiche Servi S.p.A.	Busto Arsizio (VA)	Italy
Arti Grafiche A. Gallati spa	Cambiago (MI)	Italy
Prealpi S.r.l.	Castiglione Olona (VA)	Italy
Arti Grafiche Reggiane e LAI S.p.A.	CAVRIAGO (Reggio Emilia)	Italy
Nampak Healthcare Italy S.r.l.	Cervia (RA)	Italy
Fincarta spa	Chieri	Italy
Cartotecnica Chierese S.p.a.	Chieri - Torino	Italy
Cartotecnica Tifernate S.p.A.	Città di Castello PG	Italy
Box Marche S.p.A.	Corinaldo (AN)	Italy
Litocartotecnica Ival S.p.A.	Curtatone (Mantova)	Italy
P.L.V. Produzioni Litografiche Varie S.r.l.	Daverio VA	Italy

Company	City	Country
Palladio Industrie Grafiche Cartotecniche S.p.A.	Dueville (VI)	Italy
Maserpack Srl	Inzago (MI)	Italy
Italpack Cartons S.r.l.	Lacedonia (AV)	Italy
Grafiche Favillini S.r.l.	Livorno (LI)	Italy
Cartografica Veneta spa	Lonigo (VI)	Italy
Eurografica S.r.l.	Macomer (Nu)	Italy
Assografici Gifasp	Milano	Italy
ICIS S.p.A.	Mozzo (BG)	Italy
Smurfit Kappa Italia S.p.A.	Orsenigo (CO)	Italy
Grafica Zannini S.p.A.	Ospedaletto (PI)	Italy
Tecnocarta S.a.S.	Passaggio di Bettona PG	Italy
GPP Industrie Grafiche S.p.A. - Divisione Pharma	Peschiera Borromeo MI	Italy
Lucaprint Group	Pianezze San Lorenzo (VI)	Italy
Interpack S.p.A.	Pomezia (RM)	Italy
Sada Packaging S.r.l.	Pontecagnano-Faiano (SA)	Italy
Fustelgraf S.p.A.	Pontida (BG)	Italy
Sa.GE.Print S.p.A.	Pordenone (PN)	Italy
A. De Robertis & F. S.p.A.	Putignano (Bari)	Italy
Cosmografica Albertini S.p.A.	Robecco sul Naviglio (MI)	Italy
Con-Pak S.p.A.	Roletto TO	Italy
Modiano Industrie Carte da Gioco ed Affini Spa	San Dorligo della Valle - Trieste	Italy
Eurografica S.r.l.	Schio VI	Italy
Gruppo Cartotecnico Abar Litofarma Srl	Sesto Uteriano	Italy
GPP Industrie Grafiche S.p.a.	Truccazzano (MI)	Italy
Cartotecnica Goldprint Srl	Vailate (CR)	Italy
Pusterla 1880	Venegono Inferiore (VA)	Italy
Furubayashi Shiko Co. Ltd.	Tokyo	Japan
Graphicsleader Packaging S.A.	Seixezelo	Portugal
Romanian Packaging Association	Bucuresti	Romania
Promis JSC	Nizhniy Novgorod	Russia
Nampak Cartons + Labels	Sandton	South Africa
Tompla Packaging, S.L.	Alcalá de Henares (Madrid)	Spain
Industrias San Cayetano, S.A.	Aldea Mayor de San Martin (Valladol)	Spain
Litografia Platival, S.A.	Alicante (Alicante)	Spain
Amadeo Sánchez S.L.	Almansa (Albacete)	Spain
Mandriladora Leiza, S.L.	Areso (Navarra)	Spain
Gaez, S.L.U.	Arganda del Rey (Madrid)	Spain
Elche Cartón, S.L. (Cartoelx)	Aspe (Alicante)	Spain
Macopa, S.A.	Bañeres de Mariola (Alicante)	Spain
Cartonajes Bañeres, S.A.	Banyeres de Mariola (Alicante)	Spain
Cartonajes Rakosnik, S.A.	Barcelona (Barcelona)	Spain
MWV Embalaje, S.L.	Barcelona (Barcelona)	Spain
José Soler Soler, S.L.	Crevillent (Alicante)	Spain
Artenvas Industrias Gráficas del Envase S.L.U.	Elche (Alicante)	Spain
Cartonajes Urban, S.L.	Elche (Alicante)	Spain
Ginés Coll, S.A.	Elche (Alicante)	Spain
Gráficas Belda y Parreño, S.L.	Elche (Alicante)	Spain
Hijos de Manuel González, S.L.	Elda (Alicante)	Spain
Miger, S.L.	Elda (Alicante)	Spain
Envase Gráfico Industrial, S.A. Egisa	Esplugas de Llobregat (Barcelona)	Spain
Comercial Cajera Comca, S.A.	Esplugues de Llobregat (Barcelona)	Spain
Manufacturas Marber, S.L.	Fuenlabrada (Madrid)	Spain
Alvi, Industrias Gráficas, S.A.	Getafe (Madrid)	Spain
Nekicesa Packaging, S.L.	Griñon (Madrid)	Spain
Gráficas Beyco, S.L.	Hospitalet de Llobregat (Barcelona)	Spain
Policolor Offset, S.A.	Hospitalet de Llobregat (Barcelona)	Spain
SCA Packaging Bertako	Huarte-Pamplona (Navarra)	Spain
D.D.C, S.A.	Irún (Guipuzcoa)	Spain
Pack sur Artes Gráficas, S.A.L.	Jerez de la Frontera (Cádiz)	Spain
Arte Xixona S.L.	Jijona (Alicante)	Spain
David Recio, S.L.	La Roda (Albacete)	Spain
Cartonajes Igamo, S.A.	Legutiano (Álava)	Spain
Chesapeake	Madrid (Madrid)	Spain
Torreangulo Arte Gráfico	Madrid (Madrid)	Spain
Aspack	Majadahonda-Madrid	Spain
Norgraft Packaging, S.A.	Maliaño (Cantabria)	Spain
Industrias Leonesas del Embalaje, S.A.	Marialba de la Ribera	Spain
Fatec, S.A.	Méntrida (Toledo)	Spain
Miralles Cartonajes, S.A.	Mollet del Vallès (Barcelona)	Spain
Cartonajes Pans, S.A.	Montcada i Reixac (Barcelona)	Spain
Cartonplex, S.A.	Montcada i Reixac (Barcelona)	Spain
Acpack, SL.	Mos (Pontevedra)	Spain
Grafopack, S.A.	Ódena (Iguualada)	Spain
Graphic Packaging International Spain S.A.	Ódena (Iguualada)	Spain
Cartonajes Bernabéu S.A.	Ontiniente (Valencia)	Spain

Company	City	Country
Karbest, S.L.	Paiporta (Valencia)	Spain
Cartonajes Mora, S.A.	Paterna (Valencia)	Spain
Litografía Espinosa, S.L.	Porriño (Pontevedra)	Spain
A.G. Novograf, S.A.	Puente Tocinos (Murcia)	Spain
Cartonajes Leca, S.A.	San Fernando de Henares (Madrid)	Spain
Litoplex Industria Gráfica, S.A.	Sant Fruitós de Bages (Barcelona)	Spain
Alzamora Packaging S.A.	Sant Joan Les Fonts (Girona)	Spain
Artepack Andalucía, S.A.	Santa Fe (Granada)	Spain
Envases Tendero S.L.	Sax (Alicante)	Spain
Grupo Docu World	Sondika (Vizcaya)	Spain
Manufacturas Cartrix S.A.	St. Coloma de Gramenet (Barcelona)	Spain
Mandriadora Alpasa S.L.	Tavernes de la Vallidigna	Spain
Gráficas del Noroeste, S.A. Grafinsa	Vigo (Pontevedra)	Spain
Artes Gráficas LAGA, S.L.	Villabona (Guipuzcoa)	Spain
Cartonajes Fervi, S.A.	Villares de la Reina (Salamanca)	Spain
Manufacturas Seher, S.L.	Villena (Alicante)	Spain
Cartonajes Jabar, S.A.	Vitoria (Alava)	Spain
Embalajes Ecológicos Transpack, S.A.	Xàtiva (Valencia)	Spain
Cartonajes Del Saz, S.L.	Xirivella (Valencia)	Spain
Cipriano Martínez, S.L.	Xirivella (Valencia)	Spain
Svenska Kartongförpackningsföreningen	Göteborg	Sweden
Schur Pack Sweden AB	Kumla	Sweden
Mellby Pac AB	Laholm	Sweden
Lidköpings Tryckeri & Emballage	Lidköping	Sweden
A&R Carton Lund AB	Lund	Sweden
A&R Carton AB	Malmö	Sweden
Strand Grafiska AB	Malmö	Sweden
A&R Carton Norrköping AB	Norrköping	Sweden
Eson Pac Isbergs AB	Norrköping	Sweden
IT-Pac Sverige AB	Rävlanda	Sweden
Umpack AB	Umeå	Sweden
Eson Pac AB	Veddige	Sweden
Förpacknings AB Nord-Emballage	Ystad	Sweden
Zäta Förpackning AB	Ystad	Sweden
Rondo AG	Allschwil	Switzerland
Schrempp AG	Allschwil	Switzerland
Verband der Schweizer Druckindustrie (VSD)	Bern	Switzerland
Vereinigung Kartonverpackung Schweiz	Bern	Switzerland
Gantenbein AG	Birsfelden	Switzerland
Säuberlin + Pfeiffer SA	Châtel-St-Denis	Switzerland
Kartonagefabrik Zellweger	Degersheim	Switzerland
Cafag SA	Fribourg	Switzerland
Läser AG	Gontenschwil	Switzerland
Wittwer Offset AG	Heimberg	Switzerland
LxBxH Gauch AG	Kirchberg	Switzerland
Zeiler AG	Köniz	Switzerland
Weber Verpackungen	Menziken	Switzerland
Haass AG	Muttenz	Switzerland
Müller Kartonagen AG	Näfels	Switzerland
Aeberhard AG	Rheineck	Switzerland
Amcor Tobacco Packaging Switzerland LLC	Rickenbach	Switzerland
Schelling AG	Rupperswil	Switzerland
Glanzmann Verpackungen AG	Schueren/ Biel	Switzerland
Baudi Verpackungen AG	St. Gallen	Switzerland
K+D AG	St. Gallen	Switzerland
CAG Cartonagen AG	Stans	Switzerland
Fratelli Roda SA	Taverne	Switzerland
Karl Augustin AG	Thayngen	Switzerland
PEG Kartonagen AG	Urdorf	Switzerland
Model Management AG	Weinfeld	Switzerland
Sonderegger CH	Wil	Switzerland
PAWI Verpackungen	Winterthur	Switzerland
Betschart AG	Wohlen	Switzerland
Brieger Verpackungen	Zürich	Switzerland
Swisscarton	Zürich	Switzerland
Amcor Tobacco Packaging Brabant B.V.	Bergen op Zoom	The Netherlands
ECMA Nederland	Den Haag	The Netherlands
Smurfit Kappa Zedek B.V.	Deventer	The Netherlands
Schut Hoes Cartons bv	Eerbeek	The Netherlands
Eindhoven Packaging B.V.	Eindhoven	The Netherlands
Vrijdag Premium Printing B.V.	Eindhoven	The Netherlands
Chairman Pro Carton Nederland	Eindhoven	The Netherlands
Nampak Cartons	Hoogerheide	The Netherlands
Boxes LPF	Leeuwarden	The Netherlands
Wesly printing & packaging	Maastricht	The Netherlands

Company	City	Country
Intergrafipak B.V.	Nieuw-Vennep	The Netherlands
Acket Drukkerij Kartonnage B.V.	Oss	The Netherlands
MeadWestvaco Netherlands B.V.	Roosendaal	The Netherlands
A&R Carton BV	Sneek	The Netherlands
Drukkerij de Vries B.V. Vouwkartonnage	Sneek	The Netherlands
Van Eerd bv	Tilburg	The Netherlands
Remmert Dekker	Wormer	The Netherlands
TEKNOPAK MİKRODALGA KUTU AMBALAJ SAN. VE TİC. LTD. ŞTİ.	ADANA	Turkey
KASAD - Karton Ambalaj Sanayicileri Derneği	İstanbul	Turkey
AKADEMİ MATBAACILIK İLET. HİZ. SAN. VE TİC. LTD. ŞTİ.	İSTANBUL	Turkey
ALTAY MATBAACILIK SAN. VE TİC. A.Ş.	İSTANBUL	Turkey
ATLAS MATBAACILIK	İSTANBUL	Turkey
BOZBOĞA KAĞITÇILIK SAN. TİC. A.Ş.	İSTANBUL	Turkey
CAMIŞ AMBALAJ SANAYİİ A.Ş.	İSTANBUL	Turkey
CEM OFSET MATBAACILIK SAN. A.Ş.	İSTANBUL	Turkey
CEM OFSET MATBAACILIK SAN. A.Ş.	İSTANBUL	Turkey
CÖMERTLER MATBAACILIK SAN. VE TİC. A.Ş.	İSTANBUL	Turkey
DİZAYN MATBAACILIK SAN. VE TİC. LTD. ŞTİ.	İSTANBUL	Turkey
DURAN-DOĞAN BASIM VE AMBALAJ SANAYİ A.Ş.	İSTANBUL	Turkey
EKOL OFSET	İSTANBUL	Turkey
EVREN KAĞIT. VE MATB. LTD. ŞTİ.	İSTANBUL	Turkey
FEYZİ MATBAA VE GIDA SANAYİ MAKİNALARI MÜMESSİLLİK VE TİC. A.Ş.	İSTANBUL	Turkey
FLOK AMBALAJ VE MATBAACILIK SAN. VE TİC. LTD. ŞTİ.	İSTANBUL	Turkey
GELBUL KAĞITÇILIK-MATBAACILIK SAN. ve TİC. A.Ş.	İSTANBUL	Turkey
GÖRSEL SANATLAR MATBAACILIK	İSTANBUL	Turkey
GRUPSAN DIŞ TİC. ve PAZARLAMA A.Ş.	İSTANBUL	Turkey
HALAMAN MATBAACILIK VE AMBALAJ SAN. LTD. ŞTİ.	İSTANBUL	Turkey
HARMAN ETİKET MATBAA VE AMBALAJ	İSTANBUL	Turkey
KAPTAN OFSET	İSTANBUL	Turkey
KOMBASSAN KAĞIT-MATBAA-TEKSTİL SAN. VE TİC. A.Ş.	İSTANBUL	Turkey
KUTAŞ BASIM. AMBALAJ SAN. TİC.	İSTANBUL	Turkey
KUTİŞ KUTUCULUK AMBALAJ SA. A.Ş.	İSTANBUL	Turkey
LİTHOSAN BASIM YAYIM AMBALAJ SAN. VE TİC. LTD. ŞTİ.	İSTANBUL	Turkey
MATSET. A.Ş.	İSTANBUL	Turkey
MAYR-MELNHOF KARTON TÜRKİYE	İSTANBUL	Turkey
MICHAEL HUBER TÜRKİYE MATBAA MALZEMELERİ LTD. ŞTİ.	İSTANBUL	Turkey
MİTRA TEMSİLCİLİK DIŞ TİCARET A.Ş.	İSTANBUL	Turkey
MOLAYPAK TİFDUK BASKI VE AMBALAJ SAN. VE TİC. A.Ş.	İSTANBUL	Turkey
NAM OFSET AMBALAJ VE MATBAACILIK SAN. TİC. A.Ş.	İSTANBUL	Turkey
OMAKS AJANS VE MATBAACILIK SAN. VE TİC. LTD. ŞTİ.	İSTANBUL	Turkey
OMKASAN OFSET & AMBALAJ SAN. VE TİC. LTD. ŞTİ.	İSTANBUL	Turkey
ÖZKARDEŞLER KARTON AMBALAJ ED. KALIP SAN. VE TİC. LTD. ŞTİ.	İSTANBUL	Turkey
ÖZTÜKEL BASIM VE AMBALAJ SAN. A.Ş.	İSTANBUL	Turkey
PAKSİS PAKETLEME SİSTEMLERİ LTD. ŞTİ.	İSTANBUL	Turkey
PASİFİK İÇ VE DIŞ TİCARET VE MÜMESSİLLİK A.Ş.	İSTANBUL	Turkey
RESİM OFSET MATBAACILIK SAN. VE TİC. A.Ş.	İSTANBUL	Turkey
SENTEZ AMBALAJ SAN. TİC. A.Ş.	İSTANBUL	Turkey
SESA MATBAA İTHALAT İHRACAT SAN. TİC. LTD. ŞTİ	İSTANBUL	Turkey
SEYHAN KARTON AMBALAJ KALIP SAN. VE TİC. LTD. ŞTİ.	İSTANBUL	Turkey
SİNANGİN MATBAACILIK AMBALAJ SAN. VE TİC. LTD. ŞTİ.	İSTANBUL	Turkey
TEM OFSET MATBAACILIK SAN. VE TİC. LTD. ŞTİ.	İSTANBUL	Turkey
TEMPO MATBAACILIK VE AMBALAJ SAN. A.Ş.	İSTANBUL	Turkey
VENK OFSET SAN. TİC. LTD. ŞTİ.	İSTANBUL	Turkey
BAREM AMBALAJ SAN. TİC. LTD. ŞTİ.	İZMİR	Turkey
DOĞANPAK AMBALAJ AMBALAJ SA. VE TİC. LTD. ŞTİ.	İZMİR	Turkey
KESİMLİ OFSET AMBALAJ SAN. VE TİC. LTD. ŞTİ.	İZMİR	Turkey
KORSİNİ-SAF BASKI-AMBALAJ SAN. A.Ş.	İZMİR	Turkey
MAYR MELNHOF GRAPHIA KARTON SAN. VE TİC. A.Ş.	İZMİR	Turkey
METROPAK AMBALAJ TURİZM SAN. VE TİC. LTD. ŞTİ.	İZMİR	Turkey
SÜPERPAK AMBALAJ SAN. VE TİC. A.Ş.	İZMİR	Turkey
EGEM AMBALAJ SAN. VE TİC. A.Ş.	MANİSA	Turkey
Superpak Ambalaj Sanayi Ve Ticaret A.S.	Torbali (Izmir)	Turkey
Nampak Paper Holdings Ltd.	Bagshot, Surrey	United Kingdom
Carton Edge Limited	Banner Park, Coventry	United Kingdom
Benson Box Limited	Bardon, Leicestershire	United Kingdom
MSO Cleland Ltd.	Belfast	United Kingdom
Delta Print and Packaging Limited	Belfast, County Antrim	United Kingdom
Boxes (GH)	Blackburn, Lancashire	United Kingdom
Sun Branding Solutions Limited	Bradford, West Yorkshire	United Kingdom
Heidelberg Graphic Equipment Ltd.	Brentford, Middlesex	United Kingdom
CPC Packaging (UK) Limited	Bristol	United Kingdom
East Kent Cartons Ltd	Broadstairs, Kent	United Kingdom
Chesapeake Limited	Buckinghamshire	United Kingdom
Mayr-Melnhof UK Ltd.	Calcot, Reading	United Kingdom
Vibixa Limited	Cheltenham, Gloucestershire	United Kingdom

Company	City	Country
AGI Media Europe	Chichester, Sussex	United Kingdom
Alexir Packaging Ltd.	Crawley, West Sussex	United Kingdom
Medica Packaging Ltd (Benson Group)	Crewe, Cheshire	United Kingdom
Foil Ribbon	Croydon, Surrey, London	United Kingdom
Mayr-Melnhof Packaging UK Ltd, Deeside	Deeside, Clwyd	United Kingdom
Boxes Prestige	Earls Barton, Northampton	United Kingdom
Falconer Print & Packaging Ltd	Elland, West Yorkshire	United Kingdom
Benson Group	Gateshead, Tyne and Wear	United Kingdom
Print Design and Graphics Limited (PDG)	Gateshead, Tyne and Wear	United Kingdom
Seda UK	Gellihaf, Blackwood, Gwent	United Kingdom
Nampak Cartons - Gillingham	Gillingham, Kent	United Kingdom
Glossop Carton & Print Limited	Glossop, Derbyshire	United Kingdom
Firstan Ltd	Godmanchester, Cambs	United Kingdom
Edward J Wood & Co. (Printers) Ltd.	Harrow, Middlesex	United Kingdom
Arden Software Limited	Hawk Green, Marple	United Kingdom
Kodak Ltd.	Hemel Hempstead, Hertfordshire	United Kingdom
Foil Ribbon & Impact Printing Group	Hinckley, Leicestershire	United Kingdom
Printing & Packaging Co. Ltd.	Hinckley, Leicestershire	United Kingdom
Celloglas - Hunslet	Hunslet, Leeds	United Kingdom
Trenton Box Co. Ltd.	Huntingdon, Cambridgeshire	United Kingdom
Nampak Healthcare - Storey Evans & Co Ltd	Idle, Bradford	United Kingdom
Stott O'Connell Ltd	Keighley, West Yorkshire	United Kingdom
Shuttleworth Business Systems	Kettering, Northants	United Kingdom
Kingston Carton Co. Ltd.	Kingston upon Hull, East Yorkshire	United Kingdom
Nampak Cartons - Leeds	Leeds	United Kingdom
Celloglas - Leicester	Leicester	United Kingdom
Scenestock Ltd T/A Leyprint	Leyland, Lancashire	United Kingdom
Mayr-Melnhof Packaging UK Ltd, Liverpool	Merseyside	United Kingdom
Chesapeake Newcastle	Newcastle upon Tyne	United Kingdom
Clondalkin Group	Northampton	United Kingdom
Castle Colour Press Ltd	Norwich, Norfolk	United Kingdom
Stehlin Hostag Ink UK	Nottingham, Nottinghamshire	United Kingdom
Sun Chemical Ltd	Orpington, Kent	United Kingdom
Zenith Print & Packaging Limited	Ponytridd, Mid Glamorgan	United Kingdom
Chesapeake Corporation	Portsmouth	United Kingdom
Nampak Healthcare - Portsmouth	Portsmouth, Hampshire	United Kingdom
Celloglas - Reading	Reading	United Kingdom
Bobst Group (UK & Ireland) Ltd	Redditch	United Kingdom
MWV U.K. Limited	South Gloucestershire	United Kingdom
Foil Ribbon	Stockport, Cheshire	United Kingdom
Harrison Packaging	Thornaby, Stockton on Tees	United Kingdom
Qualvis Packaging Ltd.	Thurmaston, Leicester	United Kingdom
Amcor Bristol	Warmley, Bristol	United Kingdom
KBA (UK) Ltd.	Watford, Herts	United Kingdom
Duncan Print Group Ltd	Welwyn Garden City, Hertfordshire	United Kingdom
British Printing Industries Federation	West Yorkshire	United Kingdom
FG Curtis Plc	Wimbledon, London	United Kingdom
BPIF Cartons	Woking, Surrey	United Kingdom