

# BEST PRACTICE GUIDELINES FOR COVERMOUNTS & PROMOTIONAL GIFTS

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# 1. Introduction

#### i. Overview

Covermounts and other promotional gifts are used to enhance the appeal of magazines to consumers and most pose no health and safety risks or legal compliance issues regarding distribution, selling or disposal. This Best Practice Guideline, however, advises publishers on the types of products which <u>do</u> carry additional requirements. It highlights those items which the PPA recommends publishers do NOT use and also those items which should only be used after due consideration. Care should be taken at all times to avoid potential risks associated with gifts in themselves and consideration should be given to safe and legal disposal of quantities left over after the sales period.

## ii. Publisher Responsibility

Over and above the advice given here in good faith, it must be noted that individual Publishers carry their own responsibility for being aware of legal compliance, for their own corporate responsibility, and for maintaining awareness of legal and good practice developments. Where covermounts or other gifts are used, they should always conform to Trading Standards requirements in relation to safety endorsement, user age limits etc.

The PPA cannot, and does not attempt to identify all products that may be subject to covermount compliance issues. Exceptions change over time and by retail multiple. Likewise, publishers may wish to gift something that hasn't previously been covermounted. The examples contained within this guideline are not an exhaustive list but represent some key factors that have arisen in the past. If in doubt, publishers should discuss their proposals with their supply chain partners before committing to this type of promotional activity.

#### iii. Barcodes

Covermounts should always be sufficiently secured to, or polybagged with, the core product in such a way as to prevent the barcode of the publication from being obscured. It is also permissible for the publisher to print the magazine barcode directly onto the polybag where used but please refer to the PPA Best Practice for Barcoding for directions on positioning. Additionally, if the gifted product has its own barcode, this should be obscured or mounted in such a way as to prevent it being scanned in error.

# iv. VAT

It is worth noting that while magazines are 0% rated for VAT, covermounts are often liable for VAT. If a gift is added or indeed removed for any reason it will change the VAT-able element applicable to that magazine. If this occurs you must advise your supply chain partners to ensure that they apply the VAT correctly to comply with HMRC.

#### v. Recycling

Publishers should be aware that the following types of covermounted gifts, inserts or co-bagged items may severely inhibit recycle-ability of the core magazine product to which it is attached. Use of these materials, whilst not prohibited, may incur additional costs for copy retention or gift removal.

- Collectable stickers or equivalent
- Solvents and glues
- Oils
- Any chemicals



- Wax (in large quantities)
- Paints based on oil
- Glitter (in large quantities)
- Aerosols
- Food
- Glass/ceramics
- Large articles of cloth or textiles
- Large metal objects bigger than a golf ball for example a spanner

# vi. Disposal

Be aware that disposal of covermounts can be to landfill. However, certain products or packaging may cause contamination or may breach transport or dangerous goods regulations (see ADR link in Section 3)and will not be acceptable for such general disposal. Any such material will be disposed of by wholesalers or distributors in a safe manner and in line with Governmental guidance, or relevant best practice, at the full expense of the publisher

## vii. Oversized product

Some Retail Multiples have restrictions not only on the type of gifts that can be covermounted but also on the dimensions of the product. Publishers should consider the depth of covermounts and the use of large backing boards and the impact these will have with in store operations and on shelf compliance. Wholesalers may also have problems with oversized product and must be kept informed of publisher plans

## 2. Covermount Restrictions

# Not Accepted – fully prohibited

Publishers must NOT use any of the following as cover mounted gifts, inserts, or co-bagged items as to do so may breach ADR (Carriage of Dangerous Goods) legislation and/or health and safety regulations:

- Knives Not acceptable under any circumstances
- Fishhooks
- Explosive substances and articles containing explosive substances (Fireworks, Flares, etc)
- Gas: compressed, liquefied or dissolved under pressure
- Flammable Liquids (Aerosols, Lighters, Lighter Refills, Glue, Liquid oil or solvent based paints, Christmas Crackers, Cooking Oil, etc)
- Flammable Solids or Gases (Firelighters, Matches, Butane Gas, etc)
- Oxidising Substances & Organic Peroxides (Mercury Thermometers, Bleaches, etc)
- Toxic and Infectious Substance (Thinners, Solvents, etc)
- Radioactive Substances
- Corrosive Substances (Wet cell batteries, etc)
- Miscellaneous Harmful Substances (Medicines, Mace Spray, Weed Killer, etc)

# ii. Not Accepted - Retailer specific restrictions

Some items, whilst not completely prohibited, can cause problems for certain retailers. Common sense and communication are required but for more information, please refer to each individual retailer's policy or check with your distributor



# iii. Not Accepted - Airport Regulations

Special attention should be given to Airport based retailers which have particular and very strict policies as to which items are permitted for sale in terminals. Policies vary between airports and are regularly updated but as a general rule, any of the items listed under 2.i (above) will be prohibited as well as the following...

- Any toy guns or other toy weapons (even if they are clearly a toy)
- · Razors or other cutting implements

It is highly advisable to specifically check airport websites.

BAA Heathrow Heathrow BAA Airports – Heathrow, Stansted, Edinburgh, Glasgow

MAG Manchester
 Manchester, East Midlands, Bournemouth & Humberside

Gatwick: Gatwick AirportLuton: Luton Airport

# iv. Accepted - with caution

The following articles can be used but **subject to prior notification** to wholesalers and retailers so that appropriate health and safety precautions can be implemented:

- **Beauty and Bathroom products** (including eye drops) always ensure that they are contained within appropriate packaging and are properly labelled for transport, handling and display.
- Batteries potential transport issues for distributor and wholesaler (ADR) and disposal (WEEE/RoHS) (Waste Electrical & Electronic Equipment & Restriction of Hazardous Substances) implications
- Electrical Equipment disposal by wholesaler, distributor and consumer (WEEE/RoHS)
- Glass Health & Safety issues for all handlers in the supply chain through to consumers, if breakages
  occur
- Wire or Metal Bands Health & Safety issues for all in the supply chain where used as a product tie or used within products as strengtheners
- Malodorous Products some items may give off either unpleasant or misleading odours such as smelling
  of natural gas or chemical leakage, which may adversely affect all in the supply chain through to
  consumers
- Liquids or Creams breakage or bursting of containers or sachets can affect other products
- Sharp objects Sharp or pointed objects such as knitting needles, metal scissors, metal nail files, hand tools, safety razors etc. Be aware that sharp metal objects will not be accepted for sale at airports and may need a guard over sharp ends to avoid injury to handlers.

## v. Accepted – subject to conditions

Certain items cannot be used as covermounts unless they comply to the same standards that would apply if they were sold separately. Below is a summary of these regulations and further information is available via the links under Section 3

- a) Toys, provided they meet **BSI Kitemark** and **CE Mark** regulations.
- b) Foodstuffs provided that they:
  - (i) Conform to safety standards relevant to the product; and
  - (ii) The sell by date does not expire during on sale period of the magazine/title.
  - (iii) Are suitably packaged and labelled



- c) DVDs, CDs, and similar media products (referred to as DVD hereafter for simplicity), provided they meet the regulatory requirements by carrying appropriate age guidance as follows:
  - i) The DVD must carry symbols indicating the age rating applicable to that DVD;
  - ii) The label or symbol should be printed on both the front and reverse of the DVD cover so that it is visible to the buyer. If the symbol on the DVD is visible through the cover it is not required to be printed on that side of the cover. If the spine of the cover is not less than 2 centimetres in any dimension, the spine must also carry the symbol;
  - iii) One of the symbols must also be accompanied by the relevant explanatory statement within a single rectangular shaped frame;
  - iv) Each symbol must meet the minimum size requirements such that the relevant letters/numbers must be at least 5mm high excluding any shadow;
  - v) No other printing or labelling must obscure the symbol on the finished DVD cover;
  - vi) All DVDs planned for circulation within the Irish Republic must carry the appropriate age rating symbol as defined by the Irish Film Censor's Office (<a href="https://www.ifco.ie">www.ifco.ie</a>) shown to the required format.
  - vii) Any wrapper around the covermounted magazine should not obscure the label or symbol from the buyer such that:
    - The label or symbol on the DVD remains clearly visible through the wrap; or
    - If the label or symbol might be or is obscured by the wrapper, then the same symbol must be printed prominently on the front of the wrapper, and preferably also on the reverse, remain clearly visible during handling of the wrapped magazine, and it is recommended that the relevant letters/numbers are at least 10mm high.
  - viii) The publisher/distributor must advise the wholesaler of any DVDs with a rating of 18.
  - ix) Publishers should ensure that interactive games are labelled according to the Pan-European Game Information (PEGI) age rating system, see PEGI Age Ratings

# vi. Covermounts for Export Markets – International Regulations

As with the UK, there are restrictions to what commodities can and can't be shipped as a magazine Covermount. In general, the same considerations apply but some additional points are as follows...

- Mode of transport Air, Rail, Road and Sea all have specific cargo guidelines
- Local retailer policy as with the UK, overseas retailers may also have banned items
- Sales duty in non-EU counties magazines are largely exempt but certain types of covermounted product are not. Local Customs will decide what duty is applicable

International regulations vary greatly by export market so publishers should always check the potential impact with their overseas distributor before committing to a particular covermount



# 3. Key Information Links

#### 1. British Board of Film Classification (BBFC)

The BBFC classifies videos, DVDs and other digital works under the Video Recordings Act 1984. **See bbfc Home Page for further details** 

#### 2. Video Recording (Labelling) Regulations

Regulations 4 and 9 apply. Please see the full Best Practice Guide for further details: See bbfc.co.uk/industry-services/video/labelling-regulations for further details

## 3. Video Packaging Review Committee (VPRC)

The VPRC is a voluntary scheme of self-regulation by the industry which regulates the sleeve of videos/DVDs. Approved packaging carries the VPRC logo.

Packaging is assessed by the BBFC in the first instance and referred to the VPRC as appropriate. See <a href="bbfc - Video Packaging Regulations">bbfc - Video Packaging Regulations</a> for further details.

## 4. ADR (Transport of Dangerous Goods)

Carriage of dangerous goods in the UK has been brought into line with the European ADR Directive. See Health & Safety Executive - ADR and carriage regulations 2004 for further details.

# 5. WEEE/RoHS

The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2005 (RoHS) came into force on 1 July 2006.

See Environment Agency - WEEE Regulations &

Removal of Hazardous Substances Regulations 2006 for further details

#### 6. BSI Kitemark & CE Marking



A Kitemark Scheme can be developed using a publicly available specification: either a BS, EN, ISO or a Trade Association specification. The BSI then produces the formal scheme protocol for the certification based on this specification. BSI Product Services have developed the RoHS Trusted Kitemark Service.

The CE Mark indicates that the product can be legally sold within the EU and EFTA areas. It indicates that the product meets designated safety standards, promotes public health & safety, enhances product credibility.

See **BSI Healthcare and Testing Services** for further details