Packaging Reuse

Maximising the Benefits

POSITION PAPER

Introduction

Packaging plays an instrumental role in our modern world. It ensures goods remain unscathed during transit, prolongs the lifespan of products, contributes to consumer experience and product performance, and serves as a conduit of essential information within the supply chain and to consumers. Yet, despite these invaluable functions, it has become increasingly clear that our current approach to packaging in the European Union (EU) is unsustainable.

The Packaging and Packaging Waste Regulation (PPWR) proposal draws attention to the staggering figures—packaging accounts for an astounding 40% of all plastic and 50% of all paper consumption in the EU[1]. Packaging waste constitutes over a third of all municipal waste generated, and despite endeavours in weight reduction, overall packaging waste generation is increasing. The swelling tide is largely propelled by the pervasive use of single-use packaging. While the amount of packaging waste going to landfill has reduced since the early 2000s, it remains significant - estimated at 20% in 2020. In some cases, landfilling of packaging waste has simply been displaced by incineration - estimated at 16% in 2020. The rate of packaging waste recycling in the EU has stagnated since 2010, plus ~17% of all packaging is non-recyclable by design.[2] This stagnant recycling rate is despite many industry initiatives and policies on recycling, and means that any improvements in recycling have merely been enough to compensate for the growth in packaging use, not any more than that.

Halting and reversing these trends in material consumption and waste within the EU's packaging sector is imperative. Embracing the essential functions of packaging while limiting its environmental footprint necessitates moving from single-use-only, towards the development of reuse in practice and at scale of high-performing reuse systems. This development would enable us to extract utility from packaging over longer periods, concurrently decoupling consumption from material extraction and excessive carbon emissions on the long-term.

Recycling, on its own, is not enough to reduce Europe's material and carbon footprints at the speed and scale needed to achieve its climate and environmental goals. Nor is the simple substitution of one single-use material for another acceptable – instead the EU should seek to drive genuine circular solutions. Reuse before recycling, therefore, stands as a cornerstone to ensure the sustainability of the EU's packaging sector in the future. But in a region challenged by finite natural resources, the impetus for reuse in Europe is more than an environmental endeavour; it also embodies a crucial component of an ambitious, globally differentiated and diversified green industrial strategy in Europe, where we lead the way in building the industries of the future. The Commission's own estimates are that the reuse transition will contribute a net 600,000 jobs to the EU economy by 2030 and have a deflationary impact on the cost of consumer goods[3]. So the reuse transition means a transition away from growth driven by consumption of imported natural resources, towards growth in green jobs and services within the EU, needed now more than ever.

The central role of reuse within the draft PPWR text is therefore a welcome—and essential—inclusion. Setting forth clear and ambitious targets for both 2030 and 2040 is key to providing Europe's innovators, entrepreneurs, and investors the confidence needed to innovate and invest in the next generation of packaging solutions. The Commission is to be commended for bringing forward these elements in the draft text. With that said, it is imperative to acknowledge that, to maximise the potential of reuse, some further improvements are necessary. In particular, the most optimal legislative framework must be put in place to ensure that the reuse transition is smooth and efficient.

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Maximising the opportunity to benefit from Reuse in the PPWR: Key Principles

As we navigate the pathway towards a more circular packaging future, below are some key principles for maximising the opportunity to benefit from reuse in the PPWR:

Setting high performance criteria

To ensure that packaging —and the wider systems they are a part of—which are labeled as "reusable" truly fit the description, it's critical that clear requirements be established. These would outline, for example, the minimum number of times a package needs to be reused before it's counted as reusable.

Sharing responsibility throughout the value chain

Both manufacturers and final distributors are essential to making a reuse system work. Clear obligations throughout the value chain to offer and takeback reusable packaging is essential to fully unlocking the potential of reuse. It is also important to apply targets to manufacturers as well as final distributors, including ensuring that manufacturers meet targets in every Member State they operate in. Consumers also have a vital part to play, as they are the ones needed to ensure their packaging is reused.

Aiming higher to ensure success

It is essential that ambitious targets be maintained, if not increased. High targets, as well as long-term targets, are a prerequisite for incentivising innovation and securing investment in reusable packaging systems. Additionally, targets must be set high enough that the size of the reuse market is sufficient to achieve economies of scale and the resulting efficiency benefits, providing a level playing field. Expansion of sectoral coverage should also be considered in due course, as much of the infrastructure can be shared across sectors.

Always striving to improve

Transparency in reporting for reuse systems is essential, as is a dynamic process of review that enables ambition to be raised as lessons are learned. Having a way to evaluate and report on how well we're doing with reusables will help us keep moving forward, for example on key performance indicators such as return rates. Coverage should also be expanded to additional product categories on the most accelerated timeline feasible.

Embracing refill's role

Refill, whereby people fill up their own containers instead of using single-use items, whether at-home or in-store, is a well-proven means of waste prevention and is highly complementary to reuse.

Clear definitions, criteria and metrics

Given the broad range of reuse and refill models, and the big differences between them, it will be crucial set out clear definition of which models are included under the target and minimum criteria metrics that these meet to be counted towards the target, ensuring that they are effective and beneficial.

The European Parliament's Environment Committee has put forward a number of proposals to strengthen the PPWR text on reuse, but should now move forward to provide decisive leadership in support of the ambitious reuse agenda that Europe needs.

The Future is Reuse

The urgency of the environmental challenges confronting us has reached an unprecedented level, shining a glaring spotlight on the unsustainable nature of our current packaging practices. The status quo is no longer sufficient; a radical shift is imperative—a shift that requires us to embrace and nurture new ways of doing things. Simultaneously, we find ourselves at the precipice of a profound transformation in global materials consumption and management. Europe's pivotal role in this transformation is undeniable, as it holds the potential to lead the global transition to a true circular economy.

In this context, reuse has the potential to be a cutting edge of these wider changes, and the PPWR stands as a catalyst, poised to propel the EU toward a future centered on reuse. The EU has the potential to lead the world in the development of the materials, systems, processes, and digital tools needed to deliver our reuse vision.

[1] Eurostat, Packaging Waste Statistics
[2] Eurostat, Packaging Waste Statistics
[3]https://ec.europa.eu/commission/presscorner/detail/en/ip_22_7155
[4]https://ec.europa.eu/commission/presscorner/detail/en/ip_22_7155

ACR+ Association of Cities and Regions for Sustainable Resource Management

ANEC – European Consumer Voice in Standardisation

Alianza Residuo Cero

Aimplas

Avery Dennison

Bibak

Bocoloco

Boomerang

Borealis

Bout à Bout

Bric a Vrac

Bumerang

Cartonplast

Changing Markets

Checkpoint

Circle Back

Circular Economy.it

Circolution

City of Amsterdam

Cleopa

CLUBZERO

Corplex

CPL

Crafting Future

CU Mehrweg

Cuploop

DBP Plastics

Deutsche Umwelthilfe

DishCircle

dotch

Druckerei Proppe

Dutch Cups

dw Reusables

Eco Standard

Ecomar Fundación

Ecopreneur

Ekupac

Ellen MacArthur Foundation

Enfit

Environment Engineering Group

Environmental Paper Network

Eternity Systems

European Environment Bureau

Fabrice Peltier

FERN

Firplast

Fondation Tara Océan

Fritz Kola

Fyllar

Get Ravioli

Greenpeace

Haut la Consigne

Health Care without Harm

hey circle

Humusz

In Off Plastic

inotec Barcode Security

Jean Bouteille

Jokey

Keepin

Kleen Hub

Le Fourgon

LemonTri

LICO

Loop

Lorge

MealGood

Mehrweg Verband

Mehrwegverband Deutschland

Meiko France

Minderoo Foundation

NewERA - New European Reuse Alliance

No Plastic in my Sea

NoWW

Océans Sans Plastiques

Oceansix

Opopop

Options Solutions

Pack-it-eco

PackControl

Pacoon

Panter

Petrel

PFABO

Planet Reuse

Polish Zero Waste Association

Prime Port

Pro Mehrweg

Proppe Etiketten

Pyxo

Ravioli

Re-Circle

Re-Frastructure

Re-uz

Re-zip

Recircula

RECUP

Recycling Netwerk

Regenerate

Relevo

Reloop Platform

RePack

Réseau Vrac & Consigne members

Rethink Plastic Alliance

Retoornado

Retorna

Reuse Alliance

Reuse me

Rhinopaq

Roundtable for Reusable Containers

Trays and Pallets

RPE Reusable Packaging Europe

RPL Digital Solutions

Scheplast

Searious Business

SENSONEO

Surfrider

Swiv

Sykell

Tare Tag

The Ocean Package

Tomra

Tucem

turtlebox

Umwelt daschverband

USEO.

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Yoyo Boost Reuse

Zero Waste Alliance Ireland

Zero Waste Europe

Zero

Zerooo