



For an ambitious EU policy on the prevention and reduction of packaging

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The EU leadership on prevention and reuse

The EU has the opportunity to prevent waste and scale up reuse for one key sector, packaging, with the negotiations of the Packaging and Packaging Waste Regulation (PPWR). Indeed, prioritising prevention and reuse can significantly contribute to reducing emissions and achieving climate targets, while also preventing pollution, drastically cutting on energy and resource use, and benefitting SMEs and communities.

As an example¹, **scaling up reuse systems in Europe by just 20% in just three promising product groups** (food and beverages takeaway, e-commerce and household care products) **by 2027 would decrease 1.3 million tonnes of CO2-equivalent emissions, save nearly 2.5 billion cubic metres of water, and use 10 million fewer tonnes of materials annually.** The annual impacts of scaling these systems by 50% by 2030 would prevent 3.7 million tonnes of emissions from being released, conserve 10 billion cubic metres of water, and avoid the use of nearly 23 million tonnes of resources. These estimates are based on conservative estimates for Europe alone, which means far greater benefits if reuse systems are deployed worldwide, at scale.

The EU gave the first signal on plastic and packaging reduction with the Single Use Plastics (SUP) Directive, and can now assume a leadership role by pushing targets and measures on prevention and reuse at the EU level, and at international scale with the plastics treaty negotiations².

Reuse - single use : consumers habits and demand

Consumers are becoming more aware of the impact that their packaging choices have on the environment, particularly in relation to single-use and non-recyclable packaging. Slowly but surely, the culture of "use, discard, pollute" is being challenged.

As stated by a recent report³, **70% of European consumers are actively taking steps to reduce their use of plastic packaging.** Moreover, packaging preferences are also changing towards items that are reusable. Another survey carried out by WWF France in 2019⁴ showed that 88% of consumers favour systems which allow the reuse of bottles and containers.

Indeed, consumers are becoming more interested in sustainable options⁵, this is why the PPWR presents an important opportunity to establish a sound framework for reusable packaging to become the norm and thereby change the general consumer habit in the EU⁶.

Reuse - single use : what's the environmental impact?

While niche examples can always be found where a reuse system may not be the most effective environmental choice along one of the environmental indicators (e.g. carbon impact, plastic consumption, water use, etc.), **reusable packaging is in general a more sustainable choice compared to single-use packaging**^{7 8}. Research⁹ shows that when scaled effectively, reuse systems have a lower carbon impact per use, higher resource efficiency per gram, and lower likelihood of contributing to mismanaged waste such as littering. Reuse is identified by leading organisations such as UNEP¹⁰ WWF¹¹ and Ellen Macarthur Foundation¹² as critical to addressing the current environmental crisis. This is also confirmed by large coalitions of public and private operators, such as the Global Commitment 2022¹³ endorsed by more than 500 organisations and the Plastic Pacts signed up in many European countries.

However, the reality is that **reusable packaging systems do not face a level-playing field because producers and users of single-use packaging do not pay for the environmental impact of their products**. Existing extended producer responsibility and other systems do not adequately level the playing field either.

Key policy recommendations

The co-signatory entities welcome the proposed PPWR as it represents a great opportunity to establish the conditions for the uptake of reusable packaging systems. The setting of **mandatory reuse and refill targets for certain packaging formats and markets is a good starting point**. However, we believe there is scope for more ambitious targets. Moreover, there are important issues that have been overlooked in the proposal and that need to be taken into account by co-legislators to achieve truly sustainable, convenient and efficient reuse systems.

Reuse and refill targets should not be combined

Article 26 of the proposed PPWR refers indistinctly to reuse and refill targets for food and beverages in sales packaging, leaving the choice to the operator to meet the objectives either by implementing a system for reuse or enabling refill. As recognised in the definitions in Article 3, **reuse and refill are different approaches to packaging**. Refill means an operation by which an end-user fills its own container. In this sense, the container is not a packaging but a consumer-owned product. Therefore, the action of refill by a consumer should be considered as a measure to prevent packaging waste as underlined by recital 65 of the proposal¹⁴. On the other hand, reuse means an operation by which reusable packaging is used again for the same purpose for which it was conceived. In this case, reusable packaging is an asset owned by the system operator, which ensures it is collected, washed and refilled.

Due to their clear differences and distinct levels of maturity of data collection, **the targets for achieving one or the other should not be combined in order to avoid the risk of huge**

margins of error and unreliable data¹⁵. In addition, reuse and refill targets are at two different levels of the waste hierarchy, which is particularly important when it comes to the implementation and enforcement of the measures.

The main issues arising from merging reuse and refill targets are:

- **different calculation methods and metrics.** Reusable packaging in systems for reuse is easily traceable by units (e.g. with a serial number or similar). However, it is very difficult to measure refill through consumer-owned products. Combining both targets will lead to a huge margin of error and unreliable data.
- **challenge for market operators to guarantee that the reuse/refill targets are not being reached with single-use packaging, in the case it is provided on the side** (even if not for free). This could risk erroneous inclusion towards the reuse/refill targets, which will make the data even less reliable.

Rethinking refill definition and pushing for more waste prevention measures

Following the above, **co-legislators should redefine the term “refill” as “bring your own”, because the ownership of the container is what differentiates this concept from reusable packaging systems.** The term “refill” can lead to confusion as reusable packaging returned by consumers is refilled as well before it is reused. Instead, there should be a recognition of the **sale in bulk, including a new definition in Article 3, as a particular method of refill that consists of the commercialisation of products free-of-packaging in quantities chosen by the consumer and filled in reusable containers either provided at the point of sale by the retailer or brought by the consumer.** Bulk sales can be offered on a self-service or assisted service basis in ambulant point of sales. In principle, it should be possible to commercialise any product in bulk except for justified public health reasons.

In addition, the proposed requirements for refill stations are too restrictive. The proposal requires that economic operators offering refill containers need to introduce “refill stations” that include weighing devices. However, take-away beverages and food prepared on the spot for immediate consumption are mostly sold by the unit, not by weight (e.g. coffee). This requirement places a disproportionate burden on operators allowing customers to bring their own containers. By default, economic operators preparing cold and hot beverages and food for immediate consumption on the go should enable consumption by “bring your own” containers. Exceptions should be justified.

Furthermore, in order to accelerate the deployment of bulk systems, and to prevent the consumption of unnecessary packaging, we recommend to include in the PPWR a **target for retailers to dedicate 20% of their space to free-of-packaging areas (i.e. refill stations) for both food and non-food products by 2030 if their premises are bigger than 400m²** while recognising justified exemptions for some retailers. **Single-use bags and containers, regardless of the material they are made of, should not be provided free of charge to consumers at the point of sale where the refill stations are located** (similarly to the way it was established in the Plastic Bags Directive 2015/720 for lightweight plastic carrier bags), and **over time only reusable options should be available.**

For the standardisation of reusable packaging

The proposed PPWR barely refers to standardisation when announcing that the European Commission will ask the European standardisation organisations to come forward with harmonised standards for reusable packaging. There are basic standards for reusable packaging at EU (EN 13429:2004) and international level (ISO 18603: 2003) dating nearly 20 years. The diversity of packaging formats and materials is so large that asking the competent authorities to develop mandatory standards on the shapes and forms of reusable containers is nothing but a mammoth task. Rather, **the European standardisation bodies should first focus on elaborating standards on the characteristics needed to deploy well-functioning reuse systems**. It is important that standardisation bodies do not start their work from scratch, but consider the current EU standard as well as the stakeholder dialogues on the topic that are taking place at international and national level (e.g. PR3 Standards¹⁶).

Voluntary standards on certain reusable packaging systems will also play an important role in supporting the scale-up of reuse systems at local and EU level. The agreements made between industry players should not leave any stakeholder behind, and hence, SMEs must participate in the discussions to avoid the standards being a burden instead of an opportunity¹⁷. Besides, operators of reusable packaging shall be given the choice -and not the obligation- to apply the standards, as long as interoperability and fair access to all players is guaranteed.

Include prevention and reuse under EPR obligations

Based on the polluter pays principle, Extended Producer Responsibility (EPR) makes producers and industries responsible, including financially, for the end-of-life of the products they put on the market. Since the EPR principle is well recognised by the EU as a key policy to accelerate the circular economy, and mandatory within the Waste Framework Directive and the previous version of the PPWR, we recommend that co-legislators recognise the **key role Producers Responsibility Organisations (PROs) can play in achieving prevention and reuse objectives through better design, eco-modulation and a fund for reuse**.

In this perspective, we recommend to include several measures in the PPWR :

- give the responsibility to PROs to achieve the selective collection targets of packaging within the scope of their responsibilities, such as in Belgium within State's accreditation of Fost Plus and Valipac.
- harmonised eco-modulation principles related to prevention (depending on the consumer's sales units sold on the market), reduction (depending on the use of resources and empty space), reusability (one-shot bonus for SMEs to incentive them to switch from single-use to reusable packaging)¹⁸ and recyclability while avoiding undesirable side effects, such as eco-modulation stimulating the integration of recycled content for non-recyclable packaging.
- include a requirement for PROs to cover the costs of management and clean-up of litter caused by packaging as well as the costs of awareness-raising measures to prevent and reduce such litter. Taking inspiration from Article 8 of the SUP Directive,

we recommend applying the polluter pays principle for all packaging formats to shift the financial responsibility from public authorities and taxpayers to producers.

- dedicate a minimum of their budget to finance reduction and prevention actions, and reuse infrastructure for the deployment of systems for reuse. Annual PRO revenues for packaging across the EU represent several billion euros. Yet, although they have served to partially fund the collection of some waste streams, they have had little or no success in pushing for better eco-design of packaging and negligible or negative impact on reduction and prevention. As a national example, French regulation¹⁹ requires the PROs in charge of household packaging (Citeo and Léko) to dedicate 5% of their turnover to reuse systems. Furthermore, the EU is proposing this measure within the negotiations of the international plastics treaty²⁰. PROs should be properly monitored by independent bodies ensuring the budget is duly invested in systems for reuse to meet the reuse targets.
- maintain the target on the economic operators and make public the declaration of reusable packaging to PROs to improve transparency and get a better view of the single and reuse packaging challenges and opportunities in the single market.

The deposit refund system, a complementary tool to accelerate the deployment of reuse systems

As underlined by the OECD in its last circular economy report, deposit refund systems (DRS) have proven effective in increasing collection rates and reducing littering. Countries are increasingly interested in implementing DRS for certain products, combined with other EPR policy instruments covering broader waste streams²¹.

DRS is indeed the reference scenario to reach the 90% collection for recycling target for plastic bottles and cans. DRS systems are a very effective way to implement an EPR policy and can lead to synergies, as they can improve the quality and quantity of recycling, enable reuse systems and incentivise eco-design. DRS also helps to address littering and influence consumer behaviour, which is difficult to address with other mandatory EPR policy instruments.

For example, after the introduction of a DRS for beverage containers in Estonia, the share of beverage containers amongst littered items along roadsides dropped from 80% to below 10%²². In Germany, the share of beverage containers amongst total litter dropped from 20% (in 1998) to “almost zero” two years after introducing a DRS on one-way beverage containers in 2005.

In this perspective, **minimum requirements on DRS within PPWR should help to achieve the targets on recycling, reuse or recycled content by material or type of packaging. DRS can be helpful for enabling reuse of packaging by giving consumers an incentive to return products, thus facilitating the necessary physical movement between consumers and producers.** In addition, the return of products needs to be made easy and possible by adequate and accessible logistics for consumers. We therefore call on the European co-legislators to include measures to encourage the increase of systems to enable re-use according to Article 45 such as the use of a deposit return system for packaging

mandated by Article 44 of the proposal (which is currently only for single-use plastic beverage bottles with the capacity of up to three litres and single-use metal and aluminium beverage containers with a capacity of up to three litres). In this perspective, all DRS systems should be designed to accept both reusable and single-use packaging to improve convenience for consumers, reduce the need for additional reverse vending machines, and reduce costs. Infrastructure could be given a reasonable period of time to adapt existing DRS to this scenario.

Finally, **regulation should clearly define the scope of a DRS in the context of other EPR instruments and establish which products are subject to which programme, to avoid potential “double coverage” or unintended substitution effects.** Policies that define the scope of a DRS based on certain materials leave more opportunities for producers to change materials in product design to avoid participation. Policies that instead specify the scope based on product groups may be better suited to avoiding possible substitution effects.

For the creation of an EU observatory on reuse

On top of the previous measures, we would welcome the creation of an **EU observatory on reuse with DG ENV and Eurostat**. This new body would be a place for sharing and capitalising on knowledge, as well as to provide expertise and decision support in the field of reuse. A good model to look at could be the French Observatory on reuse, recently created following the legal mandate of the Climate and Resilience Law²³.

The observatory could go beyond packaging issues and enlarge its scope to other products and waste streams, seizing the opportunity of the upcoming revision of the Waste Framework Directive.

Endnotes

1. [“Realising Reuse : the potential for scaling up reusable packaging, and policy recommendations”](#), Rethink Plastic Alliance & Break Free from Plastic, July 2021
2. [EU submission for INC-2](#), 13th February 2023.
3. [European Packaging Preferences 2020: A European study of consumer preferences, perceptions, and attitudes towards packaging, Two Sides Europe 2020](#)
4. [Le plastique, ça t’emballe pas?](#), WWF France 2019
5. [See Chapter 3 of ANEC position paper on revised EU Rules for packaging and packaging waste, 16 March 2023](#)
6. [How to help consumers adopt reusable packaging, Institute of Grocery Distribution, 2021](#)
7. [Fetner, H., Miller, S.A., \(2021\). Environmental payback periods of reusable alternatives to single-use plastic kitchenware products. The International Journal of Life Cycle Assessment \(2021\) 26:1521–1537](#)
8. [Hitt, C., Douglas Jacob D. and Keoleian, G. \(2023\). Parametric life cycle assessment modelling of reusable and single-use restaurant food container systems. Center for Sustainable Systems, School for Environment and Sustainability, University of Michigan](#)
9. [Greenwood, S., Walker, S., Baird, H.M. et al. \(6 more authors\) \(2021\) Many happy returns: combining insights from the environmental and behavioural sciences to understand what is required to make reusable packaging mainstream. Sustainable Production and Consumption, 27. pp. 1688-1702. ISSN 2352- 5509](#)
10. [UNEP report: Single-use supermarket food packaging and its alternatives: Recommendations from Life Cycle Assessments. December 2022.](#)
11. [WWF Position: The role of reuse in a circular economy for plastics. 16 November, 2022.](#)
12. [Reuse - Rethink Packaging. Ellen MacArthur Foundation.](#)
13. [Global commitment 2022 – Ellen MacArthur Foundation](#)
14. Recital 65 of the PPWR proposal: *“To incentivise waste prevention, a new concept of ‘refill’ should be introduced. Refill should be considered as a specific waste prevention measure...”*
15. For further reference read pages 4 to 6 of the [position paper from the Rethink Plastic Alliance](#).
16. [P3R standards](#) are being discussed by stakeholders at global scale although they are intended to become standards at US level.
17. An example could be the [guidelines to develop standards of reusable packaging for the HORECA, fresh products and beverage sectors published by Citeo](#) (French EPR scheme for household packaging). However, it should be noted that standards developed at national level have the risk to pose burdens to economic operators of other Member States, with a potential result of causing a fragmentation of the single market.

18. [Extended Producer Responsibility and Ecomodulation of Fees](#), European Environmental Bureau, 9th July 2021 and article 29.1 of the [French law - number 2021-1104 of August 22, 2021, against climate change and for a climate resilience](#)
19. Article 25 of the [French law - number 2021-1104 of August 22, 2021, against climate change and for a climate resilience](#)
20. [EU submission for INC-2](#), 13th February 2023.
21. [Deposit-refund systems and the interplay with additional mandatory extended producer responsibility policies](#), OECD, Frithjof Laubinger, Andrew Brown, Maarten Dubois et Peter Börkey, December 2022
22. [Global deposit book](#), Reloop, 2022
23. Article 29.2 of the [French law - number 2021-1104 of August 22, 2021, against climate change and for a climate resilience](#)

About the signatories



[New European Reuse Alliance \(New ERA\)](#) is a trade association founded in 2022 representing the interests of operators that offer, use and promote reusable packaging systems, services and/or products across Europe. Our aim is to move away from single use packaging in key market segments and become truly circular and zero waste by providing expertise to deploy effective reuse systems and raise awareness among relevant EU and national policymakers in order to establish the necessary infrastructure, incentives and rules to accelerate the transition from disposable to reusable packaging.



[Minderoo Foundation](#) is one of the largest philanthropies in Australasia. Since its inception in 2001, it has invested more than AUD\$2.6 billion funds in philanthropic causes and has supported over 230 initiatives at a global level. In the European Union, via our [No Plastic Initiative](#), the Minderoo Foundation is actively advocating for laws and policies which eliminate the negative impacts of plastics on people and the planet through increasing transparency in the plastic value chain, investing in new technology and innovations, and by working with industry and policymakers on reduction and recycling of plastic waste solutions.



[Recycling Network Benelux](#) advocates system changes that lead to a strong reduction in the consumption of raw materials and help minimise their negative (environmental) impact. We explicitly focus on system changes around production, consumption and waste management. We are all about impact. Everything we do revolves around concrete changes. To this end, we feed the public debate with facts and figures, we campaign, we remind companies of their responsibilities and we push politicians and governments to formulate more ambitious environmental policies. In doing so, we have always had a strong focus on packaging and packaging systems, but we also work on other themes such as textiles, producer responsibility, synthetic turf and rubber crumb



[Environmental Coalition on Standards - ECOS](#) was established in 2001 to enhance the voice of the environment within the European and international standardisation system. Our vision is a healthy and clean environment, protected by robust rules that respect nature and its resources. We are an international NGO with a network of members and experts advocating for environmentally-friendly technical standards, policies and laws. We ensure the environmental voice is heard when they are developed and drive change by providing expertise to policymakers and industry players, leading to the implementation of strong environmental principles.



Set up in 1974, [the European Environmental Bureau - EEB](#) is Europe's largest and most inclusive network of environmental citizens' groups – and the only one that works on such a broad range of issues. We bring together more than 180 civil society organisations from more than 38 European countries (virtually all EU Member States plus some accession and neighbouring countries), including a growing number of European networks, with a combined membership of an estimated 30 million people. We advocate for progressive policies to create a better environment in the European Union and beyond.



[Reloop](#) is an international non-profit organisation that works at the centre of policy-making with governments, industry stakeholders, and NGOs. Our vision and mission are ambitious and focused on building a world free of waste, where our natural resources remain resources. Reloop's policy positions and recommendations are always based on data-driven research, real-world case studies and experience, best-in-class principles, and the collective expertise of our team.



[Zero Waste Europe \(ZWE\)](#) is the European network of communities, local leaders, experts, and change agents working towards the prevention and elimination of waste in our society. We advocate for sustainable systems; for the redesign of our relationship with resources; and for a global shift towards environmental justice, accelerating a just transition towards zero waste for the benefit of people and the planet. ZWE is participating in the international organisation Global Alliance for Incinerator Alternatives (GAIA) and the Zero Waste International Alliance (ZWIA).