

Mr. Thierry Breton
Commissioner for Internal Market
European Commission

Brussels, 20 October 2022

Reusable Transport Packaging and Energy Supply amid Energy Crisis

Dear Commissioner Breton,

We are contacting you on behalf of Reusable Packaging Europe (RPE), which is an industry (non-profit) association that represents the interests of businesses active in the pooling of reusable transport packaging (RTP) including the pooling Reusable Packaging Containers (RPCs) as well as the pooling of Reusable Wooden Pallets (RWPs).

It is RPE's mission to promote the pooling of reusable transport packaging (RTP) as a circular service and as the most efficient and sustainable solution for the transport of (fresh) food and other essential products in the European Union.

By means of this letter, we would like to express our concern regarding the aggravating energy crisis and potential disruptions during winter 2022-2023. Considering the latest geopolitical developments, speculations of potential energy disruptions are becoming increasingly plausible, despite measures of energy efficiency and sobriety.

In this context, we would like to emphasize that the RTP pooling operations of RPE's members constitute an essential element of (fresh) food, FMCG and pharmaceutical supply chains in the European Union. Without the pooling of RPCs and RWPs, many of these vital products would simply not be available for the for the citizens of the European Union.

The smooth and efficient functioning of the RTP pooling industry rests on a reliable provision of energy (i.e. electricity and gas). Due to the reusable nature of RTPs, RPCs need to be sorted and cleaned upon their use and RWPs need to be sorted and sometimes repaired and (ISPM15) heat-treated upon their use, all in accordance with applicable laws and regulations. These operational processes inevitably require ample energy use.

In view of the above, and in order to secure the continuity of the essential (fresh) food, FMCG and pharmaceutical supply chains during this aggravating energy crisis, RPE is seeking that the RTP pooling operations of its members are categorized as "essential services". To that end, RPE is, in case of energy shortages and energy rationing, seeking to be spared against any potential energy cuts or rationing.

We are grateful for your urgent consideration during these difficult times. Should you require further clarification, please do not hesitate to get in touch with us.



Kind regards,

The RPE Secretariat, on behalf of the members of Reusable Packaging Europe

Cc: Ms. Kadri Simson, Commissioner for Energy