

## Position on review of Packaging and Packaging Waste Directive

Subject: Written input by Reusable Packaging Europe on public consultation by the European Commission: Inception impact assessment on Reducing packaging waste – review of rules

### Who we are

Reusable Packaging Europe (RPE) is the European association which represents the interests of companies active in the area of reusable transport packaging systems, primarily in the pooling of Reusable Packaging Containers (RPCs). Inspired by the EU Green Deal, it is RPE's mission to promote the pooling of reusable packaging as a circular service and as the most efficient and sustainable solution for the transport of food products in the European Union.

With this position paper, RPE would like to contribute to the European Commission's public consultation on the inception impact assessment the Packaging and Packaging Waste Directive, "*Reducing packaging waste – review of rules*". RPE would very much like further involvement in the consultation process of this legislative act.

### Promote reuse over recycling

In developing a circular economy, RPE believes it is of the utmost **importance that the EU packaging framework legislation is further modernized by increasingly promoting reuse**, to effectively apply the waste hierarchy and improve on waste reduction. RPE believes that the legislative framework should reward packaging on the basis of its sustainability performance by linking high sustainability (and durability) performance levels to financial or regulatory incentives.

RPE believes that specifically the (re)use of RPCs should be promoted in the packaging sector given that:

1. RPCs' inherent strength, durability and ventilation substantially reduces food waste and avoids packaging waste. Each RPC can be used for years before it is replaced due to wear, damage, or design changes.
2. RPCs have minimal environmental costs, use relatively less raw materials, have a proven lower CO<sub>2</sub> footprint and are positively aligning with the principle of Extended Producer Responsibility. At the end of their lifecycle RPCs do not result in any landfill or incineration but are scrapped for recycling and reuse (the resulting granulate is either converted into new RPC's or reused for other means).
3. RPCs are long-established and proven to be the most versatile and efficient transport packaging system across fresh food supply chains (ultimate sharing business model).

RPE believes on the basis of the above that the EU should proactively promote the pooling of RPCs due to the fact that his model maximizes the **balance between utilization and environmental impact** (also being positioned high on the agenda of the European Commission) by issuing, collecting and reusing RPCs.

## RPE presents several policy recommendations which would support the promotion of (re)use of RPCs:

### 1. Improve packaging design to promote reuse and recycling



Creating a **harmonized standard for packaging Life Cycle Analysis (LCA)** will be effective, as it is the most unbiased way of determining the impact of packaging products. The waste hierarchy and added value of reuse over recycling should be taken into account in the LCA. In order to incentivize packaging producers and handlers, a broad and proper introduction and implementation of the principle of Extended Producer Responsibility (EPR) is crucial. RPE thus believes that the **EPR principle should be mainstreamed to make it applicable to the broadest possible range of products.**

### 2. Increase recyclable and recycled content in packaging



RPE agrees that the **recycled content in packaging should be increased.** However, when introducing targets, the characteristics of each type of packaging should be considered. Single use packaging should strive for a very high percentage of recycled content, while **reused packaging such as RPCs should not be subject to stringent targets** given their inherent strength in reducing packaging as a concept.

### 3. Reduce packaging and food waste



**Reducing the material layers of application where possible will reduce both packaging and packaging waste.** For example, vegetables and fruits can be (and are) both transported and displayed in stores in the same RPCs, without the use of additional layers of packaging. Additionally, RPCs reduce food waste as they can be used as primary packaging for fruits and vegetables and certain other fresh food products such as bread, given their safe characteristics with regards to hygiene. Therefore, RPE believes that **RPCs should be promoted as the preferred packaging method in the (food) supply chain.**

### 4. Introduce reuse quota



**Targets and limits will force all industries to (re)consider their packaging solutions in line with the EU's sustainability and circular economy ambitions.** RPE believes that binding targets are the only way to ensure significant increase in packaging waste reduction. Complementary to a potential EU wide overall packaging waste reduction target or waste generation limit, RPE thus argues for the introduction of reuse quota (e.g. refill quota).

## 5. Minimize administrative burden



Increase of reuse of packaging also demands for the **implementation of harmonized tax rules (and reduced administrative burdens) to allow for a smooth free movement of reusable packaging across the European Union**. The owners (and therefore the facilitators of the use) of reusable packaging should therefore be rewarded with the simplification or abolishment of administrative barriers.