

## Position on review of Packaging and Packaging Waste Directive

### 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.

### 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 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 use and pooling of RPCs due to the fact that this 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 for the revision of the PPWD:

### 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 different types 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 and to all stages of the supply chain, including the transport, storage and presentation of goods.**

### 2. Exempt Reusable Packaging Containers from targets for recyclable content

RPE embraces first and foremost “reuse” as a (sustainable) concept. Reuse is the essence of the circular RPC business model of the members of RPE (being a “Packaging-as-a-Service” business model). At the end of their lifecycle (after many years of reuse), these RPCs are either (i) recycled for reuse in new RPCs, being suitable for the transport of (fresh) food products or, to a larger extent (ii) recycled for reuse in other (non-food) applications (such as garden furniture): **A clear distinction needs to be made** between on the one hand **plastic that can be recycled for reuse for “food applications”** and **plastic that can be recycled for reuse in non-food applications.**



Re (i) Recycling for reuse in new RPCs, which are intended to be used for the transport of (fresh) food products, requires pure and certified food safe regrind plastic of single origin.

Re (ii) Recycling for reuse in other (non-food) applications does not require such pure and certified food safe regrind plastic of single origin.

RPE agrees that the recycled content in packaging should overall be increased. However, when introducing targets, the characteristics of each type of packaging should be considered and the waste hierarchy should be respected. **Single use packaging should strive for a very high percentage of recycled content, while reusable packaging such as Reusable Packaging Containers (RPCs) should not be subject to targets** given (a) its typical “reuse character” and the RPCs’ inherent strength in reducing packaging as a concept and (b) the mere unavailability of sufficient single origin, pure and certified food safe regrind plastic.

An introduction of (stringent) recycling targets in reusable packaging (more in particular RPCs being used for the transport of (fresh) food products) will be **detrimental to the reusable supply chain (transport) packaging sector** for

(fresh) food products and thus counterproductive to the goal of a fully circular economy. The reason is that if such targets would be applied to RPCs used in (fresh) food supply chains, that would disincentivize manufacturers from producing such RPCs and thus poolers (in the (fresh) food supply chain) from building up their reusable and sustainable RPC pools. Currently and in the foreseeable future **there is no mentionable (supply) market for single origin, pure and certified food safe regrind plastic which is required to build RPCs from recycled content** (for (re)use in the (fresh) food supply chain).

The RPC pooling sector would thus be dependent on the number of damaged RPCs which is simply not feasible given their durable nature in a rapidly growing market: many millions of durable RPCs are currently used in the (fresh) food supply chain across Europe. These RPCs will, depending on their individual age, continue to be used for many years. Moreover, RPCs which are reused and circulated for many years in the (fresh) food supply chains, will – depending on the type and size – require an important share of virgin (non-recycled) resin material to warrant durability and material flexibility.

As a result, **any specific RPCs being used for the transport of (fresh) food products should be exempted from recycling targets for application in new RPC's** for the transport of (fresh) food products. Imposing recycling targets with respect to such RPC's (having arrived (after many years of service) at the end of their lifetime) into other applications (e.g. garden furniture) are however welcomed by RPE: in principle all “end of life” RPCs can (and are being) recycled.

### 3. Reduce packaging and food waste by reducing layers of packaging

**Reducing the layer of packaging 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. At the end of each rotation, each RPC is thoroughly cleaned in accordance with a strict washing regime. This ensures a consistent source of clean trays that comply with the highest quality and hygiene requirements. 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.