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RPE position on the revision of the Waste Framework Directive

Position
paper

RPE's recommendations for the revision of the Waste Framework Directive

Reusable Packaging Europe (RPE) fully supports the European Commission in its ambition to reduce food and textile waste: RPE calls on the European Parliament and the Council of the EU to respect the waste hierarchy in its legislative activities thus promoting reusable (transport) packaging. RPE is convinced that reusable transport packaging, in line with the waste hierarchy, plays a crucial role in preventing food waste and therefore welcomes the initiative to introduce overall waste prevention measures.

Who we are

[Reusable Packaging Europe](#) (RPE) is the European association that represents the interests of **companies active in the area of reusable, including pooled, transport packaging systems**. RPEs members are primarily active in the pool of Reusable Packaging Containers (RPCs) and Reusable Wooden Pallets (RWPs). Inspired by the EU Green Deal, 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 products in the European Union.

The transport packaging pooling business has been operating for several decades with the ambition to **reduce the environmental impact including waste generation** of supply chains by reducing the use of natural resources (virgin material) needed to transport goods within the EU, and by maximizing the reuse of transport packaging within these pooling systems.

Please find below more information on RPE's position on the revision of Revision of the Waste Framework Directive.

RPE policy recommendations:

1. Promote **packaging solutions** capable of reaching the revision's objective to reduce food waste

To achieve the revision's objective of reducing food waste, it is imperative to promote transport packaging options that have a demonstrated record of preventing food loss and spoilage. Such options are Reusable Plastic Crates (RPCs) and Reusable Wooden Pallets (RWPs). They are unique examples of the circular economy in action as they are reused over a lifespan of 7 to 10 years, are fully recycled at the end of life, prevent packaging waste and prevent a substantial amount of food loss.

A. Reusable Transport Packaging prevents food wastage

Reusable transport packaging (RTP) significantly reduces food waste by enhancing the stability and protection of fruits and vegetables during transportation. Research from the Fraunhofer Institute¹, focusing its scope on Germany, reveals that, when these perishable goods are exclusively transported in disposable packaging, approximately 36,000 tons worth €68 million are damaged annually due to instability issues.

In contrast, when reusable crates are utilized exclusively, the estimated wastage decreases to 1,100 tons, with a market value of approximately €2 million. **Reusable Transport Packaging leads to a food waste reduction of 97%, compared to disposable transport packaging.** This substantial reduction in damage occurs because Reusable Transport Packaging offers superior stability.

- In **central warehouses**, where the comparison between the two packaging methods is most notable, the benefits of Reusable Transport Packaging become even more apparent. According to the Fraunhofer study, when goods arrive in damaged disposable packaging, about 40% of the fruits and vegetables were also partly damaged. However, when reusable packaging was used, this figure significantly dropped to around 22%, illustrating the protective advantages of Reusable Transport Packaging.
- In **retail outlets**, Reusable Transport Packaging proved to be the most efficient transport packaging to protect food. According to the Fraunhofer study, when goods arrived in damaged disposable packaging, roughly 20% of the produce was partially damaged. In contrast, no damage was observed for produce transported in Reusable Transport Packaging. This demonstrates that Reusable Transport Packaging not only reduces overall food waste but also ensures that the produce remains in excellent condition throughout the supply chain, ultimately benefiting consumers and the industry as a whole.

¹ Save the Food Study (May 2013) Determination of spoilage levels of fresh fruit and vegetables according to the type of packaging – full study available here (in cooperation with Fraunhofer Institute)

B. Reusable Transport Packaging prevents packaging damage

Reusable Transport Packaging, in addition to preventing food waste is also a key player in the battle against packaging waste within the supply chain. Its impact becomes evident when we examine the contrasting rates of damage incurred by disposable and reusable packaging at different stages of distribution, based on the aforementioned Fraunhofer German study.

To start with, when we consider the overall packaging damage, approximately 4% of disposable is damaged as it moves from the producer to the retail outlet. On the other hand, Reusable Transport Packaging demonstrates better durability, with only 0.1% of it sustaining damage throughout this journey.

- Digging deeper into the **first distribution level (producer to the central warehouse)**, Reusable Transport Packaging offers enhanced food safety and boasts a significantly lower breakage rate than cardboard by 80%, a testament to its sturdiness. According to Fraunhofer, poorly secured loading units and improper handling are behind the damage rate of Reusable Transport Packaging while disposable packaging's vulnerabilities stem largely from inadequate packaging stability.
- As we move to the **second distribution level**, (warehouse to the retail outlets), Reusable Transport Packaging continues to maintain a low damage rate at 0.1%. Disposable packaging, however, faces a 3.32% damage rate, underlining its fragility in comparison. The causes of damage to Reusable Transport Packaging at this stage remain mainly tied to improper handling. In contrast, disposable packaging's susceptibility to damage is largely attributed to a lack of standardization, which accounts for a substantial 75% of the damage experienced.

In summary, the use of Reusable Transport Packaging significantly contributes to the reduction of packaging waste by virtue of its ability to withstand damage far more effectively than disposable packaging at every stage of the supply chain. This is achieved through better loading practices, secure packaging, and adherence to standardized processes, making Reusable Transport Packaging a sustainable and environmentally conscious choice.

The EU needs to promote specific packaging solutions to achieve its food waste prevention targets during the transport phase.

<i>Current text Article 9a</i>	<i>Proposed amendment Article 9a</i>
<i>1. Member States shall take appropriate measures to prevent generation of food waste in primary production, in processing and manufacturing, in retail and other distribution of food, in restaurants and food services as well as in households.</i>	<i>1. Member States shall take appropriate measures to prevent generation of food waste in primary production, in processing and manufacturing, in retail and other distribution of food, in restaurants and food services as well as in households.</i>

<p><i>Those measures shall include the following:</i></p> <p><i>(a) developing and supporting behavioural change interventions to reduce food waste, and information campaigns to raise awareness about food waste prevention;</i></p> <p><i>(b) identifying and addressing inefficiencies in the functioning of the food supply chain and support cooperation amongst all actors, while ensuring a fair distribution of costs and benefits of prevention measures;</i></p> <p><i>(c) encouraging food donation and other redistribution for human consumption, prioritising human use over animal feed and the reprocessing into non-food products;</i></p> <p><i>(d) supporting training and skills development as well as facilitating access to funding opportunities, in particular for small and medium sized enterprises and social economy actors.;</i></p>	<p><i>Those measures shall include the following:</i></p> <p><i>(a) developing and supporting behavioural change interventions to reduce food waste, and information campaigns to raise awareness about food waste prevention;</i></p> <p><i>(b) identifying and addressing inefficiencies in the functioning of the food supply chain and support cooperation amongst all actors, while ensuring a fair distribution of costs and benefits of prevention measures;</i></p> <p><i>(c) encouraging food donation and other redistribution for human consumption, prioritising human use over animal feed and the reprocessing into non-food products;</i></p> <p><i>(d) supporting training and skills development as well as facilitating access to funding opportunities, in particular for small and medium sized enterprises and social economy actors;</i></p> <p><i>(e) promote reusable transport packaging that has a demonstrated record of preventing food loss and spoilage</i></p>
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2. Introduce **binding reusable packaging measures as part of the food waste reduction targets to ensure sufficient regulatory and/or market incentives for businesses to invest in waste prevention and reuse activities**

RPE views it is crucial that the EU waste framework legislation is modernized by increasingly promoting reuse, to effectively apply the waste hierarchy and improve food waste reduction.

RPE urges policymakers to acknowledge and promote the positive role that reusable transport packaging plays in food waste reduction. Reusable Transport Packaging withstands transport damage and keeps content protected. It offers twice as much protection for goods compared to disposable transport packaging, and food waste is reduced by 75% compared to disposable transport packaging. Reusable Transport Packaging, by offering better stability during transport,

leads to greater protection for food and boasts a significantly lower breakage rate than cardboard by 80%².

Under the current formulation of targets in the new article 9a introduced by the European Commission, the waste hierarchy is not sufficiently promoted as Member States can reach their target by focusing recycling, without ambitiously pursuing more sustainable reuse strategies (being ranked higher in the waste hierarchy than recycling). Furthermore, considering industries' unique characteristics, **these reusable packaging targets should be sector-specific and translated into concrete incentives.**

Current text Article 9a	Proposed amendment Article 9a
<p>4. Member States shall take the necessary and appropriate measures to achieve, by 31 December 2030, the following food waste reduction targets at national level:</p> <p>(a) reduce the generation of food waste in processing and manufacturing by 10 % in comparison to the amount generated in 2020;</p> <p>(b) reduce the generation of food waste per capita, jointly in retail and other distribution of food, in restaurants and food services and in households, by 30% in comparison to the amount generated in 2020.</p>	<p>4. Member States shall take the necessary and appropriate measures to achieve, by 31 December 2030, the following food waste reduction targets at national level:</p> <p>(a) reduce the generation of food waste in processing and manufacturing by 10 % in comparison to the amount generated in 2020;</p> <p>(b) reduce the generation of food waste per capita, through the entire cycle: from the producers to the retail, and other distribution of food, in restaurants, and food services and in households, by 30% in comparison to the amount generated in 2020.</p> <p>Member States' measures should take the waste hierarchy into account whereas priority to packaging options is granted in the following order: reusable, recyclable, single-use.</p>

² Source: Albrecht, S., Bertling, J., Fischer, M., Gehring, F., Kabasci, S., Prescher, T., Schulte, A.: Reusable plastic crates vs. single-use cardboard boxes - two packaging systems in competition, Oberhausen/Stuttgart 2022.

3. Ensure **harmonized application of the waste reduction targets in all Member States to effectively reduce the environmental and climate impacts of food systems associated with food waste generation**

The Waste Framework Directive plays a pivotal role in the European Union's efforts to achieve its environmental and climate goals. By ensuring **consistent application** of food waste reduction targets across all Member States, the Directive should aim to foster **uniformity, fairness, and collaboration** in addressing the environmental and climate impacts associated with food waste generation while acknowledging the **unique characteristics of each Member State**. Ultimately, this would contribute to a more sustainable and resilient food supply chain in Europe.

In addition, the harmonized application of food waste reduction targets under the Waste Framework Directive would also **incentivize more standardization of packaging**. Standardization can promote the use of packaging that extends the shelf life of products, provides better protection against spoilage and contamination, and **enhances overall product quality**. Moreover, standardized packaging can facilitate better inventory management and transportation logistics, which can further **reduce food losses throughout the supply chain**. By addressing packaging standardization in conjunction with food waste reduction targets, the Waste Framework Directive would promote a holistic approach to mitigating food waste and its associated environmental impacts, ultimately contributing to a **more sustainable and resilient food supply chain in Europe**.

In the pursuit of a **harmonized implementation** of the Waste Framework Directive, RPE calls upon the European Parliament and the Council of the EU to **strike a balance** between establishing a level playing field through a unified Directive and recognizing the imperative for Member States to tackle their specific challenges and capabilities in waste reduction.



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