



April 2024

RPE Manifesto – I Vote for Reuse

Manifesto

Reusable Packaging Europe for a sustainable, circular and competitive EU economy

Who we are

Reusable Packaging Europe (RPE) is the European association, representing the interests of **companies active in the area of reusable, including pooled, transport packaging systems**, primarily in the pooling of Reusable Packaging Containers (RPCs) and Reusable Wooden Pallets (RWPs). Inspired by the European 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 maximising the reuse of transport packaging within these pooling systems. In addition, the transport packaging pooling system aims at eliminating single-use transportation packaging, in accordance with the ambition of recent legislation.

Our ambition and priorities

Reusable Packaging Europe fully supports the European Union in its ambition to reduce packaging and packaging waste, promote sustainable supply chains. However, improvements are still necessary to ensure the legislation's objectives. Consequently, RPE calls on the European institutions to aim for higher ambitions, in respect of the waste hierarchy, thus promoting **reuse** of (transport) packaging (and thus **reusable** (transport) packaging) **above** the lower ranked **recycling** of (transport) packaging, as stated in the waste hierarchy. RPE's ambition is to help the legislative institutions set the EU on the path to a green transition through circular economy, and to ultimately reach climate neutrality by 2050.

RPE herewith presents its manifesto for the new European Parliament and European Commission mandates, elaborating on RPE's main priorities and enabling factors to reach the above stated objectives.

Implementation of the EU's waste hierarchy and establishing a clear baseline for reusability

Circular economy policies play a crucial role in transforming the EU waste management strategies, emphasising the need for the widespread recognition and application of the waste hierarchy across all policies related to products and packaging. It is imperative to highlight the importance of prioritising reuse as the most efficient waste management option, after the principle of prevention. Equally essential is the fair treatment of all packaging options, with a specific focus on evaluating reuse based on tangible product and packaging performance, requiring a minimum of 10 rotations. The use of RTP throughout supply chains plays a crucial role in: (i) removing corrugated and single-use packaging in all forms by providing robust reusable options, (ii) preventing the leakage of non-returnable plastic into the seas across the world, thus effectively curbing municipal and marine waste, and (iii) enhancing the protection and quality of goods transported throughout supply chains.

We also acknowledge the growing waste crisis and are actively working to reduce the footprint of our operations. Our goals are focused on promoting reusable packaging as the most efficient and sustainable solution for transport packaging.

For the EU to truly embrace a circular economy, it is vital to treat all packaging options equally, eliminating any preferential treatment for minimum and single-use alternatives, and to actively promote reusable packaging. Therefore, RPE calls on the EU regulators to:

- to actively promote reusable packaging;
- adopt a definition of reuse based on a minimum number of 10 rotations;
- promote reuse as the preferred waste management option, prioritising it above recycling, in line with the waste hierarchy.

Protection of the ownership of reusable transport packaging assets in closed pooling systems at both national and EU level

The Packaging and Packaging Waste Regulation (PPWR) proposal provides a **first element in the protection of the ownership** of reusable assets in closed loops systems by **identifying the absence of ownership transfer as a crucial criterion for defining such systems**. The concept of protecting ownership is key in this context to ensure the promotion of sustainable, reusable transport packaging solutions that will increase the efficiency of supply chains and protect our planet.

In the context of a transition to a circular economy, RPE emphasises that a key hurdle for any transition will be **the lack of protection and enforcement of ownership rights for reusable transport packaging assets**. RPE advocates for considering this issue in initiatives related to circular economy transitions, as it affects all circular products. Within a system of closed transport

packaging pooling, **RPE members retain the ownership of the RTP assets within their pool and act as a service provider for their customers**, managing the RTP in the loop. RTP pooling companies “rent out” RTP assets, with a high rate of reuse (95%), **but some RTP assets leave the system without consent or end up with unauthorised entities** (around 4%). RPE members are individually implementing enforcement policies to protect their assets and maintain control throughout the RTP lifecycle. However, challenges arise when third parties knowingly withhold or misuse RTP assets owned by RPE members, leading to legal battles for their return. **Failure to return RTP assets** hinders optimal reuse and **diminishes the circularity of the pooling system**, thus reducing environmental benefits. To address this, RPE calls for:

- a **uniform recognition and protection of ownership rights in the EU**,
- **obligations to return assets**.

Additional critical enablers

Affordability & availability of green energy

Enhancing the sustainability of energy usage is paramount within the reusable transport packaging sector, encompassing manufacturing, washing, and repair processes. By prioritising affordable and eco-friendly energy sources, we can significantly reduce our carbon footprint while ensuring the longevity and efficiency of the packaging lifecycle.

Securing access to affordable and environmentally friendly energy sources poses a challenge despite substantial strides in energy efficiency. The transition to climate neutrality places a heightened demand on the sector for climate-friendly energy carriers, notably decarbonised electricity and gaseous biofuels. Currently, these carriers are either available in insufficient quantities or come at a higher cost compared to conventional fossil fuels. To facilitate the attainment of climate neutrality by 2050, policymakers must:

- implement measures ensuring an ample, secure, and cost-effective supply of climate-neutral energy carriers;
- ensure further integration of the EU energy and electricity market, enable consumers to benefit from declining costs in renewable electricity production thanks to the economies of scale, revising energy taxation frameworks to favour cleaner energy sources, streamlining permitting rules for the rapid deployment of renewable energy sources; and
- provide R&D and investment support for emerging technologies like green hydrogen, biomethane production, carbon capture and storage, and large-scale battery storage that are yet to reach full maturity.

Decarbonisation of the transport sector

Decarbonising the transport sector is essential for the reusable transport packaging industry as poolers are responsible for moving goods. With decarbonised transport, the sector can operate with even greater environmental responsibility.

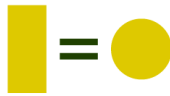
Policies and initiatives aimed at facilitating the decarbonisation of the transportation sector are crucial. The reusable transport packaging sector relies on both policymakers and logistics providers to implement necessary measures and investments to achieve full decarbonisation of the EU's transport system by 2050. Key measures include:

- provide incentives for the uptake of low-and zero-emissions heavy-duty vehicles in the EU market as well as boost the deployment of combined transport operations;
- ensure adequate charging infrastructure for the transition to zero- and low-emission vehicles, as proposed in the [Regulation on the deployment of alternative fuels infrastructure](#), is essential;
- increase the share of renewable energy sources in the transport sector, supported by the revision of the [Renewable Energy Directive](#), and promoting the development of climate-neutral fuels.

Critical enablers to make transport packaging in a sustainable and climate neutral way



Adopting a definition of reuse based on a minimum number of 10 rotations.



Ensuring fair and equal treatment to all products and packaging options, in line with the waste hierarchy without favouring single-use options.



Implementing measures ensuring an ample, secure, and cost-effective supply of climate-neutral energy carriers.



Ensuring further integration of the EU energy market, market reforms enabling consumers to benefit from declining costs in renewable electricity production, revising energy taxation frameworks to address imbalances, streamlining permitting rules for the rapid deployment of renewable energy sources.



Providing R&D and investment support for emerging technologies like green hydrogen, biomethane production, and large-scale battery storage that are yet to reach full maturity.



Establishing ambitious emission standards for Heavy-Duty Vehicles.



Ensuring adequate charging infrastructure for the transition to zero- and low-emission vehicles, as proposed in the Regulation on the deployment of alternative fuels infrastructure, is essential.



Increasing the share of renewable energy sources in the transport sector, supported by the revision of the Renewable Energy Directive, and promoting the development of climate-neutral fuels.



Protecting ownership is key to ensure the promotion of sustainable, reusable transport packaging solutions that will increase the efficiency of supply chains and protect our planet.



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