SETTING
EFFECTIVE REUSE TARGETS
TO SERVE THE UPSCALE
OF REUSABLE PACKAGING

#WE choose reuse

The European Union (EU) is about to revise its Packaging and Packaging Waste Directive (PWWD). This provides an opportunity to eliminate unnecessary packaging and transition from single-use to reusable packaging, and hence significantly reduce resource use, waste and pollution. The fact that the current PPWD includes only recycling targets creates an excessive focus on recycling, whereas upstream measures should be given priority. Setting reuse targets in the PPWD is one of the tools the EU can and should use to make reusable packaging the new norm.

1 TARGETS SHOULD BE LEGALLY BINDING

Voluntary measures and commitments have not led to a reduction in single-use packaging and uptake of reusable packaging. For example, the Coca Cola Company has failed to deliver on the many commitments taken the last two decades[1], and Plastic Pacts adopted in recent years across the world have shown very little progress to date[2]. By launching intergovernmental negotiations on a legally-binding plastics treaty, world leaders have acknowledged the need for legal measures to address the full lifecycle of plastics in order to end plastic pollution.

Setting legally binding reuse targets in Europe will trigger alignment across all concerned parties (including producers and retailers but also investors) and create financial stability and security for reuse infrastructures and technologies. Therefore, reuse targets should be mandatory and set in the law, for example as is the case in Austria[3], France[4], Romania[5] and Portugal[6].

2 TARGETS SHOULD ENSURE ALL SECTORS CONTRIBUTE TO THE TRANSITION

The transition to reusable packaging should happen across sectors (and packaging categories) and be a shared responsibility. Therefore, several targets should be set:

• an overall reuse target for all packaging put on the market in the EU, that sets a clear intention, brings stability and confidence for investments, and drives the market shift;

• sectoral targets, at least for key market sectors e.g. retail, HoReCa, e-commerce, B2B transport packaging, to ensure effective implementation of reusable packaging and reuse systems; as well as per product categories (e.g. beverages, takeaway food and drinks). Higher targets should be set for sectors where the transition can happen faster due to infrastructures already in place (e.g. beverage sector). Targets should also take into account the sectors' environmental impact, including resource use and contribution to packaging waste and pollution.

1 - Talking Trash: Coca Cola's Trail of Broken Promises
2 - Ellen MacArthur Foundation: The Global Commitment 2021 Progress Report
3 - Rechtsinformationssystem des Bundes: Gesamte Rechtsvorschrift für Abfallwirtschaftsgesetz 2002, Fassung vom 22.03.2022
4 - Légifrance LOI n° 2020-105 du 10 février 2020 relative à la lutte contre le gaspillage et à l'économie circulaire (1)
5 - Guvernul României: Monitorul Oficial al României nr 630 din 2018-07- 19
6 - Diário da República n.º 154/2021, Série I de 2021-08-10, páginas 5 - 106

3 TARGETS SHOULD ENSURE REUSABLE PACKAGING IS ACCESSIBLE TO ALL

Reuse targets should be set in a way to ensure fair and equitable access to reusable packaging. Reusable packaging should be accessible to all consumers, at a reasonable price, and convenient for use and return, regardless of where they live and shop. As an example, in the retail sector, targets should apply for all stores, to ensure consumers have access to reusable packaging regardless of the branch they shop in. Take-back systems should not require specific skills or equipment (e.g. a smartphone). Reusable options should also be provided for online shopping.

In addition, products provided in reusable packaging should be accessible at a lower or equal price compared to a similar product provided in a single-use packaging (not counting an eventual deposit for the return of the packaging). Possible expenses for single-use packaging (SUP) (deposit fees, specific SUP-levies, etc.) should be indicated clearly to consumers, in receipts for example, and distinguished from the cost of the packaged product.

4 TARGETS SHOULD BE ACCOMPANIED BY REQUIREMENTS FOR TRANSPARENT MONITORING AND REPORTING, AND ENFORCEMENT MECHANISMS

Since the 2018 revision, the PPWD has already set reporting requirements on reusable packaging put on the market. The upcoming PPWD revision should set more granular reporting requirements - i.e. by main sectors, as well as mechanisms to monitor (annually) progress made towards the achievement of the reuse targets.

The data collected should be made publicly available. Deposit Return Schemes (DRS) can help with collecting data and ensuring transparency as the data is available in real-time in blockchain. With regards to the databases, Member States should prioritise using and adapting existing databases rather than creating new ones.

In addition, the PPWD should foresee penalties for not meeting reporting requirements, as well as for not reaching the reuse targets. Such a sanction system should take effect at an early stage, e.g. via step-by-step-plans for the implementation of the reuse targets.

5 TARGETS SHOULD BE ADOPTED TOGETHER WITH OTHER PREVENTION AND REUSE MEASURES

Well designed reuse targets can be a very effective tool to support reusable packaging, but to ensure the transition to reuse, saving resources and avoiding pollution, they should be accompanied by other prevention and reuse related measures, including:

• packaging reduction targets, to ensure overall decrease in packaging, both in volume and number of packaging items and avoid a shift to other resources with less weight but more environmental impact.

• an overall cap on single-use packaging put on the EU market;

• an obligation to provide free-of-packaging consumer goods that can be handled safely without any packaging (e.g. fruits and vegetables);

• measures to ensure toxic-free packaging design, including bans on the use of harmful chemicals in packaging and leaving room to apply the precautionary principle when needed, so as to ensure safe use, reuse and recycling at the end of life;

• harmonised reusable packaging formats, which will provide clear conditions for investors and operators to develop interoperable reusable packaging systems, without impacting innovation and product differentiation;

• measures to support and harmonise accessible reuse infrastructures and

systems, including minimum requirements for the implementation of deposit return schemes (DRS) or other reuse systems to ensure interoperability and optimised systems for reuse & refill. Existing take-back systems should be duly taken into account when setting these requirements ;

• economic incentives to support reusable packaging and initial capital investments for reuse infrastructures and systems (e.g. Extended Producer Responsibility (EPR) fee eco-modulation, earmarking of EPR revenues, VAT-based incentives, earmarked levies on single-use plastics). At least 10% of the EPR revenues should be dedicated to finance reuse infrastructure and promote refillables;

• measures to support bring-your-own schemes which contribute to reducing waste, even though they should not be included in the definition of reusable packaging;

• public funds in research and development and pilot projects for industrial reuse systems (e.g. using Horizon Europe, LIFE, or the Cohesion Funds);

• measures to incentivize reusable packaging in Green Public Procurement.

6 TARGETS SHOULD BE AMBITIOUS, ON A PAR WITH THE SIZE OF THE PACKAGING WASTE AND POLLUTION ISSUE

The fact that there is limited available data should not hamper the adoption of targets and the transition to reusable packaging. Data collection and monitoring on reusable packaging put on the market are already required under the PPWD. Data granularity may be missing, especially in some sectors; yet, this should not prevent reuse targets from being set in the PPWD.

We recommend setting the following targets for all packaging put on the EU market:

• By **2027, 30%** should be reusable

• By **2030, 50%** should be reusable

• By **2035, 75%** should be reusable

Intermediate targets can also be a good tool to support the adoption of early measures and ensure progress towards the target is on track.

In addition, we recommend setting targets for certain sectors, including the following targets:

• 75% reusable packaging by 2030, and 100% by 2035, for beverages (soft and alcoholic) in the retail sector;

• 75% reusable packaging by 2030, and 100% by 2035, for household cleaning products in the retail sector;

• 50% reusable packaging by 2030, and 80% by 2035, for cosmetics and personal care products in the retail sector;

• 75% reusable packaging by 2030, and 90% by 2035, for take-away and delivery food and beverages, accompanied with a 100% target by 2030 for eat-in food and beverages;

• 50% reusable packaging by 2030, and 80% by 2035 in e-commerce, for all goods shipped within the EU;

• 100% reusable packaging in B2B packaging applications, including transport packaging, by 2030.

EXISTING REUSE TARGETS IN EUROPE

AUSTRIA

reuse targets of 25% by 2025 and at least 30% by 2030 for beverage packaging

FRANCE

5% of all packaging to be reusable by 2023 and 10% by 2027

GERMANY

reuse target of 70% for beverage packaging

PORTUGAL

30% of all packaging to be reusable by 2030

ROMANIA

5% packaging to be reusable by 2020 and 5% annual increase until 2025

SWEDEN

increase of reusable packaging by at least 20% by 2026 and by at least 30% by 2030 (compared to 2022 levels)

And several other countries are currently discussing adopting reuse targets.

#we Choose reuse

Learn more about reuse systems at
WWW.WECHOOSEREUSE.ORG

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