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## Open letter to

**Ursula von der Leyen**, *President of the European Commission*

**Frans Timmermans**, *Executive-Vice-President of the European Commission*

**Virginijus Sinkevičius**, *European Commissioner for Environment, Oceans and Fisheries*

**Thierry Breton**, *European Commissioner for Internal Market*

Brussels, November 10th, 2022

**Subject: Reuse and prevention at the core of packaging law to achieve circularity, decarbonisation and strategic independence.**

Dear President von der Leyen, dear Executive Vice-President Timmermans, dear Commissioners Sinkevičius and Breton,

As world leaders gather for the UNFCCC COP27, we would like to emphasise that prioritising reuse and waste prevention can significantly contribute to reducing emissions and achieving climate targets, while also preventing pollution, drastically cutting on energy and resource use, and benefitting SMEs and communities. This November, the EU has the opportunity to prevent waste and scale up reuse for one key sector, packaging.

The context illustrating why bold action in the revision of the EU packaging legislation is needed, is clear. Packaging waste is at its highest level in history, now over 177 kg per capita annually, growing by 20% in 10 years, faster than economic growth. Plastic production (close to 40% of which goes to packaging) is the single largest user of oil and gas in the EU, responsible for 8% and 9% of final consumption respectively.<sup>1</sup> Furthermore, as illustrated by the recent progress report from the Global Commitment, industry led voluntary initiatives have failed to deliver any reduction in virgin plastic, increase in reuse or improvement in product design from the brands most responsible for polluting the environment across the globe.<sup>2</sup>

In contrast, well designed reuse systems can provide significant environmental benefits: a reduction in resource, energy, toxic substances, and water use; reduced carbon emissions; and

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<sup>1</sup> More information is available in the report "Winter is coming - plastic has to go", available at : <https://www.breakfreefromplastic.org/winter-is-coming/>

<sup>2</sup> Ellen MacArthur Global Commitment - recent results admit signatories will not meet their 2025 targets, available at: <https://ellenmacarthurfoundation.org/global-commitment-2022/overview>

prevention of pollution.<sup>3</sup> Furthermore, much can be achieved by preventing waste in the first place by removing unnecessary packaging or not using packaging at all.<sup>4</sup>

Reuse systems maximise their positive environmental impacts if operated locally, regionally and at scale, and have the potential to create jobs, benefit SMEs, and contribute to vibrant local economies and communities.<sup>5</sup> In order to scale up current small-scale initiatives, supportive regulatory frameworks and economic conditions are needed.

For these reasons we welcome the EU's increased attention given to reuse and urge you to ensure the EU packaging and packaging waste legislation:

- Reverses urgently the trend of packaging waste growth - 20% in 10 years -, and then drives significant reduction in packaging waste by setting ambitious waste prevention targets. Member States with exceptionally high levels of waste (over 180 kg of packaging waste per capita annually) should face the greatest responsibility;
- Provides security for the development of reuse systems by setting legally binding reuse targets for key sectors, including food retail, takeaway food, all beverages, cosmetics and cleaning products, and e-commerce;
- Provides clear guidance and harmonisation for reusable packaging formats and the systems that are needed to operate these to ensure they are effective at scale and avoiding cases of "fake reuse", where single use packaging continues to be used but is labelled as reuse or refill ; and
- Removes unnecessary packaging notably multi-packs, which increase food waste, and single use packaging in the HORECA sector.

Ambitious measures on waste prevention and reuse should be accompanied with strong design requirements and consolidated provisions on recycling to ensure that (reusable) packaging is recyclable and actually recycled, building on the efforts made in the last years to improve recyclability and (mechanical) recycling infrastructures.

The moment to design how Europe achieves genuine circularity through well-designed, well-financed large-scale reuse systems is now. Through the #WeChooseReuse campaign 100,000 citizens, hundreds of businesses and tens of cities across Europe have signed open letters demanding the EU to deliver ambitious measures.

Reducing packaging through prevention measures and reuse has the potential to address several crises at once. We are calling on you to not overlook or waste this potential and to embrace a just transition to reuse.

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<sup>3</sup> A few examples can be found in the "Realising Reuse" report available at:

<https://rethinkplasticalliance.eu/wp-content/uploads/2021/07/Realising-Reuse-Final-report-July-2021.pdf>

<sup>4</sup> WRAP illustrate waste prevention by selling products loose, available at:

<https://wrap.org.uk/resources/report/reducing-household-food-waste-and-plastic-packaging>

<sup>5</sup> More information can be found in the report " A Just Transition to reusable packaging" available at :

<https://rethinkplasticalliance.eu/wp-content/uploads/2022/10/A-Just-Transition-to-Reusable-Packaging.pdf>

Yours sincerely,



The #WeChooseReuse [campaign](#) is a European campaign coordinated by the Break Free From Plastic (BFFP) movement, which consists of over 100 core members (organisations and networks) in Europe, including the Rethink Plastic alliance.

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Break Free From Plastic is a global movement envisioning a future free from plastic pollution made up of more than 2,000 organisations from across the world demanding massive reductions in single-use plastic and pushing for lasting solutions to the plastic pollution crisis. More info : [www.breakfreefromplastic.org](http://www.breakfreefromplastic.org)



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