

Open letter to

**Members of the European Parliament  
Ministers of the Council of the European Union**

Brussels, 8 June, 2023

**Subject: Well designed reuse systems as a driver of packaging waste prevention**

Dear Members of the European Parliament,  
Dear Ministers of the Council of the European Union,

We, the signatories of this letter (civil society organisations and reuse businesses across Europe), are concerned that misinformation and intense lobbying from the single-use packaging industry and the take-away sector are undermining the need for reuse as a driver for waste prevention, resource conservation and climate protection in the Packaging and Packaging Waste Regulation (PPWR).

This regulation represents a critical opportunity for the much-needed transition towards more circular packaging systems at a time where it is crucial to tackle emissions, pollution and resource use in all sectors. **The focus of decision-makers should remain firmly on the key objective of the PPWR, which is reducing packaging waste and improving the environmental performance of this increasingly wasteful sector .**

The EU has a special responsibility to lead by example in an ambitious packaging policy. The packaging waste generated in the member states of the EU weighs heavily on our environment and the countries of the Global South. Currently packaging volumes are at an all-time high in history, having grown 20% over the last decade alone and having even largely outpaced economic growth. To tackle the current packaging waste crisis it is necessary to prevent its production and consumption as much as possible by deploying efficient reuse systems and moving away from single-use applications. In doing so, it is key to rule out materials substitution (replacing one single-use material with another, i.e: single-use plastic with single-use paper-based packaging). **The shift away from single-use to re-use is not an utopian idea, but rather a transition that has already started but needs fundamental support of European policy to fully thrive.**

There are ample independent scientific studies<sup>1</sup> showing the benefits of reusable packaging systems compared to single-use. In line with the waste hierarchy, these scientific studies demonstrate that well-designed reuse systems can bring significant benefits to environmental and human health, including reducing emissions as well as resource, energy, water and (often harmful) chemicals use. Decision-makers should base their decisions on this peer-reviewed literature rather than on biased studies sponsored by vested interests in order to show doubt and maintain the status quo. As marginal improvements of recycling alone will not suffice to tackle the packaging waste crisis, it is essential to rely on long-term and resilient solutions, like reuse and (resource) prevention.

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<sup>1</sup> A few examples from ScienceDirect Studies:

<https://www.sciencedirect.com/science/article/abs/pii/S0921344922006942>

<https://www.sciencedirect.com/science/article/abs/pii/S0048969721036421>

<https://www.sciencedirect.com/science/article/abs/pii/S0959652621002687>

<https://www.sciencedirect.com/science/article/abs/pii/S0921344920306145>

The longer we maintain the business as usual, based on disposable packaging, the harder it will be to solve the packaging waste, resource use and pollution crisis. **Supporting waste prevention and reuse is the best way to address the environmental costs of single-use packaging, which are not yet reflected in the product price, making single-use a presumed cheap alternative in the short term.**

The shift of a share of the packaging market towards reuse in key sectors is absolutely essential, as proposed by the European Commission in the PPWR. The takeaway sector is one such sector: consumption on the go at best results in overcharged municipal mixed waste bins, and at worst results in a littered environment. Not surprisingly, these packaging types are in the top 10 items of the most commonly found single-use plastic items on European beaches<sup>2</sup>, and their end-of-life disposal consists of incineration and landfill in most cases. They also represent a significant part of municipal waste. A recent study<sup>3</sup> in Ireland has estimated that between 2012 and 2017 approximately €409 million has been spent by 24 Councils on street litter cleaning and rubbish bin collections, equating to an average of €68 million per year, or around €6 billion per year extrapolated to the EU population.

**Several EU countries already have legislation promoting reusable packaging for the takeaway sector, and there are already businesses transitioning to reuse packaging systems at local, regional and national level, partly supported by reuse legislation.** A compilation of this evidence can be found in the attached Factsheet. **Yet, to ensure such systems can scale up across the EU and compete with single-use applications, a strong signal from EU legislation is needed.**

We believe the European Union, through the revision of its packaging rules, should focus its efforts to reduce resource use. For this, the path we need to follow is one that avoids all unnecessary extraction, production, and recycling of products and materials. For these reasons, we call on you to:

1. **Support the European Commission's sectoral reuse targets, including for the takeaway sector;**
2. **Critically assess evidence comparing reuse and single use packaging, challenge opaque methodologies and results, vested interests and unrealistic assumptions;**
3. **Set economic incentives for reuse packaging systems (e.g: dedicated fund from Extended Producer Responsibility schemes).**

Yours sincerely,



Deutsche Umwelthilfe



<sup>2</sup> [https://environment.ec.europa.eu/topics/plastics/single-use-plastics\\_en](https://environment.ec.europa.eu/topics/plastics/single-use-plastics_en)

<sup>3</sup> [https://assets.website-files.com/606fdf75a1ce4331ed2696ec/6226288027876f0d233f2179\\_public-waste-out-of-sight-out-of-mind-1.pdf](https://assets.website-files.com/606fdf75a1ce4331ed2696ec/6226288027876f0d233f2179_public-waste-out-of-sight-out-of-mind-1.pdf)



