



Roundtable for Reusable Containers Trays and Pallets Future Vision on the European Packaging Market

The Roundtable for Reusable Containers Trays and Pallets (RCTP) represents the European manufacturers of Returnable Transit Packaging (RTP). RTPs are reusable and predominantly used for transport and storage.

Europe needs to reduce single-use packaging drastically and urgently

According to the United Nations (UN), the current consumption and production patterns rest on the use of the natural environment and resources in a way that continues to have destructive impacts on the planet¹. As a response to the World's environmental crisis, the European Commission adopted the European Green Deal² in December 2019, which introduces a roadmap for a sustainable growth strategy and a target of climate neutrality by 2050. Packaging is seen as one of the core sectors to achieve these objectives; while the sector is notorious for using a significant number of natural resources, it also has a high potential for circularity. The RCTP is a strong promoter of the highest level of circularity. Moreover, as manufacturers of RTPs for closed loops, we welcome the UN Plastic Pollution Resolution³, which is aligned with the RCTPs firm belief that no plastics - including microplastics - should be flowing into the environment.

In 2019, the yearly packaging waste generated was estimated at 177.4kg/inhabitant in the EU, with cardboard being the most common packaging waste material (40,6%) followed by plastics (19,4%) and glass (19,2%)⁴. Currently, packaging alone represents 36% of municipal solid waste in Europe⁵. Yet it is essential to acknowledge that this only represents one part of the packaging market. Reusable containers, trays and pallets have other characteristics that create zero waste but are also categorised as packaging. Therefore, sustainable, low-carbon and zero-waste solutions are needed to facilitate the EU climate ambitions and tackle the issues related to packaging waste and resource efficiency.

Reusable packaging is the only way forward

To optimally use the potential that RTPs have, the RCTPs encourages to:

- **Prioritise reuse over recycling**

The EU should place reuse at the core of the circular economy, aligned with the waste hierarchy⁶ and scientific evidence^{7,8}, prioritising reuse over recycling across legislation and criteria for public funding.

¹ United Nations, Sustainable Development Goals, [Goal 12](#): Ensure sustainable consumption and production patterns.

² European Commission, [A European Green Deal](#), December 2019.

³ UNEA of the UNEP, [End Plastic Pollution: Towards an international legally binding instrument](#), March 2022.

⁴ EuroStat, [Packaging waste statistics](#).

⁵ Zero Waste Europe & ReLoop, [Reducing packaging waste: choose prevention and reuse](#), (December 2020)

⁶ [Waste Framework Directive 2008/98/EC](#), Article 4.

⁷ Fraunhofer Institute, [Carbon Footprint of Verpackungssystemen für Obst- und Gemüsetransporte in Europa](#), February 2018, pp. 7, 38

⁸ [Expert interview](#), European Commission, 2014.

- **Replace single-use packaging with reusable alternatives**

It is of utmost importance to phase out and eventually ban single-use packaging in applications for which a reusable solution is available. Hence, to ensure that - with only a few exceptions - all packaging is reusable by 2050.

- **Allocate non-renewable natural resources to RTPs and not to single-use packaging (or energy creation)**

Allocate non-renewable fossil-based products to RTPs and other applications that can contribute to improved sustainability, instead of applications with a proven damaging environmental impact. Reusable packaging keeps the material in circulation for an extended period significantly preventing CO² emissions and waste generation.

Reusable packaging prevents packaging waste and saves resources

a. Cradle-to-cradle reuse systems

Investments in reusable packaging systems facilitate a circular economy and sustainable future for the EU. More precisely, investments in RTPs will significantly lower the environmental impact of a multitude of value chains that need packaging and transportation vessels to protect their products. The waste generation from RTPs is minimised by the long durability of products and the highly efficient recycling process. Moreover, the material from which the RTPs are produced will be reused and recycled within a closed-loop for over a century. The RTP manufacturers are committed to a cradle-to-cradle system, in which:

1. All packaging is designed for recycling and treated in closed-loop, i.e., such packaging shall consist of 100% of materials that are recyclable to their origin.
2. The producers commit to processing and recycling products that can no longer be reused.⁹

The cradle-to-cradle system ensures that RTP products are not only made of recyclable material but are recycled at the end of their life cycle in the most direct way. This contributes to a high quality of recycled materials and minimises unnecessary transportation and trade of recycling material and resource losses during the recycling process.

The RTP manufacturers are aligned with the high hygiene standards for certain packaging types, such as food contact materials. Nonetheless, the RTP manufacturers are convinced updated rules are necessary to ensure alignment with the modern packaging systems and recycling technologies.

Reduction and prevention of CO² emissions

A report of Zero Waste Europe, comparing single-use cardboard boxes and reusable plastic crates, finds that the greenhouse gas emissions of reusable plastic crates are around 88% below the greenhouse gas emissions of the single-use system.¹⁰ Furthermore, a study comparing reusable and single-use plastic crates for the transport of fruit and vegetables in

⁹ The customer must commit and be incentivised to handling the packaging product in a way which precludes contamination with substances that are hazardous or cannot be definitely removed by cleaning, as such substances will lower the quality and safety of the recycled material.

¹⁰ Zero Waste Europe & Reloop, [Reducing packaging waste: choose prevention and reuse](#), (December 2020), p. 42.

Italy, shows that with regard to climate change, the reuse system becomes more sustainable than the single-use system on the third rotation¹¹.

It is essential to recognise plastic packaging types' different applications and characteristics. Single-use plastic packaging is being disposed of after one use, and, although recyclable, only 9% of plastics are recycled properly¹². Instead, single-use plastic items often end up either being incinerated or are going to landfills, releasing greenhouse gases, or discarded into the environment contributing to environmental pollution and littering¹³. Single-use packaging is used in a wide range of applications in B2B and the consumer market, and it comes in many forms from wrapping to bags, bottles, and food containers. Reusable plastic packaging, such as RTPs, is very different in its features. RTPs are specifically used for transport and storage applications. RTPs have a life expectancy of 15 years during which they make an average of 75 trips across Europe. RTPs are distributed in a closed cradle-to-cradle system, which ensures their full recycling into new RTPs once a product reaches the end of its life cycle. Therefore, the material entering the cradle-to-cradle system remains in the loop for over 100 years, compared to single-use plastics, which become waste and are disposed of after only one-time use.

RTPs have the potential to expand into new applications by replacing a significant amount of single-use packaging in sectors that currently rely on single-use plastics and cardboard solutions. Replacing single-use packaging with reusable alternatives will significantly cut down the generation of packaging waste and CO² emissions caused.

The RTP sector envisions a European-wide closed RTP cradle-to-cradle system, in which the manufacturers' commitment that their products can be recycled and re-processed by any other RTP producer. This will increase the availability of high-quality recycled material, harmonise the reuse system, as well as significantly reduce the transportation distances of RTPs into reuse and recycling facilities.

b. Distribution of natural resources

The RTP industry has the potential to make a significant sustainable change in the European packaging sector but is suffering from the bad stigma on plastics. RTPs are a responsible application for fossil fuels, in which the material remains in circulation for an extended period, hence if managed correctly, the carbon is not released. By using fossil fuels more efficiently, through reusing or repurposing material, carbon emissions of the manufacturing of products could contribute to the path of zero emissions.¹⁴

The RCTP is concerned that sustainable plastics solutions are undermined since the virgin raw material is fossil-based. We believe that fossil-based resources need to be phased out, as

¹¹ Camilla Tua, et al. [Life Cycle Assessment of Reusable Plastic Crates \(RPCs\)](#), 2019, p. 10.

¹² "Our Planet Is Drowning in Plastic Pollution. This World Environment Day, It's Time for a Change," accessed January 12, 2022, <https://www.unep.org/interactive/beat-plastic-pollution/>.

¹³ Ibid.

¹⁴ Bill Gates, *How To Avoid A Climate Disaster* (New York: Alfred A. Knopf, 2021), p. 108.

energy sources (and raw materials) should only be attributed to applications that can make a positive contribution to the circular economy, such as RTPs.

The RCTP future vision targets:

- All packaging for which reusable options are available should be reusable by 2050.
- Cradle-to-cradle systems should be promoted as the preferred way of recycling. Non-renewable resources should be allocated only to the manufacturing of durable products enabling circular economy such as RTPs.