



## **Roundtable for Reusable Containers Trays and Pallets Position Paper on the Ecodesign for Sustainable Product Regulation**

The Roundtable for Reusable Containers Trays and Pallets (RCTP) represents the specialised European manufacturers of Returnable Transport Packaging (RTP). RTP is a form of reusable packaging predominantly used for transport and storage. This reusable packaging has a lifecycle of about 15 years, after which it will be recycled with a nearly 100% recyclability rate. The foldable model of many crate types also reduces transportation space, resulting in a reduction in carbon emissions. The environmental benefits of reusable packaging can be significant, especially for transport packaging, as researches show that RTP has a significantly lower environmental impact than a single-use equivalent<sup>1</sup>.

The RCTP welcomes the European Commission's (Commission) ambition to make products in the EU market more sustainable, in line with the goals set in the Circular Economy Action Plan, ensuring that waste generation is prevented and used resources are kept in the economy for as long as possible. RTP manufacturers stand ready to contribute to achieving these goals. Therefore, we applaud the effort of the Commission to update the Ecodesign Directive and welcome the opportunity to offer feedback on the Proposal for Ecodesign for Sustainable Products Regulation (ESPR), providing comments on the following aspects:

### **1. Coherence with other EU policies**

As packaging products, RTPs are effectively regulated by the Packaging and Packaging Waste Directive (PPWD). While we support provisions that will effectively enhance the sustainability of products, we believe that the new requirements set out by ESPR should not increase the administrative burden or impose costly compliance measures on businesses and manufacturers. We believe compliance and effectiveness of the ESPR are more easily achieved if legislation is kept as manageable and affordable as possible.

In order to have legislative clarity for the operators, the ESPR should be coherent with other policies avoiding duplication of terminology and requirements. We are happy to see that the Commission will ensure the coherence of the proposed Ecodesign requirements with existing laws already regulating the packaging sector, such as the PPWD (recital 21) and be consistent with the definitions set out in the Waste Framework Directive (WFD) (article 2). Therefore, packaging should not be included in the forthcoming ESPR Delegated Act on specific product groups. The RCTP calls on the Commission to include all the necessary sustainability requirements for packaging in the revised PPWD, to give normative clarity to the sector. We are eager to contribute to the ongoing recast of the PPWD and the WFD ensuring the right definitions and standards are established.

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<sup>1</sup> [Reducing packaging waste: choose prevention and reuse](#), Zero Waste Europe & ReLoop (December 2020), Figure 26



## **2. Ecodesign requirements**

The RCTP supports the decision of the Commission to extend the scope of the Ecodesign Regulation beyond energy-related products. The RCTP is particularly pleased with the Commission's ambition to focus on the full lifecycle of products and welcomes the proposals included in Article 5 and Article 6 which incorporate requirements to improve, among others, durability and reusability.

Indeed, the ecodesign requirements should place the overall environmental impacts of products as the basis for sustainability. Carbon and environmental footprints shall be based on a transparent analysis of qualified data throughout the entire life span of the product. However, increased administrative burden and costs to the producers should be avoided, as this would spill down to an increase in price for sustainable products. Only such an approach will truly address the sustainability of a product and incentivise the uptake of sustainable products by the market.

Durable products such as RTPs have overall a lower carbon footprint than single-use applications as the material remains in circulation for an extended period. As a result, less CO<sub>2</sub> is emitted after the production when reusable packaging is being used multiple times. Therefore, ecodesign requirements should be suitable to reflect the advantages of reusable packaging, per use-rotations or use-time, as there are strong positive interdependencies between reusability and carbon and environmental footprint which must be accounted for.

As leaders and pioneers in sustainable and circular products, we believe that ensuring Ecodesign requirements will help support sustainability efforts. In fact, RTP products are already made to last longer in the market in line with the Waste Hierarchy, which prioritises reuse – and consequently durability - over recycling.

## **3. Digital product passport**

The RCTP believes that introducing a digital product passport (DPP) is an effective tool to facilitate disclosure and grant access to the most relevant information regarding the products along the value chain. Nonetheless, it is key to ensure that the right information is included focusing on a higher quality of data. Data must not be challenging or even impossible to collect, potentially commercially sensitive or not helpful in measuring the sustainability of the product. For the packaging sector, circularity level, carbon footprint per use cycle and controlled supply chain are the relevant indicators. Moreover, the protection of European Intellectual Property Rights regarding confidential business information on products must be guaranteed.

Therefore, for each item of information, the Commission shall prepare guidelines setting out harmonised definitions and guidance on uniformity, as well as a common template to allow for consistent reporting across all Member States. In our view, the DPP should not be physically linked to the product with a tag or an additional layer but should be included in an EU-wide online registry of products. As RTPs are manufacturers of injection moulded packaging, a physical DPP would require adding a packaging layer to the product.

Finally, the RCTP calls on the Commission to take into account SMEs in developing the DPP. SMEs may need additional assistance to deliver the requirements of the DPP, supporting them across the EU.



**Recommendations:**

- Apply consistency with existing EU legislation for packaging (PPWD and WFD) and avoid duplication;
- Implement ecodesign requirements taking into account the entire life span of products;
- Include only relevant, feasible and non-business-protected information in the digital product passport.