



Roundtable for Reusable Containers Trays and Pallets Position on the Packaging and Packaging Waste Directive

September 2022

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 research shows that RTP has a significantly lower environmental impact than a single-use equivalent¹.

The Roundtable for Reusable Containers Trays and Pallets (RCTP) welcomes the review of the Packaging and Packaging Waste Directive (PPWD) and is convinced that the negative environmental effects of the European packaging market can be significantly reduced when encouraged by ambitious legislative measures. The following five aspects could improve the PPWD to facilitate a zero-waste, low-carbon and European circular economy.

1. Implement the Waste Hierarchy: Emphasise reuse over recycling

The PPWD should actively pursue aligning its measures with the waste hierarchy², which sets waste prevention and product reuse above recycling. Thus, when such an option is available, packaging should be primarily reused and only recycled when its condition no longer allows reuse. The recycled packaging can then be returned to the reuse system. This process can be repeated over and over again.

2. Article 3 § 5: definition of reusable packaging

The RCTP recommends a more precise definition for reusable packaging³, to increase its uptake. Reusable packaging can only be defined as such if it is being reused a sufficient number of times instead of only being reusable in theory. Therefore, the RCTP calls on the Commission to amend the definition of reusable packaging by taking into account the reuse in practice and not only their potential reusability. Consequently, products should only be qualified as reusable if they are designed and accomplish at least 10 rotations in a reuse system. The RCTP is eager to contribute to ensuring the right definitions are established.

3. Incentives to increase reusability: extended producer responsibility

In order to further reduce the environmental impacts of packaging in terms of resource use and plastic waste, and to ensure optimal reuse, recycling and repurposing, the RCTP proposes to enforce extended producer responsibility (EPR) on all packaging products. However, the EPR definition introduced in the Waste Framework Directive⁴ is not fit for the RTP products. This is because of the (long) life expectancy

¹ [Reducing packaging waste: choose prevention and reuse](#), Zero Waste Europe & Reloop (December 2020), Figure 26

² [Waste Framework Directive 2008/98/EC](#), Article 4.

³ [Packaging and Packaging Waste Directive 94/62/EC](#), Article 3:2a, Annex II:2.

⁴ [Waste Framework Directive 2008/98/EC](#), Article 8.

of the RTP products of around 15 years, and the high demand for secondary raw materials across other sectors. The RCTP suggests an alternative EPR be applied to the reusable secondary and tertiary packaging, as follows:

1. All reusable secondary and tertiary packaging shall be designed for circular cradle-to-cradle recycling, i.e. such packaging shall consist entirely of materials that are recyclable to their origin.
2. The producers of such packaging shall commit to taking back and processing their products that have reached the end of their reuse cycle if the returned products can be safely processed into new products within the reuse system⁵.

The two commitments are complementary and should be implemented together.

The described EPR model ensures effective separation processes and high-quality recycled raw materials retrieved from the supply chain, that can then be used for new products and will ensure that all RTP producers can receive and process all RTP products that reach the end of their reuse cycle.

4. Minimum recycled content: extended producer responsibility

The RCTP recognises and fully supports the need to increase the use of recycled content in the packaging to avoid waste and to keep used resources in the economy as long as possible. We recommend the Commission to make a clear distinction between the necessity of recycled content in single-use packaging and reusable packaging that is used over 50 times. While a high percentage of recycled content will have a positive effect on reducing waste in the single-use packaging sector, it has the opposite effect in the reusable packaging sector. This is because the reusable packaging produced today is up for being recycled in approximately 15 years.

There are considerable barriers to the implementation of minimum recycled content on RTP products. In fact, the RCTP is convinced that a target for recycled minimum content would hinder the EU's objectives of transitioning to a fully circular economy by 2050, hence an economy where the value of products and materials are maintained as long as possible and waste generation is minimised⁶. The RTPs have the potential to significantly reduce packaging waste by replacing one-way packaging in several applications. Firstly, A recycled content target will negatively impact the quality and the durability of RTP products due to the inconsistency in resources if resourced outside of the RTP sector. Furthermore, the RTP products are produced, reused and returned within a closed loop, which allows full recycling of the RTPs into new products at the end of their life cycle. A recycled content target will disturb this well-functioning ecosystem and the growth of the reuse sector. Secondly, such a target also conflicts with the availability of the material on the market. There is little continuity in the recycled material flows, meaning production processes and growth of the reuse sector could be hampered.

The sector already uses all the available recycled material for its products and if a target is enforced, manufacturers could be forced to recollect products before the end of the life cycle. Furthermore, reusable transport packaging produced for applications such as pharma and direct food contact must by default be exempt from targets, as legislation blocks the use of recycled content in those packaging products.

⁵ 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. Using low-quality recycled material compromise the quality of the RTPs such as durability, hygiene/safety, and strength. The producer can guide the customer on the use of their product, but not oversee the customers' actions. Thus, it is necessary to consider the role of each player involved in the supply chain when setting up EPR schemes.

⁷ [Circular Economy – overview](#), Eurostat.

In our view, the cradle-to-cradle-based EPR model will ensure that the packaging reuse systems will gradually use an increasing amount of recycled material, as the suggested system empowers the creation of reuse systems - or loops - in which the recycled content of packaging increases on each product life cycle, whilst the guaranteeing the quality of recycled material and growth opportunity for a sector replacing single-use packaging.

The RCTP believes that workable and proportionate provisions within the PPWD would create an even playing field in Europe, drifting away from far less sustainable single-use solutions and driving towards the fully circular economy that the EU strives for.

5. Reduce single-use packaging: uptake targets for reusable packaging

In order to effectively reduce packaging waste, the EU must move away from using single-use packaging. The RCTP calls for ambitious uptake targets to be set for reusable packaging, whilst taking into consideration the varying features and safety requirements of different packaging types. The RCTP recommends a 50% uptake target by 2030 for secondary and tertiary packaging in B2B markets, and for all the packaging in B2B markets to be reusable by 2050.

6. A call for a circular approach

The RCTP calls for the PPWD to be reviewed with a focus on a circular approach to packaging. The potential for the packaging market to shift to reusable products is especially high regarding - but not limited to - secondary and tertiary packaging in the B2B market, for which reusable alternatives are widely available and they have the potential to significantly decrease the use of natural resources and waste generation related to packaging.

Recommendations:

1. Implement Waste Hierarchy: emphasise reuse over recycling;
2. Amend the definition of reusable packaging by adding a 10 rotations minimum requirement.
3. Incentivise reusability by extended producer responsibility;
4. Exclude reusable packaging with high a rotation from recycled content target;
5. Set targets for reusable packaging.
6. Review the PPWD with a focus on a circular approach to packaging.