



**Roundtable of Reusable Containers Trays and Pallets**  
**Position Paper: Waste Framework Directive**

08-09-2022

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. 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 equivalent<sup>1</sup>.

The RCTP welcomes the European Commission's (Commission) ambition to improve the protection of public health and the environment through the proper management of waste. RTPs play a significant role in reducing waste generation and supporting the EU's 2050 climate targets. The revision of the Waste Framework Directive (WFD) aims to improve waste management by reducing waste generation through the re-use of products and reducing mixed waste by improving separate collection. RTPs contribute to these objectives by offering reusable alternatives for one-way packaging. In addition, RTP manufacturers commit to taking end-of-life products back for recycling into new products which offer a solution for proper collection. Therefore, the RCTP encourages the Commission's efforts to revise the WFD and welcomes the opportunity to offer feedback, providing comments on the following aspects:

**1. Defining Re-use**

To take steps regarding the circular character of the WFD, it is of utmost importance that definitions are consistent and accurate, to provide clarity to all sectors involved. Prevention and preparation for re-use are the two top layers of the waste hierarchy (Art. 4) to tackle waste generation. As the waste hierarchy needs to be considered as the order of preference for managing and disposing of waste, the hierarchy's definitions should not conflict with other definitions.

To support the Commission's efforts to improve the overall environmental outcome of waste management, the RCTP calls on the Commission to introduce consistent and accurate definitions regarding re-use, 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.

**2. Waste Hierarchy**

The impact assessment of the Commission highlights the problem that only 38% of total waste was recycled in the EU in 2018. Although recyclability of products and components contributes to the EU's commitments to the European Green Deal, the focus should always be first on prevention and reusability to avoid waste. On the one hand, recycling produces significant residues that cannot be recycled yet, and

on the other hand, re-use often produces less CO<sub>2</sub> emissions compared to single-use.<sup>1</sup> Thus, the RCTP supports ambitious measures to adopt principles and practices in legislation that enable waste prevention and re-use, instead of fueling the assumption that all products or components can be recycled endlessly.

Currently, the definitions of the Waste Hierarchy do not provide enough clarity on the scope. The existing definition of the WFD considers 'reuse' as part of the top layer 'prevention'. Therefore, given their characteristics and use, RTPs fall within this layer of the Waste Hierarchy. However, this should be explicitly spelt out, by ensuring that:

- whole reuse *systems* are considered, not only single products or activities
- reuse and reuse systems are clearly described as promoting sustainable business models
- 'reuse' should be recognized as 'enabler' of waste prevention

On the contrary, the layer 'preparing for reuse', is fit for up-cycled products that became waste and only then refurbished, and reusable products. This is not applicable to RTPs as they do not become 'waste' after one rotation. They could be considered waste at the end of one life-cycle, after which they are 100% recycled and put back into the material loop for the same product. But even then, RTPs can be reground for the same purpose they were originally conceived, i.e. by applying a closed loop system recycling approach.

### **3. Uptake targets and quota**

The RCTP believes that EU-driven incentives can help to steer the EU's circular economy in the direction that leads to a society that generates less waste. By introducing ambitious uptake targets and/or quotas for prevention of waste through a reuse system and re-use decoupled from recycling, the Commission could add effective incentives towards the transition to a circular economy. The RCTP advocates for a forward-looking WFD, which can address upcoming issues and have a longer impact in time. As RTP products are designed to last longer in the market than single-use alternatives, the effect of quantitative incentives would be significant.

#### **Recommendations:**

- Recognise and define re-use as part of waste prevention in the waste hierarchy by explicitly respecting reuse systems as 'enablers' of waste prevention.
- Apply consistency and accuracy to the definitions of 'preparing for re-use' and 're-use' in line with the PPWD.
- Extend the re-use definition with a number of 10 minimum rotations.
- Organise collection of materials by a close loop and introduce an obligation to give back end of life products to the producer for recycling
- Suggest ambitious uptake targets of 50% by 2035 and/or quotas for preparing for re-use and re-use decoupled from recycling targets.

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<sup>1</sup> Reloop & Zero Waste Europe, Reusable vs Single-use packaging – a review of environmental impacts, December 2020.