



The Packaging Waste Regulation should enable the reuse of packaging

The RCTP has decades' long experience in the reusable packaging sector. Please find below our recommendations to encourage reuse and reduce packaging waste.

1. Definition of reuse should be clear (Art. 3 and 10)

The RCTP believes the term 'reusable packaging' should be clearly defined in the legislative text, both in Art. 10 and Art. 3. The definition currently lacks legal clarity with the use of both trips and rotations without mentioning a specific number, causing greenwashing practices and the mismarketing of single-use packaging as reusable. Therefore, the RCTP calls the legislators to include a minimum of 25 rotations instead of trips with an expected lifespan of at least 5 years.

2. Minimum Recycled Content should not hamper the uptake of reusable packaging (Art. 7)

Minimum recycled content targets could be an effective way to stimulate the transition to a circular economy. The RCTP has the following suggestions to make these targets more effective:

- To secure the longevity and quality of reusable packaging in closed loops, the minimum recycled content target by 2030 should be no higher than 30%. This is important to achieve the reuse targets. Reuse is an effective way of preventing waste, even beyond recycling.
- Due to the limited availability of recycled material suitable for reusable packaging, higher recycled content targets will hamper the uptake of reusable packaging as defined in Art. 26. This is even more important for contact-sensitive materials, which are legally obliged to source recycled materials from closed and controlled loops. A 10% target by 2030 for contact-sensitive packaging is therefore unattainable and contradicts the PPWR's reuse targets.
- The targets should be calculated per factory at the producer level, instead of per unit per packaging, because this will allow for the highest percentages of use. In addition, it will be more reliable to audit and check the percentage of recycled material at a production site. Moreover, some reusable products are less suitable to absorb recycled materials than single-use packaging, as it affects longevity. Naturally, lowering the quality and thereby the longevity of reusable packaging to accommodate higher recycled content counteracts the principles of the waste hierarchy and scalable use of reusable packaging.

3. Obligation of Manufacturer (Art. 13)

Art. 13 obliges manufacturers to withdraw packaging if not in conformity with the legislation. The reusable packaging that is produced today, is produced according to the current legislation and designed to last at least 15 years on the market. Therefore, Art. 13 should not apply to this type of packaging, as the reusable packaging will otherwise need to be taken off the market prematurely. This, in turn, would slow down the penetration of reusable packaging in the market.

4. Reuse Targets should make no exemptions (Art. 26)

- The RCTP supports the proposed 30% reuse target by 2030, but it believes that it can be more ambitious, as 50% is justifiable and a realistic step towards the 2040 target.
- However, the RCTP is extremely concerned about the exclusion of cardboard from the obligation to use reusable transport packaging within the same member state from Art. 26 (§12, 13). This provision undermines the goal of increasing the share of reusable packaging of the very same article. Finally, it will hamper the transition to a European circular economy in the transport packaging sector. The RCTP strongly recommends to make the rules binding for all packaging types.