

Statement on the PPWR Agreement

The Roundtable for Reusable Containers Trays and Pallets (RCTP), on behalf of reusable transport packaging manufacturers in Europe, welcomes the provisional agreement reached by the co-legislators on the Packaging and Packaging Waste Regulation (PPWR).

The PPWR is a legislative milestone and an important first step to incentivise sustainable, circular alternatives. We are pleased that the text contains numerous historic 'firsts' for both the EU and the packaging market:

1. For the first time, the EU will introduce legally-binding reuse targets for transport packaging in the member states;
2. A standardised definition of reuse has been articulated in a legal text;
3. To further limit the risk of greenwashing in the packaging industry, the EU recognised the importance of setting a definitive minimum number of rotations and empowered the European Commission to do so through secondary legislation.

Reuse targets

For the first time, companies in the EU will be obliged to use reusable transport packaging for inter-branch logistics throughout the EU, and for transporting products within the same member state. Clear reuse targets have also been set for other transport packaging use cases, whereby 40% of transport packaging must be reusable by 2030. This sets a positive direction of travel for industry players to move away from single-use and towards reuse.

However, the exemption of cardboard packaging from the reuse targets in Article 26 is a missed opportunity to prioritise more sustainable packaging. Data from Germany confirms that 61% of transport packaging is made of cardboard,¹ and the non-cardboard segment of transport packaging is to a large extent already reusable (reusable plastic, metal and pooled wooden packaging). Zero Waste Europe, the leading anti-waste NGO warns of the risk of material substitution, where one single-use packaging (plastic) is simply replaced by another (cardboard)². We believe a better approach would have been to further strengthen the reuse targets by minimizing the exception, since well-designed reuse systems lead to real packaging waste reduction.

Finally, although reuse is above recycling in the waste hierarchy, the final text introduced a last-minute option for certain member states to exempt their economic operators from the reuse targets. Those countries which exceed the 2030 recycling targets by 5 percentage points by 2025, or are expected to do so by 2030 may (but thankfully don't have to) allow a 5-year derogation from the reuse targets. Recycling after a single use uses many valuable resources and is not an equal alternative to reuse or waste prevention, therefore any exemptions on these grounds will be counterproductive to the PPWR's objectives.

¹ Study by the Naturschutzbund Deutschland (NABU), 2022, https://www.nabu.de/imperia/md/content/nabude/abfallpolitik/20220925-%20nabu_gvm-transportverpackungen.pdf

² Zero Waste Europe, 2024, <https://zerowasteurope.eu/press-release/ppwr-deal-good-steps-to-reduce-packaging-waste-despite-worrying-exemptions-says-zero-waste-europe/>

Definition of reuse

A clear definition of reuse is essential to reduce the risk of greenwashing. Having a standardised definition of reuse set out in EU legislation is another positive step for European operators in the reuse sector. A specific number of rotations will form an essential part of that definition, in order to ensure further clarity and reduce greenwashing. The minimum number of rotations have to be set sufficiently high so as to allow end users to distinguish true reuse. This is also key to avoid single-use packaging being mis-marketed as reusable.

Recycled content

The PPWR sets obligations to use a minimum percentage of recycled content in various packaging formats. We are pleased that the recycled content levels will be calculated per packaging type and format on an operator or plant level, as this is the most logical and feasible approach for verification and will allow for the fastest scaling of recycled material use.

As manufacturers of reusable transport packaging, we are already taking steps towards including recycled content in our products where possible, while ensuring that our products maintain the high quality that allows them to be reused for years. However, this requires that sufficient high-quality recyclate is available on the market, at a level that allows for a significant scaling up of reusable packaging.

Moreover, the reusable transport packaging industry has long been a trailblazer in recycling its own products. Our plastic remains highly valuable once our products reach their end of life. We regrind our crates typically after years of use, and use the plastic to remake a new crate. The cradle-to-cradle approach, in a closed loop, is the most sustainable way to reuse our valuable resources.

Reuse is the most sustainable and resource-efficient solution to eliminate unnecessary packaging waste. The RCTP will continue to work together with European policymakers to advocate for higher waste prevention measures and stronger reuse ambitions to drive circularity and incentivise resource efficiency.