

Creating a policy framework to support the transition to reuse

POLICY RECOMMENDATIONS
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Credits

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Creating a policy framework to support the transition to reuse

The disposable nature of most packaging used today responds to a rationale and logic that is likely to change in the coming decades. According to a study from the World Economic Forum, 10-70% of plastic packaging could shift from single-use to refillables by 2030,¹ and many retailers are already piloting or scaling up reusable packaging. Yet, the reality today is that the infrastructure to deliver and manage products is designed and optimised for single-use packaging.

Drawing from the findings and conclusions of the accompanied **Report: Making Europe Transition to Reusable Packaging**² (hereinafter “the report”), these policy recommendations aim to objectively guide European policy-makers on how to accelerate the transition to effective reuse systems; what is needed in terms of legislative framework; and from where we should start.

The following key points are among the findings of the report:

- **The study has found that the packaging materials with higher energy use** - specifically single-use glass and aluminium - **are the ones with the greatest environmental impacts associated**. In other words, there is a strong correlation between the energy used for producing materials and the other environmental pressures for producing those materials. Although it is logical and necessary to address single-use plastics to tackle plastic pollution, we've been underestimating the impact of these other single-use materials and the unnecessary pollution they cause.

Special attention needs to be given to single-use glass, whose impact per litre is higher than for the other materials. In fact, consumption of single-use glass and related environmental impacts are massive yet not justified, since it is a material that is perfectly made/suited for reuse³ under the right conditions.⁴

¹ World Economic Forum, *Future of Reusable Consumption Models Platform for Shaping the Future of Consumption - Insight Report*. July 2021. Available at: www3.weforum.org/docs/WEF_IR_Future_of_Reusable_Consumption_2021.pdf

² Zero Waste Europe, *Making Europe Transition to Reusable Packaging*. Available at: <https://zerowasteurope.eu/library/making-europe-transition-to-reusable-packaging>

³ This is also confirmed by the findings of a previous study on the comparison between single-use and reusable packaging materials showing that single-use glass is the worst packaging format in terms of its overall environmental footprint, compared to other single-use material types. Further information is available at: www.zerowasteurope.eu/library/executive-summary-reusable-vs-single-use-packaging

⁴ As per right conditions, it means that for reusable packaging systems to be efficient, a set of conditions need to be in place, such as: system infrastructure (e.g. drop-off networks, return logistics, washing facilities, redistribution, item tracking, incentive to return) under a well-managed pooling system, packaging design and durability (e.g. number of cycles, 'universal' designs), employee training, systems at scale, minimum viable population density, among others.

- **Start with beverages, take-away food & drinks and e-Commerce packaging: These are market sectors that are already in route to deliver on reuse and offer the biggest potential to increase their reuse rates in the coming years.** These sectors include beverages (especially beer, wine, soda drinks, water), take-away food and drinks as well as e-Commerce. Developments in these sectors can create the conditions and infrastructure for other sectors to introduce reusable packaging systems in the future.

Therefore, the findings of the study suggest starting to legislate for these market segments in order to start building the necessary infrastructure, which over time could also be used to accommodate other packaging categories.

The upcoming revision of the Packaging and Packaging Waste Directive is an opportunity for the EU to provide direction, vision, and legal certainty for the reintroduction of reusable packaging for these sectors by adopting the ambitious policy measures as illustrated hereafter.

Overarching reuse policies

Setting a cap on single-use packaging

- **The use of single-use packaging for food, beverage, e-Commerce, and household care products should be reduced by 50% (by units) by 2030.**

A recent study⁵ has shown that scaling up reusable food and beverage containers in the HORECA sector by 50% by 2030 can bring about the following savings:

- 27.1 million tonnes fewer resources used;
- 7.4 billion cubic meters of water saved;
- 2.6 million tonnes of CO₂ eq;
- 10.4 billion EUR in savings;

Likewise, scaling up reusable packaging in the household care sector by 50% by 2030 can bring about the following savings:

- 537,000 tonnes fewer resources used;
- 1.6 billion cubic meters of water saved;
- 642,000 tonnes of CO₂ eq;
- 804 billion EUR in savings;

For the e-Commerce sector, scaling-up reusable packaging by 50% by 2030 can bring about the following savings:

- 250,000 tonnes fewer resources used;
- 1 billion cubic meters of water;
- 429,000 tonnes of CO₂ eq.

Introducing reuse targets

⁵ Rethink Plastic Alliance, *Realising Reuse*. July 2021. Available at: rethinkplasticalliance.eu/wp-content/uploads/2021/07/Realising-Reuse-Final-report-July-2021.pdf

- **Overall reuse target for all packaging placed on the EU market, thus sending a strong signal to all market sectors to kick-start the transition.**
- **Sector-specific reuse targets or dedicated targets per packaging type**

These sector-specific targets should be set at a higher level according to (i) their readiness to shift to reusable packaging, for instance those under which reuse systems infrastructure is already in route or already in place (e.g. beverage sector, take-away food and drinks, and e-Commerce); as well as (ii) their environmental footprint (e.g. market segments relying heavily on single-use glass)⁶.

Reuse targets should be legally binding as it is already the case in Austria (reuse targets of 25% by 2025 and at least 30% by 2030 for beverage packaging), France (5% of all packaging to be reusable by 2023 and 10% by 2027), Germany (reuse target of 70% for beverage packaging), Romania (5% packaging to be reusable by 2020, plus a 5% annual increase until 2025), Portugal (30% of all packaging to be reusable by 2030) and Sweden (increase of reusable packaging by at least 20% by 2026 and by at least 30% by 2030). Also, targets should be accompanied with requirements for transparent monitoring and reporting, and enforcement mechanisms as well as guidance on how to set up well-managed pool systems.

Economic incentives to support the transition:

- **Extended Producer Responsibility (EPR) schemes should dedicate a minimum of 10% of their budget to promote refillables and finance reuse infrastructure.**

So far, existing EPR schemes have served to partially fund the collection of some waste streams, but have had little to no success in pushing for better design of products. Therefore, in addition to the eco fee modulation that can enable the shift towards circular packaging and reward pioneering business models implementing reusable systems, a 'Fund for Change' to support this transition should also be created.

Due to the current lack of a level playing field with single-use packaging, raising revenues to create a 'Fund for Change' could ensure financial support for reusable systems to overcome barriers to entry - such as capital investments for collection vehicles or washing facilities. They could also be used by municipalities and communities to invest in waste prevention/reuse local systems.

For instance, CITEO (the French PRO) dedicates part of its budget to meeting the 5% target of reusable packaging in accordance with the French Circular Economy Law.

- **Any single-use packaging should pay a minimum fee of 10 cents per unit.**

Placing a levy (visible on payment) on single-use packaging can help create a level playing field with reusable packaging, as today the former does not internalise its associated costs. Also, it could quickly incentivise businesses to seek alternatives and create demand for reuse systems.

⁶ WeChooseReuse, Setting effective reuse targets to serve the upscale of reusable packaging. April 2022. Available at: https://rethinkplasticalliance.eu/wp-content/uploads/2022/04/WeChooseReuse_EffectiveTargets_def.pdf

For example, Estonia has set a minimum of €0.50 for single-use beverage cups and food containers to be paid by consumers at the point of sale. In parallel, the Estonian legislation has set an obligation to establishments to inform the availability or the acceptance of reusable containers.⁷

Supporting reuse alternatives:

- **Large retailers should offer refillable options for food, beverage containers and household products.**
- **Obligation to offer and take-back packaging: Any restaurant, cafe, or shop selling food or drinks to consume on the go should be obliged to offer refillable options and to take back the containers.**

It is important that the reusable packaging belongs to an effective pooling reuse system with take back logistics (see below about effective pool systems) and is linked to an incentive to return (e.g. deposit). Also the availability of reusable packaging options should be clearly indicated in the establishment and communicated to consumers. In addition, refillable options should not be a lot more expensive than the single-use packaging.

This is already the case in the Netherlands,⁸ where HORECA will have to offer a reusable alternative from 1 July 2023 onwards, and Estonia, under which any establishment will have to offer the consumer the opportunity to purchase food and beverage in reusable packaging by the end of 2023, and then fully switch to reusable packaging by the end of 2025.

- **Any retailer selling food, drinks, and non-hazardous cleaning products should accept that consumers bring their own container (dully washed packaging).**

Supporting the implementation of refill/reuse systems

- **Encourage deposit-return schemes (DRS) for refill/reuse beyond beverage packaging.**

A common denominator to most successful collection systems is the presence of a deposit return scheme (DRS), which guarantees high return rates of the packaging.

If the EU wants to move towards a real circular economy that retains value by reusing materials over and over, uses recycling as a last resort and ensures that no waste is leaked into the environment, DRS should be implemented beyond one-way packaging to include reuse and refill and expanded to as many packaging categories as possible.

⁷ Rethink Plastic Alliance, *Moving on From Single-Use Plastics: How is Europe Doing?*, July 2021. Available at: rethinkplasticalliance.eu/wp-content/uploads/2021/06/SUP-Assessment-Design-final.pdf

⁸ Rijksoverheid, *Regeling kunststofproducten voor eenmalig gebruik*, March 2022. Available at: www.rijksoverheid.nl/documenten/regelingen/2022/03/29/bijlage-2a-ministeriele-regeling-kunststofproducten-voor-eenmalig-gebruik

A recent case study⁹ on a refillable wine system in the region of Catalonia, Spain has found that DRS is the most effective way of guaranteeing the return of empty bottles to establishments by consumers - far above other incentives. Specifically, the economic rewards registered an average return rate of between 2-22%, similar to the raffles (12-18%); whereas DRS achieved higher return rates (85-95%).

- **Define essential requirements for pool systems and provide guidelines on their set-up and operation.**

Well-managed pool systems are a key element for the success of reusable packaging. Providing guidelines about how they should be set-up and operated would save time and effort going forward.¹⁰

For instance, the German Genossenschaft Deutscher Brunnen (GDB) system for mineral water and soft drinks and VDF for juices are examples of well-managed effective pool systems in operation for decades. They are living proof of the importance of having well-established governance structures when achieving high performance in both economic and environmental terms.

- **Set general parameters for aligning standardising packaging design and return incentives across brands and companies in a way that enables sharing of container collection points, washing facilities, and logistics**, including a minimum number of cycles (re-uses), labelling, digital tags (QR codes), reuse symbols, among other product design requirements.

Specific reuse policies per product category

Take away food and drinks

- **By 2026, refillable alternatives to single-use packaging should be made available by any restaurant, cafe, or shop selling food or drinks to consume on the go.**

This initiative was already announced in the New Circular Economy Action Plan,¹¹ with an initiative to substitute single-use packaging, tableware, and cutlery with reusable products in food services would be proposed by the European Commission.

Some Member States have already established a legal obligation to offer reusable packaging alongside single-use options for take-away food and beverage containers, such as Germany, whose requirement will enter into force on 1 January 2023.¹²

- **By 2025, a levy on single-use packaging of at least €0.50 per packaging should be applied to every unit of single-use packaging. The money raised with the levy should be reinvested in reusable infrastructure ('Fund for Change'), as mentioned above.**

⁹ Zero Waste Europe, *The Story of reWINE*. October 2021. Available at: zerowasteurope.eu/library/the-story-of-rewine

¹⁰ Detailed information is provided in our policy briefing on the need to set essential criteria for setting up managed pool systems.

¹¹ European Commission, *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: A new Circular Economy Action Plan For a cleaner and more competitive Europe*, p15. March 2020. Available at: eur-lex.europa.eu/legal-content/EN/TXT/?qid=1583933814386&uri=COM:2020:98:FIN

¹² Bundesministerium der Justiz, §33 and §34. July 20217. Available at: www.gesetze-im-internet.de/verpackg_

While €0.50 per item seems high, it is imperative that the cost gap between reusables (which cover all their related costs), are competitive with single-use packaging (whose environmental burden is mostly externalised and cost communities excessive amounts of money from waste management). Without a proper levelling of the playing field, the transition to reuse will not happen quickly.

Along these lines, the Estonian Law has set a minimum cost for single-use cups and food containers of €0.50 from 2023. This is also happening at the local level in other EU Member States: for instance, the city of Tübingen (Germany), has announced the introduction of a municipal tax on single-use packaging for consumption on the go at the beginning of 2022.¹³

In Ireland, a “latte levy” was introduced as of 2022 to incentivise the consumption reduction of single-use cups. Levies should also be imposed on single-use food containers with a requirement to provide reusable food containers at large-scale public events.¹⁴

On the investment side, France has allocated €40 million towards reuse investments for 2021–2022 as part of their circular economy fund.¹⁵

- **By 2027, 75% (and by 2035, 90%) of the take-away food and drink containers should be in reusable and refillable packaging.**

Sweden has adopted a consumption reduction target of 50% by 2026 (compared to 2022 data) for food and beverage containers, and all suppliers must offer a reusable alternative.¹⁶

- **By 2027, 100% of eat-in food and beverages should be in reusable packaging.**

In this regard, the Estonian Law has also determined the availability of reusable packaging from 2023 onwards, and the phase-out of single-use packaging entirely by 2025. According to Estonian Law, local governments will also be required to ensure that reusable containers and cutlery are provided at public events as of 2023.¹⁷

In Greece, the law has set binding requirements for retailers to provide for reusable packaging and obligatory discounts for consumers who bring their own reusable packaging. These measures are applicable to the entire hospitality and retail sectors, and have been enforced since January 2022. Catering services are no longer allowed to use single-use plastic products.¹⁸

Ireland established a ban for restaurant use of disposable cups, with a provision for a full ban in the longer run.¹⁹

¹³ CAPonLITTER, *The local packaging tax in Tübingen (Germany)*, Interreg Europe. October 2020. Available at: www.interregeurope.eu/caponlitter/news/news-article/10114/the-local-packaging-tax-in-tuebingen-germany

¹⁴ Rethink Plastic Alliance, *Moving on From Single-Use Plastics: How is Europe Doing?*, July 2021. Available at: rethinkplasticalliance.eu/wp-content/uploads/2021/06/SUP-Assessment-Design-final.pdf

¹⁵ Republique Francaise, Décret n° 2021-517 du 29 avril 2021 relatif aux objectifs de réduction, de réutilisation et de réemploi, et de recyclage des emballages en plastique à usage unique pour la période 2021-2025, April 2021. Available at: www.legifrance.gouv.fr/loda/id/JORFTEXT000043458675

¹⁶ Rethink Plastic Alliance, *Moving on From Single-Use Plastics: How is Europe Doing?*, July 2021. Available at: rethinkplasticalliance.eu/wp-content/uploads/2021/06/SUP-Assessment-Design-final.pdf

¹⁷ *Ibid.*

¹⁸ *Ibid.*

¹⁹ *Ibid.*

In the Netherlands²⁰, single-use plastic cups, containers, and tableware will no longer be allowed in restaurants, events or offices as of 2024. Therefore, reusables will be obligated by 2024 for in house consumption for food and beverages. The regulations distinguish between on-site and on-the-go consumption. For on-site consumption, reusable tableware is to be used, with only care facilities exempt. For on-the-go and take-away consumption, an amount will have to be paid for the single-use plastic cup and container in addition to the price of the coffee or meal from July 2023. This also applies to paper cups that have a plastic layer, as well as plastic packaging available in supermarkets that resembles to-go packaging.

Soft drinks, water, wine and beer

- **By 2030, the HORECA sector should sell the following rate of refillable packaging:**
 - Beer: 80%
 - Soft drinks: 70%
 - Bottled water: 70%
 - Wine and sparkling wine (including champagne, cava, spumante, etc): 50%
- **By 2030, the retail sector should sell 60% of the overall beverage packaging in refillable packaging.**
- **By 2027, there should be an obligation to use hydrosoluble glues and labels (in order to ease washing up processes and reduce the pollution caused by microplastics).**
- **By 2027, there should be an obligation to implement DRS for refillable packaging for soft drinks, water, wine, and beer.**

Spain has drafted a national decree²¹ for the adoption of beverage reuse quotas in the HORECA sector for water, beer, juices, and soft drinks; as well as a general beverage packaging reuse target for domestic consumption.

In Greece, a provision of public water taps has been made mandatory in all municipal athletic centres and playgrounds (since July 2021) to reduce the consumption of bottled water.²²

Last year, Austria announced the adoption of binding refillable targets in their Waste Management Act²³ by mandating a beverage reuse quota of 25% by 2025 for specific market sectors.

²⁰ Kuntstoffweb, *Niederlande: Verbot von Einweg-Bechern und -Verpackungen*, April 2022. Available at: www.kunststoffweb.de/branchen-news/niederlande_verbot_von_einweg-bechern_und_-verpackungen_t250008

²¹ Ministerio para la transición ecológica y el reto demográfico, *Proyecto de real decreto, de envases y residuos de envases*, September 2021. Available at: www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/participacion-publica/210927proyectordeenvases_tcm30-531124.pdf

²² Rethink Plastic Alliance, *Moving on From Single-Use Plastics: How is Europe Doing?*, July 2021. Available at: rethinkplasticalliance.eu/wp-content/uploads/2021/06/SUP-Assessment-Design-final.pdf

²³ Rechtsinformationssystem Des Bundes, *Bundesrecht konsolidiert: Gesamte Rechtsvorschrift für Abfallwirtschaftsgesetz 2002, Fassung vom 30.03.2022*, March 2022. Available at: www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=20002086

E-commerce packaging

- **By 2027, any online retailer selling in the EU should offer the shipping of bought products in reusable packaging.**
- **By 2030, 50% (and by 2035, 80%) of the packaging used by online retailers should be reusable.**
- **By 2027 any online retailer should offer an 'opt-out' option for free-packaging delivery of products whose own packaging is already suitable for shipment.**

Nowadays, many product packaging is already suitable for shipment (e.g. those that already come in boxes, and not fragile, etc.), so often, additional shipment packaging is simply not needed. Therefore, online retailers should offer an option for consumers that want to reduce their waste with a packaging-free delivery.

- **By 2027, a levy on single-use packaging of at least €0.50 should be applied. The money raised with the levy should be reinvested in reusable infrastructure (the 'Fund for Change').**

The full report 'Making Europe transition to reusable packaging' can be found here.