

# Making Europe transition to reusable packaging

EXECUTIVE SUMMARY  
MAY 2022



#We  
Choose  
reuse

#GET  
BACK

ZERO  
WASTE  
EUROPE



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# Credits

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## Project Partners



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# Executive Summary

The way we use packaging in Europe has wide room for improvement. The overwhelming majority of packaging in the market loses over 95% of its value after the first use.<sup>1</sup> The last decades have brought about an unprecedented increase in packaging use and a decline in packaging reusability<sup>2</sup> and recyclability.<sup>3</sup>

Despite prevention and reuse getting priority in the European waste hierarchy since 2008 in the Waste Framework Directive (WFD) and in the Packaging and Packaging Waste Directive (PPWD), all packaging related legislation has focused almost entirely on single-use packaging. From the existing studies and analysis of the environmental impacts of single-use and reusable packaging, it is known that the circumstances under which the packaging is produced and used (e.g.: production process; mode of transport, energy mix, frequency of reuse (number of cycles); reverse logistics and end-of-life) determine what type of packaging provides the most sustainable and cost-effective solution in a given context.<sup>4</sup>

In a context where increasing public attention is put on the urgency to decarbonise our economies and move towards a circular use of resources and materials, the clear limitations of single-use packaging are being exposed, and reusable packaging is now standing high on the agenda of policy-makers and key market players. However, **the big question is where and how to start this transition to circularity when the whole retail distribution system is designed and wired to work with single-use packaging.**

The focus on single-use packaging by the industry and policy-makers over the last decades has created a situation in which there is still a broad lack of data on how reusable packaging is used across Europe. Among others, this lack of baseline makes it hard to prepare a roadmap to implement reusable packaging where it makes sense.

**Therefore, this report aims at bringing the evidence needed (from a quantitative and qualitative aspect) for determining the product categories that are most suitable for the transition of some packaging from single-use to reusable options.**

This report is based on a [study](#) (hereinafter called 'the study') commissioned by Zero Waste Europe (ZWE) to the Recycling Network Benelux (RNB), as part of a European project - the ReuSe Vanguard Project (RSVP) - which also relies on the active involvement of stakeholders from 5 European

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<sup>1</sup> EMAF, *The new plastics economy rethinking the future of plastics and catalysing*, available at:

[ellenmacarthurfoundation.org/the-new-plastics-economy-rethinking-the-future-of-plastics-and-catalysing](https://ellenmacarthurfoundation.org/the-new-plastics-economy-rethinking-the-future-of-plastics-and-catalysing)

<sup>2</sup> Reloop, *What We Waste*, available at:

[www.reloopplatform.org/wp-content/uploads/2021/04/What-We-Waste-Reloop-Report-April-2021-1.pdf](https://www.reloopplatform.org/wp-content/uploads/2021/04/What-We-Waste-Reloop-Report-April-2021-1.pdf)

<sup>3</sup> Rethink Plastic Alliance, Zero Waste Europe, Friends of the Earth Europe, *Justifying Plastic Pollution: The shortcomings of Life Cycle Assessments in Food Packaging Policy*. Available at:

[www.zerowasteurope.eu/wp-content/uploads/2019/11/zero\\_waste\\_europe\\_report\\_justifying-plastic-pollution\\_the-shortcomings-of-lc-as-in-food-packaging-policy\\_FoEE.pdf](https://www.zerowasteurope.eu/wp-content/uploads/2019/11/zero_waste_europe_report_justifying-plastic-pollution_the-shortcomings-of-lc-as-in-food-packaging-policy_FoEE.pdf)

<sup>4</sup> Zero Waste Europe, Reloop and University of Utrecht, *Reusable VS single-use packaging – A review of environmental impact, Executive summary* available at: [www.zerowasteurope.eu/library/executive-summary-reusable-vs-single-use-packaging](https://www.zerowasteurope.eu/library/executive-summary-reusable-vs-single-use-packaging)



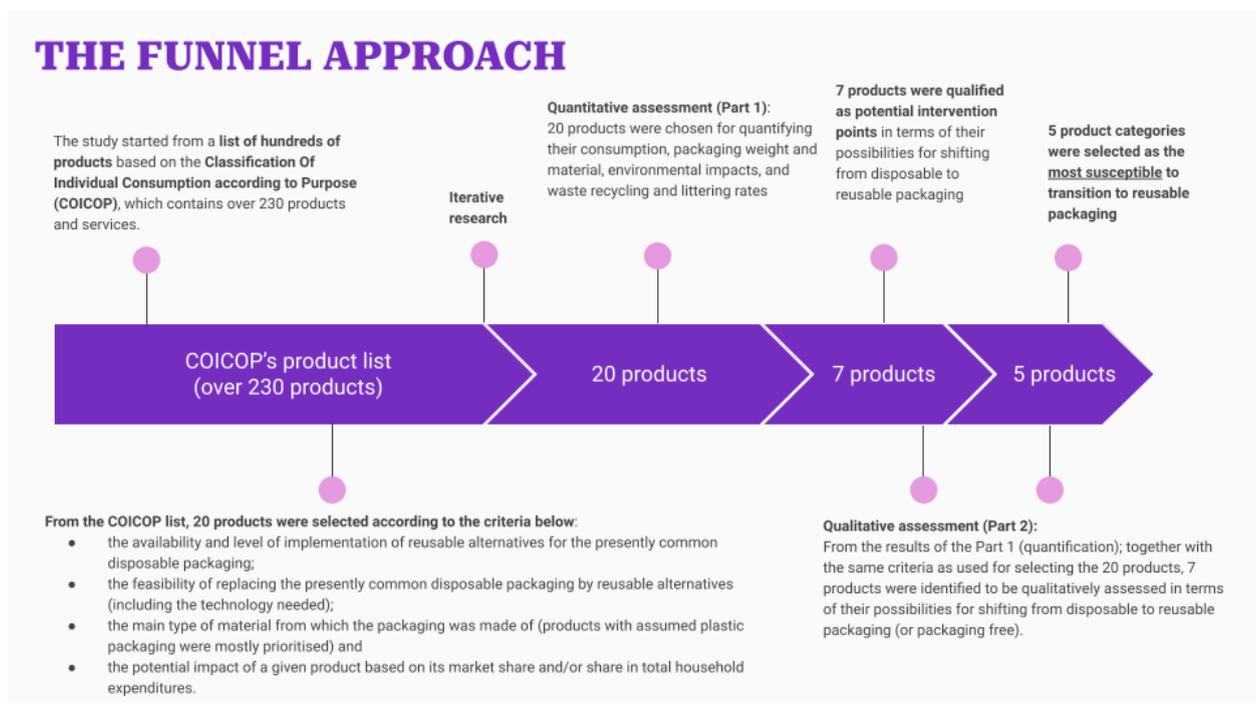
countries, namely Belgium, the Netherlands, Germany, Spain and France, the EU and beyond. Through this report we aim to highlight the findings of the study related to the concrete packaging sectors that present the biggest potential in terms of their environmental impacts and feasibility of replacing (partly or completely) single-use by reusable (or no) packaging in the coming years.

**To our knowledge, this study is the first to quantitatively and qualitatively analyse the European packaging market with the purpose to detect specific market interventions which will allow the transition of some packaging from single-use to reusable options.**

# Study's methodology

The study was based on an iterative collaborative research designed to follow a funnel approach, which helped select 5 priority products for which market intervention plans for shifting their packaging from single-use to reusable would be further developed.

The funnel approach started from a list of hundreds of product categories (selected based on the Classification Of Individual Consumption according to Purpose (COICOP)), which contains over 230 products and services at the most detailed level ([Eurostat, 2022a](#)). This list was further narrowed down in a couple of steps according to a set of criteria (see Figure 2) until the final list of the 5 most suitable products to transition, partly or completely, to reusable solutions.



The study was divided into two parts:

- **Part 1: Quantitative assessment**

The first part mapped the packaging landscape in Europe through an iterative collaborative research by quantifying 20 products in terms of their:

- Consumption;
- The weight of their packaging and of the materials in these packaging;
- The related environmental pressures; and
- Rates of waste recycling and littering.

The quantification applies to **2019 as the base year**, and covers **the Netherlands, Belgium, Germany, France, Spain and EU28**.

The 20 products packaging covered in the first part were: 1 & 2) baby food in pouches & jars; 3) beer; 4) cleaning agents; 5) conserved vegetables; 6) dry food (refined further to pasta and rice); 7) fruit juices; 8) milk & milky drinks (refined to milk); 9) oils & fluid fats for cooking (refined to olive oil); 10) postal services (refined to post & packages); 11) shampoos & shower gels (refined to hair care products); 12) soda drinks; 13) grapes; 14) water (refined to carbonated water and still water); 15) wine; 16) take-away warm drinks; 17 & 18) take-away & delivery meals (refined to pizza and other meals); 19) textile washing soaps & softeners (limited to softeners); and 20) yoghurt.

For the purpose of this report, we have divided the 20 products into 4 market sectors:

- **Beverages:** Beer, soda-drinks, water (sparkling and still water), wine, fruit juices, milk & milky drinks;
  - **e-Commerce:** Postal services (refined to post & packages);
  - **Take-away:** take-away warm drinks, and take-away & delivery meals;
  - **Retail (excluding beverages):** baby food in pouches & jars, cleaning agents, conserved vegetables, dry food (refined further to pasta and rice), oils & fluid fats for cooking (refined to olive oil), shampoos & shower-gels (refined to hair care products), table grapes, textile washing soaps & softeners (limited to softeners), and yoghurt.
- **Part 2: Qualitative assessment**

From the results of this quantification assessment, the study selected 7 products to run additional qualitative assessment; which are: (i) cleaning agents, (ii) dry food, (iii) soda drinks & (sparkling) water, (iv) postal services, (v) take-away & delivery meals, (vi) take-away warm drinks and (vii) wine.

The approach for this second part took the following steps:

- Identifying 7 products qualifying as potential intervention points in terms of their possibilities for shifting from disposable to reusable packaging (or packaging-free).
- Qualitatively assessing prospects to shift from disposable to reusable (or no) packaging.
- Identification of the final 5 product categories most susceptible to transition to reusable packaging.

Therefore, the second part qualitatively assessed the possibilities for shifting from disposable to reusable packaging (or packaging-free) for the 7 products above mentioned, and then, selected the final 5 product categories most susceptible to transition to reusable packaging.

Then, based on the additional qualitative assessment, 5 final products were selected as the most suitable to transition, partly or completely, to reusable packaging, which were: (i) soda drinks &

(sparkling) water, (ii) postal services, (iii) take-away & delivery meals, (iv) take-away warm drinks and (v) wine.

This report summarises the results for both the first and second part.

# The quantitative assessment

For the product consumption assessment, the study used a mix of trade statistics (like from the European Union ([Eurostat, 2022b](#)) or Food and Agriculture Organisation ([FAO, 2022](#)) and data from other reliable data sources, since trade statistics usually do not provide an exact indication of product consumption.

The quantification for each selected product started with its consumption, which was the basis for quantifying the weight of (the materials in) the single-use packaging for each product category; which were, in turn, the basis to quantify the associated environmental impacts.

Nevertheless, depending on data availability, the quantification of the packaging of the chosen product categories was either derived from sales data - which could or could not be disclosed (e.g. GlobalData - most the case of beverages), like volumes or total number of units sold - or based on self weighing of most current used formats of packaging and extrapolations on the basis of the number of inhabitants in each country and the EU28 as taken from [Eurostat \(2022c\)](#). For further detailed information on the criteria and assessment is available on Table 2 of [the study](#).

According to the reference study, the data represents the best quality currently available as packaging for most products has not been quantified before.

## Packaging Consumption

The findings of the quantitative assessment of the 20 selected products are described below. **The data of all products assessed and quantified in this report are of single-use packaging.**

**In the EU28, the single-use packaging consumption (in kttons) for the products below in 2019 were:**

*PS: The data below has been colour coded according to their quality, **green** data being considered of **good quality** and **red** of **mediocre quality**.<sup>5</sup>*

### Beverage packaging:

- **Wine (in single-use glass bottles):** 7,651.5 kttons of single-use packaging.
- **Beer:** 3,465.1 kttons of single-use packaging.
- **Soda drinks:** 1,056.4 kttons<sup>6</sup> of single-use packaging.
- **Sparkling water:** 831.3 kttons of single-use packaging.

<sup>5</sup> In the reference study the data was classified as good, reasonable, mediocre; according to the sources of the obtained data for product consumption and product packaging. Since some data for the product consumption and packaging were mixed (included good/reasonable/mediocre data), in this report, we've classified the data in two: good (only the product categories under which both product consumption and packaging were classified as good) and mediocre (for the product categories under which the data was mixed, reasonable and mediocre). According to the reference study, the data represents the best quality currently available as packaging for most products has not been quantified before. Detailed information on the classification is available in [the study](#) (p.15).

<sup>6</sup> A kiloton or metric ton (kton) is the standard indicator base unit for mass is the kilogram. 1 kton is equal to 1,000,000 (1 million) kilograms.

- **Still water:** 779.2 ktons of single-use packaging.
- **Fruit juices, nectars and (fruit) flavoured still drinks:** 597.3 ktons of single-use packaging.
- **Milk:** The shares of milk sold in cardboard milk-boxes or plastic jugs are unknown. So therefore the total packaging weight has been quantified as if all milk would be for 100% in either the one or the other.
  - If 100% would be in 2 litre single-use plastic jugs: 805.9 ktons of PET packaging material.
  - If 100% would be in 1 litre single-use cardboard boxes: 764 ktons of cardboard packaging material, 40.7 ktons of aluminium and 213.9 ktons of HDPE.

SINGLE-USE PACKAGING CONSUMPTION (in kton)	
<b>SINGLE-USE BEVERAGE PACKAGING</b>	14,380.80
Wine (single-use glass)	7,651.50
Beer	3,465.10
Glass bottles	3,117.99
Aluminium cans	258.60
PET bottles	88.50
Soda	1,056.40
Glass bottles	345.60
Aluminium cans	149.10
PET bottles	561.70
Sparkling water	831.30
Glass bottles	188.30
Aluminium cans	3.20
PET bottles	639.80
Still water	779.20
Glass bottles	131.30
PET bottles	646.20
Cardboard boxes	1.70
Juices	597.30
Glass bottles	276.40
Aluminium cans	6.10
PET bottles	125.70
HDPE bottles	2.20
Cardboard boxes	180.50
Aluminium foil pouches	0.60

Milk	
If 100% plastic jugs	805.90
If 100% cardboard boxes	1,018.60

## e-Commerce packaging:

- **Postal services:** 59 billion units of single-use packaging for postal services were used in 2019 in the EU28, which corresponds to 2,848.2 kttons of packaging.

SINGLE-USE PACKAGING CONSUMPTION (in kton)	
SINGLE-USE e-Commerce PACKAGING	2,848.20
Cardboard shipping boxes	2,495.40
Paper envelopes	283.50
Plastic cover for periodicals	44.80
Plastic shipping bags	24.50

## Take-away packaging:

- **Take-away warm drinks (single-use) cups:** 17.1 billion units of single-use packaging for take-away warm drinks were used in 2019 in the EU28, which corresponds to 169,7 kttons of packaging.
- **Take-away & delivery (single-use) packaging meals:**
  - **For pizza in cardboard boxes:** 1.4 billion units of single-use packaging for take-away pizza, which corresponds to 186.5 kttons of packaging.
  - **Other than pizza:** 16.5 billion units of single-use packaging for take-away & delivery meals (other than pizza), which would correspond to:
    - If 100% would be in Polypropylene (PP): 519.8 kttons.
    - If 100% would be in Paper: 430.9 kttons.
    - If 100% would be in Aluminium: 125.4 kttons.

SINGLE-USE PACKAGING CONSUMPTION	
SINGLE-USE TAKE-AWAY PACKAGING	Weight in kton
Take-away warm drinks	169.70
Paper cups	31.90
Plastic cups	137.80
Take-away food	

Pizza cardboard boxes	186.50
Other than pizza cardboard boxes	430.90
Plastic (PP)	519.80
Aluminium	125.40

## Retail packaging consumption (other than beverage and take-away):

- **Baby food in single-use pouches:** The shares of baby food sold in pouches or jars are unknown. So therefore the total packaging weight has been quantified as if all baby food would be for 100% in either the one or the other.
  - If 100% would be in single-use plastic pouches: 8.7 ktons of plastic (PP) material.
  - If 100% would be in single-use glass jars: 70 ktons of single-use glass packaging material.
- **Cleaning agents in single-use plastic bottles:** No sufficient data was available. Data found from Belgium has then been extrapolated to the other covered countries and the EU28, which in terms of packaging weight represents 131.5 ktons of PET bottles and 54.8 ktons of HDPE bottles.
- **Conserved veggies:** No sufficient data was available. Data found from Germany and France has then been extrapolated to the other covered countries and the EU28.
  - In single-use metal cans: 12.8 billion of metal cans were consumed in 2019, whose packaging weight estimation accounted for 2,826.3 ktons, including 668 ktons of steel packaging.
  - In single-use glass jars: 15.1 billion units of 340g jars, whose weight estimation would be 2,826.3 ktons, including 2,584.5 ktons of single-use glass jars and 166.3 ktons for the iron lids.
- **Hair care products in single-use plastic bottles:** No sufficient data was available. Data found from the Netherlands has then been extrapolated to the other covered countries and the EU28: 5 billion bottles of hair care products were consumed in 2019, which accounts for 1.5 billion litres consumed. As regards packaging weight, it represents 84.1 ktons of HDPE bottles and 81.4 of PET bottles each.
- **Yoghurt:** The total packaging weight has been quantified as if all yoghurt would be for 100% in either the one or the other.
  - **If 100% would be in 1 litre single-use cardboard boxes:** In the EU28 around 11.7 billion units of yoghurt in cardboard boxes would have been consumed in 2019, whose weight volume accounts for 371.1 ktons, being 278.3 ktons of cardboard material, 77.9 ktons of HDPE plastic lining and 14.8 ktons of aluminium lining.

- **If 100% would be in single-use plastic containers:** In the EU28 around 94 billion units of yoghurt in plastic containers would have been consumed in 2019, whose weight volume accounts for 411.3 ktons of PP plastic, 250.6 ktons of coreboard overwrap, and 23.7 ktons of aluminium.
- **Olive oil in single-use plastic bottles:** In the EU28 around 2 billion plastic bottles were consumed for olive oil in 2019, whose PET packaging weight corresponds to 95.5 ktons.
- **Pasta & rice - if 100% would be in single-use plastic bags:** Both pasta and rice are available in many volumes in either cardboard boxes or plastic bags with unknown market shares. For this quantification, the study assumed that 100% of pasta and rice would be available in single-use plastic bags only.
  - **Pasta:** In the EU28 around 4,593.2 ktons of pasta were consumed in 2019, whose PP plastic packaging weight corresponds to 13.8 ktons.
  - **Rice:** In the EU28 around 2,344.8 ktons of rice were consumed in 2019, whose PP plastic packaging weight corresponds to 18.1 ktons.
- **Table grapes in single-use plastic clamshells:** 4.9 billion units of single-use plastic clamshells were consumed for table grapes in 2019, whose PET packaging weight corresponds to 97.9 ktons.
- **Textile softeners in single-use plastic bottles:** No sufficient data was available. Data found from Belgium has then been extrapolated to the other covered countries and the EU28: 667 million litres of textile softeners were consumed in 2019, whose packaging weight corresponds to 32.9 ktons of PET bottles and 13.7 ktons of HDPE bottles.

SINGLE-USE PACKAGING CONSUMPTION	
SINGLE-USE RETAIL PACKAGING	Weight in kton
<b>Baby food in single-use pouches</b>	
If 100% in plastic pouches	8.70
If 100% in glass jars	70.00
<b>Cleaning agents in single-use plastic bottles</b>	
PET bottles	131.50
HDPE bottles	54.80
<b>Conserved veggies</b>	
Metal cans	668.00
Glass jars	2,584.50
<b>Hair care products in single-use plastic bottles</b>	
PET bottles	81.40
HDPE bottles	84.10
<b>Yoghurt</b>	

<b>If 100% in cardboard boxes:</b>	371.10
- Cardboard	278.30
- HDPE plastic lining	77.90
- Aluminium lining	14.80
<b>If 100% in plastic containers:</b>	685.43
- PP plastic	411.13
- Coreboard overwrap	250.60
- Aluminium	23.70
<b>Olive oil</b>	
PET bottles	95.50
<b>Pasta in single-use PP plastic</b>	13.80
<b>Rice in single-use PP plastic</b>	18.10
<b>Table grapes in PET plastic</b>	<b>97.90</b>
<b>Textile softeners in single-use plastic bottles</b>	
PET bottles	32.90
HDPE bottles	13.70

From the data analysis above it is possible to identify that **the two product categories with the highest consumption rate in terms of packaging weight (from the 20 selected product categories) are:**

- **the beverage sector with total of 14,380.80 ktons of single-use packaging and**
- **e-Commerce with the total of 2, 848.2 ktons of single-use packaging consumed in 2019 in the EU28.**

## Packaging material and weight

**Products with glass packaging represent by far the largest weights, followed by cardboard (corrugated board) packaging, plastic and aluminium, respectively.** Although plastic is the material most used for packaging, the overall weight appears to be lower due to this material's lighter composition. **The material weights are indicators for the resources needed to produce these materials, but not of the environmental impacts related to the resource extraction, production, and end-of-life of packaging.**

In 2019, the total consumption by material type (in kton) for the beverage sector in the EU28 is:

BEVERAGE PACKAGING BY MATERIAL (without milk)	TOTAL WEIGHT (in kton)
Single-use glass bottles	11,711.09
Single-use plastic bottles (PET+HDPE)	2,064.10
Single-use aluminium cans	417.00
Single-use cardboard	182.20

In 2019, the total consumption by material type (in kton) combined for the beverage (excl. milk), e-Commerce & take-away warm drinks sectors in the EU28 is:

BEVERAGE (without milk), E-COMMERCE & TAKE-AWAY DRINKS	
BY MATERIAL	TOTAL WEIGHT (in kton)
Single-use glass	11,711.09
Single-use paper	2,993.00
Single-use plastic	2,271.20
Single-use aluminium	417.00

## Packaging recycling and littering rates

**Most statistics available on the recyclability of packaging are inaccurate and differ greatly between countries** according to their recycling capacity and calculation method. **Although EuroStat presents higher recycling rates for some packaging materials types, they do not reflect the reality of what is being actually recycled**, since:

- The calculation method for recycling differs country by country;
- The most common calculation method is by weight of the separated collected packaging - that is, without excluding losses of sorting and cleaning;
- A separate collection for recycling does not mean that the packaging is going to be effectively recycled - in fact, one third of plastic packaging destined for recycling is shipped outside of EU territory to developing countries without recycling capacity;
- Most single-use packaging placed in the EU market is made out of complex materials (e.g. layers, different materials and polymers); which implies the existence of waste management infrastructures equipped to deal with these products, which is not the case in practice;
- Current recycling statistics do not take into account inappropriate disposal and littering.

## Environmental impacts

The packaging categories that have the highest environmental impacts overall are: beverage packaging (beer, wine, soda and water) and e-Commerce packaging (cardboard paper). **More specifically, from the 20 products analysed:**

- Global warming (CO<sub>2</sub> emissions from the production phase): Beers, wine and soda drinks, respectively, are the products with the highest total carbon footprint;
- Energy use (from non-renewable sources): Wine, beer, soda drinks, water (sparkling and still), respectively, have shown the highest energy consumption;
- Land use: Cardboard boxes and envelopes, wine, and milk in cardboard boxes, respectively, have shown the highest impacts in terms of land use;
- Eutrophication: Beer, wine, soda drinks, and cardboard boxes, respectively, have shown to contribute the most to the eutrophication process.

Therefore, the **top 5 packaging with the highest environmental impact in Europe are those associated with the following product categories:**

- Beer;
- Wine;
- Soda drinks;
- Water (sparkling and still); and
- Cardboard packages for e-Commerce.

As per material type, these products are associated with single-use glass, single-use plastic, aluminium and single-use paper mostly.

Hence, as a result of the quantitative part of the study it can be argued that these are the categories that should receive most attention from the side of policy-makers as they contain the highest potential for reduction of environmental impact.

# The qualitative assessment

Giving continuity to the funnel approach, from the results of this first part (quantification); together with the same criteria as used for selecting the 20 products in the first part (Figure 1), 7 products were identified to be qualitatively assessed in terms of their possibilities for shifting from disposable to reusable packaging (or packaging-free). Then, the same criteria were applied to identify the final 5 priority products for which market intervention plans for their transition to reusable systems.

The 5 final priority products selected were:

- Soda-drinks & (sparkling) water;
- Wine;
- e-Commerce (cardboard packaging);
- Take-away & delivery drinks; and
- Take-away & delivery meals.

Although the quantitative results for beer in terms of their packaging consumption and environmental impacts were very significant, the reason for not prioritising beer in the qualitative assessment is because beers already have well-established and relatively well-functioning reuse packaging systems in Europe. In contrast, refilling systems for wine are not yet developed although they have a great potential.

On the other hand, although take-away packaging for delivery of meals and drinks were not among the packaging categories with the highest environmental impact from the results of the study, there are other various factors that make these products a key intervention point to the transition towards reusable packaging, such as its large and growing consumption, its iconic nature, its high litterability and the fact that alternatives are already available in the market albeit at small scale.

# Conclusions and recommendations

Looking at the quantitative and qualitative results of this study, two conclusions can be drawn:

- **First, from a materials perspective the current European legislation is putting a justifiable focus on reducing plastic pollution, yet in environmental terms there are other materials which have even bigger environmental impact (even when they are collected and recycled) and they have not been targeted by the prevention or reuse agenda.** For many applications in Europe using reusable packaging would significantly reduce the environmental impact and this study is the first to put these impacts in the spotlight.
- **Second, from a packaging categories perspective it can be argued that for the sectors of beverage (especially beer, wine, soda drinks, water), take-away food and drinks as well as e-Commerce have potential to greatly increase their reuse rates in the coming years and should be seriously considered as targets for legislative action.**

Currently there are systems and pilots more or less developed in most of these product categories and many EU member states, and local authorities are starting to intervene to provide such legal frameworks and economic incentives.

Nevertheless **it would be much more effective, especially for those European countries lagging behind, if for the upcoming revision of the Packaging and Packaging Waste Directive the EU would include the definitions, targets and incentives necessary to provide legal certainty to the above-identified priority packaging categories to start switching to reusable packaging.**

**Legislation that could be enacted to provide direction, vision and legal certainty for the reintroduction of reusable packaging for beverage, e-Commerce and take-away would be:**

- **Putting a cap on single-use packaging:**
  - A 50% reduction (by units) on the amount of single-use packaging for the beverage, e-Commerce and take-away food and beverage sector by 2030.
- **Setting reuse targets:**
  - Sector-specific reuse targets or dedicated targets by packaging types are one of the key elements that can help this transition.
- **Economic incentives to support the transition:**
  - EPR schemes should dedicate a minimum of 10% of budget to promote refillables and finance reuse infrastructure
  - Any single-use packaging should pay a minimum fee of 10 cents per unit.

- **Supporting the reuse alternatives:**
  - Refillable alternatives (belonging to a reuse system) to single-use packaging should be made available and taken back by any restaurant, cafe or shop selling food or drinks to consume on the go;
  - Any retailer selling fresh produce, drinks and non-hazardous cleaning products should accept that consumers bring their own container (dully washed packaging).
- **Supporting the implementation of refill/reuse systems:**
  - Deposit-return schemes for refill/reuse: A common denominator of most successful collection systems is that all of them include a deposit return scheme (DRS) for guaranteeing the return of the packaging for reuse. Therefore, Member States should be encouraged to implement DRS beyond beverage packaging and to incorporate reuse/refill within the system where possible.
  - Define essential requirements for pool systems: Well-managed pool systems are a key element for success for reusable packaging and providing guidelines about how they should be set-up and operated would save time and effort going forward.

**Further detail on the policy recommendations are available here.**