

Packaging Reuse vs. Packaging Prevention

Understanding which policy measures best apply
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Credits

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Zero Waste Europe is the European network of communities, local leaders, experts, and change agents working towards the elimination of waste in our society. We advocate for sustainable systems and the redesign of our relationship with resources, to accelerate a just transition towards zero waste for the benefit of people and the planet.



Environmental Action Germany (DUH) has been committed to preserving the natural foundations of life for more than 40 years. In doing so, it brings together environmental and consumer protection like no other organisation in Germany. In the area of circular economy, DUH has been campaigning for waste prevention, responsible consumption and sustainable business models.



Reloop is an international non-profit organization that brings together industry, government, and NGOs who share a vision of a thriving global circular economy - a system where resources are kept in continuous use and waste and pollution are eliminated. Our broad network seeks to bring about positive change at all levels of resource and waste policy. We want a world free of pollution, where an ambitious and integrated circular economy allows our precious resources to remain resources, so that people, businesses and nature can flourish.



Rethink Plastic is an alliance of leading European NGOs with one common aim: a future that is free from plastic pollution. It represents thousands of active groups, supporters and citizens all across Europe, and is part of the global Break Free From Plastic movement, consisting of over 1000 NGOs and millions of citizens worldwide.



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When dealing with packaging there seems to be a confusion between the actions referring to reuse and to prevention. Despite the fact that both contribute to reducing waste arisings, from a policy making perspective they should be treated as different concepts.

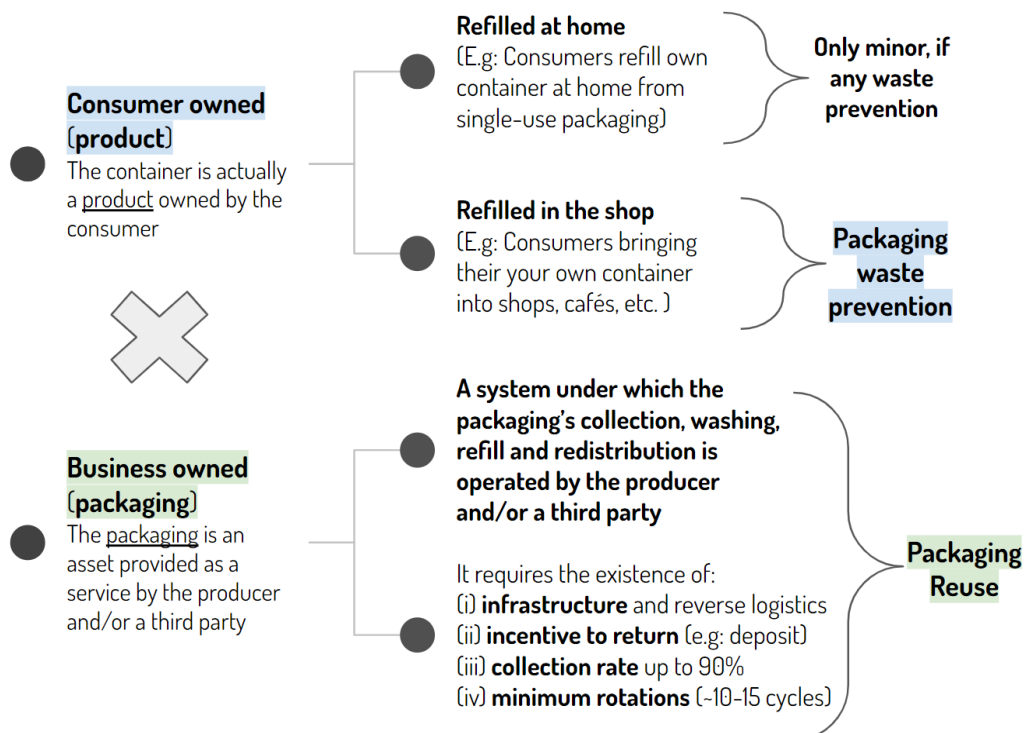
In view of the upcoming revision of the Packaging and Packaging Waste Directive (PPWD), this paper aims to clarify what should be defined as packaging reuse and what should be defined as packaging waste prevention and which are the policy measures that encompass one and the other.

1- Packaging reuse vs. packaging prevention: how they differ

When addressing what is popularly referred to as “reusable packaging”, one is in fact referring to two types of processes:

- The action of using a container that is **owned by the consumer** and it is either refilled in the shop or refilled at home - as per the diagram developed by the Ellen MacArthur Foundation.¹ In both cases the container is in fact not packaging but a product, and hence it should be considered as: **packaging waste prevention**.
- The action of using a container that is an asset **owned by the producer or a third party** and/or collected, washed and refilled by a third party. This process is what should be considered as: **reusable packaging**.

In sum:



¹ <https://emf.thirdlight.com/link/mtrsni6m4q0-wm25fb/@/preview/1>

Therefore, there's an important differentiation to make between: **packaging waste prevention** and **reusable packaging systems**, since the measures and requirements that should apply to each of them differ (although are very much complementary) and this differentiation needs to be set clear within the upcoming revision of the PPWD.

2- Getting the definition for reusable packaging right

Packaging waste prevention is already well defined under the current PPWD.² On the other hand, reusable packaging deserves a dedicated definition and we strongly support the adoption of a definition similar to that set in German Law³, in which logistics and incentive aspects (e.g. deposit) are mentioned as decisive criteria. In our view, an appropriate definition would be:

"Reusable packaging is packaging that is designed to be reused several times for the same purpose after use and whose actual return and reuse is made possible by adequate logistics and promoted by suitable incentive systems, usually by a deposit."

In fact, there are some key aspects that are crucial to be embedded into the definition of a reusable packaging system:

- The **existence of infrastructure and reverse logistics** for actual take-back, cleaning, refill and redistribution of the packaging (operated by the producers and/or a third party).
- A **suitable incentive to return** the packaging (usually a deposit, but can also be a system in which the consumer pays a fine when the packaging is not returned).
- A certain amount of **minimum rotations**, which should be at least between 10-15 cycles⁴.
- A **collection rate of at least 90% of the packaging**.

3- Measures applicable to packaging prevention and reuse: different, yet complementary

Distinguishing **Packaging Waste Prevention** and **Packaging Reuse** and adopting a correct and legally binding definition allows for better policy making, avoids loopholes and allows for implementing specific, yet complementary, measures that refer to each of them.

² Packaging waste prevention is already defined under article 4 of the PPWD as: 'the reduction of the quantity and of the harmfulness for the environment of: (i) materials and substances contained in packaging and packaging waste, (ii) packaging and packaging waste at production process level and at the marketing, distribution, utilisation and elimination stages. The calculation method should be based on the total packaging placed on the market, against a baseline year.

³ Section 3 (3) of the German Packaging Act (VerpackG)

⁴ Setting individual minimum rotations for each packaging type would cause a very high administrative burden. According to a comparison of 32 LCA studies 10-15 rotations for all packaging materials already brings more benefits compared to single-use packaging. Source: Reusable vs. Single-use Packaging. A review of environmental impacts. Downloadable at https://zerowasteurope.eu/wp-content/uploads/2020/12/zwe_reloop_report_reusable-vs-single-use-packaging-a-review-of-environmental-impact_en.pdf.pdf_v2.pdf

In our view, **in order to support and incentivise both waste prevention and reuse of packaging, separate targets should be set for each of them.** For instance, **an overall packaging waste prevention target of 50% by 2030, which would include 30% to be achieved through reuse could be set.** In addition to that, **an overall reuse target should be established (e.g: 50% by 2030 for all packaging placed on the EU market⁵), as well as dedicated sector-specific reuse targets.**

The following measures below (at least) need to be in the toolkit of the PPWD revision:

Measures supporting packaging waste prevention (non exhaustive list):

- Setting an **overall packaging waste prevention target**
- Setting a **cap on the overall single-use packaging placed in the market.**
- Applying **levies/taxes on single-use packaging.**
- **Restricting the use of single-use packaging for certain applications**, such as onsite consumption of food and beverages.
- Encouraging refillable packaging alternatives to be made available by any restaurant, cafe, or shop selling food or drinks to consume on the go.
- Encouraging or obliging retailers selling food, drinks, and non-hazardous cleaning products to accept that consumers bring their own container (duly washed container).⁶
- Encouraging online retailers to offer an 'opt-out' option for free-packaging delivery of products whose own packaging is already suitable for shipment.

Measures supporting packaging reuse (non exhaustive list):

- Setting an **overall reuse target** of 50% by 2030 for all packaging placed on the EU market, thus sending a strong signal to all market sectors to kick-start the transition.
- Setting **sector-specific reuse targets** or dedicated targets per packaging type.
- Encouraging **deposit-return schemes (DRS) for refill/reuse** beyond beverage packaging.
- Defining **essential requirements for pool systems** and providing guidelines on their set-up and operation.
- Setting **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.

Detailed policy recommendations are available [here](#).

⁵ For further information on Reuse Targets:

https://rethinkplasticalliance.eu/wp-content/uploads/2022/04/WeChooseReuse_EffectiveTargets_def.pdf

⁶ Guidelines on how to handle consumer-owned packaging in a way that conforms with hygiene provisions have been published by the German Food Federation in cooperation with several industry associations, the Federation of System Gastronomy and the Hotel & Catering Association (<https://bit.ly/3anicS9>). The most recent version (March 2020) is available at:<https://bit.ly/3wSwTUC>

4- The dangers of mixing up packaging prevention and reuse

Although we see the value of encouraging 'bring your own (BYO)' as a waste prevention measure, mixing "BYO" and reusable packaging in the definition of the PPWD could do more harm than good.

The main dangers we see of 'lumping together' packaging reuse and packaging waste prevention in the context of the PPWD are:

- 1. Lack of incentives to efficient reuse systems for packaging:** Mixing-up waste prevention measures, such as BYO, would not allow for efficient reuse systems for packaging (where parameters like logistics, washing, transport, etc. are optimised by system/pool operators) to be incentivised to the degree they need to operate and become the norm in the EU. These systems make it easy and convenient for consumers and businesses to participate. By not incentivising systems in which packaging reuse plays to its strengths, the EU could witness the implementation of inefficient, dispersed and strongly individualised approaches, paralleled by an overall bad reputation for what would be considered "packaging reuse", and the respective legislation.

In addition, the initial system setup costs for reuse are considered too high by many market participants, which might encourage them to keep tweaking their "business as usual" approach without making any real system changes as long as it is possible. On the other hand, for many SMEs, the competition of the subsidised old linear infrastructure is unfair. Therefore, these systems need a proper set of measures that will encourage investment to be channelled into new infrastructure to be able to provide large volumes and make economic sense for reuse.

- 2. Lack of support to waste prevention:** By not addressing packaging waste prevention separately, e.g. through the above-mentioned waste prevention target and the dedicated measures, an important opportunity would be missed to also foster the overall reduction of packaging volumes, packaging-to-product ratio, encourage bulk selling, incentivise the reduction of unnecessary secondary packaging (like a cardboard box around a toothpaste tube, to only name one of dozens of examples), and the selling of unpackaged goods (like fruit and vegetables) in general.
- 3. Greenwashing/Consumer confusion:** Mixing "BYO" and reusable packaging in the definition allows for a massive grey area, which will encourage several options of greenwashing and pseudo-reuse that we already see on the market today. Single-use oriented businesses will take advantage of this kind of leeway in the regulation as they are already doing today. This would, in many cases, even lead to an increase in resource consumption and waste generation.

Below, there are examples of measures which are neither considered as packaging waste prevention nor packaging reuse:

- a. Shops providing thicker single-use packaging to consumers (for free and without a deposit) while labelling it as reusable:** These items are typically too low quality to really be reused at home or for further shopping and this might even create more waste than the current single-use alternatives. This already happens with low-quality cotton/thicker plastic bags, and with takeaway cups and containers, for example.

Packaging should NOT be considered or labelled as 'reusable' if it is not embedded into a system where a proper infrastructure and logistics for take-back, washing,

redistribution and an incentive to return is in place. One of many current examples is the takeaway food packaging issued by the fast food chain Vapiano SE without a deposit, which is advertised on the company's website as follows: "Our stable packaging guarantees safe transport and the pasta bowl can even be reused after the meal."⁷ That means that takeaway food is sold in single-use pseudo-reusable packaging without a deposit, however, consumers are told it is reusable. In the end, it is very likely that customers will use their own high-quality reusable containers that they have at home for refrigeration or to bring their lunch to work, etc., and will throw away the low-quality pseudo-reusable container made from hard plastic, meaning that it is still single-use packaging, just thicker and thus wasting more resources.

- b. Shops selling reusable products, like cotton bags and stainless steel coffee cups with food/drink/purchases:** Although in this case, items are being *sold* to consumers, and not given out for free, this does not mean that they will be brought back for every shopping and it also does not mean they will be reused at home. Many consumers who have forgotten their own personal items at home will just buy another reusable item, or will still revert to single-use packaging instead. This would not happen in the case of reuse systems where items are taken back through an adequate incentive system. Reusable packaging systems make it easy and convenient for consumers to participate.
- c. "Refill at home systems":** In this case, consumers are likely to be confused because companies label something as "reusable/refillable/reuse/refill" just because consumers can buy a "refillable item (e.g. a bottle)" (consumer-owned product) to refill at home. The single-use refill pack that is then bought at the supermarket to refill the consumer-owned container is still single-use packaging, often multilayer with low recyclability. Example: <https://bit.ly/33jUSRD>, last accessed on 25.05.2022

⁷ <https://bit.ly/3m0hrBc>, last accessed on 25.05.22