



Position paper

The role of legislation and standards in mainstreaming reusable packaging

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Summary: The ongoing revision of the Packaging and Packaging Waste Directive provides a crucial window of opportunity to dramatically reduce the amount of single-use packaging wasted in the EU and make eco-efficient reusable packaging systems more widespread. As we stand at the doorstep of a systemic shift towards reusable packaging, the key to unlocking this potential is a smart combination of ambitious targets for single-use packaging to be replaced by reusables, clear definitions, and harmonised sector-specific formats, systems and protocols. Standards to harmonise reusable packaging formats and systems will lever a scale-up of reuse systems and enable system efficiencies. Ecologically detrimental single-use packaging must be replaced to truly achieve circularity in packaging.

Introduction

At the moment, the absence of a clear legal framework and standards for reusable packaging means that systems are not interoperable, therefore businesses face uncertainty and struggle to **compete with single use**. Entrepreneurs in business-to-consumer reusable packaging too often try to design packaging and systems from scratch, leading to the proliferation of packaging formats, logistics chains and washing lines operating differently, creating inefficiencies along the reusable packaging value chain. The overall potential for reusable packaging to compete economically with single-use packaging and to achieve maximum environmental and resource savings and benefits is therefore very much limited to date.

Packaging legislation must push unnecessary single-use packaging off the EU market and set ambitious targets, minimum requirements and monitoring measures supporting the uptake of reusables and the incremental improvement of reuse systems' efficiency, adapted where relevant to different packaging types and market utilisation. In this legal setup, the primary role of reusable packaging standards should be to guide businesses in complying with regulatory requirements by providing harmonised packaging formats and specifying reuse system requirements which, if applied, allow businesses to claim compliance with the law. Legal measures and standards could be differentiated at the highest level between business-to-business (such as industrial and transport packaging) and business-to-consumer packaging (such as beverages, food take-away and delivery, e-commerce, etc.).

Potential benefits of laws and standards

Standards harmonising reusable packaging formats and systems will reduce business uncertainty by limiting packaging and infrastructure diversity, thus providing clear framework conditions for investors and operators to develop interoperable reusable packaging systems, without stifling innovation and product differentiation. Standardisation can help create value chains of standard-compliant systems where packaging types and the infrastructure and logistics that support them are streamlined and interoperable. As such, standardisation will facilitate collaboration of value chain actors to yield more predictable economic outcomes.

More specifically, through streamlined packaging dimensions and adapted logistics, storing and washing, legislation and standards can:

- Reduce the **investment and operating costs** of reusable packaging systems, as packaging designers and operators avoid having to design packaging and systems from scratch, following requirements instead to ensure fitness for logistics and washing infrastructure.
- Maximise **environmental benefits and economic viability** by setting durability requirements including a minimum number of rotations, and increasing the overall efficiency thanks to standardised packaging designs optimised for space and ease of handling during transport, washing and storage, for instance through stackable/nestable designs that are easy to clean.
- Ensure **safety from health and environmental risks** thanks to standardised washing processes and handling safety protocols, enhancing washing results and preventing contamination for different packaging materials, shapes and dimensions.
- Foster **economies of scale and market penetration** of reusable packaging systems by potentially enabling companies to share the same packaging and/or the same logistics and washing lines.
- Increase the **return rate of used packaging** by making it more straightforward for citizens when different systems work in a similar manner. Standardisation also allows for setting up

comprehensive, decentralised return points are which i) can be operated at low costs due to effort-sharing and ii) reduce the effort for the return on the customer's side and iii) allows for the application of digital tools for tracking the packaging.

- Provide **methodologies and tools for monitoring and reporting the efficiency of reusable packaging systems**, supporting the setting of targets for systems and driving their incremental improvement in terms of ecologic and economic efficiency using digital tracking and reporting systems.
- Enable policymakers to **identify reusable packaging businesses eligible for financial support**.

EU reusable packaging standards: What could they look like?

Standardised packaging systems already exist for instance in the beverage industry where only the labels on the bottles change. These systems have existed for decades in the Netherlands (brown glass beer bottle system) and in Germany with the Perlenflasche (glass mineral water bottles). In South America and in Germany, Coca-Cola experimenting with reusable plastic bottles for different soft drinks.

Standardised reusable packaging can also have a different look and feel from one brand to another while following the same dimension requirements in order to fit logistics and washing systems. Containers can be of the same size and overall shape, but their colour, edges, embossing, finish, and other details of the design could still differ. The most specific designs would not be exchanged between brands, but they could be washed and transported within the same systems.

While some reusable packaging systems are created from scratch, other systems can be developed that match existing standards and practices. In the food sector for instance, reusable food packaging can be developed according to Gastronorm sizes and which fit in collomodular Euronorm crates.¹ Standardisation can be seen as a tool to reduce research and development costs by identifying best practices for reusable packaging. Citing the work of KIDV, standards can formulate specific requirements in order to develop efficient and effective cleaning and reverse logistics. In the case of reusable food packaging, KIDV suggests using polypropylene as a material thanks to its heat resistance for cleaning (up to 85°C), designed in a rectangular shape that is nestable, and using light colours, and with a separable and universal lid.²

ECOS recommends that future standards supporting environmentally-efficient reusable packaging systems should, at minimum:

- Provide a definition for “eco-efficient reusable packaging systems”, ‘reusability’ and ‘refillability’, including the following criteria for meeting the definition:
 - existence of minimum degree of accessibility of return points, and of infrastructure for reuse and refill,
 - durability in sustaining normal use and maintenance under realistic conditions, including a minimum number of rotations.
- Specify criteria for harmonised deposit-return systems.

¹ KIDV, ‘Standardisation in reusable food packaging’, July 2020, page 1. Accessed at: https://kidv.nl/media/cop/herbruikbaar/shared_packaging_def_standardisation_in_reusable_food_packaging__cop__jan-21_.pdf?1.1.7

² Ibid.

- Specify requirements for efficient reuse/refill systems (such as the number of rotations), as well as calculation methods and performance indicators to monitor and report on systems efficiency.
- Establish test methods for verifying product durability through multiple reuse or refill cycles.
- Specify harmonised reuse and refill infrastructure and process requirements to collect, transport, wash and reuse or refill packaging based on new technical requirements or existing standards in different sectors.
- Specify harmonised product shapes and dimensions adapted for different market applications, preventing exposure to hazardous chemicals, enabling efficient (reverse) logistics and storage, and designed to enable different product information labelling across multiple lifecycles.
- Provide clear labelling to packaging users about the reuse system in place and its functioning (including how to return used packaging).
- Specify or refer to existing recyclability criteria.

Setting the right standards for all – we need an inclusive process

In order to develop, implement and monitor measures for sector-specific reusable packaging systems, a participatory process involving reusable packaging stakeholders, industry associations and civil society could be adopted in the context of the Circular Economy Action Plan. The European Commission is able to set the overarching principles and requirements for reusable packaging, which will need to be specified sector-by-sector in more detailed participatory processes. Comparable to the one under the Ecodesign Directive, such processes would involve development requirements and standards for reusable packaging in different applications, and subsequent monitoring of their implementation and effectiveness. Such a process would assess, sector-by-sector, the efficiency of reusable packaging systems and progressively update requirements and standards. This would foster incremental improvement of the framework and for each sector.

The solution to packaging waste is not more recyclable single-use packaging. Push single-use packaging off the EU market and support reusables with legislation and a series of standards adapted to each packaging type and market utilisation. If done right, standardisation can create a fertile ground for reusable packaging to flourish.

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