

Reusable Packaging

Science- and enforcement-based evidence regarding Art. 3 (22), 10, 23, 24, 26 and Annex VI of the Proposal for a Regulation on Packaging and Packaging Waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC

Lessons Learned

 The theoretical refillability is not sufficient for packaging to be considered reusable. As long as the actual return and reuse is not enabled and promoted the packaging has to be considered as single-use packaging. We propose a definition of reusable packaging as follows:

"Reusable packaging" or packaging component means packaging that has been conceived, designed and placed on the market in such a way that, once returned, it can be reused multiple times for the same purpose in a system for reuse that enables its actual return and reuse through sufficient logistics and encouraged by appropriate incentive systems, such as a deposit."

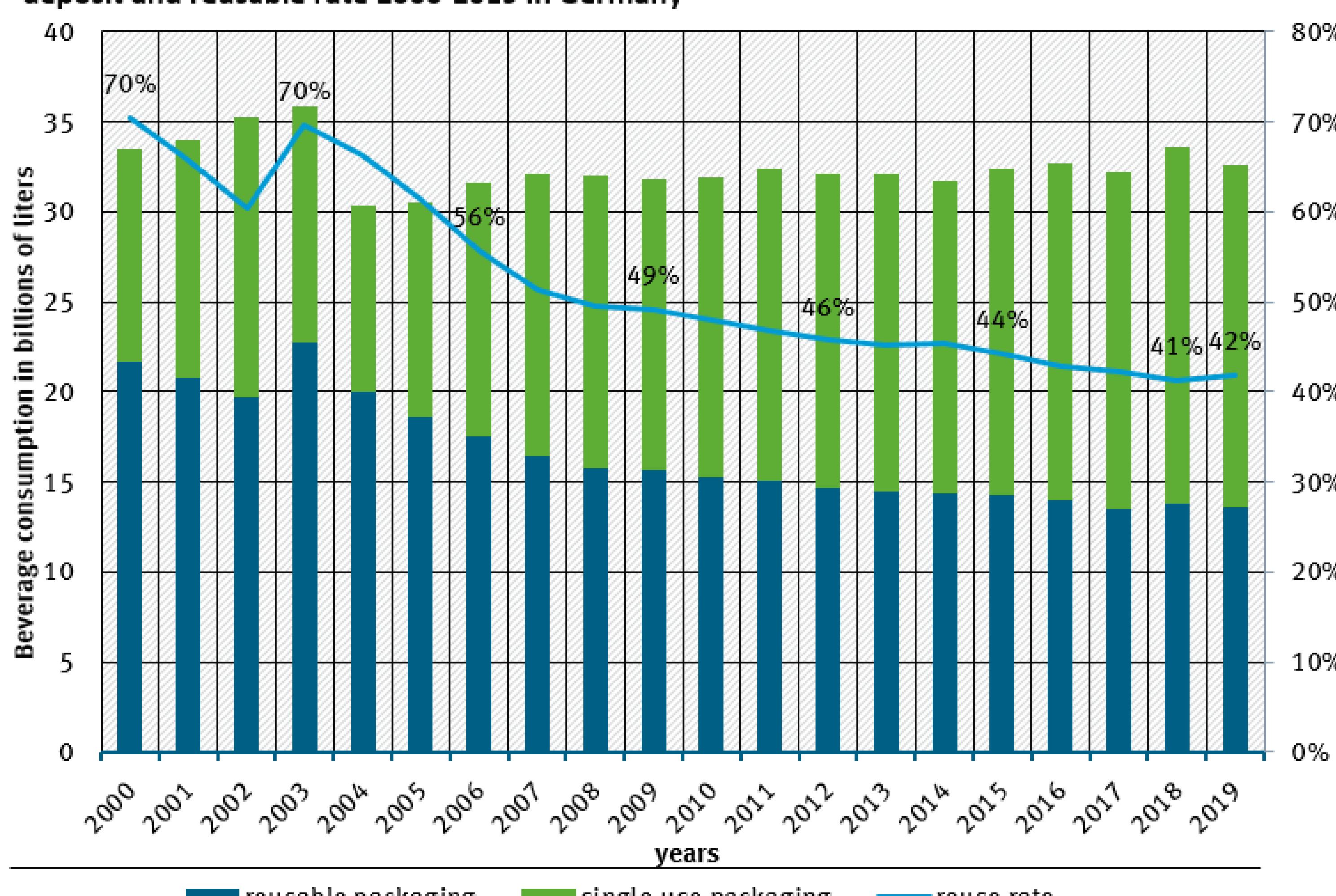
 An obligation for final distributors to offer reusable packaging for all beverages and food packaged at the point of sale should be introduced in the proposal.

 Ambitious reuse targets committing specific stakeholders to offer reusable packaging and shorter transition periods than envisaged in Art. 26 are possible, esp. in the beverage sector.

 It needs a regulation that allows Member States to set higher reuse and refill targets than the proposal.

 Enabling refill must not contribute to the targets in Art. 26.

Amount of beverages consumed in reusable and single-use beverage containers subject to deposit and reusable rate 2000-2019 in Germany

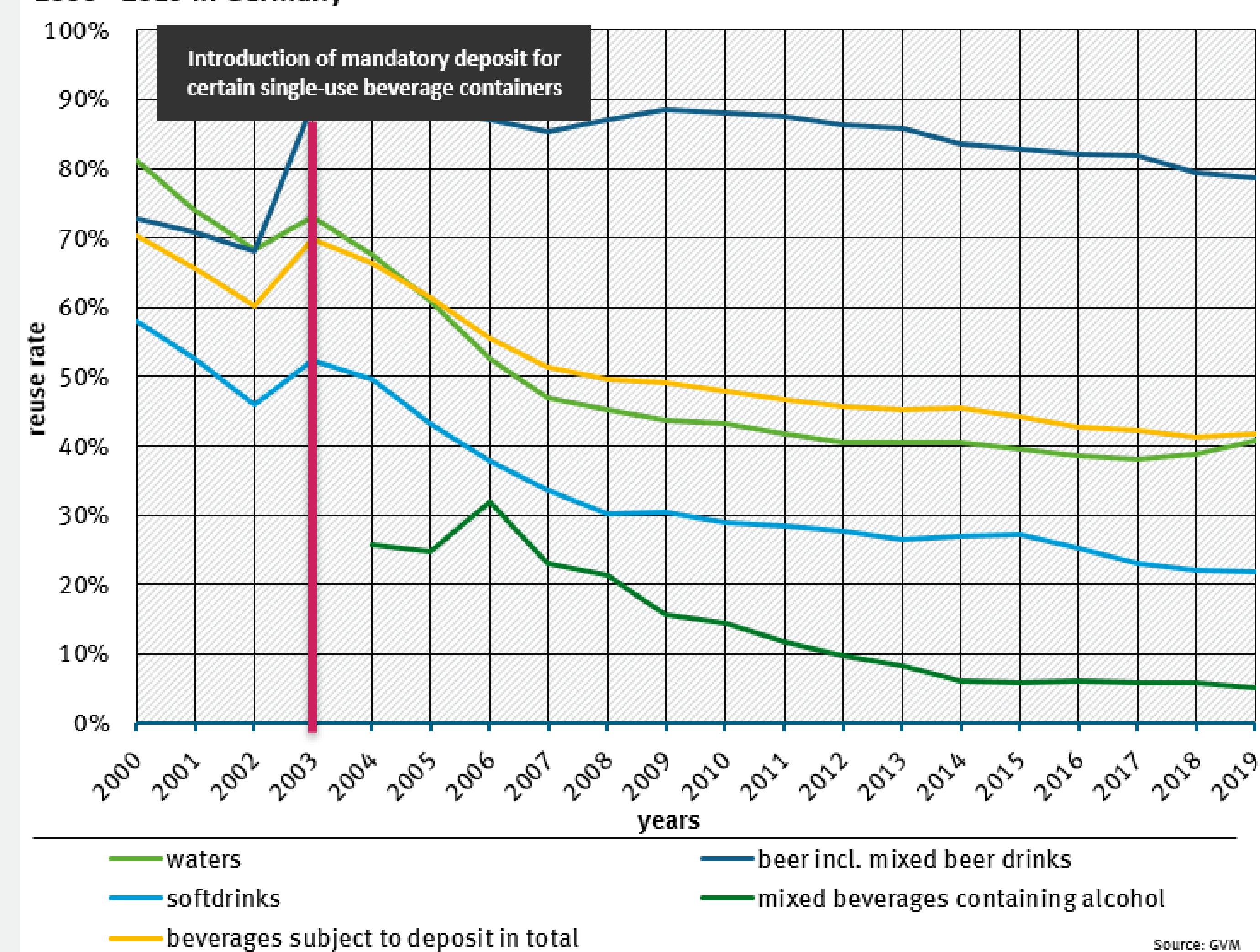


reusable packaging must apply to single-use packaging of all materials. In Germany, we are currently experiencing this evasive effects especially to paper and cardboard. Distributors who themselves package goods can easily offer reusable packaging for each good.

Some Member States have higher targets than the proposal even sets for 2040. In Germany, the current reuse target in the beverage sector is 70 %. In 2000, the reuse rate for beverage packaging subject to deposit was 70.4 %. It dropped to 43.1 % in 2020. This makes clear that it is already possible to achieve higher targets than currently stated in Art. 26.

The introduction of the mandatory deposit for certain single-use beverage containers has contributed to increased recycling of PET, it has not led to the intended waste prevention or strengthening of reuse.

Development of the reuse rate of beverage packaging with a deposit by beverage segment 2000 - 2019 in Germany



As long as enabling refill contributes to meeting the reuse targets, it is not necessary to establish real reuse systems. To encourage reuse and the establishment of reuse systems, a separate rate for refill needs to be introduced.

Links

[Promotion of reusable packaging systems to reduce packaging consumption \(Research Sub-Report\)](#)

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Section III 1.6 Plastics and Packaging and
Subsection Implementation of the German Packaging Act

Background

As long as the theoretical refillability is sufficient for packaging to be considered reusable, producers can claim to have reusable packaging and avoid their obligations.

Since 1st of January 2023, final distributors of single-use plastic food packaging and of single-use beverage cups in Germany must offer reusable packaging for food and beverages for immediate consumption filled at the final distributor. As a result, reuse initiatives have been established and guidelines for the use of reusable packaging were developed, e.g. considering hygienic requirements. In order to avoid evasive effects to other materials, the obligation to offer