

RREUSE's reaction to the Revised Packaging And Packaging Waste Regulation

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On November 30, the Commission released its proposal for a new Packaging and Packaging Waste Regulation as part of its second Circular Economy Package, aiming to reduce the environmental impact of packaging by removing its usage where unnecessary while also making packaging more reusable and recyclable.

The proposal includes a headline waste prevention target requiring Member States to reduce the packaging waste generated per capita by 15 % by 2040. A ban on certain packaging formats, such as single-use packaging for fruits and vegetables, is also foreseen from the entry into force of the regulation in 2025.

Crucially, the initiative also features re-use and refill targets for some types of packaging that have been identified as having the greatest reusability potential. For instance, 30 % of transport packaging will have to be reusable by 2030 and 90 % by 2040. While some of these targets could have been more ambitious, RREUSE welcomes this important step undertaken by the Commission to introduce binding commitments to re-use as a valid solution to the issue of packaging waste. However, we regret that the foreseen exemptions are not always justified, creating potential loopholes if Member States are allowed to introduce exemptions based on arbitrary criteria such as the number of employees and the dimension of stores.

Finally, the new Regulation will require all packaging to be recyclable by 2030 and establish recycled content targets to foster demand for secondary raw materials. These targets are based on the quantity of recyclates recovered from post-consumer plastic waste. EPR fees are also seen as an instrument to achieve these aims and will be eco-modulated depending on the recycled content contained in packaging and how much they are designed for recyclability.

RREUSE recently contributed to a [Report](#) commissioned by the Rethink Plastic Alliance on how reusable packaging can help achieving the objective of a just transition from a socio-economic perspective. Therefore, RREUSE welcomes the revised proposal as an important step in reducing packaging waste by setting concrete legally-binding targets for reuse and prevention, but hopes that the co-legislators will raise the ambition by increasing the level of the targets and rethinking the possibilities of exemptions.

RREUSE also welcomes these developments in packaging waste legislation in light of the broader EU policy debates on circular economy. We especially think setting of re-use and reduction targets in waste policy represents an important milestone in the evolution of European circular economy policy, which can be conducive to the adoption of quantitative weight-based targets in the Waste Framework Directive. We hope these developments can serve as a precedent to the establishment of preparation for re-use and re-use targets for municipal waste by the end of 2025 and especially for some key waste streams such as textiles, furniture and electronics.

Edoardo Bodo, Environment Policy Officer, RREUSE: *The introduction of targets for waste prevention and reusable packaging is an important step in a new approach to uphold the waste hierarchy in order to advance towards a more circular economy for packaging, which we hope will be replicated in the upcoming and future revisions of the Waste Framework Directive. Now, the level of ambition must be increased to ensure that the new Regulation will make a real contribution in reducing packaging waste by harnessing the full potential of re-use.*

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