

Joint industry statement calling for thoughtful and science-based reuse policies in the transport packaging sector

The undersigned associations representing different segments of the packaging value chain, **urge policy makers to agree on effective and realistic measures for transport packaging during the trilogue negotiations on the Packaging and Packaging Waste Regulation (PPWR). Such measures should take into account the real impact that reuse obligations have on certain packaging formats and related products.**

While we recognise that reuse has a role to play in accelerating packaging circularity, derogations should apply where the reusability of packaging does not provide the best overall environmental outcome or when reuse is not a viable option due to the specific requirements of the products packed, the impact on packaging performances and consequently, transport and food safety.

Flexible transport packaging formats including intermediate bulk containers, pallet wrappings, shrink wraps and stretch films are specifically intended to provide load stability thus securing the cargo and preventing potential accidents and damage. Pallet wrappings allow for the unitisation of goods, turning multiple items into a single, manageable load. This allows efficient handling during loading, unloading, and storage, reducing the time and work required for these processes.

Flexible formats also serve as a protective barrier against external elements, crucial to maintain **hygiene standards for packaging in contact with food, food ingredients or products that may be sensible to moisture or contamination.** This holds true also for **insulation transport packaging** which is primarily used for transporting medicines/vaccines, pharmaceuticals or food over long distances while maintaining the cold chain.

Furthermore, **protective packaging for fragile or heavy items**, such as home appliances is customised to offer specific shock-absorbing protection. This tailored protection is designed to match the unique shape and size of each product type further safeguarding against potential harm or damage.

The above-mentioned packaging formats are also easily collected and highly recyclable and can be manufactured with significant percentages of recycled plastics, thereby having a positive impact on increasing recycling rates, and any regrettable substitution should be assessed when setting minimum requirements in relation to recycling at scale.

The characteristics and performances of protective and flexible transport packaging formats cannot be guaranteed through reuse. For example, the cushioning or stretching properties of the material would diminish with each use, compromising the protection afforded to the packaged items and transport safety requirements. Very limited reuse alternatives are available in Europe which have not demonstrated the same performances of these packaging formats neither in terms of efficiency and safety nor from a life cycle perspective.

We urge policy makers to consider the unique requirements of these packaging formats when defining reuse obligations for transport packaging to prevent that disproportionate or unfeasible targets would lead to supply chains' disruptions, negatively impacting the efficiency of transporting goods and of businesses dependent on reliable and safe logistics.

Furthermore, as the development of reuse systems and reverse logistics require significant investments and reorganisation of processes and supply chains, all reuse obligations, including those set out in paragraph 12 and 13 of Article 26, should apply from 2030, to allow companies the necessary time to build and implement these systems.

We therefore call on the co-legislators to consider the following recommendations, to ensure a balanced approach that promotes packaging circularity without compromising transport safety.

We recommend to:

1. Maintain the **exemption for protective packaging** designed to protect fragile and/or heavy goods as proposed by the European Parliament in Art. 26, para 1 (row 448)
2. Support the European Parliament position **against setting 2040 targets for pallet wrappings** in para 9 (row 472) before assessing how reuse will develop in the coming years
3. **Apply the reuse obligations in para. 12 and 13 from 1 January 2030** providing economic operators the time necessary to develop the new system (rows 477 and 481)
4. **Exempt flexible formats and insulation packaging formats** from the reuse obligations in para. 12 and 13 and secure the exemption for transport packaging in direct **contact with food, food ingredients** and for **dangerous goods** (as introduced by the Council and European Parliament respectively in rows 480 and 482 and in row 486e)
5. Ensure the application of the provisions in paragraphs 14a and 15 (rows 485b and 486) to transport packaging formats, allowing a widely recognised life cycle assessment (LCA) to determine whether reuse is the most environmentally favourable option.

Signatories (in alphabetical order)



AIM
European Brands Association



A.I.S.E.
International Association for Soaps, Detergents and
Maintenance Products



AmCham EU
American Chamber of Commerce to the EU



APPLiA
Home Appliance Europe



Ceflex
A Circular Economy for Flexible Packaging



CEFS
European Association of Sugar Manufacturers



EUMEPS
European Manufacturers of EPS



EuPC
European Plastics Converters



EuroCommerce
European organisation representing the retail and
wholesale sector



EUROPEN
The European Organisation for Packaging and the
Environment



Flexible Packaging Europe



FoodDrinkEurope
The Organisation of Europe's Food & Drink Industry



PCEP
Polyolefin Circular Economy Platform



Petcore Europe
The PET value chain association



PET EUROPE
Producer's Association



Plastics Europe
Association of Plastics Manufacturers



SCS
Styrenics Circular Solutions



TIE
Toy Industries of Europe