

A reuse standard to match new packaging rules

How to align the EU's harmonised packaging reuse standard with the Packaging and Packaging Waste Regulation (PPWR)

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Introduction

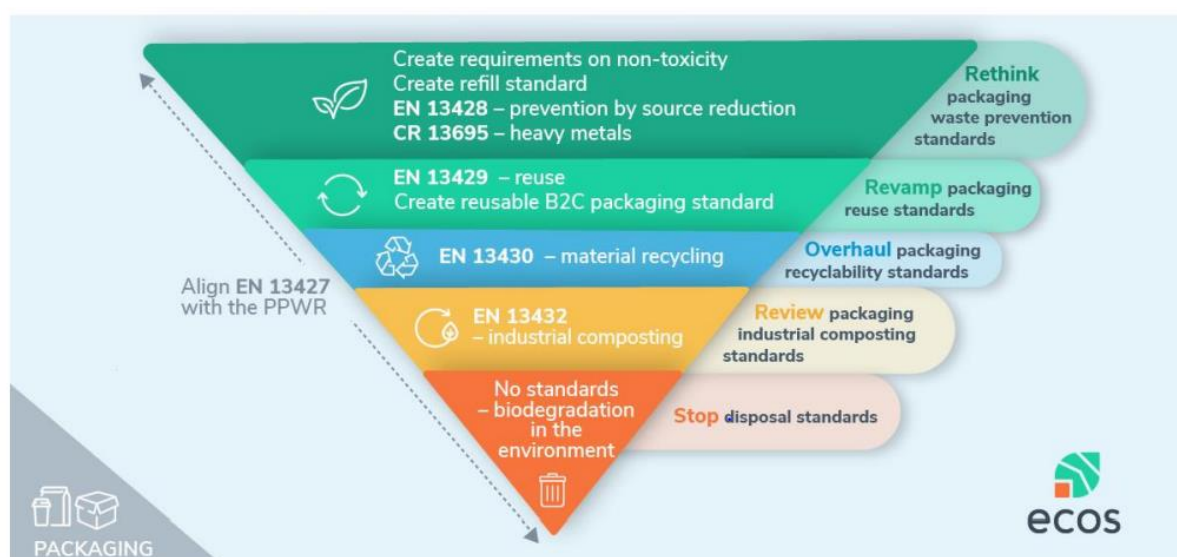
The EU Directive 94/62/EC on Packaging and Packaging Waste established essential requirements for packaging to be placed on the market.¹ Packaging that complies with relevant harmonised standards is presumed to comply with the essential requirements of the Directive.

Accepting a mandate by the European Commission, CEN developed a European standard on reusable packaging. It was adopted in 2004.² By following this standard, operators, making use of reusable packaging, can demonstrate compliance with the requirements relating to reusable packaging stemming from Directive 94/62/EC.

In 2018, the European Commission received a mandate to review existing EU packaging rules to examine “the feasibility of reinforcing the essential requirements with a view to, inter alia, improving design for reuse and promoting high quality recycling, as well as strengthening their enforcement”.³ In 2022, it published a proposal for a Regulation on Packaging and Packaging Waste (PPWR).

ECOS recommended changes to the harmonised standards linked to Directive 94/62/EC, including the harmonised standard on packaging reuse based on the published PPWR proposal.⁴

Aligning packaging standards with the waste hierarchy



In 2024, following extensive political negotiations, the final text of the PPWR was adopted by the European Parliament and EU Member States. It will reinforce some of the essential requirements for packaging and will introduce additional requirements for reusable packaging.

The standard EN 13429:2004 must be revised should it provide a presumption of conformity with the requirements stemming from the PPWR. In this paper we fine-tune our recommendations for a revision of the existing harmonised packaging reuse standard based on the final text of the PPWR.

¹ EU Directive 94/62/EC, Annex II (“Essential requirements on the composition and the reusable and recoverable, including recyclable, nature of packaging”).

² EN 13429:2004 Packaging - Reuse

³ EU Directive 94/62/EC, Art 9 (5)

⁴ ECOS, [Recommendations for a standardisation request on packaging and packaging waste](#), February 2024

Revision of the harmonised reuse standard

The PPWR, in addition to maintaining and strengthening sustainability requirements for reusable packaging (Chapter 2, Art. 11), introduces, for the first time at EU level, specific labelling requirements for reusable packaging (Art. 12(2)), as well as obligations of economic operators in relation to reusable packaging and refill (Ch. V, Art. 26-28, Annex VI).

Furthermore, specific requirements relating to the mandatory use of reusable packaging (Ch. V, Art. 29-31, 33) are introduced. They are directly applicable to economic operators in three sectors, i.e. the transport sector (reusable transport packaging), the retail sector (reusable beverage bottles) and the HORECA sector (reusable take away packaging).

The scope of the standard must therefore be widened to support economic operators in using reusable packaging in conformity with all the new requirements.

Incorporate new requirements

To reflect the additional requirements from the PPWR, we recommend that the **requirements section** of the standard is structured into the following sub-sections:

- Design and manufacturing requirements.
- Labelling requirements.
- Reuse system requirements.
- Monitoring requirements.

Develop durability test methods

The standard should consider that a delegated act will define minimum number of rotations for the most used reusable packaging formats 24 months after publication of the PPWR (Art. 11(2)).

The revision of this standard must take this into account and provide robust and reproducible durability test methods for reusable packaging. A harmonised test method will allow stakeholders to speak the same language when setting durability requirements in secondary legislation. Once durability requirements are adopted it facilitates demonstrating conformity of packaging with the new requirements.

Durability testing should be added to the new section “Design and manufacturing requirements” and a new normative Annex should describe durability tests and recording of test results for reusable packaging. This will allow to demonstrate compliance with the minimum rotation requirements for the most used reusable packaging when they are set.

Introduce labelling requirements

Art. 12 of the PPWR establishes that the manufacturer of reusable packaging shall verify that each packaging unit bears a label informing users that the packaging is reusable, as well as a digital data carrier that informs users of the availability of re-use systems and collection points, allowing for a calculation of trips and rotations of the packaging within the re-use system.

A new section (“Labelling requirements”) should be introduced to reproduce the labelling requirements for reusable packaging stemming from the PPWR.

Monitoring requirements

Three sectors, i.e. the transport sector (reusable transport packaging), the retail sector (reusable beverage bottles) and the HORECA sector (reusable take away packaging) are obliged to introduce the option to use reusable packaging and many businesses will be required to meet a share of reusable packaging (reuse targets).

To support businesses in enabling them to monitor the share of reusable packaging the standard should introduce monitoring requirements. The methodology to calculate the share of reusable packaging will be defined in an implementing act but the standard should introduce requirements to enable collecting necessary data in an efficient way. This should be added to the new section on “Monitoring requirements” together with a new normative annex that explains the enabling conditions of calculating the number of trips or rotations of reusable packaging in re-use systems.

This Annex should be in three parts to specify monitoring best practices tailored to each of the three sectors obliged to use reusable packaging (transport packaging, beverage retail packaging, take away food and drink packaging). This may involve the use of digital means (e.g. the use of digital data carriers).

Differentiated responsibilities for meeting requirements

Directive 94/62/EC on Packaging and Packaging Waste does not specify who bears the responsibility for meeting essential requirements for reusable packaging (Annex II(2)) and the existing standard on packaging reuse does not differentiate between actors of the value chain to explain who must fulfil a specific requirement.

The PPWR, on the other hand, defines differentiated responsibilities:

- The manufacturer is responsible for the design of reusable packaging (Art. 11).
- The operator who makes reusable packaging available on the territory of a member state for the first time is responsible for ensuring the availability of an appropriate re-use system (Art. 26).
- Operators that use reusable packaging have the responsibility to ensure that reuse systems, including the reconditioning of packaging, comply with requirements of the PPWR (Art.27).

The existing standard must be revised to align with the differentiated approach taken by the PPWR for who is responsible to comply with requirements relating to reusable packaging.

Distinguish refill and reuse

To provide clarity for operators of refill systems on when this standard applies, it should clearly distinguish and explain possible overlaps between re-use and refill systems.

Refill systems operating exclusively with reusable packaging are open loop re-use systems. Re-use systems are refill systems if the ownership of packaging is with the end user (therefore the responsibility for reconditioning is with the end user) and filling of the re-usable packaging is carried out at the point of sale (Art. 3(33)). Refill arrangements allowing the use of single-use packaging are not re-use systems as hybrid systems are not considered re-use systems (Annex VI(A)).

In addition to introducing clarity in the reuse standard, we suggest the development of a harmonised standard on refill to specify requirements for refill and refill stations and to specify test procedures of hygiene requirements.⁴

Additional standardisation needs

Reuse

Ideally a European standard would also include additional requirements to optimise the environmental benefits of reuse systems, such as:

- Requirements relating to conditions for achieving minimum number of trips or rotations of reusable packaging.
- Requirements relating to incentives to achieve optimal return rates of reusable packaging.
- Requirements relating to the reusability of separate parts of reusable packaging.

European standards for reusable packaging used in a business-to-consumer setting should promote interoperable reusable packaging formats and systems by:

- Suggesting packaging format and infrastructure diversity, thus providing clear framework conditions for investors and operators to develop interoperable reusable packaging systems, without stifling innovation and product differentiation.
- Specifying standardised 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.

Refill

A new standard specifying procedures and requirements for economic operators with obligations to allow for refill of packaging by customers (non-professionals). The refill standard should be adapted to the HORECA setting (bring your own packaging) and to the retailer setting (bulk sales).

Conclusion

The PPWR introduces new requirements for reusable packaging and the existing harmonised standard must be revised to provide a presumption of conformity with the new regulation.

The standard must introduce durability test methods, labelling and monitoring requirements. The latter must be tailored to three targeted sectors (transport sector, the retail sector (reusable beverage bottles) and the HORECA sector (reusable take away packaging)) to support them in meeting reuse obligations. The standard must attribute responsibilities for requirements to specific operators, in line with the differentiated approach of the PPWR. Finally, the standard should clearly distinguish between reuse and refill systems.

A revised harmonised standard would improve standardisation of reusable packaging. However, additional aspects of reuse systems should be standardised to optimise the environmental benefits of reusable packaging and to improve the interoperability of reuse systems.