

# Short version

of the study

## **”The reuse targets in the PPWR (Packaging and Packaging Waste Regulation) and possible exemptions from the reuse obligations“**

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## Background

The European Packaging and Packaging Waste Regulation (PPWR) came into force on February 11, 2025. The reuse targets and possible exemptions are a relevant part of this.

Art. 29(1)-(3) PPWR describes the reuse targets for transport packaging and sales packaging with a transport function. In addition, Article 11(1) PPWR specifies the requirements for the reuse of packaging, e.g., by stipulating that it should be designed and constructed in such a way that it can complete as many rotations as possible under foreseeable conditions of use. Two years after the regulation comes into force, the Commission is to define these minimum rotation figures for different packaging formats in a delegated act, taking into account hygiene and other requirements.

According to Art. 29(18) PPWR, the Commission is authorized to grant exemptions from these reuse requirements for certain packaging formats. These include economic difficulties in a particular industry, food safety, and hygiene and environmental aspects. These exemptions may also be laid down in a delegated act.





## Purpose

The aim of the study is to evaluate the reuse requirements of the PPWR for practical applications. In particular, it should highlight the challenges and limitations for certain packaging formats in relation to reuse systems in order to identify reasons that could justify exemptions under Article 29(18) PPWR. In addition, the prospects of success for exemptions should be assessed.

## Scope

The study examines the regulatory basis and current practice relating to the plastic transport packaging and sales packaging with a transport function in question, against the backdrop of reuse and single-use applications. Reuse systems made from other materials are not included in this study. On this basis, established reuse systems and their success factors are analysed, and challenges and limitations in terms of technical and economic aspects are identified in order to identify specific reasons for exemptions from the reuse targets of the PPWR. To this end, 11 interviews were conducted with packaging experts in European or global industrial companies, packaging manufacturers, and associations. The interviewees came from the areas of packaging development, purchasing, logistics, and sustainability. The survey considered overarching issues relating to reuse regulations as well as specific questions for individual plastic packaging systems.

With regard to the packaging formats affected under Art. 29(1) PPWR, as shown in the chart below, the survey focuses on the following five packaging formats: buckets, drums, canisters, intermediate bulk containers (IBCs), and flexible intermediate bulk containers (FIBCs).

<b>Pallets</b> 	<b>Foldable plastic boxes</b> 	<b>(Non-foldable) Boxes</b> 	<b>Trays</b> 
<b>(Non-foldable) plastic crates</b> 	<b>(Foldable) plastic crates</b> 	<b>Inter-mediate bulk containers (IBC)</b> 	<b>Flexible intermediate bulk containers (FIBC)</b> 
<b>Pails/ buckets</b> 	<b>Drums</b> 	<b>Canisters</b> 	<b>Flexible formats: Pallet wrappings/ straps</b> 

*Transport packaging and sales packaging with transport function in the focus of the study (in green)*

## Results

Based on a desk research, three established reuse plastic systems were identified as representative of other successful reuse systems on the market: pallets, fruit and vegetable crates, and beverage crates. These were analysed using three market-leading companies as examples. The main advantages over single-use systems are economic and ecological benefits, logistics and quality advantages, and the pooling system itself, which provides the necessary services. An analysis of the available studies on the relevant packaging systems also shows that even in cases where several studies are available, they come to different conclusions regarding the minimum number of rotations required for ecological break-even due to different framework conditions and scenarios. The studies also differ on the question of how many rotations are realistic. Consequently, it appears expedient to specify a minimum number of rotations with regard to Article 11(1) PPWR.

With regard to the challenges and limitations for reuse systems, respondents expressed concerns in particular about hygiene and food safety, and reasons for possible exceptions in future delegated acts. The key findings for the packaging formats examined are summarized below.

- In the area of buckets, liquid and paste-like foods are not suitable for reuse due to odor development, mold growth, and contamination through migration. This also applies to appropriately filled construction chemical products such as varnishes, paints, and plasters, if cleaning is made difficult by the possible hardening of the products. In addition, hot washing is not sufficient for containers such as polyolefin buckets to safely remove filled products or substances that can migrate into the bucket wall.
- The issue of migration from the filled product into the plastic packaging also applies to canisters. In this case, no hygiene risk should be taken, especially with contact-sensitive filled products such as food and medical products.
- In the area of drums, hygiene is particularly relevant for products in the cosmetics and food industries, pharmaceuticals and medicine, and photovoltaics, among others. The highest hygiene requirements cannot be guaranteed, particularly with polyolefins. To date, new polyethylene (PE) drums are significantly cheaper, which means that reuse drums are not worthwhile for economic reasons. In addition, reusable drums are not ecologically sensible for long transport distances due to the high emissions associated with them and the high empty volume during return transport.

- Similar reasons are cited for IBCs in relation to hygiene and food safety. While rebottled IBCs can meet hygiene requirements, washing alone would not be sufficient for this purpose. Opinions differ on the environmental benefits of reuse packaging and the achievable number of rotations, but 2-5 rotations are considered possible for IBCs compared to other packaging formats. However, reusable IBCs are also not ecologically sound for long transport distances.
- In the area of FIBCs, similar reasons for exemption are cited in the same industries in the context of hygiene and food safety as for drums. In addition, higher labor costs would arise due to the complex post-treatment of FIBCs. Since new FIBCs are significantly cheaper, reuse would not be worthwhile from an economic point of view.

The survey shows that the reuse targets of the PPWR are considered unrealistic for the packaging formats examined. The lack of economic viability and standards, as well as concerns regarding hygiene and food safety, are key reasons for possible exemptions in delegated acts.

In addition to the possible exemptions from the reuse obligations, the survey also addressed general questions about reuse packaging regulations. With regard to the terms “transport packaging” and “sales packaging with transport function”, all respondents consider the distinction to be neither comprehensible nor reasonable. The majority of respondents view the packaging systems examined as sales packaging due to the direct contact with the contents. Some of the participants therefore expect these packaging formats to be exempted from the reuse regulation.

Most respondents consider the 40% reuse target pursuant to Art. 29(1) PPWR to be unrealistic for buckets, canisters, drums and FIBCs, while it appears to be achievable for IBCs. None of the respondents consider a 100% reuse rate for a specific packaging system to be realistic. In principle, it is not possible to accurately assess the achievability of the reuse rates, as there is no data on the current total share of reuse packaging in the relevant packaging mix, either in the PPWR explanatory memorandum, in literature, or among the companies.

## Conclusion

The results highlight the technical and economic challenges in the context of the reuse targets in Art. 29(1)-(3) PPWR for the packaging formats examined. The respondents see the reasons for delegated acts on further exemptions under Article 29(18) PPWR in particular in relation to issues of hygiene and food safety and the associated requirements. In addition, the study highlights the issues of setting minimum rotation figures for reuse packaging against the background of Article 11(2) PPWR.

The long version of the study can be ordered via the website of BKV GmbH:

<https://www.bkv-gmbh.de/study-reuse-targets-in-the-ppwr.html>

It provides a detailed description of the regulatory background of the PPWR's reuse requirements, focusing on political developments and issues as well as the positions of relevant stakeholders. It also provides an in-depth description of the success factors of established reusable systems and, with regard to the challenges and limitations, offers detailed reasons for exemptions from the reuse requirements with an assessment of the prospects of success.

Further studies of BKV GmbH: <https://www.bkv-gmbh.de/studies.html>