



December 5th, 2023

The reuse industry urges EU policymakers to take action and vote for the economical and ecological common sense

We are writing on behalf of the European reusable and refillable packaging industry, represented by the 8 signatory organisations of this letter, totalising more than 1,700 companies to strongly urge you to support the draft General Approach of the Packaging and Packaging Waste Regulation proposed by Spain the 1st of December, in particular for the restrictions on the single-use packaging market (article 22) and the reuse and refill targets (article 26).

The transition to reuse systems offers economic opportunities for European businesses by reducing our dependence on global supply chains while supporting local economies and contributing to sustainable economic growth. Among some of the positive economic effects of reuse systems are: lower inventory costs, energy savings, reduced price sensitivity to rising resource costs, and diminished waste management costs.

This is not theoretical: many companies across Europe are already benefiting from the implementation of re-use systems.

"Since the 1st of January 2023, France has made reusable tableware compulsory for onsite consumption in fast-food restaurants. It's a technical challenge that we're delighted to have met in all our restaurants. Since the launch, the results are highly satisfactory: strong consumer support, a positive reorganisation of the way we serve, and a deep satisfaction among our teams that gives meaning to their efforts. Our experience proves that this challenge is not only feasible, but also ecologically and professionally beneficial as it enables us to build customer loyalty . We're not going backwards."

 *Charlotte Gibaud - Purchase and product development Director at Bioburger (fast-food chain)*

"Vytal operates in Germany, which we consider to be the most developed market for reuse in the takeaway sector. In the last four years we have grown to become the world's largest digital reuse solution in the takeaway industry with more than 7,000 B2B-partner locations and more than 550,000 registered users. Thanks to our own tech platform, more than 7.8 million single-use containers were replaced by Vytal customers. With a 99% return rate and an average return time of less than 5 days, Vytal reduces packaging costs for the foodservice industry and proves the effectiveness of reusable packaging. Based on our success so far, local entrepreneurs from Ireland, Sweden, Luxembourg and other countries are now implementing Vytal's reusable system across Europe as Vytal franchisees. With support of the German GLZ, Vytal is even being exported to Latin America."

 *Dr. Tim Breker - Managing Director at VYTAL Global (provider of reusable takeaway packaging)*

A PPWR with ambitious reuse targets is a unique opportunity for Europe to become the global driver of the circular economy, establishing an unequalled global advantage in knowledge and location for decades to come. Beyond the positive impact on the environment, Europe's strong position in reusable and refillable packaging will create massive economic value through the export of effective European solutions to the global packaging waste crisis.

Boosting reuse systems should also lead to a minimum of 600,000 jobs by 2030, according to the European Commission. This is already the case in Germany, where beverage reuse systems are estimated to employ 150,000 people. According to the latest study "Unlocking a reuse revolution: scaling returnable packaging" of the Ellen MacArthur Foundation, scaling reuse systems could create 11,000 jobs in return logistics in a market like France. These jobs are essentially local and cannot be outsourced outside Europe. Imagine the potential if such systems were deployed throughout Europe.

“Business and society are embedded into and dependent upon healthy ecosystems. Today, taking action on a company’s environmental impact is not only about ethical leadership, but also about questioning our impact on our society's well-being and its viable future. With a community of over 7,500 companies of all sizes and sectors in 90 countries, including over 360 in France, the B Corp movement and its current international certification standards already list a range of beneficial circular practices. We encourage companies to consider how their different product and packaging choices contribute to reducing the overall pressure on natural resources. Ambitious reuse targets at European level are a positive step forward towards building a more inclusive, equitable and regenerative economic system. In this sense, the B Corp movement intends to accompany the evolution of our economy, reflected in the evolution of our standards. This will involve accelerating circular models, developing the economy of use and functionality, and the emergence of new models with regenerative potential.”

 *Augustin Boulot - Director General of B Lab France (business association)*

"Biocoop is France's leading specialist retailer of organic food and products with more than 740 shops and a turnover of 1.5 billion euros in 2022. Since we were founded in 1986, we've strived to market our products with the least environmental impact and with a minimum of single-use packaging. As proof of our commitment, refill stations have been available at our shops since we opened, and we completely stopped selling single-use plastic water bottles in all our shops in 2017.

Refill and reuse now account for more than 1/3 of our turnover and 50% of our sales volumes. This is clear proof that the move away from single-use packaging is making progress and is not in contradiction with the goals of business, but is simply helping it to evolve.

By 2025, we aim to achieve 50% of our turnover from selling products without single-use packaging. To achieve this, we plan to accelerate our efforts in several areas:

- *Our refill offer: by improving the existing range and phasing out the distribution of certain products sold in single-use packaging. By 2023, certain products in the dried fruit range will only be available in refill format.*
- *Products available in reusable packaging: we have already sold 5.5 million bottles in reusable packaging since 2020. For wine and beer, 1 product over 5 is sold in reusable packaging. We are currently working on extending the reusable packaging system to other markets in order to offer our customers even more reusable solutions.*
- *The collection of empty reusable packaging: increase the number of our shops capable of doing so from the 389 currently to 100% by 2025.*

As you can see, refill and reuse are an operational and commercial reality for the Biocoop Cooperative. We are therefore hoping for an ambitious European trajectory to support this approach."


 *Tanguy Le Gall - President of Biocoop (retailer)*

By adopting a forward-thinking and robust legislation, EU policymakers can accelerate the adoption of reuse systems and create a level playing field with single-use packaging.

In doing so, the European Union could bring about a profound and positive transformation that empowers the growth and competitiveness of reuse systems. Legal certainty is essential to unlock investment in reuse and refill business models. These investments aim to drive innovation in the design, labelling, traceability, transport, sorting and cleaning of reusable packaging.

“MIWA is a globally awarded and recognized reusable packaging and refill system. It allows producers and retailers to distribute dry and liquid products from food through pet food to personal care and home care products via reuse and refill while significantly decreasing both material footprint (by 90%) and carbon footprint (by 62%). System is fully certified to meet the highest requirements (including for food) in terms of cost-effectiveness, efficiency, hygiene and product protection. A proof of it being MIWA cooperating with 5 large retailers and 4 global brands where consumers can buy known products via refill without compromising on quality.

Up to date over 100,000 consumers have shopped from the system and by the end of January 2024 MIWA will be installed in 40 large supermarkets in Europe (Czech Republic, Germany, and the Netherlands). With data features and traceability MIWA also allows building of a reuse habit among consumers, who can be incentivized via discounts to further reuse their consumer packaging.”

 Ivana Soboliková - Impact Strategy & Investor Relations at MIWA (refill stations designer and operator)

"Since its creation in 1994, ETERNITY Systems has enjoyed constant double-digit annual growth to reach + €110 million turnover. The company collects, transports, repairs, washes and stores more than 750 million reusable containers and packaging a year at 18 European and global centres of its own. It employs nearly 1,500 people in Europe (France, Germany, Spain and Portugal) and North America. R&D and technological developments (automation, Industry 4.0, digital traceability, etc.) are at the heart of the development of reuse. With the opening of one to three centres a year, the Packaging and Packaging Waste Regulation is the response we are waiting for to invest and scale up."

 Gildas Bouilly - CEO of ETERNITY Systems (industrial solutions for reusable packaging)

An ambitious PPWR that defines clear measures for reuse and removes obstacles to the implementation of these solutions is paramount. However, this is exactly the opposite of what the European Parliament adopted on 22 November. The text is full of derogations and reduced aspirations, and provides an insufficient response to the packaging waste crisis we are experiencing (with a record level of 189 kg per EU citizen every year).

“Through its work, Porto Protocol has created a collaborative network of European stakeholders and beyond, spread across the wine value chain, at various stages of implementing returnable bottle schemes. This collective of companies has been working towards its environmental and economic feasibility, understanding how this solution can be scaled within the complexity of the wine industry. Wineries have experienced climate change, glass scarcity and increased costs of production. Legislation to support the reuse of glass bottles, winemakers’ container of choice, will provide a myriad of benefits to mitigate this combination of pitfalls: cost savings, increased operational efficiency and waste reduction, allowing wineries to rely less on single-use bottles and reduce its vulnerability to disruptions in the supply chain related to packaging materials. It can contribute to the conservation of raw materials like sand, a finite and highly exploited resource. Ultimately, it can build on the long-term sustainability and resilience of the industry.”



Marta Mendonca - Manager at The Porto Protocol Foundation (global organisation of the wine industry)

Considering the imminence of the adoption of the Council's position of the Packaging and Packaging Waste Regulation (PPWR) scheduled on 18 December, **we strongly urge you to support the draft General Approach proposed by Spain on December 1st, in particular the restrictions on the single-use packaging market (article 22) and the reuse and refill targets (article 26).**

We thank you in advance for your consideration of this crucial matter for our industry.

Organisations signatories

New European Reuse Alliance - Fernando Rodriguez-Mata (Director General)

Réseau Vrac et Réemploi - Célia Rennesson (Founder and Managing Director)

Mehrwegverband Deutschland e.V. - Mathias Gerspacher (Head of EU Policy and National Political Affairs)

Pro Mehrweg - Günther Guder (Executive Member of the Board)

Reusable Packaging Europe

Roundtable for Reusable Containers Trays and Pallets

B Lab France - Augustin Boulot (Executive Director)

The Porto Protocol Foundation - Marta Mendonca (Manager)

About the signatory organisations



(HoReCA, retail, e-commerce and industrial packaging).

The **New European Reuse Alliance (New ERA)** is the trade association representing the economic operators providing reusable and refillable packaging solutions in Europe. The association was created in 2022 and currently represents 50 organisations of the diverse reuse sector involved in different activities (manufacturing, transport, logistics, washing and cleaning) and present in various market segments



Réseau Vrac et Réemploi is a trade association catalysing economic players (manufacturers, suppliers, operators, etc.) along the refill and reuse value chain to structure, develop and encourage refill and reusable packaging systems in France. The association was created in 2016 and represents 1,000 businesses from multinationals to SMEs. It encompasses influencing the decision-making process, training professionals, accompanying business, creating tools and guidelines for the industry as well as launching national communication campaigns to accelerate the development of the economic and regulatory incentives and display a convenient and feasible refill and reuse offer for consumers.



Mehrwegverband Deutschland e.V. (German Reuse Association) is a non-profit organisation founded in 2022 that represents over 90 companies that are system operators of reusable packaging solutions for e-commerce, take-away, home care articles, and pre-packaged food, investigate or research the topic of reusables, and offer solutions in material selection, design, cleaning, logistics or sorting. Mehrwegverband fosters the exchange of experiences and collaboration between members and external actors from business, civil society and science. Our goal is to make reusable packaging an ecologically and economically advantageous option in as many areas as possible with the aim of shaping a political landscape that promotes and supports the use of reusable packaging systems at both national and European level.



Pro Mehrweg e.V. (Association Pro Reuse) consists of and represents 100 associations and companies of the German beverage industry, beverage wholesalers and retailers, their supplier industries, as well as environmental associations and individuals. The association acts as a platform for all those who contribute to the preservation and continuous development of the unparalleled German reuse system for beverage packaging.



Reusable Packaging Europe (RPE) represents the interests of companies active in the area of reusable transport packaging (RTP) systems, primarily packaging containers and wooden pallets, towards the European Union. Our members are considered to be leaders in the circular economy. It is RPE's aim to ensure that both EU institutions and industry partners recognize the association as the voice of the RTP industry. In doing so, RPE promotes the role of pooling models and the use of RTP in achieving a circular economy. The systems employed by RPE's members make them a frontrunner in operating Product-as-a-Service models.



**ROUNDTABLE FOR REUSABLE
CONTAINERS TRAYS
AND PALLETS**
COMMITTED TO CIRCULAR PLASTICS

The Roundtable for Reusable Containers Trays and Pallets (RCTP) represents the manufacturers of reusable and returnable transport packaging. The RCTP's members have decades long experience in providing durable packaging solutions that prevent waste, including plastic crates, trays, pallets, foldable containers, stack containers

and bulk containers. The Returnable Transit Packaging industry is estimated to employ about 10,000 people in the EU and is the backbone for many other industries. The total revenue of the industry in the EU is €2.2 billion.



B Corp - The association B Lab France represents the B Corp movement in France. It guides, leads and coordinates the development and dissemination of a new way of doing business. The association positions itself as a catalyst for social, societal and environmental change, fulfilling a mission of contribution to the common good. B Lab France is part of the B Lab network, a unified group of regional and national NGOs covering six continents. This international network is driving change in economic systems to create a more inclusive, equitable and regenerative economy.



the
**PORTO
PROTOCOL**

The Porto Protocol Foundation is a global organisation sharing practical knowledge to empower the wine industry to take action to mitigate climate change and promote sustainability. It acts as an open and dynamic platform of solutions and resources and a network of like-minded companies, with more than 250 members, spread across 5 continents, 20 countries,

and the entire wine value chain. With a focus on collaboration and innovation, Porto Protocol seeks to trigger action and create a community of changemakers who are committed to making a positive impact on the planet.