

## Inception impact assessment: Review of the requirements for packaging and other measures to prevent packaging waste

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## Introduction

Stiftung Initiative Mehrweg (SIM) is a German civil law foundation which was established in 1996. It is SIMs objective to sustainably support the conservation of natural resources, to protect the environment and to promote the use of reusable systems in all economic sectors.

The Executive Board of SIM is composed of mainly CEO's and other Senior managers being active in the reuse industry. The Board of Trustees is composed of Senior managers being active in public and private institutions within the area of Re-use.

SIM welcomes the Commission's initiative to review the requirements on packaging and packaging waste and its public consultation in that respect. SIM would like to share its feedback through this document.

## SIM's feedback:

The use of Reusable Packaging Containers (RPCs) constitutes one of the best ways to prevent (and therefore reduce) over-packaging and packaging waste in the food supply chain in the EU. (Re)use of RPCs furthermore offers a considerable potential for resource and climate protection. SIM therefore believes that RPCs should be promoted as the preferred packaging method in the fresh food supply chain.

### 1. Reduce packaging and food waste

Fruits, vegetables and other food products can be (and are) transported and displayed in stores in the same RPCs as the RPCs in which these food products are transported, therefore without the (need for) use of additional layers of packaging.

Pursuant to a study of the Fraunhofer Institute named "*Determination of spoilage levels of fresh fruit and vegetables according to the type of packaging*", it was established that from the producer to the outlet, around 4% of all disposable (transport) packaging was damaged. For RPCs, the figure was just 0.1%. When extrapolated to the German market situation at the time of the study, around 36,000 tons of fruit and

## Stiftung Initiative Mehrweg

- Founded in 1996
- Foundation for Reusable Systems
- Promotion of Re-Use

## Key components position paper

- The (re)use of RPCs should be promoted as the preferred packaging method in the food supply chain, since RPC's:
- reduce packaging and food waste; and
- cause on the same transport performance at least 60% less greenhouse gas emissions compare to single use boxes.

vegetables, with a market value of approximately €68 million, would be damaged when disposable (transport) packaging would be used for the transport of fruits and vegetables in Germany. When RPCs are used exclusively, the estimated wastage is 1,100 tons, with a market value of around €2 million<sup>1</sup>.

Each RPC can furthermore be reused for years before being scrapped for recycling (reuse for the production of new RPC's or other products).

RPC's therefore constitute the preferred packaging method in the food supply chain to reduce packaging waste and food waste.

## 2. Tax

The production and use of reusable packaging such as RPCs should be rewarded through adequate financial and tax benefits and through the implementation of tax harmonization measures ensuring a swift and free movement of reusable packaging and packaged goods throughout the European Union (minimizing the administrative burden being applied to reuse and contributing to the simplification of the regulatory environment being applicable to reuse systems).

## 3. Emissions

A study of the Fraunhofer Institute named "*Carbon Footprint of Packaging Systems for Fruit and Vegetable Transports in Europe*" clearly shows that the (re)use of RPCs results in 60% lower greenhouse gas emissions to provide the same transport performance compared to single use boxes.<sup>2</sup> SIM therefore believes that RPCs should be promoted as the preferred packaging method in the supply chain to reduce greenhouse gas emissions.



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<sup>1</sup> <http://stiftung-mehrweg.de/savefoodstudie.php>

<sup>2</sup> <http://stiftung-mehrweg.de/carbonfootprint.php>

#### 4. Introduce reuse quota/make reuse mandatory

Setting legally binding targets or making reuse mandatory for transport packaging in the food supply chain will generate commitment and momentum in the packaging sector and will reduce packaging waste, food waste and greenhouse emissions.

#### Conclusion:

Increasing the (re)use of RPC's will reduce packaging waste, food waste and greenhouse emissions. SIM believes that further reuse of RPCs will contribute to the realization of the Green Deal in the food and other supply chains.

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