



# IMPACT OF THE NEW EUROPEAN REGULATION ON COMMERCIAL & INDUSTRIAL PACKAGING



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# What is Extended Producers Responsibility?

**Extended Producer Responsibility (EPR)** is a **European environmental policy** approach that makes the producer or importer **responsible** for the entire life cycle of their product.

**According to the European legislation, the producer is responsible for :**

- Designing products using materials that are as environmentally friendly as possible and in such a way as to optimize recycling.
- Developing collection systems for its products, with particular attention to recycling.
- Meeting annually the recycling and/or recovery targets

EPR-schemes throughout Europe offer the producers a collective answer by taking over their legal obligations with regards to specific waste streams

## EPR on several waste streams:



Packaging



Electric appliances



Batteries



Waste oils



End of life vehicles



Tires



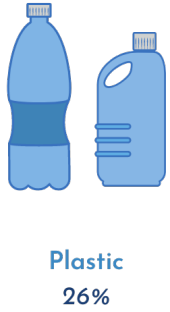
Mattresses

# EPR for packaging in Belgium



valipac

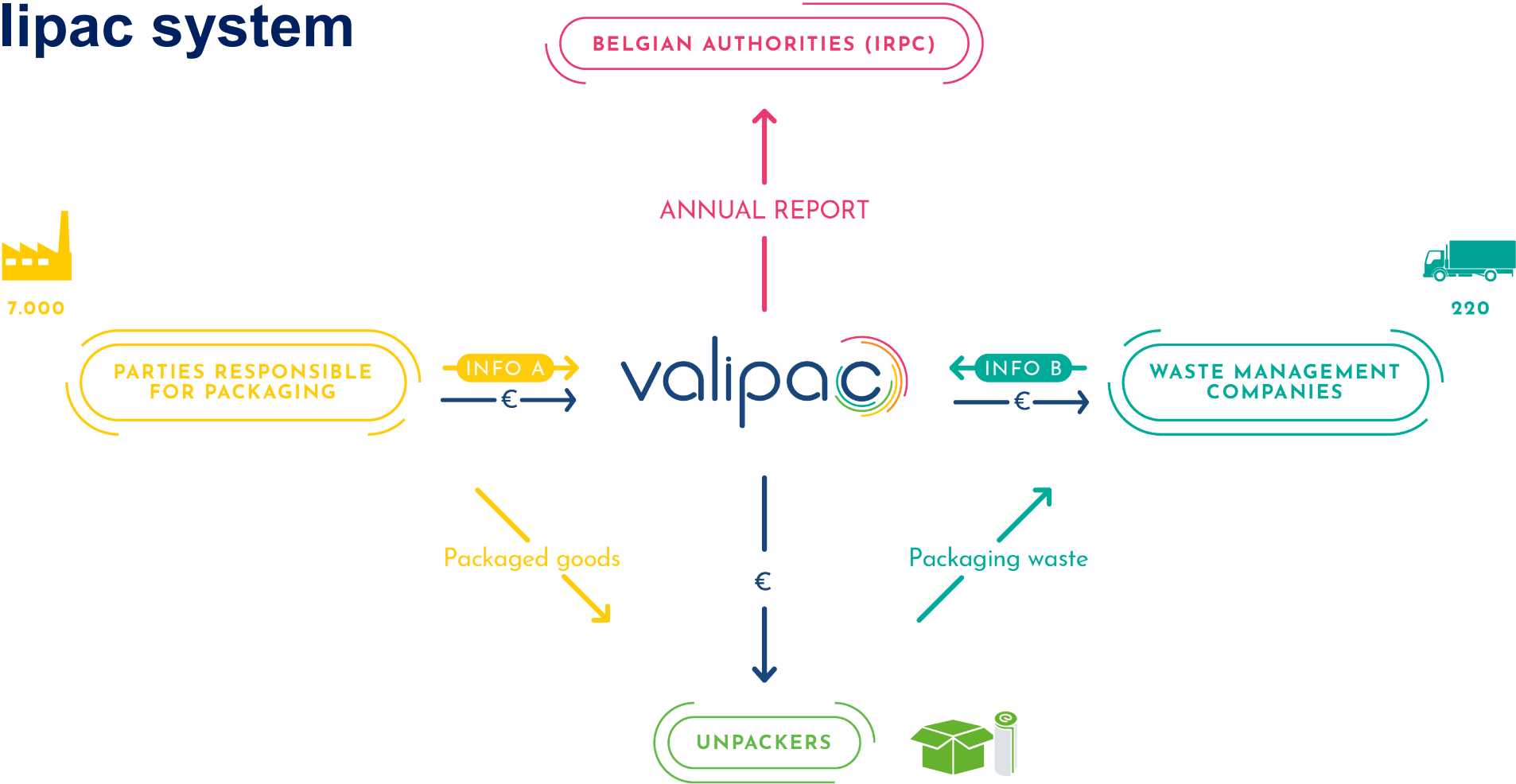
Fostplus





**=> Implementation of EPR systems for C&I packaging mandatory in all EU countries before end 2024 !!**

# The Valipac system



**INFO B: QUANTITY OF PACKAGING WASTE RECYCLED** = **RECYCLING TARGET PER MATERIAL**  
**INFO A: QUANTITY OF PACKAGING BROUGHT ONTO THE MARKET**

# Circular model of Valipac



# Valipac in figures: 2023 results (\*)



780,000 tons  
single-use industrial packaging put  
on the market



3,410,000 tons  
reusable industrial packaging put  
on the market



720,000 tons  
recycled industrial packaging  
waste



90.7%  
recycled industrial wood  
packaging waste



100%  
recycled industrial paper/cardboard  
packaging waste

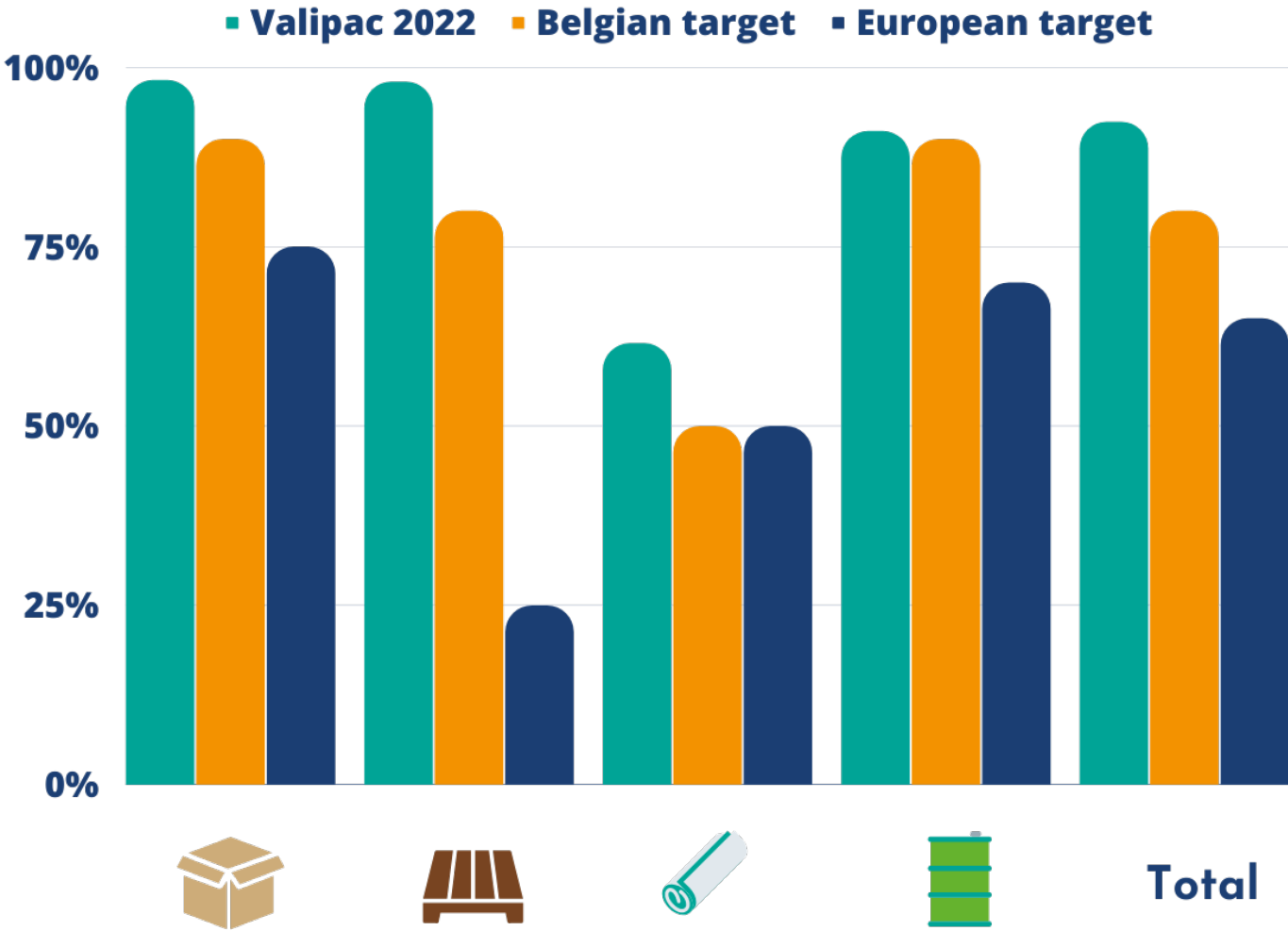


92.0%  
recycled industrial metal  
packaging waste



65.1%  
recycled industrial plastic  
packaging waste

# Targets vs. results





# Reusable industrial packaging in Belgium

Definition of reusable packaging according to the Belgian legislation

1

The company must intend to use the packaging for the same purpose.

2

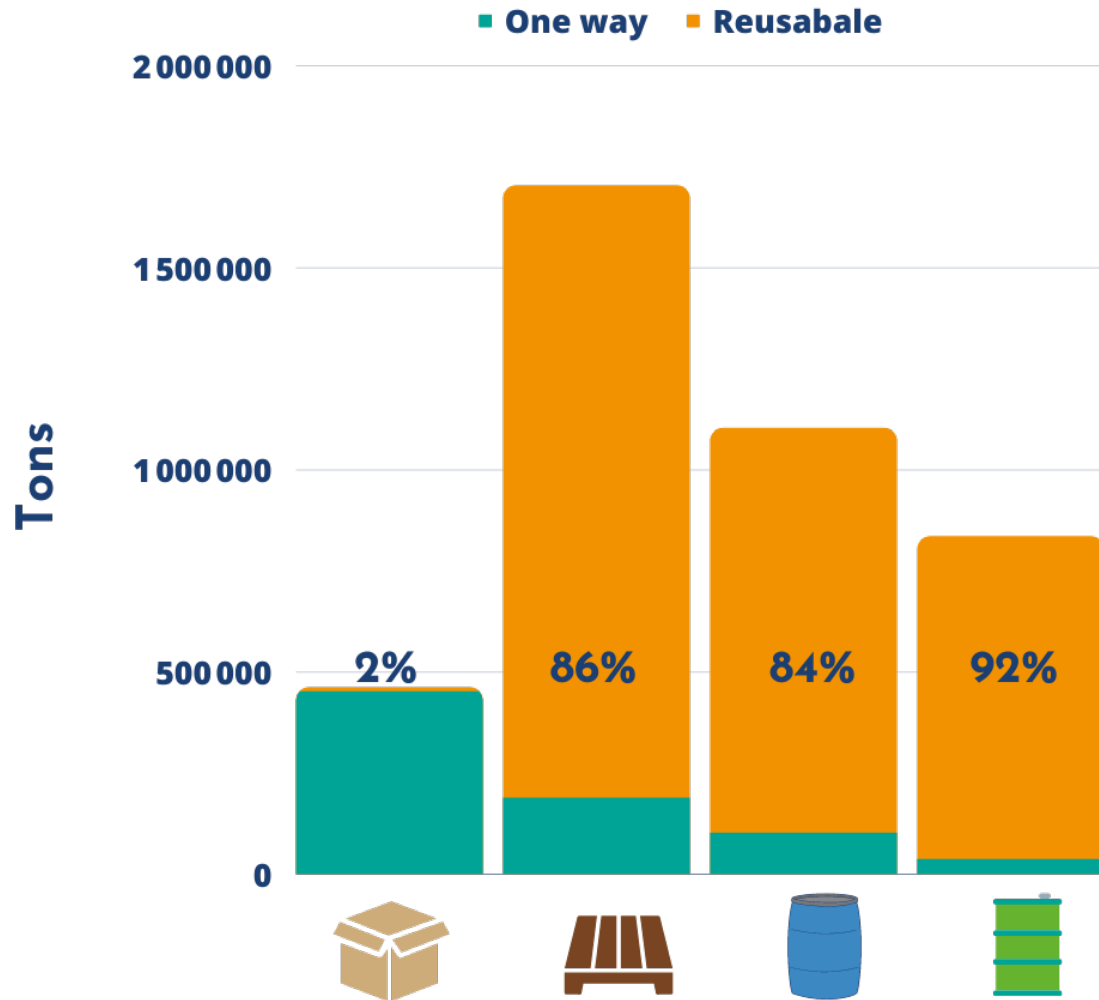
The packaging must meet all technical requirements to be reused a minimum number of times for the same purpose.

3

There should be a system in place to reuse the packaging at least 2 times for the same purpose.



# Industrial packaging put on the Belgian market



Reusable packaging are with an average of 81% already commonly used in industrial packaging.

For the remaining 19% one-way packaging, a recycling rate of 91% is reached.



# CHALLENGING FUTURE REUSE IN PPWR

# Which **packaging** is concerned?

The PPWR gives a list of packaging deemed to be reusable. At this point we have no idea if the list is exhaustive or not and if exceptions can be expected (wrapping and strap).

*Pallets, foldable-plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums and canisters of all sizes and materials, including flexible formats or pallet wrappings or straps for stabilisation and protection of products put on pallets during transport.*



# Mandatory reuse targets for transports within Europe

Economic operators using transport packaging or sales packaging used for transporting products within the territory of the Union, including via e-commerce shall ensure that such packaging used is reusable packaging within a system for reuse.

## Targets:

- From 1 January 2030, at least 40% (\*) of that packaging must be reusable.
- From 1 January 2040, at least 70% (\*) of that packaging must be reusable



2030

40%

2040

70%

# Mandatory re use targets for transports within Europe between sites of a company or any linked company

Economic operators using transport packaging or sales packaging used for transporting products within the territory of the Union between different sites on which the operator performs its activity, or between any of the sites on which the operator performs its activity and the sites of any other linked enterprise or partner enterprise shall ensure that such packaging is reusable within a system for re-use.



100%

# Mandatory re use targets for transports within the same member state

Economic operators using transport packaging or sales packaging used for transportation to delivering products to another economic operator within the same Member State shall ensure that such packaging is reusable within a system for re-use.



# Exceptions to the mandatory re use targets for sales or transport packaging

Packaging used for the transportation of **dangerous goods**

Packaging used for transportation for the large-scale machinery, for equipment and commodities for which packaging are **customed-designed** to fit the individual requirement of the ordering economic operator

In flexible format, packaging used for transportation, that is in direct **contact with food and feed and food ingredients**

In the form of **cardboard boxes**

Economic operators that made **not more than 1000 kg** packaging available on the market within the territory of a MS **and comply with the definition of micro-enterprise.**



Issues related to the fulfilment

## **Individual or collective fulfilment**

Reuse targets are imposed on economic operators on an individual basis. This is also the case for recycling rates for packaging waste.

Achieving re-use targets may prove difficult for some economic operators. For this reason, consideration could be given to delegating this obligation to an EPR scheme. In Belgium, the inter-regional cooperation agreement already stipulates that economic operators must report on the quantity of single-use and reusable packaging. Thanks to the EPR scheme for industrial packaging, Belgium already has statistics on the rate of reuse of industrial packaging placed on the Belgian market.

As reuse rates have to be demonstrated by Member State, a collective system is entirely feasible.



# OUR APPROACH

# Our proposition

- PPWR is not clear yet but for sure challenging to be implemented by the economic operators!!
  - Registration of single-use and reusable packaging used within the Member State and exported within the EU.
- As EPR organization, Valipac offers a service to 7.000 clients (economic operators)
  - ... Most of these companies are also working together with pallet pools.
- Valipac already collects some mandatory information:
  - One-way packaging put on the Belgian market;
  - Quantities of reusable packaging (equivalent one-way) put on the Belgian market.
- Pallet pools also collect a lot of necessary information:
  - Transfers within the same company or within the same Member State (MS) / within the EU;
  - Quantities of new reusable packaging put on the MS markets.
- Neither Valipac nor the pallet pools currently collect enough information to fulfill the PPWR requirements.



## Our proposition

Let's be pragmatic  
and work together in order to offer  
an added value to our clients and avoid  
administrative burden



## CONTACT



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