

inDUfed Position

Exemption of wrapping and strapping materials from reuse targets in the PPWR

1. Introduction

inDUfed supports the reuse targets in the PPWR, insofar as they are technically and economically feasible and lead to proven environmental benefits. We endorse the principle that packaging and packaging systems should be used optimally, with single-use and reusable packaging complementing one another.

Article 29, §§1–3 of the PPWR imposes reuse targets for certain transport packaging:

- **40%** for transport packaging used for deliveries to other EU Member States,
- **100%** for deliveries within the same Member State or within the same group.

Wrapping materials (such as shrink and stretch film and paper wrappers) and strapping bands fall within this scope. The European Commission (DG ENVI) has recently published a delegated decision exempting these materials from the 100% target. inDUfed welcomes this but calls for this reasoning to be extended to all deliveries and **for the publication of a second delegated decision that includes cross-border deliveries to which the 40% target applies.**

⇒ ***inDUfed advocates for the extension of the exemption to the 40% target because:***

- **Compensation between packaging formats is impossible**, which means that companies cannot use alternatives with higher reuse potential.
- **Very high shipping volumes (up to 1,700 pallets per day)** make reuse **unfeasible** in practice due to the lack of suitable reuse packaging systems.
- **The necessary infrastructure and return logistics are lacking.** Achieving 40% reuse would require, just for the paper and board converting sector in Belgium, more than 70,000 reusable units. In practice, this amount should be increased to allow for inevitable losses and damages.
- **Manual application of reusable covers and straps** leads to excessive labour costs and increased ergonomic risks.
- **Hygiene requirements in the food chain make reuse even more difficult** due to expensive and intensive cleaning and rapid material degradation.
- **Smaller Member States such as Belgium are disproportionately disadvantaged**, as exports are crucial for those countries, and an exemption limited to the 100% target causes structural compliance problems and competitive disadvantages.



2. Detailed justification

No possibility of compensation between formats

Companies in the paper and glass industry package products on pallets with film and strapping. The possibility to compensate for a format with low reuse potential with a format with higher potential, as suggested in recital (1) of the draft decision, is not available to them.

High shipping volumes make reuse unfeasible

The sector ships an average of 240 pallets per day per company to customers outside Belgium, with peaks of up to 1,700 pallets. Due to the lack of suitable reuse packaging systems, a reuse target of 40% is not feasible in practice.

Insufficient infrastructure and logistics for reuse

For the paper conversion sector, with 214 companies in Belgium of which 80% are SME's, more than 70,000 reusable units would be needed to achieve 40% reuse, even under the unrealistic assumption that all units are fully returned. Deloitte confirms that the necessary return logistics and infrastructure for reusable films and strapping do not exist today. Furthermore, loss and damage are inherent in any reuse system.

Disproportionate labour and ergonomic burden

Reusable covers and straps must be applied manually, which leads to significant additional labour costs and increases the ergonomic risks for employees.

Hygiene requirements in the food chain make reuse difficult

Cleaning reusable covers is expensive, labour-intensive and leads to accelerated material degradation, limiting the lifespan of these systems.

Disproportionate impact on smaller Member States

An exemption that only applies to domestic deliveries disadvantages industries in smaller Member States such as Belgium, where exports are essential for market access and sectoral specialisation. Without broader exemptions, structural compliance problems arise that undermine both the competitiveness and proportionality of the Regulation.

3. About inDUfed

inDUfed is the federation of the Belgian glass, paper and cardboard industries and brings together companies committed to sustainability, innovation and quality. *inDUfed* advocates for these sectors, supports their industrial initiatives and encourages progress that benefits both the environment and the economy.

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