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CITPA feedback to Ramboll: study on reuse and reusable packaging of PPWR

CITPA welcomes the opportunity to provide feedback to Ramboll following the final stakeholder workshop on the PPWR reuse methodology.

CITPA supports the development of a clear and harmonised methodology that enables economic operators to implement the PPWR reuse requirements consistently across the EU. However, **the methodology must remain strictly within the scope established by the Regulation**.

1- The methodology should not extend the exhaustive scope of Article 29(1)

The Commission FAQ confirms that Article 29(1) contains an **exhaustive list of packaging formats**. The methodology should therefore clarify how the formats expressly listed in Article 29(1) are understood and how the reuse targets are calculated. It should not result in additional packaging formats being brought into scope through analogy, size, terminology or distribution channel.

CITPA considers that the existence or technical feasibility of a reusable alternative is not sufficient to bring a packaging format within Article 29(1). **Scope and technical reusability are separate questions.**

We therefore recommend that the final methodology explicitly confirms that its definitions, examples and illustrations cannot broaden the exhaustive list established by Article 29(1), especially on:

- **Paper bags and sacks / flexible IBCs:** CITPA does not consider a 100-litre capacity threshold sufficient to classify a paper bag or sack as a flexible IBC. Capacity alone does not change the function or technical characteristics of a packaging format. An industrial paper sack does not become an IBC simply because it exceeds a certain volume.

  Flexible IBCs are recognised packaging formats with specific technical characteristics and applicable standards.

  CITPA therefore recommends removing the generic 100-litre criterion and relying instead on objective characteristics of FIBCs, including applicable technical standards, construction, integrated handling/lifting features and intended logistics function.

- **E-commerce envelopes, pouches and mailers:** CITPA is also concerned by the proposed treatment of e-commerce envelopes, pouches and mailers as flexible counterparts of canisters.

  As acknowledged during the workshop, e-commerce is a distribution channel, not a packaging format.
  An envelope or mailer cannot be considered a flexible canister simply because both formats contain and protect products. Applying such an analogy would risk extending the exhaustive Article 29(1) list beyond the formats established by the Regulation.

Also, in line with the exhaustive nature of the list of packaging formats provided in Article 29(1), envelopes, pouches and mailer bags cannot, based on any objective criteria, be considered packaging formats expressly listed in Article 29(1).

CITPA therefore recommends removing envelopes, pouches and mailers from the proposed canister interpretation

For a flexible canister format, or any other packaging format listed in Article 29, applicable technical standards, construction, integrated features and the intended logistics function should be taken into account to determine whether the packaging is suitable for multiple rotations. Relevant characteristics may include washability, a reclosable system designed for repeated use, and sufficient strength and durability. Such solutions may not be available on the market today but could be developed in the future.

- **Paperboard trays, cardboard boxes and protection elements:** CITPA welcomes the consistent implementation of the PPWR text referred to the explicit exclusion of cardboard boxes. However, further clarification is needed regarding the proposed "paperboard tray" category.

  Terminology used by the paper and board industry does not necessarily determine the regulatory function of packaging. A corrugated or solid-board format may be commercially or technically described as a "tray" while performing the same packaging function as a cardboard box.

CITPA therefore recommends that:

- classification is based on objective function and characteristics, and supports industry terminology.
- corrugated and solid-board formats functioning as cardboard boxes remain covered by the cardboard-box exclusion; and
- interlayers, separator sheets, edge protectors and other protective/stabilisation elements are not inadvertently classified as trays or other Article 29(1) formats.

Concrete examples and illustrations distinguishing these formats would provide useful legal certainty.