

The European construction products industry calls for realistic targets on the re-use of transport packaging under the new PPWR

The Packaging and Packaging Waste Regulation (repealing Directive 94/62 on Packaging & Packaging Waste) lays down requirements contributing to environmental sustainability with regard to the whole life cycle of packaging and the management and prevention of packaging waste. While it appreciates the efforts put forward by European institutions in reinforcing circularity and reducing the overall amount of packaging waste produced in the EU, Construction Products Europe urges the European Commission to **ensure that the Regulation will be implemented through economically and technically attainable targets**, not hampering the competitiveness and the productivity of the concerned industries.

In the final agreement of the Regulation, adopted by the European Parliament on 24 April, the re-use quotas for transport packaging have been significantly reformulated, resulting in considerably more far-reaching goals compared to the ones originally included in the Commission proposal. In particular, Article 29 sets a 100% re-use target for all sorts of transport packaging – including pallet wrappings and straps – used in shipments between different companies in the same Member State or sites controlled by the same operator across all the territory of the European Union.

Pallet wrappings and straps are **essential tools in securing the stabilisation and protection of products during transportation**, preventing possible breakages or damages and ensuring the safe handling of the load. Cargo securing not only is essential for the correct conservation of products, but is also a crucial element while assessing road safety related to transportation, as recognised by Directive 2014/47/EU. These packaging formats are currently widely used by the whole industry. For their inherent characteristics, they cannot be fully recovered after being detached from the packed material, neither they can be re-used while providing the same performance in terms of efficiency, safety and conservation of the load.

These packaging formats are indeed often stretched or shrunk while being secured to the load, and they can suffer slight damages during packaging, storage, transport and handling. In most of the cases, operators are also required to cut open wrappings and straps when unloading pallets, thus preventing any further reutilisation. Because of their specific function and attributes, **pallet wrappings and straps cannot be considered reusable packaging**, as defined by Article 11 of the Regulation.

The specific concerns about the feasibility of reaching the re-use quotas for transport packaging laid down in Article 29 (2) and (3) were also raised by then EU Environment Commissioner Virginijus Sinkevičius ahead of the European Parliament vote in April. The Commission is thus aware of the «economic constraints and environmental issues» related to the current re-use targets. Exemptions for specific economic operators or packaging formats due to economic or environmental constraints preventing the attainment of reusability targets can be adopted pursuant to Article 29 (18) of the Regulation. However, at this stage it is still unclear how the European Commission will assess the impact of the proposed targets on the concerned sectors and if an exemption for pallet wrappings and straps will be finally formulated.

Besides pallet wrappings and straps, multiple use is not always sustainable, if not actually impossible, for other formats of transport packaging (e.g., wooden crates used for protecting large ceramic slabs during transportation to the installation site). Furthermore, as economic operators are indeed committed to reach the 40% target for re-use for 2030 set by Article 29 (1) of the Regulation, **a transition to 100% reusable pallets employed in business-to-business transportation with the next few years may be possible in certain countries and for certain product sectors, but seems completely unrealistic for Europe as a whole and all companies**. Reusable pallets currently employed in the

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sector also have a narrow life-time (as they can be re-employed for only 6 or 7 times on average), thus making a limited overall contribution to the sustainability and circularity targets set in the Regulation.

Some additional technical requirements are currently hampering the use of standard reusable pallet formats, such as EUR-pallet, in the industry. To ensure an efficient handling and transportation of the concerned materials, pallets indeed often need to adapt to the size of the loaded products. Other relevant factors, for instance the stacking patterns of products on kiln wagons, equally influence the choice of different pallet formats by industrial operators. Moreover, in some countries pallets are standardised in accordance with a different system than EUR-pallet (e.g., HULO for façade bricks in the Netherlands). **In order to guarantee an effective transition towards reusable pallets, companies need more time to adapt to the required solutions, as huge investments in machinery are required** (e.g., replacement of mechanical grippers with robots).

Furthermore, **transport packaging can still significantly contribute to the attainment of sustainability criteria that differ from re-usability**: those packaging formats are indeed ordinarily collected and recycled, and already include a percentage of recycled content used in their manufacturing, making an overall contribution to the mandatory recycling targets laid down in Article 6 and 7 and to the general recycling quotas set in Article 52 of the Regulation (e.g., secondary raw materials from foils can be used in the production of new pallet wrappings). Additionally, industrial operators will in any case be required to comply with the overarching re-use quotas for transport packaging set out in Article 29 (1), by putting into action significant efforts in ensuring that the 40% of packaging material employed in transportation is reusable by 2030 and the 70% by 2040.

While reaffirming its commitment to implementing realistic solutions for the promotion of circularity and environmental sustainability throughout all the supply chain, Construction Products Europe asks for more clarity and balance in the definition and implementation of the re-use quotas for transport packaging. As a first and most urgent step, the European Commission should **exempt pallet wrappings and straps from the scope of Article 29 (1), (2) and (3) as well as pallets from the scope of Article 29 (2) and (3)**.

Founded in 1988, Construction Products Europe is a Brussels-based international non-profit making association. The association is made up of national and European associations that represent Small and Medium-size Enterprises and world-leading companies. Construction Products Europe aims to promote the European construction industry, to share information on EU legislation and standardisation and to provide input in all European construction-related initiatives.