



Written Comments to the OECD Environment Policy Committee

November 2025

Scoping paper on “Scaling-up reuse systems for plastic packaging”

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Comments in Response to OECD Questions

Do delegates agree with the relevance and timeliness of this work?

- Businesses view this work as **timely and relevant given the accelerating regulatory developments** on packaging, EPR, and circularity in specific jurisdictions across OECD and non-OECD regions. Companies are navigating new or revised frameworks governing:
 - requirements for packaging design and material use,
 - obligations on collection, recycling, and reuse systems,
 - expansion or tightening of EPR schemes, and
 - new reporting and notification requirements for placing packaging on the market.
- Businesses highlight that **regulatory approaches vary significantly across jurisdictions** – from detailed and prescriptive frameworks (e.g., the EU PPWR) to more flexible, innovation-driven systems that rely on industry-led solutions. This diversity underscores the need for OECD work that supports coherence, flexibility, and space for business-driven innovation.
- However, we strongly **recommend progressing this work with a more targeted scope only** – focused on Business-to-Consumer contexts in densely populated developed economies and on a limited set of applications (such as beverages, selected food and takeaway packaging, and selected hygiene products such as soap).

Do delegates see any reuse models or sectors that should be prioritised for in-depth analysis (e.g. beverage containers, takeaway packaging, e-commerce, B2B logistics)?

- **In the B2B sector – and particularly in transport and logistics – many systems are already functioning well and offer useful experience.** However, challenges remain. For example, for Swiss companies there is a lack of clarity regarding the subsidiary take-back obligation in B2B scenarios where packaging materials do not originate from the entity placing the product on the market but arise earlier in upstream supply chains.
- **Companies also face competitive distortions when packaging from foreign online retailers becomes domestic waste** without contributing to financing or take-back systems. Addressing these gaps would help ensure fair competition and effective waste management.
- Based on the evidence available, business recommends prioritising a more focused scope:
 - Business-to-Consumer systems in densely populated developed markets,

- A limited set of applications, such as beverage containers, selected food and takeaway packaging, and selected hygiene products (e.g., soap).

Are there particular case studies, pilots, other examples from your countries, or industry datasets, that would be important to include for data collection?

- Recent calculations developed as part of Switzerland's ongoing public consultation on new packaging legislation—available in the draft law and its annex (in German and French)—could provide useful methodological insights.
- Understanding the Impacts of Switching to Reusable Pallet Packaging – EuPF, stating in its conclusions:

“Based on robust independent evidence, EuPC urges the European Commission and Member States to recognize that high-performance single-use plastic pallet wrapping, particularly when incorporating recycled content, offers a proven and scalable circular solution. [...] Single-use plastic pallet wrappings have the lower environmental impact compared to reusable alternatives and other single-use solutions [...] Single-use plastic pallet wrappings are recyclable, adaptable and optimized [...] Re-use targets will increase costs for transporting products [...] Lack of technological readiness.”

- [The Trayak LCA \(Comparative Life-Cycle Assessment of Polyethylene and Alternative Packaging in the United States\)](#) compares existing reuse options across different environmental impacts.

General Comments

- Reuse systems typically cover all materials; we would therefore recommend not focusing solely on plastics, but including all materials for any applications within the scope of the study.
- A common error when considering reuse systems is forcing unnecessary functional equivalence with the single-use application being replaced. This should be avoided. For instance, in shipping polyethylene, the most common alternative to single-use 25 kg bags is ~100-ton rail hopper cars in the US and ~20-ton bulk trucks in Europe. Missing this consideration leads to illogical outcomes, such as in the PPWR, where reuse targets are imposed without counting ~20-ton bulk truck shipments, which are the current reuse model implemented by industry.
- Overall, literature on cost reductions is quite limited, so it would be important to stress this point. In the document, references to this topic mostly refer to the Ellen MacArthur Foundation, so additional case studies from business would be valuable if available.
- The scope of the Ellen MacArthur Foundation study is limited to four Business-to-Consumer examples of return (not reuse) in France—a developed and densely populated economy that is not representative of all OECD territories or developing economies. Additionally, the “in support of the study” section shows brands expressing important caveats, such as:

“The modeling proposed in this report includes ambitious scenarios for returnable packaging that will require time, policy action ensuring the right enabling conditions, and cross-sector collaboration to realize.”

We would recommend additional transparency on the study's scope and limitations. Currently, the scoping document references the EMF study 13 times, appearing in almost every paragraph, which does not seem justified.

- The study makes several references to refill systems and deposit schemes. While reuse, refill, and deposit are often considered alternatives to single use, a study focused on reuse should not include refill or deposit examples—unless the scope is revised.
- • The proposal does not define reuse. For example, is a 25 kg cement bag that carries cement for 365 days any more “single-use” than a piece of clothing worn 365 times? We would recommend limiting the scope of reuse to alternatives to packaging solutions typically used for less than a day.
- The study contains several tautologies, e.g.:
 - “Reuse systems can significantly reduce dependence on single-use packaging,”
 - “Well-designed reuse systems can generate jobs,”
 - “Well-designed reuse systems can substantially reduce environmental pressures.”

These statements should be strengthened or clarified.

Further Specific Comments

- **Paragraph 2:** «Short-lived applications currently demand more than one-half of polymer supply, generate two-thirds of plastic waste generation (350 Mt in 2021) and consequently significantly contribute to pollution (OECD, 2022[2]; OECD, 2024[1]) » Comment : this sentence implies that waste automatically generates pollution. However, it is littering and lack of waste management that generates pollution
- **Paragraph 3:** ‘Governments worldwide have imposed bans on single-use plastic products and packaging particularly likely to end up in the environment. » Comment : this sentence is misleading, as it sounds like all countries adopted bans, as part of the SUP-related measures. See paragraph 18
- **Paragraph 15:** «Reuse systems can yield long-term returns by reducing expenditure on raw material procurement and waste management costs. » Comment : this sounds a bit too simple and vague: for which stakeholders these schemes can reduce waste management costs ? For example, for producers, this usually adds an additional layer of costs, in addition to management of industrial waste. And there could be even differences depending at the different step of the value chain. So, this sentence could be included with some caveats. Also, how does it reconcile with paragraph 29 « Linear systems persist largely because they are cheap and convenient »?
- **Paragraph 16:** “Scenario modelling performed for the European market also suggests that achieving a 20% reusable packaging target by 2027 in the takeaway, e-commerce and household product sectors could result in reduced water consumption (3.5 bn m3) and reduced GHG emissions (1.3 Mt CO2-eq), compared to a business-as-usual scenario (Rethink Plastic Alliance, 2021[11]; Ellen Macarthur Foundation, 2023[8]).” The Ellen Macarthur study scope is limited to France and 4 applications, not Europe.
- **Paragraph 22:** «Since 2022, cafes and restaurants in Seoul must use reusable cups for on-site consumption, supported by a DRS system (Korea Ministry of Climate, Energy and Environment, 2022[21]). » Comment : it would be fair to say that part of these provisions

were lifted temporarily due to economic reasons in South Korea. This should be at least mentioned for clarity, to highlight that such schemes may have economic impacts

- **Paragraph 32** : « These systems thus require significant upfront investment but can achieve lower per-use costs when reuse cycles increase and when infrastructure is shared across producers or sectors. Comment : Lower compared to what ? To virgin or to the costs just after investments ? Is it replied in paragraph 34 ?
- **Paragraph 42** : « Organizations like the Business Coalition for a Global Plastics Treaty offer guidance for establishing binding reuse targets and regulations » Comment : this sounds too discretionary : there are many organizations that could be mentioned.