

Position paper **The National Packaging Council defines refill** October 2022

Context

In the light of various regulatory texts (AGEC law, Decree n° 2021-517 of April 29, 2021) and the 3R strategy of the Ministry of Ecological Transition, refilling is mentioned as being part of the 3R strategy by participating in the reuse of the associated refillable packaging.

However, there is no regulatory definition (France or Europe) of refill.

This is why the whole value chain of the packaged product that the CNE represents proposes a definition.

Definition of refill

Within the framework of the 3R strategy and the AGEC law, objectives and conditions for reuse have been set.

Refill must fit into this framework.

1. The refill must not be designed to be used independently of the refillable packaging. The refill is not a product that can be used as is.
2. The refill must always be associated with a refillable package and serve as an intermediate packaging to refill the refillable package available at home or at the professional's.
3. Most of the functionalities must be provided by the refillable package.
4. Refill must be recyclable.
5. The refill must not result in a transfer of impact to other packaging (multipack, logistics packaging, etc.) greater than the impact savings achieved by the refillable packaging solution with refill.
6. The environmental impact of the refillable packaging solution with refill must be less than the use of single-use recyclable packaging.

CNE recommendations

In order to shed light on point 6, the CNE is aligned with the position of the 3R strategy and therefore the criteria for counting and taking into account devices with refillable packaging at home its refill for refilling should be specified. The refillable packaging should be designed to ensure a minimum of refills.

The CNE reminds us that the refill is part of a reuse system that includes refillable packaging and its refill. The availability and proximity of refills with their refillable packaging and adequate information to consumers are necessary conditions for the very existence of the system.

CONSEIL NATIONAL DE L'EMBALLAGE

DES PARTENAIRES POUR LE MEILLEUR DE L'EMBALLAGE

The French Packaging Council (CNE), an association created in 1997, is a collaborative platform for the various players in the packaging value chain: packaging material producers, packaging and equipment manufacturers, consumer good companies, approved companies and operators in the collection and recovery sector, designers, other packaging professionals, local authorities, consumer and environmental protection associations.

The CNE, a recognized moral authority, works for Right Packaging and its main mission is to develop and disseminate good practice in the design, use and marketing of product packaging.

Press Contacts:

Bruno Siri - Délégué Général

Maryse Bricout - Assistante

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