# CONSEIL NATIONAL DE L'EMBALLAGE

DES PARTENAIRES POUR LE MEILLEUR DE L'EMBALLAGE

## **Position paper**

# Packaging recycling and reuse: Two solutions that shouldn't be pitted against each other for right packaging September 2023

#### Context

Articles R. 541-350 and R. 541-351 of the AGEC law, transposed into the French Environment Code, set out the definitions of reuse and reused packaging, as well as the targets to be achieved.

Article Art. D. 541-352 of the Environment Code sets targets for reuse, i.e. 5% by 2023 and 10% by 2027.

So, whether we're talking about reuse or recycling: a common objective with different paths: to reuse the material within a circular economy framework, thus limiting the extraction of natural resources, prolonging their use and improving their efficiency, in particular by eliminating the environmental impacts linked to the material's initial production cycle (extraction, transformation, transport...).

## **Regulatory definitions**

#### Reuse

Reused packaging means packaging that is the subject of at least one second use for a use of the same nature as that for which it was designed, and whose re-use or reuse is organized by or on behalf of the producer. Packaging which is the subject of at least a second use by being filled at the point of sale as part of the bulk sale, or at home if it is a charging device organized by the producer, is deemed to be reused.

#### Recycling

Any recovery operation by which waste, including organic waste, is reprocessed into substances, materials or products for its original function or for other purposes.

Reuse and recycling: two different paths<sup>1</sup>



Packaging reuse constitutes a specialized recovery and reuse loop. Recycling constitutes a general material reuse loop.

<sup>&</sup>lt;sup>1</sup> Illustration courtesy of Revipac

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The challenges for each system:

#### For reuse

This is a specialized circuit specific to the packaging format, requiring a tool stock (investment). The return rate must be high, and system loss reduced.

### For recycling

This is a general system, independent of the product contained, which accepts all recyclable packaging. Collection performance is fundamental, as is the quality of sorting and the separability of the various packaging components, so as to enable maximum recycling of the material (loss rate in the process).

The CNE considers these two approaches to be perfectly complementary, and does not wish to favor either one over the other, as each should be assessed on the basis of its environmental performance.

#### **CNE** recommendation

If a stakeholder wishes to compare these two systems - reuse and recycling - in order to seek a lower packaging impact, an LCA should be carried out, including several impact indicators in accordance with Life Cycle Assessment standards, in particular the impact on natural resources, and including greenhouse gas emissions and impacts on water.

The French Packaging Council (CNE), founded in 1997, is a forum for the different players in the packaging industry: packaging material manufacturers, packaging, and equipment manufacturers, producers of consumer goods, retailers, approved collection and recovery system and operators, designers, other packaging professionals, local authorities, consumer and environmental organisations.

The CNE, a recognised non-profit organisation, works for the Right Packaging and its main mission is to develop and disseminate better practices in designing, using, and marketing products packaging.

Contacts Presse:

Bruno Siri - Délégué Général

Maryse Bricout - Assistante

Retrouvez-nous sur:



