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Designing effective reuse policy

Regional recommendations for Europe

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Acknowledgements

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Executive Summary

Reuse systems are a major part of the solution to waste pollution, and are gaining increasing traction as a policy instrument in the wake of the Global Plastic Treaty negotiations. This report provides a strategic contribution to the development of effective reuse policies at both national and European Union (EU) levels. It brings together European policy expertise with in-depth analysis of four country case studies, France, Germany, Latvia, and Spain, to identify cross-cutting insights and propose recommendations for other regions seeking to advance reuse systems from a policy perspective. These countries were selected as each has introduced some national regulations to support reuse, and they illustrate different levels of system maturity, geographical contexts, and policy approaches. While the primary focus is on packaging reuse, relevant examples from other sectors are included where appropriate to illustrate trends and challenges.

The report is framed in close alignment with EU legislation, particularly the Single-Use Plastics Directive (SUPD), the Packaging and Packaging Waste Regulation (PPWR), the Ecodesign for Sustainable Products Regulation (ESPR), the Waste Framework Directive (WFD), and the forthcoming Circular Economy Act. It highlights how the development of national reuse systems can be harmonised with these EU-level objectives, pointing to critical policy and operational factors that enable or hinder this alignment.

Reuse is gaining policy traction across the EU, yet it remains contested by some stakeholders due to operational, financial, and regulatory complexities. The comparative analysis of the four case studies reveals both growing momentum and persistent challenges across Member States. Differences in infrastructure, reuse system maturity, economic incentives, regulatory frameworks, and consumer engagement indicate the urgent need for a more coordinated European approach.

The report concludes with six practical policy recommendations to support national progress on reuse systems. Rather than prescribing a single model, these recommendations highlight key levers that governments can use to improve system design, financial viability, and public uptake. They include strengthening national packaging laws to embed reuse targets and align with the PPWR; aligning national financing strategies with EU opportunities while allowing for context-specific leadership; directing investment and fiscal incentives to reusable packaging infrastructure; reforming EPR schemes to fund reuse across the full system lifecycle; designing consumer incentives that go beyond awareness campaigns; and establishing monitoring systems to track financial flows and reuse system performance. These actions are intended to support more stable investment environments, clearer regulatory expectations, and more consistent progress across Member States.

Finally, the report underscores the importance of policy coherence: instruments such as PPWR, Single Market Act, Circular Economy Act, Clean Industrial Deal State Aid Framework, and the revised Public Procurement Directive must work in concert to create the enabling environment for a scalable, efficient, and fair reuse economy.

Through connecting national-level experiences with EU policy, this report positions reuse systems not only as a waste-reduction strategy but as a pillar of Europe's green transition. The EU is now well-placed to lead by example, both within its borders and globally, by demonstrating how to design, implement, and scale reuse systems through effective policy in line with circular economy goals.

Contents

Abbreviations

CAPEX	Capital expenditures
CEA	Circular Economy Act
DRS	Deposit Return Scheme
EPR	Extended Producer Responsibility
ESPR	Ecodesign for Sustainable Products Regulation
EU	European Union
CISAF	The Clean Industrial Deal State Aid Framework
GPP	Green Public Procurement
MFF	Multiannual Financial Framework
OPEX	Operating Expenses
PPWR	Packaging and Packaging Waste Regulation
PRO	Producer Responsibility Organisation
SUPD	Single-Use Plastics Directive
TFEU	Treaty on the Functioning of the European Union
VAT	Value-Added Tax
WFD	Waste Framework Directive

1. Introduction

Reuse systems are increasingly recognised as a critical component of waste prevention and resource efficiency, with the potential to reduce greenhouse gas emissions by up to 20% in the consumer goods sector by 2030 (International Resource Panel, 2024). Yet despite this potential, reuse remains underdeveloped. Current systems are often fragmented, poorly financed, and unevenly implemented, limiting their ability to deliver environmental, social, and economic benefits at scale (Global Plastics Policy Centre, 2023). Reuse involves the repeated use of products or packaging without significant reprocessing, providing environmental benefits such as reduced resource extraction, lower energy consumption, and decreased landfill use. Additionally, it supports job creation and fosters emerging circular business models, with the global reuse market projected to exceed $100 billion by 2030 (Grand View Research, 2025). However, significant gaps remain in reuse policy coherence, implementation, and monitoring across countries, limiting the full realisation of reuse benefits (OECD, 2020; Global Recycling Foundation, 2022).

The Global Plastics Policy Centre, in collaboration with New ERA and Circulearth, has undertaken a global multi-country research initiative to examine how national policies can effectively support reuse systems. Through policy mapping, stakeholder interviews, and comparative analysis across diverse national contexts, the project explores how legislation, regulation, and supporting measures shape the development and performance of reuse models. While the wider project's scope is global and covers multiple regions, this report focuses specifically on Europe, a region where momentum around reuse is accelerating, spurred by evolving EU legislation such as the Packaging and Packaging Waste Regulation (PPWR), the Single-Use Plastics Directive (SUPD), and the Ecodesign for Sustainable Products Regulation (ESPR). Despite this policy drive at the EU level, national approaches to reuse remain fragmented, with considerable variation in ambition, system design, and policy coherence across Member States. By examining this complexity, the research aims to identify practical, evidence-based recommendations to support more harmonised, scalable, and economically viable reuse systems across the region.

The scope of this study is centered on packaging reuse systems, as these are the primary focus of emerging policy frameworks on reuse. While the analysis draws on packaging, many of the lessons are transferable to other sectors. The objective is to assess how national and regional policies can support packaging reuse systems, identify common barriers and enablers, and provide governments with practical options for embedding reuse within waste, packaging, and circular economy-related regulations.

This report offers a blueprint for developing effective reuse policies across Europe, drawing on case studies from France, Germany, Latvia, and Spain. These countries illustrate the varied ways in which reuse is defined, governed, and implemented, highlighting both commonalities and divergences. Rather than proposing a one-size-fits-all model, this research acknowledges that reuse systems can take multiple forms, shaped by differences in infrastructure, regulatory capacity, market structures, and cultural attitudes. In light of these national variations, the aim is to provide governments, regulators, producers, system operators, and supporting institutions with flexible and actionable policy insights and tools that can be adapted to local conditions while advancing the transition toward scalable and effective reuse systems.


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1.1 Reuse in the EU circular economy agenda

1.1.1 Reuse context in Europe

Reuse systems are a cornerstone of circularity and waste prevention. They play a crucial role in reducing reliance on single-use items, particularly in the packaging sector (Coelho, 2020) by extending product lifespans and encouraging more sustainable consumption patterns. Most reusable packaging is used in four main sectors: Hospitality, retail, e-commerce, transport-industrial.

Reuse practices have the potential to significantly reshape how we produce and consume goods, offering a wide range of benefits across economic, social, and environmental dimensions.

Economically, reuse systems can reduce costs, optimise logistics, and unlock new revenue streams. At scale, a well-designed return system with standardised packaging and shared infrastructure can match or beat the cost of single-use packaging for beverage and personal care applications being 6% and 10% cheaper per unit, respectively (Pew Charitable Trusts and Systemiq, 2020). Deposit Return Systems (DRS) can also act as an economic lever to support the transition to reuse by improving system efficiency and incentivising returns. However, not all reuse models incorporate a deposit mechanism; therefore, the associated economic advantages apply specifically to systems with an integrated DRS. Furthermore, as regulatory costs for single-use packaging rise, driven by increasing taxes, stricter material requirements, and higher compliance and waste management fees, the case for reuse becomes even stronger. Currently, the full environmental and economic costs of single-use packaging are not adequately captured by current regulations. Extended Producer Responsibility (EPR) schemes across the EU do not cover all packaging waste-related expenses, such as the collection of packaging waste in public spaces, management of packaging waste through energy recovery or landfill, and litter clearance. Consequently, although regulatory costs for single-use packaging may seem substantial, many hidden costs remain unaddressed. Were producers to bear the true total cost of single-use packaging, including these overlooked waste management and environmental impacts, the economic case for reuse systems would demonstrate significant benefits.

Socially, reuse systems not only support local job creation but also foster new service-based business opportunities that tend to be more stable and inclusive than those found in traditional linear waste systems (Global Plastics Policy Centre, 2023). A shift to a more circular plastics economy could create around 1.4 million jobs globally across the plastics value chain, particularly in areas such as logistics, cleaning, maintenance, and reverse supply systems (Pew Charitable Trusts and Systemiq, 2020). At EU level, reuse systems are expected to create 468,000 new full-time equivalent jobs by 2030 (European Commission, PPWR impact assessment report, SWD/2022/384 final, 2022). This transition aligns with the principles of a just transition by actively supporting workers and communities currently reliant on linear plastic systems. Through targeted retraining programmes, workers can be equipped to transition into new roles within the reuse economy, which often offer greater stability and improved prospects, helping to mitigate the risk of unemployment or economic displacement. Emphasising local ownership and control over waste and reuse infrastructure promotes local sovereignty, ensuring that economic benefits remain within communities rather than flowing to large, external corporations. Furthermore, reuse systems often provide safer and healthier working conditions compared to some waste disposal sectors (Gutberlet and Uddin, 2018; Rethink Plastic Alliance, 2021), which can expose workers and nearby communities to hazardous pollutants. Waste reduction and reuse models help lower environmental pollution and the associated health risks, particularly in marginalised communities that often bear the brunt of waste-processing impacts (World Health Organization, 2023). In this way, the reuse economy enhances community resilience, supports equitable and sustainable economic development, and ensures that the social, environmental, and health benefits of circularity are distributed fairly and inclusively.

Environmentally, reuse systems have the potential to significantly reduce waste, greenhouse gas emissions, and resource consumption, particularly when implemented at scale and designed effectively. Multiple studies indicate that shifting to reuse could cut plastic pollution by up to 30% by 2040 (Pew Charitable Trusts and Systemiq, 2020), and reduce lifecycle greenhouse gas emissions by between 35% and 80%, depending on the product category, transport distances, and energy sources used (Ellen MacArthur Foundation, 2024; OECD, 2022). These emissions include CO_2 from raw material extraction, manufacturing, incineration, and methane from landfill sites. Reuse systems also help lower material demand and energy consumption by reducing the need for continuous production and disposal cycles. For example, water usage for beverage bottles can be cut by up to 70% compared to single-use alternatives (OECD, 2022). At the EU level, the PPWR impact assessment report (European Commission, PPWR impact assessment report, SWD/2022/384 final, 2022) estimates that scaling up reuse could avoid 1.25 million tonnes of CO_2 emissions by 2030, increasing to 5.54 million tonnes by 2040. It could also lead to a reduction in environmental externalities valued at €427 million by 2030 (and €1.72 billion by 2040), and save around 69,000 m^3 of water by 2030 (212,000 m^3 by 2040). These environmental benefits, while significant, need to be considered in light of certain operational and systemic factors. The actual performance of reuse systems depends on variables such as return rates, washing and transport efficiency, the availability of supporting infrastructure, and consumer engagement. In cases where return loops are inefficient or poorly managed, the environmental gains of reuse can be diminished or even negated when compared to optimised single-use systems. To ensure that reuse systems deliver on their full environmental potential, it is necessary to invest in robust system design, logistics coordination, and supportive policy frameworks that encourage widespread and efficient participation.

While reuse systems hold significant environmental, social and economic potential, there are associated transition costs that require consideration. Estimates suggest that private investment in reuse and alternative delivery models could amount to approximately USD 609 billion between 2021 and 2040 at the global level (Pew Charitable Trusts and Systemiq, 2020). At the EU level, there is currently no specific estimate available for private investment solely dedicated to reuse systems, although figures exist for circular economy sectors.The economic viability of reuse systems also depends on how costs are accounted: while they are sometimes assumed to fully internalise their costs, in practice they may benefit from externalisations similar to those of single-use systems. Public policies that require single-use systems to internalise their true environmental and social costs are therefore critical. Meanwhile, pooling resources can reduce costs via economies of scale through approaches such as shared return logistics and standardised reusable containers, further strengthening the economic case for reuse (UNEP, 2023).


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According to the first European Reuse Barometer (InOff Plastic, Planet Reuse, Zero Waste Europe, New Era, 2024), the share of reusable packaging within Europe has steadily declined over the past decades. This trend reflects a shift towards increased use of single-use packaging, primarily plastic, driven by economic considerations such as lower production and distribution costs, the rise of e-commerce, and more frequent on-the-go consumption. Consequently, Europe has seen a substantial increase in the consumption of packaging materials and a corresponding growth in packaging waste volumes. While recycling efforts in the EU have improved in absolute terms, with the volume of recycled packaging waste rising from 45 million tonnes in 2013 to 54 million tonnes in 2022 and a recycling rate of 65.4% in 2022, this progress is insufficient to counterbalance the continued rise in overall packaging consumption. Despite improvements in absolute recycling volumes, the overall recycling rate has remained largely unchanged since 2013, while the amount of packaging waste not recycled has grown by around 20%, from 68 million tonnes in 2013 to 82 million tonnes in 2022. These figures indicate that recycling alone cannot resolve the packaging waste problem. To meaningfully reduce resource use and waste generation, and to advance the EU's circular economy goals, a greater focus on reusable packaging systems is essential.

In this context, a growing number of countries in Europe and beyond are implementing reuse policies. While this demonstrates increasing momentum, differences in how reuse is defined and prioritised across member states may risk leading to fragmented approaches at the EU level. The original PPWR proposal sought to provide greater harmonisation of reuse practices, but subsequent amendments introduced by the European Parliament and Council have altered the scope of these ambitions (Zero Waste Europe, 2023; Taylor, 2023). The implications of these changes, and the extent to which they may affect the EU's role in shaping a coherent reuse framework, are explored further in the following sections.

That said, although EU action on reuse systems has historically been limited, a policy framework is gradually taking shape. Several legislative initiatives and strategic documents-such as the Circular Economy Action Plan, the Clean Industrial State Aid Framework at the EU level, and specific circular economy laws or roadmaps at the national level-now incorporate reuse or link to reuse as a key component of waste prevention and circular economy objectives at both national and regional levels.

1.1.2 Key EU policy drivers influencing national reuse regulation

National reuse policy is shaped by several EU-level instruments that establish obligations on prevention, reuse, reduction, awareness, and producer responsibility (Table 1).

Table 1. Key EU policy measures influencing national reuse regulation.

Category	Measure	Legal basis	Requirements
Waste prevention	General waste prevention	WFD, Art. 9	Member States must implement measures to prevent waste generation, including economic instruments, product design, and awareness-raising.
	Waste prevention programmes	WFD, Art. 29	Adopt national waste prevention programmes every six years, including measurable objectives and indicators.
	Packaging waste prevention targets	PPWR, Art.43	Reduce packaging waste by 5% by 2030, 10% by 2035, 15% by 2040 (compared to 2018).
Reuse	Waste hierarchy prioritising reuse	WFD, Art. 4(1)	Reuse is prioritised above recycling, recovery, and disposal; Member States must apply this hierarchy in waste management.
	National reuse objectives	WFD, Art. 29	Include measurable objectives for reuse, with indicators to monitor quantities prepared for reuse.
	B2B transport packaging	PPWR, Art. 29	40% of transport packaging must be reusable by 2030, 70% by 2040; 100% within closed business environments. Cardboard boxes are excluded.
	Beverage and sales packaging	PPWR, Art. 29(5)	Ensure 10% reuse by 2030, aim for 25% by 2040.
	HORECA sector	PPWR, Art. 32-33	Allow consumer refill from 2027 and reusable takeaway packaging from 2028.

Table 1 (continued). Key EU policy measures influencing national reuse regulation.

Category	Measure	Legal basis	Requirements
Reduction	Single-use plastics	SUP Directive, Art. 4-5; PPWR, Art. 25 and Annex V	Ban certain single-use plastics; achieve measurable reduction in consumption.
	Packaging reduction and minimisation	PPWR, Art.10, 24 and Annex V	Targets for reduction and excessive packaging.
Awareness raising	Public campaigns	SUP Directive, Art. 10	Conduct campaigns to inform the public about the environmental impact of single-use plastics including food and beverage containers and promote sustainable alternatives.
Extended Producer Responsibility	Packaging EPR	SUP Directive, Art. 8; PPWR, Art. 45-51	Producers responsible for collection, waste management, littering, and treatment costs.
Deposit and return system	Plastic bottles and cans	PPWR, Art. 50	90% separate collection target by 2029; DRS is the preferred system.

Three EU policy instruments are particularly significant in shaping national reuse policy. While differing in scope and approach, all three introduce obligations that require or incentivise Member States to act on reuse.

The Waste Framework Directive (WFD) (EU Directive 2008/98/EC) serves as the cornerstone of waste management policy across the EU. It establishes the waste hierarchy (Article 4; see Figure 1) as a fundamental guiding principle for the circular economy, and sets out the EU framework for EPR schemes. Additionally, the directive provides a legal definition of "re-use" as "any operation by which products or components that are not waste are used again for the same purpose for which they were originally intended" (Article 3(13)). Beyond definitions and principles, the WFD plays a central role in harmonising waste legislation across Member States, ensuring a shared basis for policy and practice. At the same time, its implementation has highlighted persistent challenges, such as uneven enforcement and differing interpretations among national authorities. The directive thus represents both a common framework and a point of ongoing debate regarding the ambition and consistency of EU waste governance.

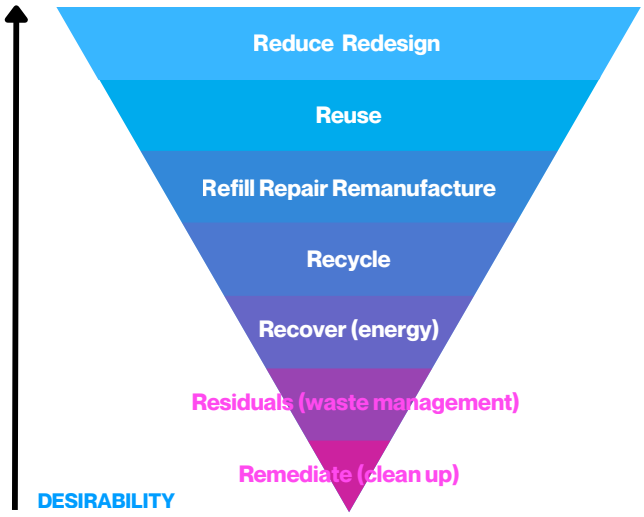

Figure 1. Waste hierarchy demonstrating the most desirable (top) to least desirable (bottom) management of waste.

The Single-Use Plastics Directive (SUPD) (EU Directive 2019/904) marked an important first step towards promoting reuse by requiring a reduction in the consumption of certain single-use plastic products and enabling Member States to adopt reuse-oriented policies. The Directive includes bans on placing specific single-use plastic items on the market, which have facilitated the development of reuse systems across Europe. Article 4 encourages measures such as making reusable alternatives available at the point of sale, introducing marketing restrictions to reduce littering, and promoting substitution with reusable or non-plastic options. However, the Directive doesn't set binding reuse targets, leaving Member States free to define their own measures and targets. Furthermore, Article 8 mandates the establishment of EPR schemes for single-use plastic products, including some takeaway and ready-to-consume products packaged in single-use plastic, with obligations for producers to cover the costs of awareness-raising, waste collection, and litter clean-up.

The Packaging and Packaging Waste Regulation (EU Regulation 2025/40) as the recent revision of the Packaging and Packaging Waste Directive (PPWD) marked a significant step forward in harmonising reuse policy at EU level. PPWR complements the WFD by introducing specific, harmonised definitions. Reuse is defined as "any operation by which reusable packaging is used again multiple times for the same purpose for which it was conceived" (Article 3), while a reuse system refers to the organisational, technical, or financial setup enabling such repeated use, including deposit-return schemes. Details on reuse systems are comprehensively outlined in Annex VI of the Regulation, providing clear guidance on their structure and implementation.


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Even though some details are to be defined in secondary legislation, it is worth mentioning that Article 11 of the PPWR sets clear criteria for packaging to qualify as reusable. These criteria include durability, the ability to withstand a minimum number of rotations, and design for reconditioning. Article 11 has been applicable since February 2025, establishing an important baseline for reusable packaging standards across the EU. Furthermore, following significant negotiation, Article 29 of the PPWR introduces, for the first time, legally binding reuse targets across several packaging types and economic sectors. These include:

Transport and sales packaging (including e-commerce):
40% by 2030; 70% by 2040

Transport packaging between sites of the same or partner enterprises:
100% by 2030

Grouped packaging:
10% by 2030; 25% by 2040

Beverage packaging (alcoholic and non-alcoholic), excluding milk, spirits and wine:
10% by 2030; 40% by 2040.

While the 2040 targets provide long-term political guidance rather than legally binding requirements, the 2030 targets are mandatory and must be implemented through coordinated national measures. To help achieve these targets, the PPWR sets out several enabling system requirements, including the development of harmonised packaging formats, standardised labelling, and consistent reporting frameworks. These measures are designed to facilitate the scaling-up of reuse systems, but they do not themselves establish specific quantitative obligations. In addition, Article 26 requires economic operators placing reusable packaging on the market to ensure the existence of a compliant reuse system, supported by incentives and proper documentation. Article 27 requires operators using reusable packaging to participate in approved systems, ensure proper reconditioning, and fulfill return obligations, either directly or via a third-party operator. These provisions aim to ensure the functionality and traceability of reuse systems, complementing the quantitative targets under Article 29. The PPWR grants Member States considerable flexibility in how they achieve the reuse targets. This creates space for tailored national approaches to regulation and system design, allowing governments to adapt implementation to their specific economic structures, infrastructure readiness, and stakeholder dynamics. For example, Member States may choose to promote reuse through financial incentives, public-private partnerships, or obligations on producers and retailers, provided they can demonstrate compliance with EU-level targets.

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The PPWR also introduced refill as a new waste prevention measure, defined as *"an operation by which a container that fulfils the packaging function, and that is either owned by the end user or purchased by the end user at the point of sale of the final distributor, is filled by the end user or by the final distributor with one or several products purchased by the end user from the final distributor"* (Article 3(33)). To support this, Article 28 provides for the installation of refill stations. It includes offering a system that allows consumers to bring their own containers to be refilled and informing consumers at the point of sale about the option to purchase products in refillable containers provided by the consumer.

The details of the implementation of measures related to reusable packaging, including technical specifications (for instance, the number of rotations required for an item to be considered reusable) and methods of verification, will be clarified in forthcoming secondary legislation. Furthermore, by 12 February 2027, the Commission will be required to establish a European Reuse Observatory responsible for monitoring the implementation of the Regulation's provisions, collecting data on reuse practices, and contributing to the development of best practices in the field.

Although the PPWR sets reuse targets, it does not include specific provisions for EPR schemes to finance or manage reuse systems. Article 31 requires economic operators to report on their progress towards achieving reuse targets to the competent authorities designated under Article 40. However, Article 51(3) states that Member States shall ensure that extended EPR schemes and deposit and return systems allocate a minimum share of their budget to financing reduction and prevention actions. This could be interpreted to include reuse initiatives, suggesting a potential, though not explicitly mandated, avenue for EPR schemes to support reuse.

Although traditionally associated with recycling, DRS are increasingly important in enabling packaging reuse, particularly for beverage containers. Under the PPWR, DRS are not only essential for achieving high collection rates of single-use beverage containers, but are also explicitly recognised as tools to support reuse systems. Specifically, the PPWR requires that DRS for single-use packaging "are equally available for reusable packaging where technically and economically feasible" (Article 50(8)), and that DRS for reusable packaging be "as convenient for end users as return points and opportunities are to return single-use packaging to a deposit and return system" (Article 50(10)). Ensuring interoperability of DRS across Member States is therefore crucial for their effective implementation.

Therefore, PPWR establishes a framework for DRS focused on recycling, requiring under Article 50 that, by 1 January 2029, Member States achieve a separate collection rate of at least 90% by weight for single-use plastic and metal beverage containers up to 3 litres. To meet this target, Member States must establish DRS for the relevant packaging formats, although the hospitality sector may be exempt under specific conditions, namely, when the deposit-bearing packaging is opened, consumed, and returned on the premises. At the same time, the PPWR promotes the use of DRS to support reuse, particularly for single-use glass beverage bottles, and encourages Member States to establish and maintain such reuse systems.

1.1.3 Other policy dynamics

The European Commission has placed the circular economy at the centre of its industrial and environmental strategy, aiming to boost EU competitiveness and reinforce the resilience of the internal market. This ambition is being advanced through flagship initiatives such as the Clean Industrial Act (European Commission, COM/2025/85) and the Single Market Strategy (European Commission, COM/2025/500), which seek to align industrial transformation with the EU's climate neutrality goals, while preserving economic cohesion across Member States. In this policy context, the Commission adopted the Clean Industry State Aid Framework (CISAF) (European Commission, C/2025/7600), a dedicated state aid instrument underpinning the Clean Industrial Deal Act. Effective from 25 June 2025 to 31 December 2030, CISAF provides a legal and procedural framework allowing Member States to grant public support to industry while remaining compliant with EU state aid rules. CISAF plays a strategic role in enabling the transition to a climate-neutral, resource-efficient, and circular economy. It offers targeted financial support to help industries move away from carbon-intensive models and adopt cleaner, more sustainable practices. Recognising the scale of the investment needed, CISAF is designed to de-risk private investment in key areas such as renewable energy, industrial decarbonisation, clean technology manufacturing, energy infrastructure, and projects promoting the circular economy, though it does not explicitly mention reuse. Under the framework, the maximum nominal aid per individual project is capped at €250 million. Beyond funding, CISAF also aims to ensure legal certainty and policy coherence, aligning national aid schemes with overarching EU priorities. It supports innovation in clean technologies, facilitates the development of circular material use systems, and promotes infrastructure investment in reuse, recycling, and energy efficiency. These objectives directly contribute to the goals of the Single Market Strategy, helping to avoid fragmentation by encouraging Member States to coordinate their industrial support efforts.

Additional policies could indirectly support reuse such as the Ecodesign for Sustainable Products Regulation (ESPR - EU Regulation 2024/1781), which aims to "enable the setting of performance and information rules" - known as 'ecodesign requirements" for almost all categories of physical goods. One of its key requirements is to improve product "durability, reusability, upgradability and reparability." This regulation will provide a concrete opportunity to encourage the deployment of reuse, as some of its aspects could interplay with the PPWR. However, this interplay remains limited, since the PPWR is considered lex specialis, meaning it overrides general provisions where the two intersect. Therefore the influence of the ESPR on the packaging sector will be only marginal (European Commission, 2024).

In addition, the Multiannual Financial Framework (MFF) could also play a role as well to promote reuse. Within the current MFF €1.35 billion has been allocated to the Circular Economy and Quality of Life subprogramme, which supports initiatives such as pilot projects. Usa e Riusa, for example, promotes the test of reuse system for fruit and vegetables (LIFE Public Database, 2025). Another key component of the MFF is Horizon Europe, the EU's research and innovation programme, with a total budget of €95.5 billion until 2027. Within Cluster 6 (focused on food, bioeconomy, natural resources, agriculture and the environment), Horizon Europe can support reuse and repair solutions. It already funds projects such as TERMINUS, which addresses the challenge of recycling and reusing flexible, multi-material packaging (Interreg Europe, 2022). As the next MFF is currently under preparation (European Commission, 2025b), there is an opportunity to further strengthen support for reuse systems, which is a need widely recognised during the debate on the PPWR, even though it was not directly linked to MFF discussions. Furthermore, own resources, which are funds independently raised by the European Union, include innovative mechanisms such as the plastic own resource - a levy of 80 euro cents per non-recycled plastic product in each member state, adopted by the European Council in June 2021. In 2023, revenue from the plastic-based own resource was 7.2 billions euros, which represented around 4% of the EU's total revenue (European Court of Auditors, 2024).This provided a significant and stable source of revenue for the EU budget, with differences in how member states implement the measure, but without requiring a reallocation of resources. Such resources could be leveraged not only to finance EU and national funding mechanisms but also to specifically support reuse infrastructure, innovation, and workforce development, thereby reinforcing the transition towards a more circular economy.

The Circular Economy Act (CEA), expected in Q4 2026, will set future ambition levels for circularity across the EU, as announced in the Competitiveness Compass for the EU (European Commission, COM2025/30). Moving beyond environmental targets, it aims to provide Member States and businesses with the right mix of economic instruments and regulatory clarity to support the environmental transition of the European industries that produce, use, or manage materials and products across value chain, to close the loop of the circular economy, while reducing administrative burden, streamlining reporting, and reinforcing the internal market. The Commission's Impact Assessment is exploring areas such as recycling efficiency, recovery rates, recycled content, and potential preparation for reuse targets, particularly in the WEEE sector. The Act will also address the data and information infrastructure needed to strengthen traceability and strategic autonomy in circular supply chains, meaning the EU's capacity to reduce dependence on external suppliers, particularly for raw materials and key industrial inputs, by building more resilient, self-sufficient, and circular systems within the internal market. The CEA presents an opportunity to support reuse, by encouraging policy and investment frameworks that prioritise waste prevention and product life extension.

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Finally, the interaction between EU-level regulation and national policy on reuse must be carefully managed, particularly as Member States increasingly take the lead in this area. Several governments have introduced ambitious national reuse targets and policies, often in anticipation of or in response to EU-level discussions. This proactive approach by some countries could have a spillover effect, influence the policy landscape in other Member States and set informal benchmarks at the EU level. However, this divergence also creates potential challenges for businesses operating across borders, as varying national obligations may lead to compliance complexities and market fragmentation. As a result, ongoing coordination between EU institutions and national governments will be essential to ensure coherence while still allowing space for ambition.

1.1.4 Summary of EU context

The legal basis for EU action towards reuse draws on both environmental and internal market provisions. On the one hand, environmental objectives, enshrined in the Treaty on the Functioning of the European Union (TFEU), provide a strong mandate for promoting reuse as a key strategy to reduce waste, conserve natural resources, and mitigate climate change. On the other hand, internal market provisions underpin the need for harmonised rules that prevent barriers to trade and ensure the free movement of goods and services across Member States.

First, national legislation on reuse often stems from European policy, which has played a key role in shaping national approaches. At the same time, some national policies go beyond EU requirements, helping to drive further developments at the EU level. In this way, national approaches not only respond to European rules but can also influence future EU policy. Therefore, the EU's push for harmonisation is necessary to help economic and political actors understand how European and national laws interact in practice.

Second, enforcement remains a key limitation. Despite a relatively strong legislative framework, there is a persistent lack of effective implementation and oversight, both at the national and EU levels. This weak enforcement creates uncertainty within countries and among economic actors, who may hesitate to invest in reuse systems without clarity on long-term policy stability and compliance expectations. Recent developments, such as delays in environmental legislation or the adoption of omnibus regulations, have further amplified this uncertainty, potentially undermining momentum for action (though this falls outside the core scope of this report).

While there is clear potential for reuse within the European policy pipeline, the PPRW still lacks a strong, explicit mandate that clearly prioritises reuse. A firmer stance could help set a clear direction for Member States and industry. Balancing legal priorities is crucial to enabling a shift toward reuse systems. Harmonised EU-level rules provide the consistency needed for cross-border collaboration and investment, allowing frontrunner countries to lead within a coherent European framework. This alignment ensures environmental ambition goes hand-in-hand with internal market integrity, avoiding fragmentation that could limit the scalability and impact of reuse solutions.

Moreover, harmonised rules provide clear and consistent signals to industry players, stimulating investment and innovation in reuse models that deliver both environmental benefits and economic opportunities. At the same time, sufficient flexibility must be maintained to respect national contexts and encourage experimentation, allowing frontrunner countries to pioneer best practices that can inspire wider adoption.

Finally, ongoing cooperation and dialogue between EU institutions, Member States, industry stakeholders, and civil society remain crucial to designing reuse policies that are practical, enforceable, and aligned with the EU's sustainability and market goals. By striking the right balance between ambition, coherence, and feasibility, the EU can unlock the full potential of reuse as a driver of sustainable growth, resource efficiency, and circular economy leadership across Europe.

2. Method

The research underpinning this report has three components - national reuse policy analyses, regional synthesis that compares and integrates findings across regions, and extensive stakeholder consultations.

2.1 National reuse policy analyses

This report draws on a structured comparative analysis of four national case studies: France, Germany, Latvia, and Spain. The case studies were selected based on a combination of factors including the presence of national regulations directly supporting reuse, diversity in policy design and implementation, varying levels of systemic maturity, geographical distribution across Europe, and distinct consumer habits. The intention was to highlight a range of contrasting models that could offer insight into different pathways toward reuse policy development. This approach does not aim to provide an exhaustive picture of all reuse policy in the EU. Countries such as Austria, the Netherlands, and Belgium also have higher reuse market shares or clear targets in place. However, the four countries included in this analysis were chosen to balance comparability with diversity, offering useful insights into how policy ambition, governance structures, and market conditions interact to shape reuse outcomes. The exclusion of other potential candidates should be seen as a limitation of scope rather than an indication of their lesser relevance.

Together, the case studies provide insights into how national policy frameworks can support or constrain the development of reuse systems as part of circular economy efforts. The case studies followed a common methodological approach, designed to produce consistent and comparable findings across different country contexts. The process combined three core components:

Literature review

A targeted review of relevant national literature was undertaken for each country. This included academic research, policy documents, grey literature, and national reporting. The review focused on the evolution of the reuse policy landscape, key legal instruments, available evidence on policy effectiveness, and the main challenges and barriers to implementing reuse policies effectively. The output of this stage was a country-specific fact sheet summarising the policy history, system structure, and key regulatory developments relevant to reuse

Policy mapping

A structured policy mapping exercise was conducted for each country to document the relevant legal and regulatory instruments that support or influence reuse. This included identifying interdependencies between different policies, tracking amendments over time, and assessing the alignment of national legislation with EU directives and regulations. The policy mapping primarily focused on financing mechanisms and monitoring requirements, while institutional responsibilities were considered to a lesser extent, providing a clear overview of the policy landscape in each country.

Semi-structured interviews

Primary qualitative data were collected through semi-structured interviews with stakeholders involved in the design, implementation, or operation of reuse systems. Interviewees included government officials, PRO representatives, reuse system operators, civil society representatives, and other relevant actors where contextually relevant. A minimum of four interviews were conducted per country, with efforts made to capture perspectives from both national and local levels, and across different stakeholder groups. Interviewees were asked to share their general reflections on the reuse policy landscape in their country, discuss the challenges they have experienced, and identify the enablers for effective reuse policy. Interviews were coded using a deductive coding framework in Microsoft Excel to ensure consistency and support comparative analysis. This qualitative approach provided in-depth insights into practical experiences and helped identify common barriers and opportunities across different contexts.

The findings from each country were synthesised into individual structured case study reports (Annex 1), which provide a comprehensive, context-specific overview of the reuse policy landscape in each country. To support transparency and reflect the variable availability of evidence across countries, each case study includes an assessment of the overall strength of evidence. This captures both the depth and breadth of available literature and stakeholder insights, allowing readers to better interpret the findings and their limitations.

2.2 Regional synthesis of findings

The regional synthesis aimed to identify cross-country findings and shared policy design considerations to inform a blueprint for national reuse policies. The regional synthesis was conducted as follows:

Cross-case coding and clustering of themes

Building on the detailed national case studies, the first step involved systematically coding qualitative data, including policy documents, stakeholder interviews, and secondary literature across the four countries. Using a common coding framework, key themes were identified and clustered to reveal patterns across cases. This coding focused on aspects such as policy coherence, regulatory gaps, institutional coordination, funding mechanisms, and monitoring practices. Themes were grouped to capture both shared issues and country-specific nuances, allowing for a structured comparison.

Identification of common enablers and barriers

The clustered themes were then analysed to distinguish enablers and barriers of effective reuse policy implementation that were common across the countries. This involved comparing the policy environments, implementation experiences, and stakeholder perspectives to highlight recurring facilitators and obstacles. The analysis also accounted for contextual factors such as the national context, which influenced how these enablers and barriers manifested at national scale.

Validation and triangulation

To ensure robustness and reliability, findings from the thematic analysis were triangulated with multiple data sources. This included cross-referencing insights from literature reviews, the policy mapping exercises, and stakeholder interviews within and across countries. Where discrepancies or unique national practices emerged, these were examined closely to assess their relevance and potential transferability. This triangulation helped confirm key findings and provide a nuanced understanding of policy dynamics.

Prioritisation of actionable recommendations

The final step synthesised validated findings into a set of actionable recommendations designed to support harmonisation and capacity building at the EU level. Recommendations prioritised areas where policy alignment could drive impact, such as regulatory clarity, knowledge exchange, institutional cooperation, and integration with EU and national circular economy goals. The process also highlighted opportunities for tailored national actions based on unique contexts, ensuring the blueprint could be adapted to diverse member state situations.

2.2 Stakeholder inputs

In addition to ensuring academic rigour, the research process was deliberately designed to be stakeholder-focused. Stakeholders contributed at multiple stages, shaping both the evidence base and the resulting recommendations.

- For each country, stakeholders participated in semi-structured interviews to share insights and practical experience.
- Further engagement took place through two rounds of workshops: at the New ERA General Assembly (Barcelona; Evans et al., 2025) and a dedicated session hosted at the University of Portsmouth (Portsmouth; March et al., 2025), where stakeholders helped to fill evidence gaps and collectively identify key enablers, barriers, and unresolved challenges.
- Draft country case studies were peer-reviewed by national experts, providing an additional layer of validation.
- Preliminary cross-country findings were presented at an online workshop in July 2025, where group activities allowed stakeholders to refine the emerging conclusions.

This final report incorporates all stakeholder inputs, totalling 124 individuals across 101 organisations. The report has also been independently peer-reviewed.

3. Cross-country analysis and comparative case study findings

3.1 Policy landscape overview

This section distils key insights from the detailed case study analyses of France, Germany, Latvia, and Spain (Annexes 2a–2d) into a concise comparative format, structured around common indicators (Table 2).

The uptake and policy framing of reuse is at varying stages across the case studies. France's policy landscape is marked by a historically strong but regionally uneven reuse tradition, now confronting definitional ambiguities, enforcement gaps, and funding shortfalls despite progressive legislation aimed at a circular economy vision, including specific reuse targets. Germany's system benefits from an entrenched DRS and robust legal frameworks but struggles with sub-national fragmentation and market-driven declines in reuse rates. Latvia's legacy of widespread refillables has diminished amid market liberalisation, resulting in fragmented pilot initiatives lacking logistical and economic cohesion. Spain, characterised by limited historical reuse and a patchwork of policies, is undergoing a critical policy transition to integrate emerging deposit systems and align with EU reuse mandates, though it faces regulatory uncertainty and insufficient public engagement.

Table 2. Summary of the reuse policy landscape in France, Germany, Latvia, and Spain.

Policy area	France	Germany	Latvia	Spain
Historical reuse context	Strong glass packaging reuse tradition in the East side of France; large-scale reuse declined before 2020.	Robust beverage reuse (beer bottles); progressive decline due to single use consumers habits.	Widespread refillables during the pre-independence era; decline after independence due to market liberalisation and plastic growth.	Minimal historical reuse; brief DRS for glass bottles in 1980s.
Key legislation on circular economy	Anti-waste law and circular economy law (2020), Climate and resilience law (2021).	Packaging Act (2019) and subsequent amendments .	Packaging law (2003), natural resource tax law (2009), law on the reduction of consumption of products containing plastic (2021).	Royal Decrees 110/2015O- on waste and contaminated soils, 1055/2022 on packaging and packaging waste, the royal decree-law 7/2021 on single use plastics.
Specific mention of reuse in policy	Yes.	Yes.	Yes.	Yes.
Key reuse targets	5% reuse by 2023, 10% by 2027; phase-out single-use plastics by 2040.	70% reusable beverage packaging by 2040.	No national targets.	Packaging reuse and waste reduction targets—13% by 2025, 15% by 2030.
Linked to DRS	No.	Yes.	Yes.	No.
DRS Implementation	Pilot of regional reuse systems launched in 2025; not yet fully implemented.	Well integrated DRS in place since 2003 with obligations for reusable packaging.	National DRS launched in 2022 with limited scope (for both single-use beverage containers and refillable glass bottles.)	The new deposit system in Spain is set to take effect from November 2026 for single-use beverage containers made of plastic and aluminum.

Table 1 (continued). Summary of the reuse policy landscape in France, Germany, Latvia, and Spain.

Policy area	France	Germany	Latvia	Spain
Linked to EPR	Yes.	Yes.	Yes.	Yes.
EPR role and mechanisms	Early EPR adoption (1992), robust non-profit EPR scheme with mandated 5% reuse allocation; CITEO as major PRO driving trials and funding.	Early EPR adoption (1991) has been criticised for weak enforcement, lack of transparency, and significant regional fragmentation.	EPR system adopted in 2002 is still in its formative phase, with foundational principles established but insufficient systemic influence to drive substantial environmental or market change.	Early EPR adoption (1996 - operational in 1998). It has recently expanded to include commercial packaging. However, it continues to face challenges related to limited funding, weak data systems, and regulatory uncertainty.
Implementation and enforcement challenges	Reuse implementation and enforcement in France face several challenges, including vague definitions of reuse, transparency issues, funding gaps, and a lack of controls and fines.	Low reuse market share of the to-go sector (1.6%), enforcement weaknesses, conflicts between actors.	Fragmented, inconsistent initiatives; lack of logistics and protocols; weak economic incentives.	Reuse implementation in Spain is challenged by regulatory uncertainty linked to EU alignment, unclear guidelines, limited public awareness, and funding constraints. Additionally, the presence of numerous regional policies and actions contributes to a fragmented approach.
Policy process	Consultative, coordinated national trials, mid-term goals.	Incremental reforms due to political change; new strategies emerging.	Fragmented local actions; early-stage pilots; limited coordination on reuse policy implementation.	Consultations have been inclusive, and political interest is growing; however, the country is in a transitional phase as it works to align the reuse targets of the PPWR with the national policy framework.

3.2 Cross-cutting challenges, opportunities and enablers

The analysis of reuse policies across the case study countries reveals a range of shared opportunities and challenges that have significant implications for future reuse development in Europe. The analysis highlights how national policy can act as a catalyst for the adoption and implementation of reuse, while also identifying barriers that hinder the scaling and integration of reuse into mainstream systems. As countries move beyond policy ambition to implementation, several consistent enablers, challenges, and opportunities have emerged as key considerations to overcome these barriers toward more systemic and impactful reuse solutions.

The separation of enablers and challenges in this section is based on evidence drawn from the case studies, the interviews conducted with stakeholders, and the outcomes of the workshop carried out for this research.

3.2.1 Key enablers of effective reuse system implementation

While the case study countries were all at different stages of implementing reuse policies, several enablers were identified both as reflections of policy making process and recommendations for future reuse policy.

Supportive policy environment

A supportive and coherent policy environment is foundational to the success of reuse systems. In all four countries, regulatory measures such as single-use plastics bans need to be closely linked with clear targets for reusable or reused packaging. Alongside these bans, taxes on disposable packaging, combined with incentives promoting reusable containers, they create t strong economic signals that can make reuse models more competitive. Germany's Packaging Act and associated binding reuse targets exemplify how clear and ambitious legislation can drive market transformation. However, enforcement gaps and inconsistent application remain challenges across the board. This is evident particularly evident in Latvia, where regulatory frameworks are still in early stages of development. Strengthening these policies by ensuring consistent enforcement and aligning them with waste prevention and circular economy goals will enhance their effectiveness and provide greater predictability for businesses and consumers alike.


Photo: © Eternity Systems

Alignment to existing national and regional policy

Ensuring coherence between existing national policy and the evolving EU policy landscape is necessary to provide regulatory certainty for innovation. Closing existing loopholes in national policy is imperative to avoid confusion and unintended consequences. For example, the Spanish single use tax may unintentionally incentivise the use of cardboard, and not actually promote reuse. Harmonising standards, reporting mechanisms, and financial tracking at both national and EU levels will reduce fragmentation and provide a starting point for cross-border efficiencies. National and regional governments can leverage EU funding streams, such as LIFE, Interreg, and Horizon Europe to support physical and digital infrastructure for reuse, while also incorporating principles of equity and accessibility to ensure that reuse systems are inclusive and deliver socially just outcomes.

Phased policy targets

Including phased reuse targets and obligations in national policy has proven effective in cases such as the French anti waste and circular economy law (AGEC Law). Setting clear, incremental goals enables initiatives to scale over time while allowing for early identification and resolution of implementation challenges of national reuse policy. Phased targets also allow authorities and stakeholders to monitor progress in ways which are manageable, identifying potential common roadblocks or impediments quickly, and adjust strategies or enforcement as needed. Moreover, lower initial targets allow space for pilot projects and regional trials, create valuable opportunities for stakeholder collaboration and generate practical insights on logistics, consumer behaviour, and viable business models. This phased approach not only facilitates learning but also signals to market actors that reuse is a permanent and serious policy priority, thereby encouraging sustained investment and innovation. The example from Germany on reuse policy further demonstrates the importance of coordinated national efforts that combine regulatory clarity with flexibility to accommodate diverse local contexts and market conditions.

Inclusive and consultative policy processes

Strong and transparent consultation processes that include diverse stakeholders from multiple scales and parts of the reuse system lifecycle are critical to ensure that targets are realistic yet ambitious. While it was difficult to determine the exact consultation processes used in policy development due to limited publicly available documentation, insights from interviewees highlighted varying experiences and perspectives of effectiveness across the different countries. In Germany and Spain, public consultation included various actors such as industry and civil society to identify potential issues before policy was adopted. In France, less public consultation was undertaken on the reuse policy, with consultations focusing mainly on the broader policy framework. Reuse received comparatively less attention during this phase and was more strongly promoted during the parliamentary negotiations of the Anti Waste and Circular Economy Law. Therefore, the impact assessment of the proposed law didn't include specific aspects of the reuse policy, which provided detractors with arguments to oppose the measures. Despite significant variation in practice, the strengths and opportunities afforded by a rigorous consultation process were identified across all countries, including that these consultations provide the space for early collaboration and knowledge sharing while ensuring reuse is fully integrated into broader circular economy consultations.. In addition, several cases and stakeholders highlighted the importance of dedicated funding to support planning phases, stakeholder engagement, and the development of the full ecosystem required for effective implementation. Without such resources,the national consultations risks being symbolic rather than substantive for an impactful reuse centric policy shift, and early-stage system design may lack the depth needed for long-term success.

Adopting DRS as part of reuse

DRS continues to be a cornerstone of reuse infrastructure in many contexts, particularly for beverage containers. Germany benefits from a well-established DRS framework that provides consumers with direct financial incentives to return containers, thereby supporting efficient collection and reuse cycles. Expanding these schemes and ensuring their interoperability with other reuse initiatives can significantly enhance consumer participation and improve system viability. Spain and France have less mature DRS infrastructure, and could benefit by integrating DRS mechanisms into their reuse strategies, as Latvia has done. Beyond beverages, extending DRS principles to other product categories could further amplify the positive impacts of these systems.

Photo: © KeepIn/Jokey

Implementing financial incentives

Targeted financial support is a critical enabler for the development and scaling of reuse systems, helping to address market distortions that favour single-use packaging and enabling both businesses and local authorities to participate effectively. Dedicated national reuse transition funds, which could be co-financed by PORs and DRS operators, can provide grants, low-interest loans, or equity investments to support key elements such as reverse logistics, cleaning facilities, and digital infrastructure. Complementary fiscal measures, including tax credits, subsidies, and reduced VAT rates, can further encourage investment in reusable packaging and associated infrastructure. When combined with policy instruments that engage and incentivise consumers, these financial incentives can create a coherent framework that promotes widespread adoption of reuse systems and reinforces long-term market viability. Furthermore, these financial incentives could support a just transition by including small businesses, workers, and communities, helping them to adapt to new reuse models while safeguarding jobs and creating equitable economic opportunities.

Strong governance and evaluation structures

Based on the evaluation of over 200 plastics and waste related policies to date, the evidence demonstrates that establishing transparency, accountability, and ongoing policy learning is foundational in ensuring effective policy (Global Plastics Policy Centre, 2022). These can take the form of multi-stakeholder platforms, financial oversight mechanisms, and robust monitoring frameworks to ensure that financial resources for reuse are used effectively and equitably.

3.2.2 Key challenges in reuse policy

The translation of the assessed reuse related policies into functioning reuse systems remains limited and uneven. In general, policies have largely focused on setting targets and general obligations, with insufficient attention paid to the enabling frameworks (technical, regulatory, and financial) that would support systemic alignment and user-friendly design. A suite of consistent challenges has been identified, as outlined below.

Lack of harmonised reuse definitions and metrics

A fundamental challenge across all four countries is the absence of standardised, clear, and harmonised definitions of reuse. Ambiguities persist regarding the exact definitions of key concepts, such as the distinctions between reusable and refillable items, and what materials or products are included or excluded from reuse targets. There is also confusion regarding the metrics used to monitor and report progress toward the targets. Without precise terminology and transparent metrics, it is difficult to accurately measure progress and ensure transparency in reporting to authorities and PROs. It is evident across all policy areas that clear and transparent metrics and monitoring are necessary to hold those implementing the policy on the ground to account. From a regional perspective, the ambiguities identified restrict cross-border benchmarking and complicate enforcement, contributing to fragmented market signals and regulatory uncertainty for the brand owners.

Weak enforcement of reuse regulations

In several countries, legal obligations to offer reusable options exist on paper but are poorly implemented in practice. In France and Germany, requirements for retailers to provide reusable alternatives are undermined by limited inspections, weak or inconsistently applied penalties, and unclear institutional responsibility for enforcement. In Latvia, where systems are still emerging, the absence of clear enforcement mechanisms or consequences means reuse remains perceived as voluntary. Tax measures in Latvia and Spain, while intended to reduce single-use packaging, are not necessarily aligned with the specific goal of promoting reuse, further weakening incentives and signalling policy misalignment.

Lack of system interoperability

A recurring issue across the case studies was the lack of compatibility across sectors or borders. Reuse schemes are often not designed with cross-sector or cross-border compatibility in mind. This is evident in both the physical characteristics of containers, where there is no standardisation in packaging formats, labelling, number of rotations, and in supporting digital infrastructure, such as traceability systems or support with DRS. The absence of harmonised European technical and operational standards limits the scalability of reuse systems, restricting efficiency and consumer uptake. One of the inspirational examples is the transport packaging sector, which has successfully implemented interoperable reuse systems for wood pallets across the supply chain through standardisation and shared infrastructure. It could serve as a valuable model for addressing the interoperability challenges faced by reuse systems.

Path dependency and infrastructure inertia

Closely linked to the previous point is the path dependency created by existing recycling infrastructure, particularly in Germany, Spain, and France. In these countries, substantial public and private investment has gone into optimising high-performing recycling systems, often at the expense of upstream waste prevention measures such as the development of reuse systems. This infrastructure inertia is reinforced by financing structures and EPR schemes that continue to favour recycling over prevention or reuse, especially in Germany and Spain. As a result, municipalities and producers face institutional and financial disincentives to transition towards reuse systems, even when there is strong national and local policy ambition

Subnational innovation and the role of PROs

At the local and regional level, pilot projects and experiments are becoming key testbeds for exploring innovative reuse systems. France, in particular, has seen several promising regional initiatives co-funded by its main producer responsibility organisation (PRO), CITEO. These pilots provide valuable lessons on consumer engagement, reverse logistics, and stakeholder coordination. The challenge remains how to scale such models without losing their contextual responsiveness. Enabling and scaling these subnational successes through dedicated funding, policy support, and harmonised frameworks represents a viable pathway for reuse system acceleration at a national scale. In this context, the role of PROs in advancing reuse is both significant and subject to

different perspectives. While CITEO is frequently highlighted as a proactive PRO supporting reuse funding and coordination,several stakeholders have raised concerns regarding its transparency, pace of delivery, and level of ambition. Thus, although CITEO has played a leading role in piloting reuse initiatives, perceptions of its operational effectiveness vary, indicating that its approach cannot be simply 'copied and applied' in other national contexts. Governance models for PROs need to and do vary significantly across countries, reflecting local realities and priorities. In France, the system is dominated by CITEO and its subsidiary, Adelphe, alongside the smaller PRO, Léko, all of which hold broad mandates across packaging types. Spain and Latvia (with Latvijas Zaļais Punkts) exhibit similar monopoly-like conditions. Spain, however, also features sector-specific PROs such as Ecovidrio (for glass packaging) and Ecoembes (for other streams). In contrast, Germany has a more diffuse model, with multiple sector-specific PROs. Each model presents distinct challenges.Centralised systems may offer coherence and streamlined investment, but could also reduce innovation and transparency due to limited competitive pressure. Decentralised systems, while potentially more responsive to sector-specific needs, can lead to duplication, hinder innovation, and create inconsistent standards.A single PRO might enhance coordination and streamline infrastructure, but could concentrate power and reduce flexibility. Multiple PROs could offer responsiveness, but require strong national or EU-level oversight to prevent fragmentation. Regardless of structure, effective systems must be underpinned by clear mandates, robust accountability, and alignment with circular economy goals. These insights raise critical policy questions for the development of reuse-centric policies. Moving beyond isolated pilots requires a systems thinking approach that facilitates scaling from the outset. This means designing pilots not as standalone experiments, but as integral components of a coherent, reuse-centric, and scalable framework.


Photo: © NewLoop

Infrastructure and financial gaps

Reuse systems require a supportive ecosystem of logistics: return points, industrial washing facilities, quality assurance mechanisms, and digital tracking systems. These are capital-intensive to establish and maintain, yet current policy frameworks rarely provide long-term funding or investment incentives. Even in countries with established EPR schemes, such as France and Germany, there remains a significant gap between available funding and the investment needed to scale reuse. In emerging or transitional markets such as Latvia and Spain, institutional capacity and private investment opportunities are often limited, leaving reuse initiatives underfunded and overly reliant on short-term or philanthropic support.Furthermore, a critical but often overlooked barrier is the gap in the ability to implement appropriate physical collection infrastructure. Specifically, current legislation in many places, such as in France, doesn't compel local officials to permit the placement of infrastructure on public streets, such as small return bins similar in size to others bins for single use packaging. While this may seem minor, it's causing significant delays in implementation and hindering progress. The pilot projects on public streets in Aarhus and Lisbon supported by TOMRA could serve as valuable sources of inspiration for local authorities facing similar challenges. These projects could demonstrate how proactive collaboration between municipalities and stakeholders can overcome infrastructural obstacles and create practical solutions for collection points.

Economic and behavioural constraints

Beyond the lack of regulatory or financial incentives for brand owners, several compounding issues limit reuse uptake. First, there is a widespread information deficit where many consumers are unaware of available reuse options or the environmental benefits associated with them, even if legislatively required. For example, in Germany there is limited uptake or awareness of the option for reuse in the food sector, despite an obligation in national policy. Second, deeply ingrained habits, particularly around convenience and disposability, require sustained behavioural interventions to shift. Third, reuse systems often involve additional effort, whether through returning containers, navigating unfamiliar procedures, or altering shopping behaviours which may unintentionally be a barrier to accessibility. Finally, and consistent across the countries, is that the cost of reuse remains relatively high in the absence of scale, and fiscal instruments targeting single use products don"t have resources allocated to scale up reuse systems, such as the Spanish plastic tax Without widespread participation and interoperable systems, the economics of reuse are difficult to justify, especially for SMEs or local authorities operating on limited margins.

Consumer engagement

Consumer engagement remains a major bottleneck in the development and uptake of reuse systems. However, low participation levels cannot be attributed solely to poor awareness or weak motivation. Hesitancy is shaped by a range of contextual factors, including inconsistent communication and unclear participation mechanisms. Across the four countries studied, consumer-facing information is often variable, overly technical, or buried in fine print. It is not always clear how systems work, what is expected of users, or where reuse options are available. Few consumers encounter compelling reasons (financial, experiential, or moral) to opt for reuse over single use. In many cases, reuse policies are not translated into coherent or user-friendly experiences. For example, subnational regulation requiring reusable cups at public events in Latvia was poorly communicated and inconsistently enforced. Interviews suggest this is not an isolated case, with reuse rules inconsistently applied at festivals, markets, and public events across the region. This undermines public confidence and system legitimacy. A scaled, consumer-centric reuse system should offer intuitive return processes, clear messaging, interoperable formats, and visible enforcement. Such systems must also be designed with a just transition in mind, ensuring that the shift to reuse does not disproportionately burden low-income or marginalised communities. Without this, participation will remain limited and fragmented, even in countries with high environmental awareness

3.2.3 Emerging opportunities to scale reuse systems

Each country evaluated was 'in transition', with significant future action needed to mainstream reuse. Several key opportunities were identified across each case study, reflecting significant areas of potential collaboration, synergy and innovation.

Integration of reuse with environmental and social agendas

The transition to reuse systems offers multiple synergies with environmental and societal benefits and agendas, including pollution, climate change and health (Global Plastics Policy Centre, 2023). Reuse can also support national goals related to resource sovereignty, and strategic autonomy by reducing dependency on imported raw materials. Furthermore, integrating and interliking reuse policy at the national and local levels could support local economies by creating jobs, encouraging community engagement and supporting pilot implementation. Furthermore, a significant opportunity lies in connecting reuse initiatives with food waste prevention and climate policies. In France, for example, pilot projects exploring refill stations for food packaging demonstrate how reuse can directly reduce food waste by encouraging consumers to purchase in quantities that limit spoilage. Similarly, in Germany, reuse schemes tied to local food networks contribute not only to waste reduction but also to decarbonisation goals by lowering packaging production and transport emissions. These synergies are incredibly valuable to harness given limited institutional resources in many regions, such as Latvia, where addressing several environmental objectives through integrated reuse policies can maximise impact and efficiency. Positioning reuse as a key strategy in climate plans and air quality improvements would allow policymakers to broaden support for reuse and justify investments that benefit multiple sectors simultaneously. Coordination between environment and finance ministries can improve the alignment of fiscal measures, such as plastic taxes, VAT mechanisms, and EPR contributions, with wider reuse objectives.

Closing regulatory loopholes ahead of SUPD to support a coherent policy framework for reuse

The SUPD has led to loopholes, implementation gaps and enforcement weaknesses, as illustrated in the case studies from France, Spain, Latvia, and Germany. Interviewees noted that some brand owners have labelled products as "reusable" despite their design for single-use consumption and clear inclusion under SUPD bans. This situation appears to stem in part from rushed negotiations during the directive's development, resulting in vague imprecise definitions and unresolved issues at the time of its adoption in 2019. Legally, the SUPD acts as a lex specialis to the PPWR, meaning it overrides general PPWR provisions where the two intersect, including on plastic items that are not strictly packaging. The upcoming European Commission review of the SUPD, expected by 2027, is an opportunity to align the two frameworks more effectively. This includes harmonising bans, clarifying cost responsibilities for littering under EPR schemes, and establishing clear, enforceable reuse criteria through standardised labelling and methodologies.

Driving technological innovation to support reuse traceability

Digital tools offer a practical route to improve reuse system efficiency, tracking, and scale. In France and Germany, mobile apps that track container returns and digital deposit management have begun to improve consumer convenience and operational transparency. Such digitalisation could enable more robust and responsive data collection and monitoring, which in turn supports policymakers and businesses in adapting and scaling reuse initiatives effectively. For Latvia, where reuse infrastructure is still emerging, digital tools could leapfrog traditional logistical challenges and accelerate system maturity.

Leveraging public procurement to support reuse at the local and national scale

Public procurement remains an underused tool for advancing reuse. In Germany and France, government institutions have started to integrate reuse requirements into their purchasing policies, mandating reusable packaging and serviceware in certain facilities. This could create stable demand, encourage suppliers to invest in reuse infrastructure, and signal long-term policy commitment. Spain and Latvia have yet to fully harness this potential, but introducing similar procurement standards could serve as a powerful catalyst for reuse adoption, especially when early market uptake is fragile.

Photo: © reCIRCLE

4. National recommendations for effective reuse policy

The transition to reuse systems is a strategic lever for achieving EU objectives and circular economy goals at the regional level. It would also allow countries to meet national targets for waste reduction. Yet, as demonstrated in Section 3.2.2 (Key Challenges), despite progress in some countries, implementation remains uneven, and financing structures are underdeveloped. This section outlines practical, scalable recommendations that can support governments and stakeholders in developing a suite of recommendations to advance reuse systems **at the national level.** The proposed recommendations are informed by policy analysis, case studies, stakeholder interviews and the outcomes of the workshop conducted as part of this research.

Isolated regulatory actions have limited effectiveness when developed and implemented without policy coherence[1]. Advancing reuse requires a suite of mutually reinforcing measures that address financing, infrastructure, and behaviour together, rather than fragmented or standalone initiatives. These recommendations therefore involve actions grounded in a systems approach, where regulatory instruments, fiscal policies, and behavioural incentives are designed to work together across multiple governance levels. For these regulatory actions to be effective, careful consideration of the right enabling environment and emerging opportunities (as outlined in Sections 3.2.1 and 3.2.2) is required to reduce policy friction, harness the 'easier wins', and facilitate timely implementation.

4.1 Embed reuse in national implementation of the EU Packaging and Packaging Waste Regulation

A robust national regulatory framework is needed to ensure reuse targets are not only mandated but made financially viable. Without regulatory clarity and financial instruments, businesses face limited incentives to adopt reusable systems. National packaging laws therefore require updating, aligned with PPWR, in the following ways:

Embedding reuse directly into national packaging law to enable long-term investment.

Where reuse is treated as a structural requirement rather than a voluntary or secondary measure, it becomes easier to justify investment in infrastructure and service design. Legal clarity helps align public and private sector expectations and facilitates planning across the value chain. As market conditions, technological capacities and consumer behaviour change, policy could be flexible enough to respond to emerging challenges and opportunities by embedding periodic review mechanisms within legislation to ensure the reuse centric policy remains relevant and responsive over time.

Ensuring proper enforcement of the PPWR targets by setting time-bound, enforceable measures to give industry a clear trajectory.

Experience from early adopters shows that progress is faster where reuse targets are time-specific and legally enforceable. This reduces ambiguity for producers, signals serious intent from the government, and enables tracking of national progress under the PPWR. Quantitative targets also form the basis for credible monitoring and evaluation systems (see section 4.6), helping governments assess whether financing and policy measures are delivering the expected outcomes. To maximise impact, this should include setting higher reuse targets for the three sectors already covered in the PPWR, making the 2040 targets binding, introducing binding reuse targets for additional beverage segments, and extending mandatory reuse targets to the takeaway sector. Targets could be defined in various ways, such as achieving minimum reuse rates by product group or sector, specifying a required number of reuse cycles per packaging unit, or establishing infrastructure coverage thresholds such as access to return points or washing facilities.

Using fiscal and financial levers to shift cost advantages towards reuse systems.

Subsidies, tax rebates, and other fiscal incentives can improve the commercial case for reuse. When paired with levies on single-use packaging, these tools help correct market distortions and generate revenue that can be directed into infrastructure or system support. These economic incentives need to be therefore easy for businesses to access and designed to reduce administrative burdens.

[1]Global Plastics Policy Centre. (2022). A global review of plastics policies to support improved decision making and public accountability. March, A., Salam, S., Evans, T., Hilton, J., and Fletcher, S. Revolution Plastics, University of Portsmouth, UK. https://plasticspolicy.port.ac.uk/research/a-global-review-of-plastics-policies/

Creating space for innovation through regulatory flexibility for large-scale pilots.

Some countries have begun to offer reduced compliance costs or targeted exemptions for businesses trialling reuse at scale. When linked to verified outcomes, these measures can encourage early adoption while preserving environmental integrity. Therefore, linked with the first recommendation of this section, the evolving regulatory frameworks could incorporate innovation pathways, enabling new reuse models to scale while maintaining alignment with long-term policy goals.

Case highlight

Spain's Act 7/2022 introduced a tax on non-reusable plastic packaging as part of its effort to reduce the environmental impact of single-use materials. While this fiscal measure marks a significant advance in internalising the environmental costs of disposable packaging, in the absence of a coordinated reuse strategy, the tax has unintentionally encouraged a shift toward alternative single-use materials, such as cardboard, rather than fostering the uptake of reusable systems. It is therefore necessary to embed such economic instruments within a comprehensive reuse framework. The revenues generated by the plastic tax offer a valuable opportunity to support the transition to reuse by financing the development of shared cleaning and logistics infrastructure, digital tracking technologies, and public engagement initiatives. Without mechanisms to direct these funds strategically, however, the tax risks functioning primarily as a deterrent rather than as a transformative tool.

4.2 Align national and EU-level reuse financing

EU frameworks offer funding and policy alignment opportunities for scaling reuse, but national leadership remains the main driver of progress. Progress on reuse infrastructure and financing varies widely across Member States, shaped by national priorities, administrative capacity, and access to technical support. While EU-level financing instruments can help address funding gaps and reduce duplication, their impact depends on how effectively national governments align these with domestic strategies. The following actions can support better alignment on reuse financing to unlock coordinated actions:

Increasing national uptake of EU funding instruments to support reuse infrastructure and innovation.

Programs such as INTERREG, Horizon Europe, LIFE, and the European Regional Development Fund (ERDF) already offer funding for circular economy projects, but few Member States have tailored these instruments toward reuse. National authorities can play a role in mobilising these funds by supporting local governments, SMEs, and system operators to apply for projects linked to washing facilities, reverse logistics, or digital traceability. Dedicated technical assistance can increase absorption and direct funding toward scalable reuse initiatives.

Using cross-border cooperation to harmonise infrastructure and reduce costs.

Cross-border collaboration offers a practical solution for smaller or less resourced countries to access shared infrastructure or develop common standards. This is particularly relevant for interoperable packaging formats and pooled cleaning or return systems. Coordination through existing platforms such as PROs or regional circular economy networks can facilitate policy alignment and reduce market fragmentation. The EU funding programmes such as INTERREG could therefore be a key enabler in implementing this recommendation, as underlined above.

Making reuse a formal priority in national circular economy strategies.

Where reuse is not explicitly prioritised in national strategies, financing remains ad hoc and implementation uneven. Embedding reuse targets and investment priorities into climate and circular economy roadmaps helps justify public expenditure and ensures consistency across planning, procurement, and fiscal reform. This can also support alignment with national commitments on emissions reduction, waste prevention, and resource efficiency.

Demonstrating national leadership to accelerate progress in the absence of EU mandates.

With limited binding ambition at EU-level, Member States play a central role in setting the pace of action. France's AGEC Law has already influenced similar developments in Spain, showing how leading countries can shape the regional policy direction. National plans and legislative advances also send important signals to investors and supply chains, and help build momentum across borders.

Facilitating peer learning and replication of successful models.

There is a growing body of experience from local pilots and national policies, but limited mechanisms for translating this into collective progress. To address this gap, Member States and EU institutions can support structured exchange through communities of practice, targeted analytical studies, and shared technical platforms. This reduces duplication of efforts, enhances policy coherence, and helps newer entrants avoid common pitfalls. In doing so, the financial strategy not only supports materials needs but also nurtures the collaborative ecosystem necessary for the implementation of systemic reuse centric policy.

Case highlight

The Change(K)now! project, funded through the INTERREG Baltic Sea Programme, supports the uptake of reusable food delivery systems across the region. It brings together municipalities, public institutions, and food service providers from several countries to co-develop and test reusable crockery and circular delivery models in contexts such as public catering, events, and local markets. By enabling knowledge exchange and coordinated piloting across borders, the project helps overcome common barriers to scale, such as fragmented initiatives and infrastructure gaps. It also offers training to help municipalities embed reuse in public services and supports businesses and consumers in shifting away from single-use packaging. The project illustrates the value of cross-border collaboration in building consistent, practical reuse systems.

4.3 Direct fiscal and financial incentives and investments towards reuse systems

Progress on reusable packaging systems depends on targeted financial support and investment in physical infrastructure and innovation. Financial tools can help correct market distortions that favour single-use packaging and make it easier for businesses and local authorities to participate in reuse. The following actions can support system growth and long-term viability:

Establishing national reuse transition funds to drive reuse system development and operationalisation.

Dedicated national reuse transition funds, potentially co-financed by PRO and DRS operators, represent a strategic mechanism to channel resources towards enterprises engaged in the development of reusable packaging solutions. Such funds could encompass a range of financial instruments including grants, low-interest loans, and equity investments that specifically address critical components such as reverse logistics, cleaning facilities, and digital infrastructure. These funds could also provide for planning phases, stakeholders engagement and eco-system building activities, including mechanisms to support cross-border collaboration to answer to the challenge mentioned above.

Using tax and subsidy incentives to stimulate business transitions to reuse systems.

Financial incentives such as tax credits, subsidies, and reduced VAT rates can make investment in reuse more attractive, particularly for infrastructure such as washing stations and digital traceability systems. These incentives could be introduced through revisions to the EU VAT Directive or integrated into national fiscal frameworks. Therefore, the VAT reform at the EU level may offer a useful lever for accelerating uptake, particularly if coupled with stronger incentives on reuse at the national level. However, it has to be noted that tax mechanisms alone may not be sufficient, in some cases, a more direct investment approach may therefore offer greater simplicity and impact for the early stage of reuse system development.

Directing public funding towards system standardisation.

Reuse adoption remains constrained by inconsistent formats and infrastructure. Public funding through EPR, DRS, or transition funds can support interoperability by backing digital traceability systems (such as RFID, QR codes), and encouraging standardised and iconic packaging design. Standardisation, such as common container sizes, shapes and closure systems allows interoperability across brands and retailers, enabling more efficient collection, cleaning and redistribution processes. Iconic packaging, meanwhile, reinforces the value of reuse by offering familiar and recognisable designs that build consumer trust and brand association, ultimately encouraging return and reuse behaviours.

Investing in physical infrastructure needed for reuse systems.

The physical infrastructure of reuse systems require upfront capital, including for collection, transportation, cleaning, redistribution, and replenishment. The mobilisation of public funds or incentivised private capital towards establishing reverse logistics systems would facilitate the efficient circulation of reusable packaging and reduce duplication of effort, infrastructure, and service provision across actors operating in the same area. Therefore, the infrastructure investments should be designed to support system-wide functionality from the outset, enabling long-term scalability at the national level rather than temporary or highly localised operations. In these conditions, the coordination between public and private actors is needed to avoid fragmented investments flows at the national level and ensure shared access to the infrastructures.

Financing cleaning infrastructure to ensure safety and scale.

Cleaning stations are a key bottleneck for food-contact reuse systems. Targeted public investment or subsidies for cleaning facilities can support hygiene standards and enable expansion beyond niche or localised models.

Coordinating financial and infrastructure tools to support a full-system shift.

Transitioning to reuse systems requires more than piecemeal interventions. Combining tax incentives, public funding, and infrastructure investment creates a more stable operating environment for businesses and municipalities transitioning away from single-use paradigms. The national reuse policy approach could therefore differentiate between financial instruments according to the purpose, at the early stage of innovation, for infrastructure development, system coordination, and cross-border scaling; and according to the supply and demand side actors, which will likely engage private actors to invest if the financial pathways is clearly aligned with the long term viability and risk mitigation.

Case highlight

Latvian bottle DRS systems rely primarily on self funding through producer fees and deposit management. The allocation of public funds for reverse logistics would lower SME barriers to participating in reuse through the development of shared infrastructure.

4.4 Reform EPR systems to fund and operationalise reuse

Although the PPWR acknowledges the potential role of EPR in facilitating reuse, it falls short of mandating such financial support, creating ambiguities in national implementation. Article 51(3) requires Member States to ensure that national EPR schemes and deposit return systems allocate a share of their budgets to waste reduction and prevention measures. To effectively mainstream reuse, EPR schemes could be adapted at the national level to provide both financial and operational support for reuse in the following ways:

Requiring producers to fund the full cost of single use packaging across its lifecycle.

Producer obligations can be expanded to cover not only the collection and treatment of single-use packaging but also the costs of reusable packaging systems. This includes initial design, collection, cleaning, redistribution, maintenance, and eventual replacement. This full-cost approach ensures that producers are accountable for the environmental impacts of their packaging choices, creating stronger financial incentives to shift away from single-use formats and invest in reusable systems that deliver measurable waste reduction and emissions savings. These obligations would be most effective if further calibrated through eco-modulation, rewarding lower-impact designs and penalising single-use or less durable options.

Using eco-modulation to reward low-impact, reusable formats.

Financial contributions can be differentiated to reflect differences in material type, durability and the potential for reuse. Eco-modulation enables higher fees to be applied to formats with limited reuse potential, high material consumption, or reduced transport efficiency, while offering lower fees or bonuses for packaging that can be efficiently reused multiple times with minimal environmental burden. For example, formats with verified high return rates and low washing energy washing requirements may qualify for preferential treatment. Alternatively, fees could be differentiated by use type, charging higher fees for single-use formats compared to reusable ones made from the same material, such as glass bottles or PP containers. Introducing bonuses applied at the point of entry into a reuse system can create upfront incentives for producers to invest in packaging that meets these criteria, encouraging design choices that reduce lifecycle emissions and system losses. Linking eco-modulation with tax incentives could be also considered, but requires caution, as taxes on single-use plastics have had limited success in Spain. Therefore, the right balance in the reuse policy framework needs to be funded between the reduced fee or eco-modulation of the PRO and the fiscal instrument to support reuse.

Allocating EPR funds to both capital and operational needs of reuse systems.

EPR funds should be allocated to support both capital and operational needs. Reuse systems require ongoing investment not only in infrastructure, such as cleaning facilities, sorting centres, and digital tracking tools, but also in operational functions, including system coordination, logistics, and data management. The effectiveness of reuse systems relies on the consistent performance of these operational elements, rather than on one-off infrastructure investments alone. To ensure interoperability and avoid fragmentation, system coordination should occur at both local and regional levels. Allocating EPR contributions across both capital and operational categories helps maintain continuity, resilience, and the long-term effectiveness of reuse schemes. It provides essential support to solution providers, innovators, brand owners, and municipalities, who implement reuse systems on the ground, coordinate local collection, monitor performance, and engage communities. Funding models should therefore be designed to address both types of needs, with flexibility to adjust allocations as systems mature and scale. Additionally, funding could be linked to progressive reuse targets within the policy framework, ensuring that investments drive measurable improvements over time.

Establishing transparent, inclusive governance mechanisms for the use of reuse system funds.

Funds can be managed by multi-stakeholder bodies that include reuse system operators, civil society, and public authorities. To ensure equity and effectiveness, access to funds should be open to a broad range of actors along the reuse value chain, including small and medium enterprises, municipalities, innovators and service providers, regardless of their PRO membership. These governance bodies can be formalised through legal or regulatory provisions that set out clear roles, voting rights, decision-making procedures, and reporting requirements. These clear governance arrangements and compliance with competition law can help prevent market capture while improving trust in how funds are allocated. Involving independent third parties in oversight and decision making could further enhance as well the transparency and credibility of the use of this fund. Therefore, financial transparency and reporting obligations should be reinforced, requiring detailed accounts of how EPR contributions are allocated to reuse schemes.

Ensuring that reusable packaging is charged once under EPR, and not at each rotation.

To avoid penalising reuse, fees should apply only at the point of first market entry. Charging for each reuse cycle undermines economic viability and discourages uptake. Ensuring single charges for reusable formats, alongside clear reporting obligations, supports a fairer and more consistent application of the polluter-pays principle.

Supporting EU-level reforms to standardise monitoring and funding pathways.

The forthcoming EPR Omnibus initiative (COM(2025)500) provides an opportunity to simplify reporting requirements and lay the groundwork for future reuse-specific provisions. While current reforms are focused on harmonisation and administrative efficiency, clearer rules on funding reuse through EPR could be introduced through future legislative updates. In the meantime, national authorities can actively contribute to shaping these reforms by sharing lessons from domestic schemes, piloting reporting tools tailored to reuse, and demonstrating how dedicated funding streams improve outcomes. Proactive engagement with EU consultations and technical working groups can help ensure that future reforms are responsive to real-world implementation challenges.

Case highlight

France's AGEC Law (2020) reserves - since 2023 - 5% of EPR fees for reuse. Funds are managed through CITEO to support reuse pilots, infrastructure development and feasibility studies.

4.5 Strengthen consumer-facing incentives and mechanisms to increase participation in reuse systems

Public participation remains a prerequisite for scaling reuse, yet most systems do not offer consumers clear reasons to engage. Awareness and education campaigns have limited impact on behaviour without supportive infrastructure, visible incentives, and a user-friendly experience. This includes reducing friction at the point of return, making packaging options more visible at point of sale, or ensuring reuse is the default rather than the alternative. Policy design often assumes environmental awareness is enough to drive participation, overlooking the importance of convenience, price signals, and habit. The following actions to structure reuse systems to reward participation, reduce friction, and build social norms can help normalise reuse in everyday routines.

Introducing single-use packaging taxes paired with reuse discounts to make reuse the cheaper option for consumers.

Behavioral change is unlikely to be sustained without system-wide nudges that make reuse easier, cheaper, or more convenient. Structural incentives embedded in daily purchasing decisions are more effective than standalone awareness efforts. A coordinated tax on single-use items paired with a corresponding incentive for reuse can shift both consumer and business behaviour. Revenues from the single-use tax can be ringfenced to fund reuse infrastructure or subsidise consumer-facing incentives. Clear communication of the cost differential between single-use and reuse is important for uptake. On the local tax such as Tübingen's 'disposable packaging tax' in Germany, stakeholders recommend that although such taxes are growing in Germany, there is concern that single-use products will become more expensive and consumers may develop a negative view of reuse through this process. Therefore, it is essential that any single-use tax is accompanied by strong reuse incentives to ensure positive consumer perception and behaviour. Similarly, it has been highlighted that levies on single-use items—such as the Spanish tax on non-reusable packaging—are often interpreted by opponents as mere penalties or extra taxation, which can create counterproductive sentiments. In the Netherlands, a low tax amount is generally absorbed by consumers without significantly increasing reuse rates. This is likely due to differences in convenience and a lack of consumer familiarity with reuse concepts. Nonetheless, a more accurate reflection of the wider costs of single-use packaging makes sense as long as this is communicated clearly and effectively to consumers.

Expanding deposit return schemes to include reusable containers, with appropriate reimbursement rates.

Expanding DRS coverage to include reusable packaging offers a direct, familiar way to reward participation through refundable deposits. This requires adaptation of current DRS design to accommodate different return timelines, durability requirements, and verification processes. National regulators can include reuse targets within DRS legislation and ensure that reimbursement rates reflect real consumer effort and return rates. Therefore, the national policy could mandate DRS operators, as for the PROs as recommended in section 4.4 to dedicate a specific reuse fund. The national reuse policy could as well avoid prioritising single-use items over reuse options. These measures will have to be linked with missions and scope of the EPR schemes in order to have the right combination of reuse policy measures.

Funding retailer-led incentives such as loyalty schemes.

Retailers are well placed to drive reuse uptake but may lack the margins or tools to do so. Public funding and the PRO fund can be used to co-finance loyalty schemes, digital tracking apps, or in-store infrastructure such as return points or refill stations. Tax incentives or transition support could reduce the perceived commercial risk of shifting away from single-use formats. While some stakeholders expressed reservations about prescriptive requirements, preferring that industry meet outcomes in their own way, others noted that allocating a dedicated sales area for reuse within reuse policy could make it easier for retailers to introduce such systems and create a level playing field.

Requiring reuse systems in closed settings, such as hospitality and catering settings.

Legislation or local ordinances can require hotel, restaurant, and catering (HORECA) providers to offer reusable options and accept consumer-brought containers. Mandates can focus on high-waste contexts such as take-away services, events, and delivery platforms. Accompanying guidance and monitoring are important to ensure compliance and protect hygiene standards.

Addressing municipal authorisation and infrastructure placement challenges.

Even where policy and financial instruments support reuse, implementation can be hindered by the absence of clear legislative mandates compelling local authorities to allow placement of necessary physical infrastructure in public spaces. Coordinated efforts between national policymakers and municipalities are needed to ensure that infrastructure placement is enabled and prioritised, closing the implementation gap and enhancing consumer access to reuse return points.

Case highlight

Germany's DRS system includes incentives for both single-use and reusable containers, with clear labelling and a well-integrated return infrastructure. This approach has led to high reuse rates for beverage packaging and consistent consumer participation.

Furthermore, since 2023, under the German Packaging Act, food service providers (including restaurants, cafes, and food delivery companies) are required to offer reusable alternatives for takeaway and delivery meals wherever technically feasible. This means consumers have the choice to opt for reusable containers instead of single-use packaging.

Photo: © Uzaje

4.6 Ensure reliable data collection and management to support reuse policy

Reliable, high-quality data is foundational to the successful design, implementation and evaluation of the EU and national reuse systems. Without consistent information on reuse flows, financial investments, consumer behaviour, and the environmental impacts, policymakers and stakeholders would face significant challenges in making informed decisions at the local and national levels. This could include difficulties in allocating resources effectively, which will be fundamental with the recommendation on the PRO fund for reuse, from the previous section, and in demonstrating progress towards the established national targets as outlined on the section 4.1.

Therefore, to strengthen data reliability, Member States could develop comprehensive data standards and protocols aligned with EU definitions and the forthcoming secondary legislation under the PPWR; require independent verification to strengthen trust in reporting and establish national reuse observatory.

Photo: © Vytal

Developing standardised reuse indicators by building on national monitoring practices.

France and Germany already use structured indicators for reuse through their PROs, DRS operators, and public agencies. These models offer a foundation for designing a shared EU monitoring framework. National governments could mandate the publication of reuse-related financial and performance data as part of EPR and DRS reporting requirements, and collaborate with EU institutions to establish a technical working group tasked with defining core indicators. These could cover reuse rates by product category, packaging lifespan, infrastructure coverage, and the proportion of EPR funds allocated to reuse. It will therefore require clearly defining the role of PROs in data collection and reporting, linked to their evolving responsibilities under EPR schemes and the recommendation to prevent double charging of reusable packaging outlined in the previous section.

Establishing national reuse observatories.

These bodies would be responsible for gathering, validating, and publishing reuse-related data, acting as a central hub for evidence-based policymaking. Their core responsibilities could include tracking financial flows from EPR schemes and public funding, as outlined in the previous sections, monitoring infrastructure development, assessing reuse rates across sectors, and evaluating environmental and social impacts. Observatories could also coordinate with PROs, digital tracking systems, and local authorities to ensure data consistency and completeness. In addition to reporting, observatories could facilitate peer learning by disseminating best practices, supporting research and innovation, and contributing to the development of national and EU-level reuse indicators.

Requiring independent verification to strengthen trust in reporting.

Third-party auditors, civil society organisations, and academic institutions could be engaged to validate data on financial flows and performance. Governments could make this a condition for EPR or public fund recipients, with independent assessments required prior to the renewal or expansion of funding schemes. Therefore, linked with the recommendation above, the national reuse observatories could also commission independent evaluations, support compliance monitoring, and provide policy recommendations to inform national reuse strategies for more effective governance, targeted investment, and public accountability in the transition to reuse systems.

Case highlight

As part of France's implementation of the anti waste and circular economy law, the national agency for ecological transition, ADEME, has established a Reuse Observatory aimed at tracking and evaluating the performance of reuse initiatives funded through EPR schemes. The Observatory collects data from producer responsibility organisations , local authorities, and private sector actors to generate detailed indicators on reuse volumes, financial flows, environmental impacts, and user participation.

Such a national observatory, in combination with the one that will be set at the EU level with the PPRW implementation, plays a dual role in both compliance and strategic development. On one hand, it supports transparency by ensuring EPR funds allocated for reuse are tracked and evaluated. On the other, it offers a centralised platform for knowledge exchange, feeding insights into policy adjustments and national reuse roadmaps. Its metrics are being developed in alignment with emerging EU reporting requirements, positioning France as a potential frontrunner in creating standardised reuse performance frameworks across the EU.

4.7 Establish transparent monitoring and evaluation focused on reuse system financing

Tracking how money flows into reuse, and what it achieves, is critical to ensuring that financing supports effective and accountable systems. Without consistent data and independent scrutiny, governments and system operators risk underperforming investments and missed opportunities for improvement. Monitoring must be paired with clear, time-bound quantitative targets (see section 4.1) to ensure there is a meaningful benchmark for assessing progress. National monitoring and evaluation systems could be strengthened to track public and private spending, assess impact, and build the evidence base for future funding decisions.

Tracking financial flows into reuse to improve accountability.

National systems could monitor both public and private financing of reuse, enabling governments to assess how funds are allocated, whether they are reaching intended actors, and what results they produce based on pilot outcomes and results. This requires assigning clear reporting obligations to fund administrators (such as PROs or municipal authorities) and publishing annual expenditure breakdowns by reuse activity and sector.

Mandating regular evaluation of reuse system impacts.

Governments could conduct recurring assessments of the economic, environmental, and social impacts of reuse systems and investments. This could be mandated through national reuse strategies or integrated into EPR obligations, with evaluations every 2–3 years based on standardised performance indicators.

Using cost–benefit analysis to guide financing decisions.

Cost–benefit analysis can identify which reuse models deliver the highest return on investment, in terms of waste reduction, emissions savings, and operational performance. Public authorities could require cost–benefit justification for any large-scale funding application, particularly for infrastructure or incentive schemes.

5. Ways forward at the EU level

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This report has identified persistent barriers to scaling reuse across four EU Member States, including fragmented regulations, insufficient infrastructure, poorly aligned economic incentives, and limited adoption by consumers and producers. Overcoming these challenges requires moving beyond scattered national initiatives and toward a unified EU policy framework that integrates reuse into industrial, environmental, and economic strategies. The following actions could support progress at the EU level to scale reuse and improve implementation across Member States.

Use secondary legislation under the PPWR to set binding, performance-based standards for reuse.

The PPWR provides a key starting point for clarifying legal definitions, technical requirements, and minimum performance thresholds. However, the PPWR currently doesn't address the standardisation of primary packaging, which poses a challenge for multinational companies. Without harmonised standards across Member States, it would be impractical for businesses operating across borders to comply with differing national requirements. The Commission could, therefore, push in this direction to ensure greater consistency and facilitate smoother implementation of reuse principles across the EU. Therefore, through delegated acts, the European Commission could define enforceable standards for packaging durability, rotation rates, hygiene, traceability, and reuse eligibility across different sectors, while allowing for sector-specific adaptation.

Strengthen the role of the Circular Economy Act in embedding reuse targets and reporting into EU legislation.

The forthcoming Circular Economy Act could establish mandatory reuse targets by packaging category, alongside standardised metrics and monitoring obligations. This would enable more consistent tracking of reuse performance across Member States and help integrate reuse into broader material efficiency and resilience goals. In addition, the Circular Economy Act could introduce VAT reductions or exemptions for products and services that promote reuse, providing financial incentives to encourage businesses and consumers to adopt circular practices. Aligning tax policy with reuse principles would support the uptake of reusable packaging and contribute to a more sustainable and resource-efficient economy.

Harmonise EPR systems and fee structures through the Single Market Act.

Revising EPR rules under the Single Market Act could remove barriers to cross-border reuse operations and support the redesign of fee modulation systems. Fee structure principles could be standardised to reflect packaging reusability and environmental impact, creating clearer incentives across internal markets.

Use the revision of the Public Procurement Directive to create predictable demand for reuse.

The ongoing revision of the Public Procurement Directive offers a timely opportunity to integrate reuse-based criteria in public tenders. Member States could be required to include minimum reuse content or service requirements for tenders in catering, healthcare, transport, and local authority procurement.

Designate reuse as a strategic investment area in EU funding instruments.

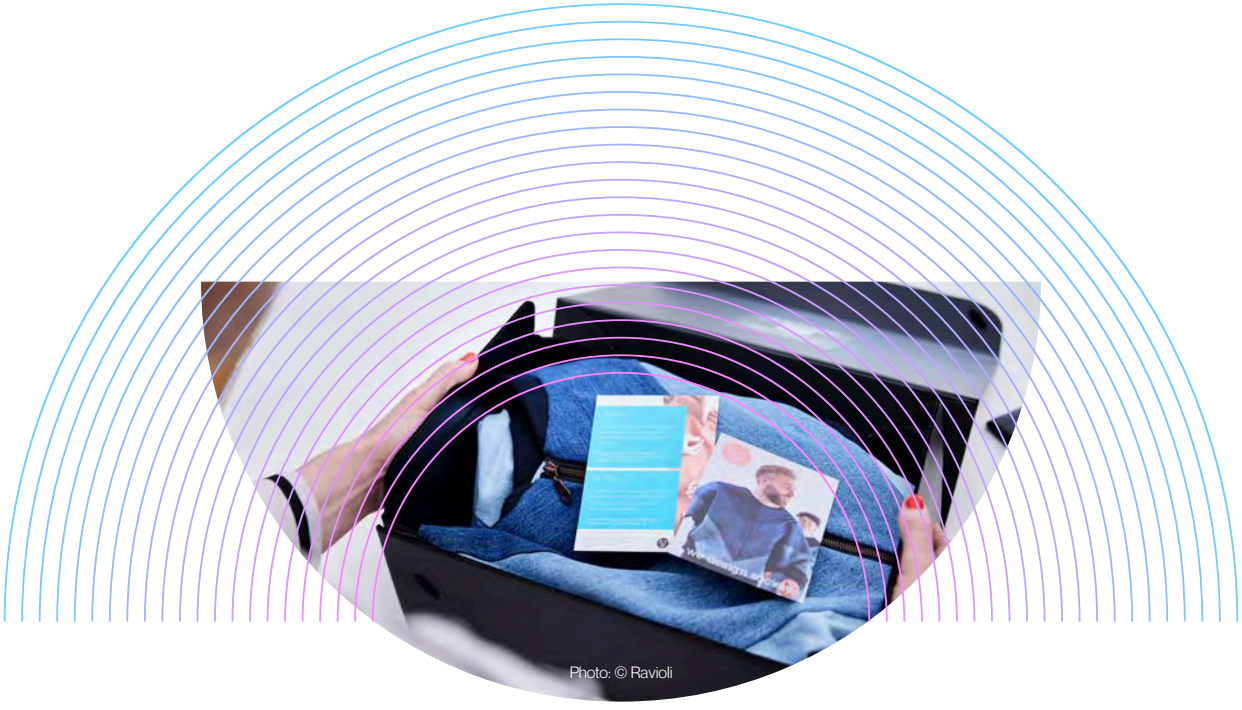
Instruments such as the Common Industrial Strategy for Advanced Forms of Recycling (CISAF) and the Multiannual Financial Framework (MFF) can be leveraged to prioritise infrastructure for reuse. Reuse could be made eligible for direct investment under cohesion policy, Horizon Europe, and LIFE, with earmarked funding for logistics, digital systems, and service-oriented business models.

Reform the “plastics own resource” (EU plastics levy) to support investment in reuse system infrastructure.

The EU plastics levy, currently based on the volume of non-recycled plastic packaging waste, could be restructured to better support waste prevention. One option is to target contributions more specifically at single-use formats, encouraging Member States to reduce their use. In parallel, a portion of the revenues could be ringfenced for investment in reuse infrastructure through EU funding programmes. This would improve coherence between fiscal instruments and the EU’s circular economy and reuse objectives.

Promote international reuse system uptake in the Global Plastics Treaty.

The EU can support international progress on reuse by advocating for its inclusion in the Global Plastics Treaty as a core mechanism for reducing plastic pollution. This includes encouraging the adoption of global targets, reporting obligations, and financing structures that support reuse at scale. As treaty implementation mechanisms emerge such as potential national plans, Conference of the Parties (COP) processes, and possible compliance frameworks, the EU has an opportunity to inform their design by showcasing consistent, effective regional action across Member States. A coherent internal approach would reinforce the EU’s credibility and offer a reference model for other regions.



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Conclusion

This report has outlined specific actions to address key policy and financing gaps that currently limit the uptake of reuse across Europe. While several Member States have introduced supportive measures, these remain uneven and often disconnected from broader packaging, procurement, and fiscal systems. In many cases, the institutional and financial architecture still favours single-use models, creating structural challenges for reuse to scale.

A more consistent policy approach, grounded in clear obligations, coordinated investment, and improved monitoring, that is grounded in clear obligations, coordinated investment, and improved monitoring can support the development of functioning reuse systems enabled by effective policy. Existing EU frameworks offer several entry points, including the PPWR, EPR reform, and upcoming legislation on procurement and circular economy. Taken together, these offer an opportunity to integrate reuse more firmly into national and regional strategies, allowing for the significant social, environmental and economic benefits of reuse to become a reality.

References

Please note, country case studies are independently referenced in their respective reference lists (See Annex 3).

Ellen MacArthur Foundation. (2019). Reuse – rethinking packaging. https://www.ellenmacarthurfoundation.org/reuse-rethinking-packaging

Ellen MacArthur Foundation, Unlocking a reuse revolution: Scaling returnable packaging (2024). https://content.ellenmacarthurfoundation.org/m/791a4013fead211e/original/Unlocking-a-reuse-revolution-Scaling-Returnable-Packaging.pdf

European Commission. (2024). Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products and repealing Directive 2009/125/EC. https://eur-lex.europa.eu/legal content/EN/TXT/?uri=CELEX%3A32024R1781

European Commission. (2025a). Proposal for a Regulation establishing a Clean Industrial Act (COM/2025/85 final). https://commission.europa.eu/topics/eu-competitiveness/clean-industrial-deal_en

European Commission. (2025b). Single Market Strategy (COM/2025/500 final). https://single-market-economy.ec.europa.eu/publications/single-market-our-european-home-market-uncertain-world_en

European Commission. (2025c). Clean Industry State Aid Framework (CISAF) (C/2025/7600 final). https://competition-policy.ec.europa.eu/about/contribution-clean-just-and-competitive-transition/clean-industrial-deal-state-aid-framework-cisaf_en

European Commission. (2025d). Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions: A competitiveness compass for the EU (COM(2025) 30 final).

Evans, T., Rodriguez-Mata, F., Revat--Dontenwill, U., & March, A. (2025) New ERA General Assembly Workshop Outcomes: Designing Effective Reuse Policy. Global Plastics Policy Centre, University of Portsmouth, UK

InOff Plastic, Planet Reuse, Zero Waste Europe, New Era. (2024). European Reuse Barometer: 2024 assessment of the current reusable packaging landscape in Europe. https://zerowasteeurope.eu/wp-content/uploads/2024/06/ZWE_June24_Report_InOff-plastic-european-reuse-barometer-.pdf

ISO. (2013). ISO 18603:2013, Packaging and the environment, Reuse. International Organization for Standardization. https://www.iso.org/standard/55871.html

Global Plastics Policy Centre. (2023). Making reuse a reality: A systems approach to tackling single-use plastic pollution. Revolution Plastics, University of Portsmouth, UK.

Global Plastics Policy Centre. (2024). Demystifying Reuse in the Global Plastics Treaty | Global Plastics Treaty Policy Brief.

March, A., Evans, T., Bowyer, C., Rodriguez-Mata, F., Revat--Dontenwill, U., Shearman, L., and Batey, J. (2025). Workshop Outcomes: Designing effective reuse policy. Global Plastics Policy Centre, University of Portsmouth, UK.

Northen, S., March, A., Bowyer, C., Fletcher S. (2023). Accelerating the scaling of reuse systems | Global Plastics Treaty Policy Brief. Global Plastics Policy Centre and Break Free From Plastic. https://plasticspolicy.port.ac.uk/research/reuse-policy-brief/

OECD (2022) Global Plastics Outlook: Economic Drivers, Environmental Impacts and Policy Options. Paris: OECD Publishing. https://www.oecd.org/en/publications/global-plastics-outlook_de747aef-en.html

Zero Waste Europe. (2025). Blueprint for harmonising the implementation of takeaway food and drinks packaging systems for reuse in Europe: Insights from the ReuSe Vanguard Project (RSVP) (2nd ed.). https://zerowasteeurope.eu/wp-content/uploads/2025/05/RSVP_May25_ReuSe_Blueprint_2025.pdf

Directive 2008/98/EC of the European Parliament and of the Council of November 2008 on waste and repealing certain directives, amended in 2018.

Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment.

PPWR proposal Article 26 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52022PC0677

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC.

Annex 1: Glossary

Capex	Funds used by an organisation to acquire or upgrade assets such as property, buildings, technology, or equipment.
Clean Industrial Deal State Aid Framework	The Clean Industrial Deal State Aid Framework is a set of EU guidelines that defines the conditions under which Member States can provide public financial support (state aid) to companies in order to accelerate the transition toward a climate-neutral, resource-efficient, and competitive industry. Published by the European Commission, it is part of the Green Deal Industrial Plan and is intended to help achieve the EU's climate and industrial policy objectives, particularly those related to the Green Deal, the Net-Zero Industry Act, and the Circular Economy Action Plan.
Circular economy	A circular economy is one that is restorative and regenerative by design. It looks beyond the take-make-waste extractive industrial model, and aims to redefine growth, focusing on positive society-wide benefits. It is based on three principles: design out waste and pollution; keep products and materials in use; and regenerate natural systems.
Consumer	Means any natural person who is acting for purposes which are outside their trade, business or profession.
Deposit return scheme (DRS)	A system in which a refundable surcharge is applied to a product to encourage consumers to return it after use. In practice, DRSs can be applied to several different situations: • Single-use beverage packaging (where it encourages return for subsequent recycling) • Reusable beverage (or non-beverage) packaging (where it encourages return for reuse) • Return of non-packaging products (though these may not always involve a centralised system that enables universal return and refund regardless of point of sale). Deposits could be applied to fulfil reuse or recycling objectives in these cases.
Extended Producer Responsibility	An environmental policy approach in which a producer's responsibility for a product is extended to the post-consumer stage of a product's life cycle. An EPR policy is characterised by: • the shifting of responsibility (physically and/or economically; fully or partially) upstream toward the producer and away from municipalities; and • the provision of incentives to producers to take into account environmental considerations when designing their products.
Multiannual Financial Framework	The Multiannual Financial Framework is the long-term budget plan of the European Union, setting out the maximum annual amounts the EU can spend in different policy areas over a period of at least five years, typically seven. The current MFF covers the period 2021–2027.

Annex 1: Glossary (continued)

Opex	Expenses incurred during the course of regular business, such as general and administrative costs, sales and marketing, or research and development.
Packaging	All products made of any materials of any nature to be used for the containment, protection, handling, delivery and presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer. In this report, we focus on plastic packaging.
Packaging waste	Means any packaging or packaging material that is waste, with the exception of production residues.
Packaging waste prevention	Means measures that are taken before any packaging or packaging material has become packaging waste and that reduce the quantity of packaging waste, so that less or no packaging is required to contain, protect, handle, deliver or present products, including measures as regards the re-use of the packaging and measures to extend the life of the packaging before it becomes waste.
Producer Responsibility Organisation	An entity established by producers (manufacturers, importers, or distributors) to collectively fulfil their extended producer responsibility obligations. These obligations typically involve organising the collection, treatment, recycling, and environmentally sound disposal of products once they become waste, ensuring producers take responsibility for the entire lifecycle of their products.
Reduce	Increase efficiency in product manufacture or use by consuming fewer natural resources and materials. It includes the prevention of food waste along food value chains including in agricultural production, processing, manufacturing, distribution and consumption.
Recycle	Recover materials from waste to be reprocessed into new products, materials or substances whether for the original or other purposes. This includes the reprocessing of organic material but does not include energy recovery and reprocessing into materials that are to be used as fuels or for backfilling operations.
Recycled	Means a material that has been recovered or otherwise diverted from the waste stream and reprocessed into a product, material, or substance whether for the original or other purposes. This excludes materials that are used as fuel or for backfilling operations.
Refill	Means an operation by which a container that fulfils the packaging function, and that is either owned by the end user or purchased by the end user at the point of sale of the final distributor is filled by the end user or by the final distributor with one or several products purchased by the end user from the final distributor.
Refill station	Means a place where a final distributor offers to end users products that can be purchased through refill.

Annex 1: Glossary (continued)

Packaging waste	Means any packaging or packaging material that is waste, with the exception of production residues.
Reuse	Reuse means use of a product (or component) multiple times in its original form for the same purpose for which it was conceived.
Reusable	Products (including packaging) that are conceived, designed, and placed on the market to be used multiple times for the same purpose for which they were conceived in a system for reuse.
Reused	A component or part that has reached the end of one use and is used again with minimal or no physical alterations—such as cleaning, minor adjustments, or repairs.
Reuse system	Systems for reuse means organisational, technical/or financial arrangements, which enable the re-use either in a closed or open loop system. In this report, we focus on reuse systems wherein consumers return the used product to the system operator, either from home or via collection points. A business or service-provider then takes care of cleaning and redistribution.
Rotations	The number of uses or trips performed by a reusable product from the moment it is placed on the market to the moment it is sent back for reuse in a system with a view to its repeated placing on the market (derived from European Commission implementing decision 2019/665). This can relate to potential rotations, referring to the number of uses that a product is designed to be technically capable of achieving, or the actual rotations that a product achieves in practice within a given operational context.
Return rate	The percentage of reusable products returned to the starting point in the reuse system at the end of a rotation. The higher the return rate, the more economically viable the reuse system, however, return rate should not be considered equivalent to a reuse rate, since items that are returned may not end up being reused thereafter.
Return and reuse models	In a return and reuse model, while the return mechanism and location may vary, the user returns a product to the reuse system between uses. Return and reuse models will typically have centralised logistics and infrastructure to manage returned products and place them back in circulation, though return and reuse on site is also possible for some contexts (e.g. hospitality and catering). In a retain and reuse model, the user keeps the product between uses, and will undertake any cleaning or repreparation themselves. 'Refill' or 'bring your own' are established terms for this model in the context of packaging, but retain and reuse can apply to a wider array of products. Especially for packaging, there may still be changes in supply chain logistics and infrastructure to ensure the food or drink product is provided efficiently and effectively at refill locations. Service industries (e.g. for cleaning) may also arise as an option for users, but these would not need to be part of a wider system.

Annex 1: Glossary (end)

Take-away packaging	Means service packaging filled at attended points of sale with beverages or ready-prepared food that are packaged for transportation and immediate consumption at another location without the need for any further preparation and are typically consumed from the packaging.
Trip	Means the transfer of packaging, from filling or loading to emptying or unloading, as part of a rotation or on its own.
Single-use plastic product	Means a product that is made wholly or partly from plastic and that is not conceived, designed or placed on the market to accomplish, within its life span, multiple trips or rotations by being returned to a producer for refill or re-used for the same purpose for which it was conceived.
Single-use packaging	Means packaging which is not reusable packaging.

Annex 2: Interview questions and coding

Semi-structured interview questions

The interviews conducted for this research were semi-structured, designed to guide discussion while leaving space to probe issues in greater depth as they arose. The set of questions presented in this annex therefore represents an indicative framework rather than a rigid script. In practice, the interviews often explored additional themes raised by respondents, reflecting the iterative and adaptive nature of the inquiry. This approach allowed us to capture both expected and unanticipated perspectives on the design and implementation of reuse policy.

Topic	Question
Reconfirmation of consent	• Are you happy to proceed with this recorded interview?
Demographics	• Could you describe your role and your organisation's involvement in reuse systems? • Are you aware of specific targets for reuse in your country?
Reuse policy landscape in case study country	• What do you think about the policy landscape in [case study country] and how it facilitates reuse? • What do you think was the main driver for the development of policy around reuse? • What has caused conflict/problems in, and how could the regulatory environment support overcoming these? • Are there gaps in the current policies that need to be addressed to improve the effectiveness of the reuse regs? • Who is expected to cover those economic costs? • Or how does the regulatory landscape facilitate the covering of these costs? If at all...? • Should gov be financing shared infrastructure etc as an example of policy support ?
Policy design	• Based on your experience, do you think reuse policies should be integrated into EPR schemes, or would standalone regulations for reuse be more effective in achieving reuse goals? • Are there specific design elements of the reuse regulations or wider policy landscape that have been particularly successful or problematic? • What other policies (beyond the reuse specific legislation) have supported reuse? • Are you familiar with how the policy was designed and the process that took place to get to including reuse in national legislation? • Were you, or others in your field of work consulted in the process around the design of the policy?
Implementation and adaptation	• How would you assess the overall effectiveness of the reuse regulations in achieving their intended outcomes? / Do you think the reuse policies are working? • Has the design of the reuse regulations aligned well with the realities of implementation? (e.g., feasibility, stakeholder capacity) • How have businesses in [country] had to change in response to the requirements of regulations related to reuse? (e.g., changes in supply chains, partnerships or infrastructure) • Has there been sufficient support for small to medium sized businesses in adapting to and complying with reuse requirements of the policy? • Have there been any unintended consequences as a result of the reuse regulations?
Close	• In summary, what would you say are the top 3 enablers that a suite of regulations to support reuse would need to ensure that the policies for reuse are effective? • Are there lessons from other countries that could enhance the effectiveness of reuse policy in your country? • Any questions for us? • Can you recommend anyone else we should interview as part of this research?

Annex 2: Interview questions and coding

Coding framework

Once anonymised, transcripts were coded against these themes to identify consistent findings, highlight areas of divergence, and guide deeper analysis. This framework therefore reflects both the planned lines of inquiry and the issues that interviewees raised in practice.

Key: ID = participant ID

Focus areas	Interview question (paraphrased)	Guidance	[ID]	[ID]	[ID]	[ID]	[ID]	[ID]	Synthesis (describing data across all cases)
Demographics	Could you describe your role and your organisation's involvement in reuse systems?	*Select role from drop-down*							
		Other points of interest							
Policy landscape	What do you think about the policy landscape in [case study country] and how it facilitates reuse?	*General sentiment*							
		Other comments, observations in bullet points							
	What do you think was the main driver for the development of policy around reuse?	*Select response*							
		Other comments, observations in bullet points							
	What has caused conflict / problems?	*Observations in bullet points but highlight on interview document*							
	How could the regulatory environment support overcoming these?	*Observations in bullet points but highlight on interview document*							
	What are the gaps in current policy?	*Answer in bullet points*							
Policy design	Do you think reuse policies should be integrated into EPR schemes, or would standalone regulations for reuse be more effective in achieving reuse goals?	*Select response*							
		Other comments, observations in bullet points							
	For policy design, what was successful?	*Observations in bullet points but highlight on interview document*							

Annex 2: Interview questions and coding

Coding framework (continued)

Key: ID = participant ID

Focus areas	Interview question (paraphrased)	Guidance	[ID]	[ID]	[ID]	[ID]	[ID]	[ID]	Synthesis (describing data across all cases)
Policy design (continued)	For policy design, what was problematic?	*Observations in bullet points but highlight on interview document*							
	What other policies supported reuse?	*Observations in bullet points but highlight on interview document*							
	How was the policy designed?	*Observations in bullet points but highlight on interview document*							
	Who was consulted in policy design?	*Observations in bullet points but highlight on interview document*							
	Key observations on finance or mechanisms for financial delivery	*Observations in bullet points but highlight on interview document*							
Implementation and adaptation	Do you think the reuse policy is successful?	*Observations in bullet points, but highlight on interview document*							
	How have stakeholders reacted to the policy?	*Observations in bullet points, but highlight on interview document*							
	How have businesses had to change in response to the requirements of regulations?	*Observations in bullet points, but highlight on interview document*							
	Has there been sufficient support for small to medium sized businesses in adapting to and complying with reuse requirements of the policy?	*Observations in bullet points, but highlight on interview document*							
	Have there been any unintended consequences as a result of the reuse regs?	*Observations in bullet points, but highlight on interview document*							
	What will support businesses to implement / adapt?	*Observations in bullet points, but highlight on interview document*							

Annex 2: Interview questions and coding

Coding framework (end)

Key: ID = participant ID

Focus areas	Interview question (paraphrased)	Guidance	[ID]	[ID]	[ID]	[ID]	[ID]	[ID]	Synthesis (describing data across all cases)
Interview close	What are the top three enablers of reuse? (Enabler 1)	*Observations in bullet points, but highlight on interview document*							
	What are the top three enablers of reuse? (Enabler 2)	*Observations in bullet points, but highlight on interview document*							
	What are the top three enablers of reuse? (Enabler 3)	*Observations in bullet points, but highlight on interview document*							
	Are there lessons from other countries that could enhance the effectiveness of reuse policy in your country?	*Observations in bullet points, but highlight on interview document*							
Analysis and synthesis	Does the interviewee mention any regional or transboundary initiatives, e.g., PPWR?	*Select response*							
		Please list							
	On reflection, who did the interviewee see as more important in driving reuse - industry or government?	*Select response*							
		Please list							

Annex 3: Country case studies

This annex presents detailed case studies from the four selected countries, providing in-depth insights into their approaches, challenges, and successes. These case studies illustrate how different national contexts influence the implementation of key policies and initiatives, offering valuable lessons and comparisons on the design and implementation of reuse policies.

Annex 3A: Reuse policy in France

1. Reuse context

Reuse in France has evolved from a historically regional and product-specific practice (notably for glass packaging) to a fragmented contemporary landscape where reuse is gaining traction under regulatory pressure (EMF, 2022; Reloop, 2024). The decline of deposit-return schemes in the 1980s left gaps in systemic reuse infrastructure, leading to a reliance on small-scale and pilot initiatives. The AGEC law (2020) signals a policy-driven revival, targeting reuse through national objectives (Zero Waste Europe, 2021). Public appetite for reuse is reflected in surveys showing 85% of French people supporting bans on single-use plastic packaging and 88% supporting deposit-return models (OffPlastic, 2022).

Interviewees widely described the context as "in transition", with reuse gaining political attention but lacking the systemic infrastructure seen in countries like Germany. Regional reuse networks remain strongest in beverage packaging, but standardisation and national interoperability are underdeveloped.

> *"We're trying to build a national system, but right now it's fragmented. Reuse is happening at a very local scale."*
>
> ***Reuse operator, P9***

Based on the interviews, this tension between ambitious policy and implementation gaps defines the current reuse environment.

Reuse history

Reuse in France has a long-standing history rooted primarily in glass packaging systems. Throughout the 1960s and 1970s, France operated extensive deposit-return schemes for bottles, enabling multiple cycles of reuse at local and regional levels (Reloop, 2024). However, these systems began to decline from the 1980s onward, driven by the rise of low-cost single-use packaging and the growing dominance of recycling as the default waste management approach (Reloop, 2024).

The decline of formal reuse systems coincided with a shift towards centralised waste collection and recycling infrastructure, reducing incentives for producers and retailers to maintain refillable systems. By the 2000s, reuse had become marginalised outside niche applications such as certain regional beer or wine bottlers (EMF, 2022).

Nevertheless, some regional strongholds persisted. Alsace remains a notable example, with around 25 million bottles reused annually and approximately 30% of stores equipped with reverse-vending machines (Reloop, 2024). This regional continuity contrasts with the absence of a cohesive national reuse infrastructure, leaving France reliant on fragmented, small-scale operators (KIDV, 2022). While not the core focus of this analysis, it is worth noting that refill practices (particularly in bulk food and personal care) have become increasingly visible in the French retail landscape,

Annex 3: Country case studies France

especially since the late 2010s. However, these systems often operate outside formal regulatory definitions of reuse and remain largely untracked in national monitoring frameworks. Several interviewees highlighted the legacy of these historic systems as both a resource and a constraint.

"It's like we're reinventing what used to exist, but without the same infrastructure or cultural habits in place anymore."

Industry representative, P12

The resurgence of reuse as a policy goal emerged gradually. The 2018 Circular Economy Roadmap (FREC) laid the groundwork, outlining 50 measures aimed at reducing waste, improving product durability, and strengthening extended producer responsibility (EPR) schemes (EMF, 2022). This roadmap explicitly identified reuse as a key strategy for achieving circularity, setting the stage for the more comprehensive AGEC law (2020) (Zero Waste Europe, 2021).

However, stakeholders have noted that despite this policy trajectory, practical reuse activity remained limited through the 2010s. Interviewees described reuse at this time as largely voluntary and niche, with few national-scale mechanisms enabling expansion beyond early adopters

"For a long time it was only glass, and only in a few regions. The rest of the market just kept moving to recycling and disposable."

Reuse operator, P9

The AGEC law marked a significant policy turning point, introducing national reuse targets (5% by 2023; 10% by 2027) and signalling a more formal regulatory role for reuse (EMF, 2022). Yet implementation has faced challenges stemming from the absence of pre-existing industrial washing facilities, standardised packaging formats, or reverse logistics systems on a national scale (CMS, 2024).

Interviewees also pointed out that, culturally, consumer familiarity with recycling has eclipsed reuse behaviours, owing to sustained investment in recycling education campaigns over the past two decades. As one operator put it:

"We spent 20 years telling people to recycle. Now we're telling them to reuse—and they're confused."

Reuse operator, P10

In summary, France's reuse history is marked by:

- Strong regional reuse legacies (e.g., Alsace)
- A national decline in reuse following the 1980s
- Policy-driven revival beginning with the 2018 Circular Economy Roadmap and formalised in the AGEC law (2020)
- Persistence of fragmented, small-scale reuse models in the absence of national infrastructure.

This historical trajectory has shaped the current challenges of scaling reuse, leaving France with regulatory ambition but uneven operational readiness.

Annex 3: Country case studies France

Reuse system structure

France's reuse system today is defined by regional fragmentation, sectoral concentration, and low interoperability (Reloop, 2024; KIDV, 2022). Reuse operates primarily through localised loops, where packaging circulates within short supply chains—typically no more than 200–300 km from producer to consumer and back. This geographic limitation reflects an operational reality: cleaning and redistribution facilities are locally based, and most reuse actors lack national-scale logistics.

The strongest sectoral presence remains in glass beverage packaging, supported by long-standing habits in regions like Alsace, which processes 25 million reused bottles annually and maintains reverse vending machines in 30% of stores (Reloop, 2024). Beyond these local hubs, reuse in other product categories (such as cosmetics or household goods) remains rare or experimental.

"We're strong in bottles and foodservice, but outside those it's still very experimental."

Reuse operator, P10

Structurally, the system is dominated by:

- Small and medium enterprises running independent reuse loops
- A limited number of retailer-led pilots, each operating proprietary systems
- Early-stage efforts to develop shared cleaning, logistics, and return infrastructure, often within pilot scopes rather than permanent networks

"We have pilots, but scaling them needs standard packaging, shared washing capacity, and reliable logistics. We're missing that."

Reuse system developer, P14

Interoperability between reuse schemes is almost non-existent. Packaging must typically be returned to the original retailer or operator, restricting consumer convenience and undermining scale. Interviewees repeatedly identified this as a core barrier:

"Consumers can't easily return reusable packaging everywhere—there's no joined-up system, so it only works if you stay local."

Reuse operator, P9

Although some national-level actors, such as CITEO, have piloted multi-region trials, these remain isolated initiatives, not yet consolidated into a cohesive infrastructure (CITEO, 2024). Although regional efforts are underway.

A further feature of the system is its dependence on closed-loop rather than open-loop reuse. Most current operations rely on producers or retailers taking back packaging they themselves placed on the market, rather than participating in shared pools or networks.The system's limited standardisation—in packaging formats, labelling, material specifications—adds complexity and raises costs for businesses attempting to scale reuse beyond pilot regions (CMS, 2024). Interviewees highlighted the operational difficulties of building return, cleaning, and redistribution systems in the absence of national standards or logistics integration.

Annex 3: Country case studies France

At a technical level, France retains some reuse infrastructure from historic systems (for example, bottle washers in certain regions), but capacity is insufficient to support national reuse targets, with many regions lacking facilities entirely (Reloop, 2024). This absence translates into high operational costs for scaling reuse beyond local contexts. Nevertheless, interviewees saw existing regional operations as proof of concept, showing reuse's technical feasibility within specific geographies:

"Some regions like Alsace show it's possible when you have local logistics and retailer buy-in. We could build on that."

Reuse operator, P3

While reuse in foodservice and beverage sectors has some maturity, other sectors remain structurally undeveloped. Several stakeholders noted that current reuse infrastructure is insufficient for high-volume, diverse packaging streams.

In summary, France's reuse system structure is shaped by:

- Strong local operations with limited national integration
- Sectoral concentration in beverages and foodservice
- Closed-loop models restricting consumer access
- Operational silos between different schemes
- Absence of shared logistics, cleaning, and return systems at national scale
- Technical and standardisation gaps hindering interoperability

These features collectively constrain France's ability to scale reuse into a national, cross-sectoral system without significant infrastructure and coordination investment.

Evolution of policy landscape including regional drivers

The policy landscape supporting reuse in France has evolved from voluntary, fragmented initiatives to formalised regulatory mandates, shaped both by national drivers and binding EU legislation (EMF, 2022; Zero Waste Europe, 2021). France's trajectory reflects a growing commitment to tackling plastic waste and embedding circular economy principles, while navigating EU regulatory frameworks that are now legally enforceable. Historically, France's policy approach prioritised EPR focused on waste collection and recycling, aligned with earlier EU directives (CMS, 2024). Under the "pay-or-play" principle, producers were required to organise or fund packaging waste management, with reuse absent from early frameworks (CMS, 2024).

The 2018 Circular Economy Roadmap (FREC) marked a domestic shift, setting out 50 measures to reduce waste, improve product durability, and promote reuse. This roadmap reflected growing EU discourse on circularity but predated binding EU-level reuse mandates. A landmark development was the AGEC Law (2020), which introduced France's first legally binding reuse targets (5% reused packaging by 2023; 10% by 2027) alongside other anti-waste measures (EMF, 2022). This placed France ahead of many Member States in legislating reuse. However, with the Packaging and Packaging Waste Regulation (PPWR) formally adopted in early 2025, France's policy landscape now sits within an enforceable EU legal framework. The PPWR establishes EU-wide reuse targets for specified packaging categories, harmonised definitions, requirements, and reporting obligations that Member States must integrate (CMS, 2024). France must now align its national targets and implementation pathways with the PPWR, potentially requiring adjustments to AGEC timelines, scopes, or enforcement mechanisms. Interviewees highlighted that this creates both clarity and new compliance complexity:

Annex 3: Country case studies France

"We know now what the EU floor is. But France set its own targets earlier—and they don't fully match. So we're waiting to see how they'll reconcile."

Reuse policy implementer, P15

The PPWR introduces binding reuse targets by packaging type, including:

- 10% reuse by 2030 for beverage packaging
- 40% reuse by 2030 for transport packaging in e-commerce
- 10% reuse by 2030 of grouped packaging in the form of boxes (excluding cardboard)
- Additional sector-specific reuse benchmarks (PPWR, 2025)

This means France's pre-existing national reuse target of 10% across packaging by 2027 under AGEC overlaps partially but not entirely with PPWR category-specific requirements. Interviewees expressed concern that compliance pathways, reporting systems, and enforcement tools may need redesign to meet both national and EU mandates without duplication or contradiction. At the same time, EU-level regulation provides policy reinforcement.

"EU rules give cover for reuse—businesses see it's not just France being difficult, it's part of a wider shift."

Reuse operator, P10

France's policy evolution has also introduced supporting measures, including:

- The Anti-waste and Circular Economy Law (2022) reinforcing packaging minimisation
- Decree No. 2021-517 of 29 April 2021, setting out the objectives for the reduction, reuse, repurposing, and recycling of single-use plastic packaging for the 2021–2025 period. Issued under the Anti-Waste and Circular Economy Law, this decree (commonly referred to as the "3R Decree", for Reduction, Reuse, and Recycling) is non-binding and does not impose any bans, but establishes targets for the 2021–2025 period aimed at phasing out the placing on the market of single-use plastic packaging by 2040. Article 2 sets a target of reducing single-use plastic packaging by 20% by December 2025, with at least 50% of that reduction to be achieved through reuse.
- The mandatory 5% EPR contribution for reuse within article 62 of the anti-waste and circular economy law (codified under Article L.541-10-11 of the environmental code)
- Creation of an Observatory for Reusable Packaging in 2022 (Climate and Resilience Law, Article 25)
- Establishment of a stakeholder committee within the PROs, mandated by the Anti-waste and Circular Economy Law, to provide non-binding oversight and strategic challenge. The committee includes NGOs and other stakeholders, offering a potential mechanism for greater transparency and influence over reuse-related EPR funding decisions, which currently remain under producer control.

Beyond legislation, voluntary agreements have accompanied regulation, such as the 2021 food delivery charter, although these remain non-binding (CMS, 2024; Again Again, undated). Stakeholders repeatedly described the policy trajectory as ambitious but operationally incomplete, with binding targets arriving faster than infrastructure, enforcement, or technical standards could be developed:

"The law set the destination, but didn't give the roadmap. And now we have to adjust it for EU rules on top."

Reuse system developer, P14

Annex 3: Country case studies France

In summary, the evolution of France's reuse policy reflects:

- A shift from recycling-centric frameworks to formal reuse mandates
- Introduction of binding national targets that build on and go beyond EU requirements, particularly those stemming from the EU SUP Directive as transposed into national law via AGEC
- Subsequent requirement to align national targets and mechanisms with PPWR (2025)
- Establishment of funded obligations (5% EPR contribution) and institutional tools (reuse observatory)
- Tension between policy ambition and operational readiness

France's policy landscape is now shaped by a dual obligation: delivering on national targets under AGEC while achieving EU-mandated reuse benchmarks under PPWR, requiring harmonisation of timelines, reporting, and enforcement frameworks.

Policy map

The figure below provides a policy map of the key legislative and regulatory instruments shaping the reuse policy landscape in France, highlighting their relationships and points of interaction.

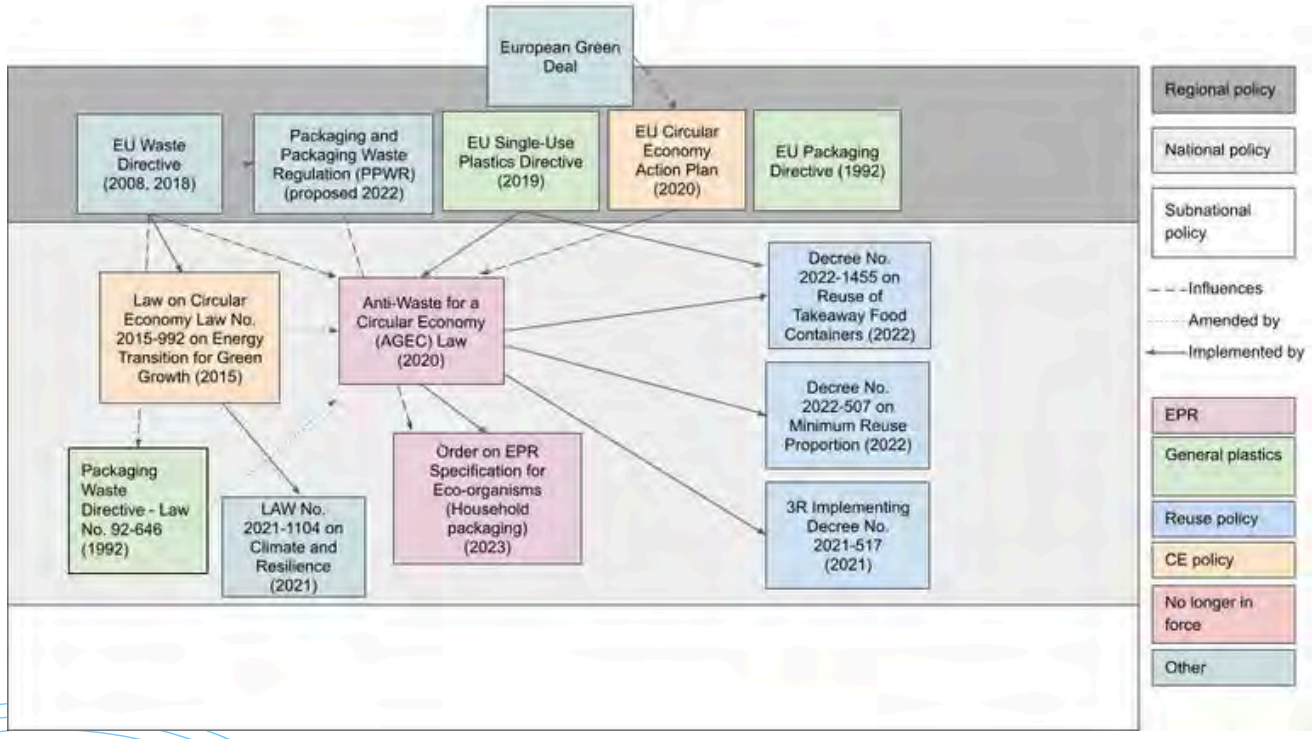

Figure 1. Policy map of France's reuse policy landscape, showing the links between core national and EU-level policies

Annex 3: Country case studies France

2. Policy design and process

Process of policy design

The design of France's reuse policy framework, particularly the AGEC Law (2020), was driven by central government leadership, with limited structured co-creation with implementing stakeholders (EMF, 2022). The AGEC law was implemented as a follow-up of the FREC consultation started in 2018. While the policy reflects high political ambition, it emerged through a top-down legislative process. Consultation was conducted with a narrow group of stakeholders, primarily focused on environmental NGOs and municipalities, while business and operational actors were engaged later or in more limited forums. Interviewees described this process as largely confirmatory rather than collaborative, with key decisions made prior to wider stakeholder involvement. Notably, some reuse-related provisions, such as the reuse fund, were not included in the original draft law or its accompanying impact assessment, but were added during parliamentary debates. This further reinforces the perception that key measures were politically driven rather than co-designed with implementers.

"It wasn't really co-constructed. The objectives were just decided, and now we're trying to respond."

Reuse policy implementor, P15

The literature notes that while the AGEC law was passed following public pressure on plastic pollution, it lacked detailed implementation planning at the design phase, instead delegating technical decisions to future decrees and ministerial guidance (CMS, 2024). This meant that roles, responsibilities, and enforcement mechanisms were undefined at the point of adoption. Pilot funding mechanisms were introduced in parallel rather than as integrated components of policy design, as seen in the ADEME–CITEO reuse calls starting in 2019 (Reloop, 2024). As one reuse operator summarised:

"The law set the destination, but didn't give the roadmap."

Reuse operator, P10

Table 2. Primary reuse related policies in France

Policy	Year	Comments
AGEC Law (Anti-Waste Law for a Circular Economy)	2020	Sets national reuse targets: 5% reuse of packaging by 2023, 10% by 2027; bans disposable tableware for on-site dining in food service establishments (essentially mandating reusables) (Article 77); requires retailers >400m^2 to offer reusable containers (Article 43); introduces reuse observatory (Article 9)
Climate and Resilience Law	2022	Broad packaging minimisation measures; reinforces AGEC reuse goals; transposes some EU requirements
Circular Economy Roadmap (FREC)	2018	Established 50 measures for circularity, including reuse promotion; policy precursor to AGEC
2021 Food Delivery Sector Charter	2021	Voluntary agreement committing signatories to reduce and replace single-use packaging; not legally binding

Annex 3: Country case studies France

These policies combine mandatory targets with voluntary commitments, supported by regulatory tools such as preferential pricing requirements (AGEC Article 42) and obligations for bulk retailers to provide reusable containers (AGEC Article 43). Enforcement mechanisms for achieving the reuse targets remain undefined in law, with no penalties attached to non-compliance.

System design and implementation infrastructure

While France's reuse policy design was largely top-down and target-driven, a range of institutional and operational efforts have since emerged to support the implementation phase. These include attempts to align system design with reuse policy objectives, such as the development of standardised or 'iconic' packaging formats led by PROs and coordinated trials in specific sectors. These packaging formats aim to increase interoperability and enable more efficient reverse logistics and washing infrastructure, particularly in the takeaway and retail sectors.

CITEO has launched a Reuse programme piloted across four regions, developed in partnership with retailers, brands, and reuse operators. This initiative represents a notable evolution in how EPR funds are deployed, shifting from generic post-consumer funding toward place-based system testing. The pilots aim to trial standardised packaging, coordinated return logistics, and collaborative governance structures that could inform future national rollout. Stakeholders saw these pilots as valuable but noted that learnings have not yet been widely shared or translated into permanent infrastructure investment. Some also expressed apprehension that CITEO's current reuse pilots which are focused on a set of regions and involve a limited number of operators could risk destabilising the market by advancing specific models or actors before national standards or coordination frameworks are in place.

In parallel, the National Observatory for Reuse and Repurposing was created under the Climate and Resilience Law and is jointly led by ADEME and the Ministry of the Environment. The Observatory plays a key role in supporting the national transition to reuse by improving visibility on system performance, identifying gaps and operational barriers, and consolidating data across pilot projects and sectors. Interviewees highlighted its potential to inform future policy calibration, although its influence on real-time regulatory decision-making remains limited.

While the Reuse programme is widely viewed as a valuable step toward system testing and coordination, some stakeholders have raised concerns about the transparency and governance structure of CITEO's role in reuse implementation. Stakeholders noted a lack of clarity around how funding decisions are made and what strategic priorities are guiding the allocation of support.

These emerging efforts reflect a growing recognition that achieving reuse targets will depend not only on regulatory ambition but also on the coordinated design of viable, scalable systems including infrastructure, packaging standards, and supportive governance mechanisms.

System design and implementation infrastructure

France's reuse policies include mandatory funding mechanisms embedded in EPR. Introduced through the AGEC Law, Article L.541-10-11 of the French Environmental Code requires that a minimum of 5% of EPR contributions be allocated to supporting reuse.

This requirement builds on an earlier 2% earmark under the AGEC Law, later raised to 5% to strengthen financing. Funds are managed primarily through CITEO, which allocates grants to support reuse pilots, infrastructure development, and feasibility studies. Key funding mechanisms include:

- €4 million awarded to 34 reuse projects across 14 regions (2019–2020) (ADEME & CITEO, Reloop, 2024)
- €39 million allocated to 152 reuse projects in 2023 (Reloop, 2024)
- €100 million allocated to reuse activities in 2024 (Producer Responsibility Coalition, 2024)

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Interviewees noted that despite this earmarked funding, the resources are insufficient to cover the infrastructure and operational costs required to scale reuse nationally, and that while the 5% reuse fund is a useful starting point, it is not structured to distinguish between capital expenditure (CAPEX) and operating costs (OPEX), making it difficult to ensure adequate support across the full system lifecycle.

"Five percent of the PRO budget isn't enough to finance a whole reuse infrastructure. We need much more to make this viable at scale."

Reuse system developer, P14

Beyond EPR funding, additional public grants (such as ADEME innovation funds) support experimentation but are project-based rather than long-term financing streams.

3. Policy implementation and outcome

Policy outcomes

The implementation of France's reuse policies, particularly under the AGEC Law, has produced early signals of impact but limited systemic uptake. While the reuse targets (5% by 2023; 10% by 2027) have created a policy mandate and legitimised reuse efforts, measurable progress toward these targets remains uneven.

Identified outcomes include:

- Increased visibility of reuse initiatives, with new pilots and platforms emerging in foodservice and beverage sectors (Reloop, 2024)
- Development of regional reuse projects supported by CITEO funding (e.g., 34 projects in 2019–2020; 152 projects in 2023) (Reloop, 2024)
- Introduction of reusable tableware in dine-in fast food outlets, though compliance varies across operators (CMS, 2024)

In parallel, system actors such as PROs have initiated efforts to develop "iconic" or standardised packaging formats, aiming to increase interoperability across reuse schemes. While these developments do not yet constitute measurable outcomes, they represent important enablers for long-term system scaling.

Despite these developments, national-level reuse rates have not yet approached the 5% target set for 2023. No penalties have been imposed for non-compliance, and no official monitoring data have been publicly released on target achievement.

"No one's reaching the targets. But there's no fine, no consequence."

Reuse operator, P7

The absence of penalties or enforcement mechanisms has contributed to variable levels of implementation across sectors and regions.

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Stakeholder perceptions

Stakeholders broadly support the ambition of France's reuse policy framework but express frustration at its implementation gaps. Interviewees acknowledged that legislating reuse targets was a critical step for raising visibility and establishing reuse as a serious market direction. Several noted that the legal obligation helped signal to brands and investors that reuse is no longer optional, legitimising what had previously been viewed as a niche or voluntary practice. However, this sense of opportunity was tempered by concerns about the lack of supporting mechanisms. Stakeholders described a disconnect between the targets and the practical conditions required to achieve them, citing insufficient infrastructure, unclear compliance roles, and weak enforcement.

This perception was reinforced by the political context of the AGEC law. The PRO (CITEO) did not actively advocate for reuse measures during parliamentary debates and remained largely silent on binding obligations, in part due to opposition from its member companies. The reuse fund was introduced as a compromise at the legislative stage, essentially offering financial support for reuse without shifting strategic control away from the PRO.

One policy actor reflected that the reuse targets created "pressure without tools", leaving businesses and municipalities struggling to operationalise requirements without coordinated guidance, funding certainty, or technical standards.

"We're under pressure to deliver reuse, but the practical tools are lagging behind the political targets."

Reuse system operator, P3

Across sectors, perceptions were characterised by policy legitimacy but operational uncertainty, with stakeholders consistently calling for clearer enforcement measures, stronger cross-sector coordination, and national standardisation of packaging formats.

Business adaptations

Business responses to reuse policy implementation have been cautious, fragmented, and largely experimental, reflecting both uncertainty over compliance expectations and concerns about commercial viability. Larger retailers and brands have typically engaged through limited pilots, targeting specific locations or product categories, rather than mainstreaming reuse across operations. Most pilots operate as closed-loop systems, requiring customers to return packaging to the same retailer or collection point. This approach avoids the complexity of interoperable networks but restricts scalability and consumer convenience.

"Pilots are happening, but they're isolated. Everyone's testing their own thing rather than building something together."

Reuse system developer, P14

Fast food chains have implemented reusable tableware for dine-in customers in line with the legal mandate, but interviewees described many businesses as focusing on "compliance minimalism", meeting the letter of the law without wider operational change.

Several stakeholders observed that businesses continue to prioritise recycling over reuse, given lower costs, greater infrastructure maturity, and clearer regulatory pathways.

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"Recycling remains cheaper and easier to communicate to consumers."

Reuse operator, P9

Without enforcement mechanisms or financial incentives tied to reuse targets, many businesses have adopted a wait-and-see stance, hesitant to invest in reuse infrastructure until clearer signals emerge.

"It's expensive. It's hard to explain to customers. And there's no enforcement, so why would a business prioritise it over recycling?"

Reuse operator, P10

Where adaptation has occurred, it has typically been led by individual companies developing proprietary systems, rather than collaborative efforts toward interoperable or standardised models. This reinforces fragmentation, increases logistical and financial burden, and limits opportunities for shared scaling.

Unintended consequences

The implementation of reuse policy in France has resulted in several unintended consequences, reflecting the gap between policy ambition and operational realities. One significant unintended effect has been the proliferation of fragmented, proprietary reuse systems. Businesses have developed isolated pilots and closed-loop models rather than collaborating on interoperable systems, leading to a patchwork of approaches with incompatible packaging, logistics, and return processes. This fragmentation has undermined economies of scale and limited consumer convenience.

A second consequence is the reinforcement of recycling as the default compliance strategy. Without penalties for missing reuse targets, many businesses have continued prioritising recycling investments, which remain more affordable and operationally straightforward than reuse.

"The ones trying to implement reuse are bearing the costs, and the others aren't penalised for doing nothing."

Reuse operator, P9

Some stakeholders also raised concerns about superficial compliance behaviours, with businesses introducing high-visibility, small-scale reuse pilots to signal compliance or sustainability credentials without committing to systemic change. This 'superficial compliance' risks creating a compliance culture focused on optics rather than substantive progress.

Inconsistent consumer experiences across regions and retailers have created confusion and disengagement, as return systems differ by retailer, product, and location, weakening public trust in reuse systems.

Finally, the absence of national coordination and standardisation has placed disproportionate burdens on early adopters, increasing their operational costs while allowing laggards to avoid investment without consequence. Several participants warned that this dynamic could disincentivise leadership and slow wider market transition.

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4. Lessons learned and recommendations

From the literature, interviews, and workshops, the following key policy enablers and barriers were identified.

Lessons learned: enablers

Binding targets raised policy visibility. The introduction of legally binding reuse targets under the AGEC Law served as a critical political signal, raising the visibility of reuse and establishing it as a compliance obligation. Legislating reuse as a mandated objective, rather than relying solely on voluntary measures, positioned it as a long-term policy priority. For industry, the targets also provided greater long-term visibility, helping to justify investment and signalling that reuse would no longer remain a niche or optional activity.

Dedicated funding allocation created an initial financial mechanism. The mandatory earmarking of EPR contributions (2%, later increased to 5%) for reuse provided a dedicated funding stream within France's producer responsibility framework. This policy feature embedded reuse financing structurally, setting an important precedent for funding reuse alongside recycling obligations.

Innovation funding supported early experimentation. The policy landscape incorporated dedicated innovation funding through ADEME–CITEO calls, enabling businesses and operators to pilot reuse schemes. This parallel investment mechanism facilitated experimentation and generated early operational lessons, even in the absence of a fully articulated national strategy.

Integration within circular economy law promoted policy coherence. Embedding reuse obligations within the AGEC Law as part of France's wider circular economy strategy allowed reuse to benefit from policy alignment with other sustainability measures, such as waste reduction and eco-design requirements. This reinforced reuse as part of a systemic approach rather than a siloed intervention.

The creation of the Reuse Observatory improved system visibility. Established under the Climate and Resilience Law and jointly led by ADEME and the Ministry of the Environment, the National Observatory for Reuse and Repurposing plays a key role in tracking progress, identifying operational barriers, and consolidating data. While its regulatory influence is limited, it supports transparency and evidence-informed policy refinement.

The PRO system provided a structural proxy to support early system design. Despite criticism of CITEO's approach, the PRO has acted as a functional intermediary in shaping early reuse implementation. Through coordination of funding, data collection, and pilot management, the PRO has helped operationalise legal obligations in a context where public administration has limited technical capacity and leverage. Its role, which is mandated by law, represents an enabling structure that can evolve as system maturity increases.

Lessons learned: barriers and challenges

Absence of enforcement undermined target delivery. A critical gap in the policy framework was the lack of enforcement mechanisms or penalties tied to reuse targets. Without compliance measures or consequences for non-delivery, targets operated more as aspirational signals than enforceable obligations, weakening incentives for businesses to transition beyond recycling.

Limited co-design reduced operational feasibility. The policy process lacked structured co-design with key implementation actors, including retailers, reuse operators, and logistics providers. Stakeholders were not consistently involved in defining timelines, roles, or technical requirements, leading to a disconnect between policy ambition and on-the-ground delivery capacity.

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Lack of technical standards has resulted in fragmentation. The absence of policy-mandated technical standards for reusable packaging, labelling, and return systems created space for uncoordinated, proprietary models to proliferate. While some standardised packaging formats have been developed voluntarily by the PRO, there are no binding standards governing the design or operation of reuse systems themselves such as return logistics, data tracking, or roles and responsibilities across actors. This policy omission has contributed to a fragmented reuse landscape, undermining interoperability and limiting opportunities for shared infrastructure and cross-sector scale.

Lack of consumer-facing incentives limited uptake. The policy framework does not include national-level incentives to encourage consumers to choose reuse, such as price differentials, deposit-refund mechanisms, or voucher schemes. In the absence of economic nudges, reuse options often remain less visible or more costly at the point of purchase, reducing consumer motivation and slowing behaviour change.

Underinvestment in enabling infrastructure constrained scaling. Although funding mechanisms were introduced, they primarily supported dispersed pilot projects rather than coordinated investment in national or regional infrastructure (e.g. shared washing facilities, return points, logistics hubs). Stakeholders noted that while a stakeholder committee exists to review PRO strategies, it has no formal role in guiding reuse fund allocation. There is a case for strengthening its mandate or creating a dedicated body to oversee strategic funding decisions. The lack of distinction between CAPEX and OPEX within the reuse fund also limits its effectiveness in supporting system-scale infrastructure.

Overlap with EU policy introduced complexity. The coexistence of France's national targets under the AGEC Law and EU-level obligations under the PPWRD has introduced regulatory complexity. While Member States retain the right to go beyond EU minimum requirements under the principle of subsidiarity, there is currently limited clarity on the practical boundaries of this flexibility. Differences in scope, timelines and compliance mechanisms between the two frameworks risk creating confusion among operators. In the absence of detailed guidance on how national policies should align with or extend beyond PPWR provisions, further clarification may be needed to ensure coherence and enforceability.

Recommendations for an effective reuse policy framework

Drawing on lessons from France's reuse policy experience, the following core elements represent key components of an effective national reuse policy framework:

- Legally binding, enforceable reuse targets that were both quantitative and time-bound
- Structured co-design process with implementation actors
- Mandatory technical standards and interoperability requirements
- Dedicated, sufficient financing embedded in EPR or parallel policy instruments
- Coordinated investment in shared reuse infrastructure
- Integrated policy approach aligned with waste and circular economy legislation
- Monitoring, reporting, and compliance mechanisms linked to reuse targets
- Alignment with international and regional regulatory frameworks
- Consumer education and communication embedded within policy design

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Strength of evidence

The Global Plastics Policy Centre is committed to transparency in our research findings, which includes identifying the specific and persistent knowledge or evidence gaps. The following table summarises the state of evidence available for France during the research period.

Literature search	Interviewees	Peer review	Total evidence strength
Moderate: coverage of key national policies, academic reviews, policy reports; limited peer-reviewed effectiveness data	High: 11 interviewees from 10 organisations	Findings have undergone formal peer review.	High

References for France

Again again. (Undated). International Plastics and packaging legislation. Available at: https://www.againagain.co/resources-eu . Accessed 25th February 2025.

CITEO. (2024). The Extended Producer Responsibility. Available at: https://clubinternational.ademe.fr/wp-content/uploads/240404-citeo-en.pdf. Accessed 25th February 2025.

CMS. (2024). Plastics and packaging laws in France. Available at: https://cms.law/en/int/expert-guides/plastics-and-packaging-laws/france . Accessed 25th February 2025.

EMF. (2022). France's Anti-waste and Circular Economy Law. Available at: https://www.ellenmacarthurfoundation.org/circular-examples/frances-anti-waste-and-circular-economy-law . Accessed 25th February 2025.

EMF. (2021) France's Anti-waste and Circular Economy Law: eliminating waste and promoting social inclusion. Available at: https://emf.thirdlight.com/file/24/kLSzgopkL.2CJxQkLb3XkLQlS7_/Case%20Studies%20-%20French%20Anti%20Waste%20Law.pdf. Accessed 25th February 2025.

Eunomia. (2024). Facilitating the Adoption of Takeaway Reuse. Available at: https://zerowasteeurope.eu/wp-content/uploads/2024/09/ZWE_Sep24_Report_Facilitating-the-Adoption-of-Takeaway-Reuse-Systems.pdf. Accessed 25th February 2025.

GAIA. (2023). The Pros and Cons of EPR: Lessons from France. Available at: https://www.no-burn.org/wp-content/uploads/2023/10/EPR-Briefing-ENG-designed-FINAL.pdf. Accessed 25th February 2025.

Kidv.nl. (2022). Reusable packaging: French lessons for the Dutch market. Available at: https://kidv.nl/reusable-packaging-french-lessons-for-the-dutch-market. Accessed 25th February 2025.

Ministère de la Transition Écologique et Solidaire. (2020). The Anti-Waste Law in the daily lives of French people, What does that mean in practice? Available at: https://circulareconomy.europa.eu/platform/sites/default/files/anti-waste_law_in_the_daily_lives_of_french_people.pdf . Accessed 25th February 2025.

In Off Plastic (2022). Reusable Packaging in France: An Introduction. Available at: https://kidv.nl/media/verdiepingsbijeenkomsten/cop_herbruikbaar/1_inoff_plastic_presentation_def.pdf. Accessed 25th February 2025.

Producer Responsibility Coalition. (2024). Extended Producer Responsibility General principles and international cases. Available at: https://cdn.citeo.com/mkt/CITEO_DRI/2024_08_04_EPR_GENERAL_PRINICPLES_AND_INTERNATIONAL_CASES_PRO_COALITION_CITEO.pdf . Accessed 25th February 2025.

Packaging Gateway. (2024). Navigating France's new packaging laws. Available at: https://www.packaging-gateway.com/features/navigating-frances-new-packaging-laws/. Accessed 25th February 2025.

Reloop. (2024). Opportunity and feasibility analysis of the deployment of the Mixed Deposit System in France (reuse and recycling of beverage packaging). Available at: https://www.reloopplatform.org/wp-content/uploads/2024/05/Reloop-Mixed-Deposit-in-France.pdf . Accessed 25th February 2025.

Zero Waste Europe (2021). France's law promoting bulk and reusable packaging. Available at: https://zerowasteeurope.eu/wp-content/uploads/2021/11/zwe_11_2021_factsheet_france_en.pdf . Accessed 25th February 2025.

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Annex 3B: Reuse policy in Germany

1. Reuse context

Germany is widely regarded as a frontrunner in establishing reuse systems, with reuse evolving in a well-established culture of extended producer responsibility and deposit return systems. VerpackG sets several measures that supports reuse in different contexts, including: an obligation for gastronomers to offer reusable products in takeaway scenarios, 70% of beverage packaging needing to be reusable, measures on deposit and return for disposable beverage packaging, and obligations for final distributors of packaging to indicate whether the packaging is disposable or reusable.

Despite these measures and history, reuse remains on the precipice. Interviewees identified a lack of enforcement and commitment to reuse to be critical barriers to effective implementation of VerpackG. With the recently agreed Packaging and Packaging Waste Regulations being higher ambition than in most aspects than VerpackG, Germany has an opportunity to reaffirm its commitment to reuse.

Reuse history

Germany has a long history of reuse in individual sectors. Roughly 43% of the beverage market currently uses reusable bottles, with beer in particular having a higher level of reuse (Beswick-Parsons et al., 2023). A strong reuse culture was supported historically by place-based and decentralised beer heritage and culture, often driven by a cooperative approach to bottling and distribution (Beswick-Parsons et al., 2023). Several interviewees noted that reuse behaviours, particularly through long-established deposit return schemes, are part of German culture.

Despite this heritage, reuse rates have been decreasing over time. In 2000, 70.4% of beverage packaging was subject to a reuse deposit, which dropped to 43.1% in 2020 (Umwelt Bundesamt). There were many contributing factors to the decline of reuse, but the introduction of a mandatory deposit in 2003 (under VerpackV, detailed below) was a significant driver. Ong, Bloomser and Lenton (2023, p.18) link this loss of market share to a lack of infrastructure prepared by retailers who "had not anticipated the mandate's actual implementation". This further unintentionally incentivised single-use alternatives. Additionally, reuse was not facilitated through DRS systems (Koning, 2019), and the higher deposit on single-use bottles than reusable bottles also unintentionally incentivised single-use. Previously high rates of reuse are a baseline for high targets in the current reuse policy (Umwelt Bundesamt).

In summary, Germany's reuse history is marked by:

- Historical reuse in beverage packaging driven by regionalisation
- A decline in reuse in the early 2000s, prompting policy development
- Extended Producer Responsibility, created through VerpackV
- Several reuse specific policy measures introduced in VerpackG

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Reuse system structure

Currently, there is a mix of managed and unmanaged reuse pool systems and individual reuse systems in the German beverage market for products such as beer, water and coffee cups (Refrastructure). There are two managed reuse pool systems: one for mineral water and parts of the Carbonated Soft Drinks (CSD) sector and one for fruit juices. Unmanaged reuse pool systems prevail in the beer sector, while there is the expectation that these pools will be transformed to managed systems in the future (Reuse Working Group, quoted by Kid.nl). Several national as well as some global brands, such as Coca-Cola, operate individual reuse systems (Coca-Cola, 2023, p.42). Further, compared to the beverage sector, there is a much smaller managed pool system for dairy and other food products, as well as several start-up companies operating reuse-as-service systems for food and non-food products. In the service packaging sector (to-go food and beverages), there are currently six start-up companies aiming to establish national reuse systems as well a regional and local providers of such reuse containers.

In summary, Germany's reuse system structure is shaped by:

- Germany's beverage market features a mix of managed and unmanaged reuse pool systems, with managed systems present for mineral water, fruit juices, and parts of the CSD sector, while beer primarily relies on unmanaged systems.
- Some national and global brands, such as Coca-Cola, operate their own individual reuse systems alongside the wider reuse pools.
- Reuse systems are less developed in the dairy and food sectors, though several start-ups are emerging, especially in the service packaging sector, where six national-level companies and various local providers are working to establish reusable container systems.

Evolution of national policy landscape

Reuse is addressed through a suite of measures that target waste, including mandatory deposits on specific items (via Deposit Return Schemes), Extended Producer Responsibility (EPR), and full reporting and transparency requirements. In Germany, Deposit Return Schemes (DRS) operate separately from EPR systems. Germany has around a dozen EPR scheme providers. Notably, packaging is subject to DRS (such as most single-use beverage containers) and reusable packaging is excluded from EPR obligations, as they fall under different regulatory frameworks.

The German Packaging Ordinance (1991; Verpackungsverordnung or known as VerpackV) aimed to ensure that used packaging would no longer be thrown away together with other household waste. The Ordinance transferred responsibility for its disposal to packaging manufacturers and retailers. Anyone placing packaging with mandatory (dual) system participation on the market for private end users was also responsible for its collection (Lizenzero.de). VerpackV introduced a mandatory deposit on cans and single-use plastic bottles since 2003 (introduced by VerpackV), which was intended to reduce littering and decrease waste of single-use packaging, but has failed to support reusable packaging options (Steinhorst and Beyerl, 2021; Umwelt Bundesamt). As noted above, the deposit unintentionally disincentivised reuse systems and contributed to their significant decline. The deposit was triggered when the rate of reuse fell below an average of 72% for two years.

VerpackV experienced many challenges, including a lack of enforcement, negative public perceptions and free-riding (Simeons and Leipold, 2021). VerpackV implemented a strong EPR system where producers and distributors are responsible for paying a fee to the Producer Responsibility Organisation (Beswick-Parsons et al., 2023). However, these EPR schemes did not lead to the anticipated outcome of waste reduction.

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The German Packaging Act (2019; Verpackungsgesetz or known as VerpackG) is the current policy framework for reuse in Germany, although it has been amended several times since coming into force in 2019. The key provisions of VerpackG are detailed in Table 1. VerpackG is a concretisation of the Circular Economy Law and aims to avoid or reduce the impact of packaging on the environment. It is diverse in its actions and ambitious in its targets and implementation phases, and reusable packaging is treated as a separate category from packaging (Umweltbundesamt.de). VerpackG is the current packaging law in Germany. VerpackG has provisions for reuse in Germany and has been amended several times since coming into force in 2019. Failure to comply with the provisions of VerpackG constitutes a regulatory infringement and may be punished with fines of up to EUR 200,000, official warnings or the imposition of a sales ban (EPR compliance.com). VerpackG also aims to ensure fair competition between the obligated manufacturers and the systems that implement product responsibility for the manufacturers. For this reason, there are comprehensive registration and reporting obligations for both these and the system operators. All companies that place packaging on the German market – regardless of the type – must register with a central register called LUCID, coordinated by the Zentrale Stelle Verpackungsregister.

Lobbying was identified as a significant challenge during the formulation of VerpackG, and was attributed to the weaker ambition and lack of legally enforceable targets relating to reuse. The most obvious example is the recent Tübingen city tax on single use packaging in the to-go sector that seeks to foster a transition to reusable items. The tax was strengthened by the provision of subsidies for dishwashers and connections to companies who had the infrastructure and equipment for reuse (Zero Waste Europe, 2022). McDonalds brought a court case against the city, arguing that the local tax "violates the competence" of VerpackG, and the case was escalated to the Federal Administrative Court, Bundesverwaltungsgericht and then escalated to the Bundesverfassungsgericht where it was rejected in 2025 (Zero Waste Europe, 2022; Bundesverwaltungsgericht, 2025).

"In general, we've had a fight, a real lobby fight, in the beverage packaging segment for decades."

Trade union representative, P4

Several European frameworks were important drivers in setting the context and imperative for embedding circular economy narratives in policy. The Waste Framework Directive (2008/98/EC) is transposed by Kreislaufwirtschaftsgesetz (KrWG, 2012), which embeds reuse into the waste hierarchy. The EU Strategy for Plastics in a Circular Economy (2018) sets a goal for all plastic packaging in the EU market to be reusable or recyclable by 2030 (Steinhorst and Beyerl, 2021). VerpackG transposes the Packaging and Packaging Waste Directive through the creation of EPR schemes (94/62/EC).

PPWR introduces binding reuse targets by packaging type, including:

- 10% reuse by 2030 for beverage packaging
- 40% reuse by 2030 for transport packaging in e-commerce
- 10% reuse by 2030 of grouped packaging in the form of boxes (excluding cardboard)
- Additional sector-specific reuse benchmarks (PPWR, 2025)

At present, consultations are still ongoing regarding how Germany will respond to PPWR, especially given the current lack of measurable targets for reuse in VerpackG. Reflecting on the current status of reuse in Germany policy, one interviewee noted:

"On the other hand, the work shows us that [the Government are] not really interested in supporting the system since they are not able to give you right decisions for the support of the system."

Reuse system operator, P12

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In summary, the evolution of Germany's reuse policy reflects:

- Reuse has evolved from VerpackV, which outlined EPR and mandatory deposits to VerpackG, which includes reuse obligations.
- Reuse is supported through a holistic suite of measures that encompass waste, including mandatory deposits on specific items (via Deposit Return Schemes), Extended Producer Responsibility (EPR), and full reporting and transparency requirements.

Policy map

Reuse is addressed through a suite of measures that target waste, including mandatory deposits on specific items (via Deposit Return Schemes), Extended Producer Responsibility (EPR), and full reporting and transparency requirements. In Germany, Deposit Return Schemes (DRS) operate separately from EPR systems. Germany has around a dozen EPR scheme providers. Notably, packaging is subject to DRS (such as most single-use beverage containers) and reusable packaging is excluded from EPR obligations, as they fall under different regulatory frameworks.

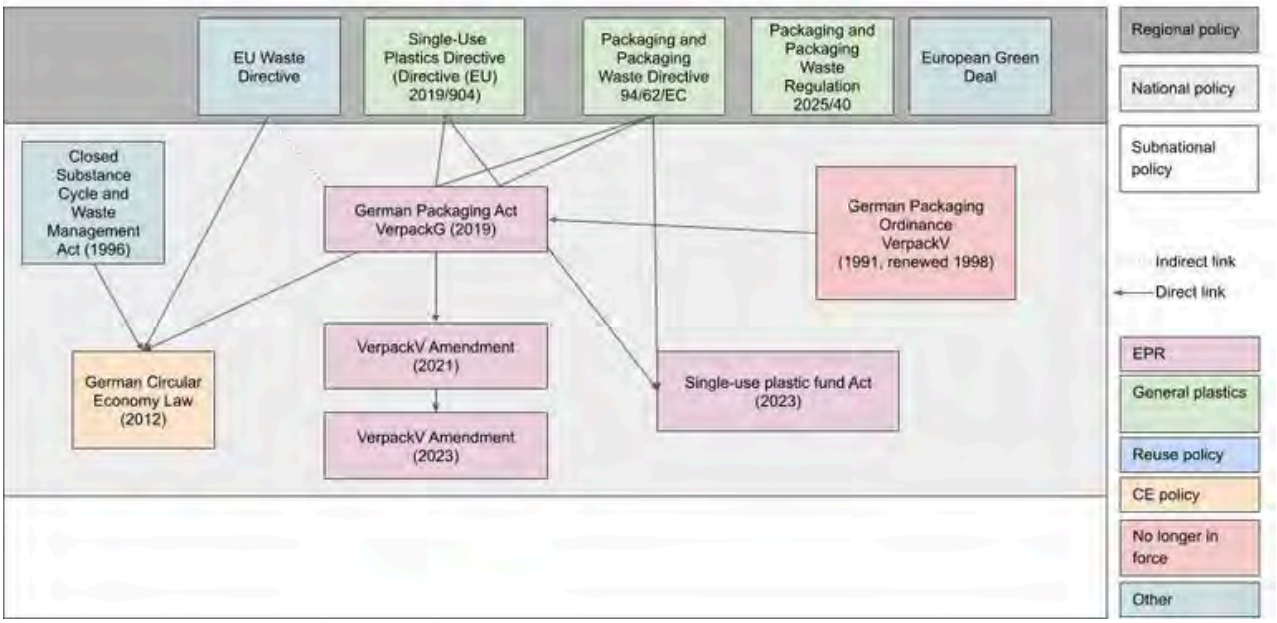

Figure 2. Policy map of Germany's reuse policy landscape, showing the links between core national and EU-level policies.

2. Policy design and process

Process of policy design

The policy-making process was complex, with confusion regarding who was included in stakeholder consultation for the formulation of VerpackG and its amendments. Half of the interviewees were unaware of any consultation process, while the remaining half identified different stakeholders. However, consultations on new legislation are public and the results can be requested to be made transparent, including municipalities, industries, civil society actors, and businesses. The results of the consultation and parliamentary debate are publicly accessible online. While the debates

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consultations focus specifically on the general content of the legislation, and do not delve into the specific reuse provisions, it is clear that there is usually consultation practice in German. An example of this is the request for transparency regarding the results of consultation, and how these influenced the scope of and amendments to VerpackG (Korte, 2020). In response to this, the Government reported that 19 association consultations were received, with the identified consultees being identified as those affected by the perceived impact of the bill, but these consultations did not lead to any changes to the draft legislation. It is noted in the Government reply that there is no obligation to record informal consultation, i.e., telephone consultations (Deutscher Bundestag, 2020).

Disagreements between public and private entities created a difficult political environment for policy formulation (Refrastructure). Stakeholders' fears of potential radical changes led to a "lock-in" (Circulus, 2020), meaning that VerpackG became an incremental adjustment of VerpackV rather than a more radical policy reform (Circulus, 2020). This is further evidenced in the Tübingen example detailed above.

VerpackG set several measures for reuse, as outlined in Table 3.

Table 3. Policy at a glance: VerpackG

Policy	Year	Comments
VerpackG	2020	• 70% of beverage packaging should be reusable • From 2023, there are obligations for reuse in restaurants and final distributors of single-use plastic food packaging and single-use beverage cups. Vendors must also offer reusable packaging options for food and beverages that are filled at the point of sale (Service-packaging), intended for immediate consumption (Umwelt Bundesamt). Smaller establishments with fewer than 5 employees or less than 80 square meters of store area are exempt. • Regulations on deposit and return for disposable beverage packaging • Obligation for the final distributors to indicate whether the packaging is disposable or reusable

The targets for the reuse of beverage packaging and for restaurant obligations caused disagreement, with some interviewees identifying the need for specific sectoral targets. One interviewee identified the need for such a sectoral policy to 'level the playing field'.

Several interviewees identified a lack of an implementation plan or pathway to achieve the policy targets as a critical barrier to implementation.

System design and implementation infrastructure

Currently, there is a mix of managed and unmanaged reuse pool systems and individual reuse systems in the German beverage market. There are two managed reuse pool systems: one for mineral water and parts of the Carbonated Soft Drinks (CSD) sector and one for fruit juices. Unmanaged reuse pool systems prevail in the beer sector, while there is the expectation that these pools will be transformed to managed systems in the future (Reuse Working Group, quoted by Kid.nl). Several national as well as some global brands operate individual reuse systems. Further, there is compared to the beverage sector a much smaller managed pool system for dairy- and other food products as well as several start-up companies operating reuse-as-service systems for food and non-food products. In the service packaging sector (to-go food and beverages) there are currently six start-up companies aiming to establish national reuse systems as well regional and local providers of such reuse containers. These are based heavily on EPR, and are regionally specific.

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"so many local solutions instead of one national solution and this is something where I think we should make it easy on the economic players to have one solution for ideally all of Europe"

Trade union representative, P4

Financing

There was inconsistency in responses to the availability of financing to support reuse implementation in Germany. Some interviewees said there was plenty of available funding, while some said only short-term funding was available. Financing was identified as a way to create shared infrastructure and incentivise behaviour. Interviewees identified taxes as an important sensitiser to implementing reuse systems in restaurants and for specific reuse cases.

This was attributed by one contributor to the research to the lack of a systematic approach to foster reuse, with financial support being based on catalysing innovation or limiting climate change. The contributor also noted that most of the available funding is for pilots, and not businesses wishing to convert to reuse or scale up an existing reuse system.

3. Policy implementation and outcome

Policy outcomes

VerpackG had a limited positive influence on reuse systems. In 2022, 0.7% of food and beverages-to-go were sold in reusable packages (Refrastructure, 2024). An amendment to VerpackG in 2023 introduced the obligation to offer reuse in the take-away sector (in German "Mehrwegangebotspflicht"), which led to an increase in the use of reusable beverage cups to 7%. However, the overall rate of reuse service-packaging remains low at 1.6% as food packaging (not beverages) contributes most volume and weight (WWF, 2024).

Providers of reusable systems noted a significant increase in demand in 2022/23, more specifically from November 2022 to February 2023. In Summer 2023, demand fell back to a lower level (WWF, 2024). Providers of reusable systems noted a significant increase in demand in 2022/23, more specifically from November 2022 to February 2023. In Summer 2023, demand fell back to a lower level (WWF, 2024).

There are significant concerns with the reuse obligation in gastronomy, with several interviewees noting the difficulty in ensuring these systems are financially viable. Instead, closed systems are being explored in gastronomy settings. In 2023, the number of reusable meals and beverages increased from 13.6 billion units to 14.6 billion compared to 2022 (WWF, 2024). German Environmental Aid has described the reuse obligation in restaurants as having "catastrophic implementation" based on the testing of 27 catering chains, around two-thirds of which did not offer reusable options (Kamaysy.de, 2023). The range of reusable packaging offered in food establishments has been described as "incomplete or poorly made, with, for example, significantly excessive deposit amounts" (Duh.de, 2023).

"Restaurants had the obligation to offer reusable takeaway containers. And that did trigger a lot of excitement and different companies to launch systems and that was helpful at the beginning. At the end, it turned out that it's still too complicated and people are not using it."

Reuse business operator, P3

In 2019, 41.8% of beverage containers were subject to a deposit, with the share of reusables falling by 0.6%. The target of 70% reusable packaging was missed in 2019.

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Stakeholder perceptions

Generally, there were mixed reactions from interviewees regarding reuse policy in Germany. Interviewees were positive regarding beverage reuse systems, with one interviewee stating “it's in our DNA”. Generally, interviewees had negative perceptions of reuse obligations in restaurants, generally with the perception that “it’s not working”. Two interviewees cited a lack of consumer demand and awareness. Incentivization was identified as a method to overcome the slow uptake.

In literature, the question of ambition was raised, with Simeons and Leipold (2021) referencing interview data that regards VerpackG as an incremental solution, limited by a lack of non-binding regulations that are “nowhere near ambitious enough” (Tauer and Aechtner, 2023).

Business adaptations

Strong industry lobbying has contributed to reduced participation in reuse systems. The decline in reuse rates can be attributed to the retail and restaurant sector's transition to single-use items due to the perceived economic and structural benefits of centralised production (Beswick-Parsons et al., 2023). Coca-Cola opposed an agreement to maintain a national market share of over 72% for refillable drinks packaging. When this initiative failed, a deposit return scheme was introduced in 2003, but it did not last. Additionally, several businesses boycotted refillable beverage bottles and products in reusable packaging, citing the “labour, space and general management requirements associated with having to take them back” (Beswick-Parsons et al., 2023, p. 6).

Unintended consequences

Through the evolution of German reuse systems, two unintended consequences were identified in this research. “Pfandschlupf” is a phenomenon where a deposit is placed on an item, and the item is not returned, meaning that the deposit is collected by the retailer or producer and not claimed back by the consumer. This has resulted in unintended financial gain for retailers and producers, and the unintended subsidisation of single-use by consumers. Nabu (2017) estimated that in 2015, a total of 180 million Euros were gained by retailers and producers through Pfandschlupf. While the retention of some of the Pfand forms a source of income for system operation, caution should be exercised when implementing deposits on returnables to ensure that unclaimed deposits are used fairly.

An interviewee described the unintended social consequences of the deposit return scheme, whereby consumers would leave bottles next to a return system for other individuals to collect and claim the deposit. The social benefit of this unintended impact is un-explored in literature, and needs further study to understand the contribution of these unexpected social social benefits.

4. Lessons learned and recommendations

Lessons learned: enablers

Shared regional infrastructure and cooperatives. Shared infrastructure across a product line makes reuse more economically viable for small to medium-sized suppliers, as demonstrated in the context of refillable water bottles or beer (Beswick-Parsons et al., 2023). This experience is reflected in the heritage and culture of traditional beer bottle infrastructure, which operates through regional scales of production and bottling cooperatives, along with wholesalers, which build an important part of the beverage sector in Germany (Beswick-Parsons et al., 2023). Cooperatives support the development of shared infrastructure, with more than 90% of mineral water companies being members of

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the Cooperative of German Mineral Water Companies (Genossenschaft Deutscher Brunnen eG (GDB). This is a nationwide reusable pool bottle management system using a standardized reusable bottle to enable economic and ecological efficiency, allowing them to be returned and transported to the closest filler (Beswick-Parsons et al., 2023, p. 5).

A holistic policy landscape is required to facilitate reuse. Reuse does not sit in a policy vacuum, but is instead strengthened by EPR schemes, DRS systems, and supporting policy measures, such as a single use plastic tax, to incentivize the use of reusables. Using bans to supplement reuse obligations were identified by interviewees as necessary, particularly when considering high-volume and fast-paced single use items.

"But a tax, a ban like these clear-cut instruments, this is just what proves to be effective."

Reuse business operator, P13

"...setting first this deposit...and then reuse can follow"

Reuse business, P7

Clear labelling of reusable products. VerpackG obliges point of sale information by retailers regarding whether packaging is single-use or reusable, achieved through signage or shelf labelling. However, there is no standardised or mandatory label required, which may pose challenges for consumers.

Lessons learned: barriers and challenges

Targets need to be legally binding and enforceable. A lack of enforcement was identified explicitly by three interviewees as a major policy barrier. Enforceability was identified consistently as a barrier to effective policy, which directly relates to the legal status of targets. The legal obligation to offer reusable products has so far only been able to provide initial impetus. In interviews with participants, the most important reason given is the lack of real control as to whether the reusable offer obligation is met and complied with (WWF, 2024). Weak countermeasures and enforcement were identified in a presentation to Reloop by Deutsche Umweltilfe. Additionally, the lack of date linked with the reuse target of 70% reuse in the beverage sector makes it challenging to enforce or monitor rates of progress. The lack of sanctions also hinders enforcement, as there are no consequences associated with non-compliance. As summarised by one interviewee:

"They don't have the resources to really enforce it...and so it's just very tiny, tiny steps towards the right direction"

Reuse business operator, P13

Businesses lack transparency in their progress towards reuse, with the perception that "many businesses and retailers hold their cards to their chest" (Reloop, presentation by Deutsche Umweltilfe). It is therefore difficult to monitor progress towards policy goals. While clear reporting of packaging on the market is mandated through the Zentrale Stelle Verpackungsregister (ZSVR), this does not apply to reusable packaging. Creating a clear reporting structure for reuse would enable transparency and accountability while progressing towards reuse goals.

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The consensus was that the current reuse targets in VerpackG are too broad, for example, the 70% in the beverage sector. It has been suggested that **reuse quotas should be attributed to individual sub-sectors** so individual companies have tailored yet equal responsibility to meet the quota (Reloop, presentation by Deutsche Umwelthilfe). Targets should be set by an annual calculation of reusable quotas, with the results published by the Ministry of Environment. There should be clearly defined sanctions if the quota is not filled. The 70% target in the beverage sector does not adequately address 'players' in the sector, such as retail. One interviewee ascribed this to "missing political will, and a resulting lazy compromise" in policy formulation.

A clear economic and business case needs to be established alongside policy formulation, including making reuse the cheapest option. This was identified in several interviewees as a pathway to ensure that businesses are on board with reuse before policy targets are put in place, and to dispel concerns regarding the economic viability of reuse. Further policy instruments can be leveraged to support this economic case, such as the Einwegkunststofffondsgesetz (EWKFondsG, Single Use Plastic Tax 2024), which applies a levy to single-use packaging, including for beverage containers. Yet, this may lead to substitution by inadequate materials rather than the incentivization of reuse, so caution should be exercised to ensure that bans do not unintentionally disincentivize reuse.

"...this is where policy needs to come in, so both to level the playing field for economic players like us in our competition against single use"

Reuse business operator, P13

Despite the traditional role of reuse in German culture, the lack of consumer-facing incentives limited uptake. The policy framework does not include national-level incentives to encourage consumers to choose reuse, such as price differentials, deposit-refund mechanisms, or voucher schemes. In the absence of economic nudges, reuse options often remain less visible or more costly at the point of purchase, reducing consumer motivation and slowing behaviour change.

"[to consumers] reuse is not always an easy sell - it was difficult in the beginning"

Reuse business, P7

"You really have to be very motivated if you want to be able to use reusable packaging in this field in Germany"

Trade union representative, P4

Overlap with EU policy introduced complexity. The coexistence of Germany's national obligations for reuse in VerpackG has introduced regulatory complexity when considered with the new PPWR requirements. While Member States retain the right to go beyond EU minimum requirements under the principle of subsidiarity, there is currently limited clarity on the practical boundaries of this flexibility. Differences in scope, timelines and compliance mechanisms between the two frameworks risk creating confusion among operators. In the absence of detailed guidance on how national policies should align with or extend beyond PPWR provisions, further clarification may be needed to ensure coherence and enforceability.

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Recommendations for an effective reuse policy framework

Drawing on lessons from Germany's reuse policy experience, the following core elements represent key components of an effective national reuse policy framework:

- A holistic policy landscape that supports measurable and quantifiable targets with policies such as EPR, DRS and bans and taxes.
- Building on existing traditions and practices, such as existing regional collaboration and infrastructure, can support scaling of reuse
- Clear business cases need to be established to support buy-in from diverse actors

Strength of evidence

The Global Plastics Policy Centre is committed to transparency in our research findings, which includes identifying specific and persistent knowledge or evidence gaps. The following table summarises the state of evidence available for Germany during the research period.

Literature search	Interviewees	Peer review	Total evidence strength
Moderate: some peer-reviewed evidence, some neutral reports, some websites	Moderate: 6 interviews from 6 organisations	Two peer reviews undertaken.	Moderate

References for Germany

Beswick-Parsons, R., Jackson, P., & Evans, D. M. (2023). Understanding national variations in reusable packaging: Commercial drivers, regulatory factors, and provisioning systems. Geoforum, 145, 103844. https://doi.org/10.1016/j.geoforum.2023.103844

Bundesverwaltungsgericht. (2025). Unsuccessful constitutional complaint against disposable packaging tax in the city of Tübingen. Available at: https://www.bundesverfassungsgericht.de/SharedDocs/Pressemitteilungen/EN/2025/bvg25-006.html

Circulus, (2020) Why the Packaging Act contributes little to the Circular Economy. Available at: https://circulareconomy.europa.eu/platform/sites/default/files/policybrief1_final_en.pdf Accessed 25th February 2025.

Coca-Cola (2023) Integrated Report and Form 20-F. Available at: https://docs.google.com/document/d/1M_SS1jqX9dX5_HIRNr83ijmtqUXwDuMa/edit
Deutsche Umweltilfe (undated). Results of inspection. Accessed 25th February 2025.

Deutsche Umweltilfe (Duh.de). (2023). Mandatory reusable packaging in the catering industry implemented catastrophically after six months: German Environmental Aid takes legal action against Backwerk, Dunkin Donuts, Cineplex and Co. Available at: https://www.duh.de/presse/pressemitteilungen/pressemitteilung/mehrwegpflicht-in-der-gastronomie-nach-sechs-monaten-katastrophal-umgesetzt-deutsche-umwelthilfe-ge/. Accessed 25th February 2025.

Deutscher Bundestag. (2020). auf die Kleine Anfrage der Abgeordneten Jan Korte, Dr. Petra Sitte, Friedrich Straetmanns, weiterer Abgeordneter und der Fraktion DIE LINKE. – Drucksache 19/16373 –. Available at: https://dserver.bundestag.de/btd/19/167/1916790.pdf

Annex 3: Country case studies Germany

Gruener-plunkt.de (undated). The German Packaging Act – what's particularly important for online retailers. Available at: https://www.gruener-punkt.de/en/packaging-licensing/packaging-act#c2858. Accessed 25th February 2025.

Kamaysy.de (2023). Mandatory reuse in Germany - a success story? Accessed 25th February 2025.

Kid.nl. (2022). Reusable packaging: German lessons for the Dutch market. Available at: https://kidv.nl/reusable-packaging-german-lessons-for-the-dutch-market. Accessed 25th February 2025.

König, W. (2019). Geschichte der Wegwerfgesellschaft: Die Kehrseite des Konsums, Franz Steiner Verlag, Stuttgart, 1170 pp.

Korte, der Abgeordneten Jan., Sitte, Petra., Straetmanns, Friedrich., Lötzsch, Gesine., Beutin, Lorenz Gösta., Bluhm-Förster, Heidrun., Cezanne, Jörg., Kassner, Kerstin., Lay, Caren., Leidig, Sabine., Lenkert, Ralph., Leutert, Michael., Perli, Victor., Remmers, Ingrid., Tackmann, Kirsten., Wagner, Andreas., Zdebel Hubertus., und der Fraktion Die Linke. (2020). Einflussnahme von Interessenvertreterinnen und Interessenvertretern auf den Gesetzentwurf der Bundesregierung – Entwurf eines Ersten Gesetzes zur Änderung des Verpackungsgesetzes (Bundesratsdrucksache 578/19). Deutscher Bundestag. Available at: https://dserver.bundestag.de/btd/19/163/1916373.pdf

Mix-up.eu. (2022). Plastic Packaging Act 2022 – A Conclusion. Accessed 25th February 2025.

Nabu (2017) Das Geschäft mit dem Einwegpfand. Available at:
https://www.nabu.de/imperia/md/content/nabude/abfallpolitik/170207_nabu_infopapier_einwegpfand.pdf

Ong, M. K. C. F., Blomsma, F., & Lenton, T. M. (2023). Tipping dynamics in packaging systems: How a bottle reuse system was established and then undone. EGUsphere, 2023, 1-35.

Reloop (2019). Presentation by Barbara Metz. Lessons learned: the refillable quota in Germany. Deutsche Umweltilfe. Accessed 25th February 2025.

Simoens, M. C., & Leipold, S. (2021). Trading radical for incremental change: The politics of a circular economy transition in the German packaging sector. Journal of Environmental Policy & Planning, 23(6), 822–836. https://doi.org/10.1080/1523908X.2021.1931063

Steinhorst, J., & Beyerl, K. (2021). First reduce and reuse, then recycle! Enabling consumers to tackle the plastic crisis – Qualitative expert interviews in Germany. Journal of Cleaner Production, 313, 127782. https://doi.org/10.1016/j.jclepro.2021.127782

Tauer, R., & Aechtner, J. (2023). A comprehensive circular economy for Germany in 2045. WWF.

Theobald, K., Mich, A., Hillesheim, S., Hartard, S., & Rohn, H. (2024). One Year of Mandatory Reusable Packaging in Germany: Opportunities and Obstacles from the Perspective of Consumers and Companies. Sustainability, 16(13), 5439.

Umwelt Bundesamt (undated). Reusable Packaging. Available at:
https://www.umweltbundesamt.de/sites/default/files/medien/6232/publikationen/fact_sheet_-_reuseable_packaging_final.pdf. Accessed 25th February 2025.

WWF (2023) Mehrweg in Der Deutschen gastronomie: Status quo, Herausforderungen und Potenziale Available at:
https://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/Plastik/WWF-Erhebung-Mehrweg-in-der-deutschen-Gastronomie.pdf (German only)

WWF (2024) Ein Jahr Mehrwegangebotspflicht: Was hat sich verändert? Available at: https://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/Plastik/Ein-Jahr-Mehrwegangebotspflicht-Erste-Ergebnisse-der-WWF-Marktanalyse.pdf (German only)

Zero Waste Europe. (2022). The story of Tübingen. Available at: https://zerowasteeurope.eu/wp-content/uploads/2024/11/Tubingen-Case-Study.pdf

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Annex 3C: Reuse policy in Latvia

1. Reuse context

Reuse history

Latvia's reuse landscape has evolved significantly over the past three decades, shaped by structural reforms, EU integration, and shifts in packaging markets. During the Soviet era, refillable containers were common, especially for beer, milk, and mineral water. However, these systems declined following Latvia's independence, as plastic packaging gained dominance and market liberalisation accelerated (Vuk et al, 2023). Early environmental reforms, including the 2000 introduction of a producer responsibility scheme and a packaging tax, laid the groundwork for reuse, but did not reverse the trend away from refillables (Dace et al., 2013; IEEP, 2022).

Reuse remained limited and fragmented throughout the 2000s and 2010s. While refillable glass bottles persisted in parts of the beverage sector, particularly for beer and spring water, the number of producers using them steadily declined. Poor system coordination and inconsistent branding hindered consumer uptake.

"Refillables were used mostly for beer and water, but there was no consistency. It depended on the brand and region."

Reuse system operator, P36

More recently, reuse has re-emerged as a policy objective. Latvia's 2022 Waste Prevention Programme identifies the promotion of reusable packaging as a priority, and the Circular Economy Strategy (2020–2027) includes reuse within national goals. However, these ambitions have yet to be matched with binding targets or regulatory instruments beyond the beverage sector.

The most substantive development is the launch of the national Deposit Return System (DRS) in 2022, preceded by the establishment of the Deposit Packaging Operator (DIO) in 2020 (TOMRA, 2024). The DRS includes both single-use and reusable containers, with a uniform deposit of €0.10 and standardised bottle formats available to producers. According to the literature, this model was designed to enable refillable bottles to scale through shared logistics and cost-effective collection (Brizga et al, 2024).

"It's not just a system for taking back bottles, it's a platform. If we do it right, we can build other things onto it, like refillables or even more circular solutions."

Reuse NGO, P32

Initial outcomes have been positive. National reporting indicates PET collection rates have risen from 45% to over 80% since the DRS was introduced, and the number of beverage producers offering refillables is slowly increasing (Packaging Europe, 2024; TOMRA, 2024). However, some interviewees were more cautious. While they acknowledged that reuse is now formally included within the DRS framework, they suggested that its actual uptake remains limited.

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"It is in the law, yes, but in practice we haven't seen reusable bottles circulating at scale."

Reuse system operator, P36

In summary, Latvia's reuse history is marked by:

- Legacy systems of refillable containers under the Soviet regime, particularly for beverages.
- A steep decline in reuse following independence, with increased reliance on single-use plastics.
- Early environmental reforms (e.g. packaging tax, producer responsibility) that supported reuse in principle but lacked operational impact.
- Fragmented and declining refillable systems through the 2000s–2010s, with limited coordination.
- A recent revival of interest in reuse within national strategy documents, but without binding targets.
- The introduction of the DRS as the most significant policy lever, offering potential for reuse integration but still limited in practical uptake.

Reuse system structure

Latvia's reuse system is not yet fully developed, but key building blocks are emerging, primarily through the DRS and a small but growing number of local and private initiatives (Brizga et al, 2024). Nationally coordinated reuse infrastructure beyond the beverage sector is absent, and reuse systems remain fragmented.

The DRS is considered the most structured and mature component of Latvia's reuse landscape. It covers both single-use and reusable beverage containers, with standardised glass beer bottles available for all producers (Packaging Europe, 2024). Interviewees described the DRS as well-controlled.

"For [the] deposit return system... the controls are in place. It's a very controlled system and it's working."

Local government, P38

Despite this, the economic advantage of single-use cans has undermined uptake of reusable bottles (Dace et al., 2013), with several producers reverting to cans for cost reasons.

"The system is technically there, but economically, reusable glass bottles are not competitive with single-use cans."

Reuse system operator, P36

Beyond the DRS, reuse services exist primarily in the events sector. Several operators offer reusable cups, food containers and associated washing services, though these remain small-scale and uncoordinated. Local governments have also introduced reuse requirements in some cases, such as Riga's rule mandating reusable cups at permitted public events.

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"In many cases, people who are merchants are not aware that such a norm exists."

Local government, P38

System operators have introduced app-based and token return models to address consumer convenience and payment preferences, though these approaches vary and are not interoperable.

"Each company runs their own system, and it's confusing for users."

Reuse system operator, P36

Shared infrastructure exists for the standardised refillable beverage bottles collected through the DRS, which uses common RVMs and a centralised counting centre with the recycling stream from the DRS system. This integrated setup means consumers face no additional effort when returning reusable versus single-use containers, helping normalise reuse behaviour even in the absence of strong financial incentives. However, there is no shared infrastructure between reuse models and sectors to support return logistics, standardised hygiene requirements, or cross-venue interoperability for reuse systems. National food safety authorities are beginning to develop hygiene guidance, but gaps remain (European Commission, 2022). SMEs face significant barriers to participating in reuse without coordinated support.

"You cannot expect a small coffee shop or event organiser to come up with their own solution."

Local government, P38

Stakeholders consistently emphasised the need for national coordination, practical infrastructure, and stronger government leadership to move beyond fragmented, voluntary reuse initiatives.

"Without legislation, nothing will happen... reuse is actually expensive. Compared to single use, with all the internalisation of the costs for the industry. That will not happen [on its own]."

Reuse-facilitating NGO, P39

In summary, Latvia's reuse system structure is shaped by:

- A centrally coordinated DRS that integrates reuse and recycling, lowering behavioural barriers and improving reuse competitiveness.
- Fragmented, small-scale reuse initiatives for cups and food containers, primarily led by private operators and local authorities.
- Local government rules, such as event-based reuse requirements, which show potential but lack consistent enforcement.
- Absence of shared infrastructure for return logistics, hygiene standards, and cross-venue interoperability.
- Limited national coordination and no overarching system to scale reuse beyond individual pilots or voluntary schemes.

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Evolution of policy landscape including regional drivers

Latvia's policy landscape for reuse has evolved gradually, largely shaped by EU requirements rather than strong national leadership (European Commission, 2022). Historically, reuse featured in national policy through the Packaging Law (2002) and subsequent waste legislation, but without binding targets or a coordinated implementation approach.

The most significant recent development is the national DRS, launched in 2022 following long-standing pressure to improve collection rates for beverage containers (TOMRA, 2024; Packaging Europe, 2024). Interviewees described the DRS as the first reuse-enabling system to be designed with national coordination, technical infrastructure and broad stakeholder support. Its structure includes both single-use and refillable beverage containers.

> *"The DRS was a good example of working with all parties, producers, NGOs, government, to get a practical system in place."*
>
> ***Local government, P38***

Latvia's Waste Prevention Programme (2022) and Circular Economy Strategy (2020–2027) both identify reuse as a policy priority, but do not set binding targets or specific obligations beyond the DRS (Brizga et al., 2024). Several interviewees emphasised that, beyond beverage packaging, reuse remains dependent on voluntary actions and isolated local rules.

> *"There's no legislation and no guidance. So it's a bit difficult to know how to act or what's needed. Reuse is in the strategies, but it's not supported yet."*
>
> ***Reuse-facilitating NGO, P32***

The EU has been the primary driver for national reuse policy development (European Commission, 2022). The Packaging and Packaging Waste Regulation (PPWR), adopted in 2025, introduces binding reuse targets by packaging type, including:

- 10% reuse by 2030 for beverage packaging
- 40% reuse by 2030 for transport packaging in e-commerce
- 10% reuse by 2030 of grouped packaging in the form of boxes (excluding cardboard)
- Additional sector-specific reuse benchmarks (EU, 2025)

Latvia is currently working to transpose these requirements into national law. The Ministry of Climate and the Ministry of Environmental Protection are leading discussions on how to account for reuse and develop supporting systems. Interviewees noted that political will exists, but practical implementation is still at an early stage.

At the local level, municipalities like Riga have introduced event-based reuse requirements, such as mandatory reusable cups at permitted events. While these initiatives show potential, enforcement remains inconsistent and awareness among businesses is low.

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In addition to the DRS, Latvia's policy evolution has introduced supporting measures, including:

- Reuse requirements at licensed public events in some municipalities
- Draft hygiene guidelines under development by national food safety authorities
- Loophole management discussions regarding falsely labelled 'reusable' single-use items (The Parliament of the Republic of Latvia, 2021)
- Early-stage private sector pilots for reusable packaging in foodservice and takeaway sectors

In summary, the evolution of Latvia's reuse policy reflects:

- Strong dependence on EU regulatory drivers, particularly the PPWR
- A focus on beverage container reuse through the DRS, with limited progress beyond that
- Fragmented local initiatives, showing both potential and inconsistency
- A policy landscape that remains in transition, with practical implementation still developing and national coordination for reuse beyond the DRS yet to be established

Policy map

The figure below provides a policy map of the key legislative and regulatory instruments shaping the reuse policy landscape in Latvia, highlighting their relationships and points of interaction.

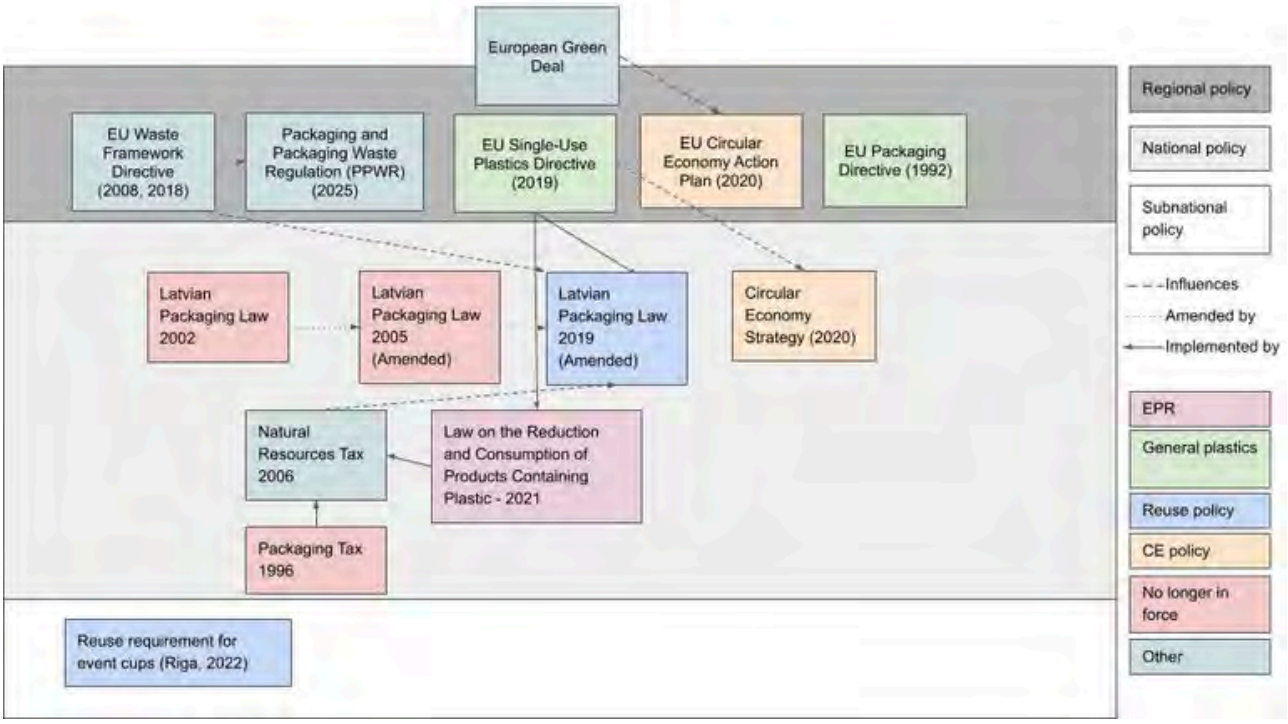

Figure 3. Policy map of Latvia's reuse policy landscape, showing the links between core national and EU-level policies.

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2. Policy design and process

Process of policy design

Latvia's reuse policy development to date reflects a mix of structured national processes and more informal, politically driven local measures. The design of the DRS is widely viewed as the most systematic example of coordinated policy-making. It was developed through broad consultation with producers, NGOs, and public authorities, and stakeholders described it as a practical, well-negotiated system (Brizga et al., 2024; TOMRA, 2024).

At the local level, some reuse policies have been introduced through political leadership rather than formal policy design processes. The requirement for reusable cups at events in Riga, for example, originated as part of an election pledge and was implemented by local authorities without a structured consultation process.

Nationally, reuse features in strategic documents such as the Waste Prevention Programme and Circular Economy Strategy, but these remain high-level and lack binding targets or a clear design process for practical implementation (Brizga et al., 2024). Work is ongoing within the government to transpose EU reuse targets under the PPWR, with technical discussions underway on hygiene standards and system requirements.

"We had a long way towards [the] DRS system, but what pushed it was European demand."

Local government, P38

Table 4. Primary reuse related policies in Latvia

Policy	Year	Comments
Packaging Tax	1996	Introduced to reduce environmental impacts from packaging. Encourages organisations to join EPR schemes by offering tax reductions on packaging. Tax breaks of up to 100% are possible (IEEP, 2022).
Latvian Packaging Law (Lepakojuma Likums)	2002	Establishes requirements for packaging design, labelling, reuse, and recycling. Aims to reduce packaging waste and ensure sustainable packaging (IEEP, 2022; European Commission, 2022).
Natural Resources Tax	2006	Applies to packaging placed on the market, with higher rates for non-recyclable or single-use packaging. Supports national waste targets and complements EPR (IFCO Systems, 2024)
Circular Economy Strategy	2020	Outlines national circular economy priorities, including waste prevention and reuse. However, reuse targets remain aspirational and non-binding (Brizga et al., 2024)
Establishment of Deposit Packaging Operator (DIO)	2020	The DIO, a Producer Responsibility Organisation, was created to manage Latvia's national DRS. It coordinates collection, sorting, and recycling, with reuse integrated into the model (TOMRA, 2024).
Law on the Reduction of Consumption of Products Containing Plastic	2021	Transposes EU Single-Use Plastics Directive. Requires producers to inform consumers about alternatives and waste management options, including DRS (The Parliament of the Republic of Latvia, 2021).

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Table 4 (continued). Primary reuse related policies in Latvia

Policy	Year	Comments
Waste Prevention Programme	2022	Identifies reuse as a national priority but does not introduce binding targets or detailed implementation measures (Brizga et al., 2024)
Reuse requirement for event cups (Riga)	2022	Mandates reusable cups at permitted public events; introduced via local political leadership rather than formal legislation.

Financing

Financing for reuse beyond the DRS remains fragmented and largely unsupported. The DRS operates on a self-financing model funded through producer fees and deposit management, providing a stable basis for beverage container reuse (Packaging Europe, 2024). However, for foodservice packaging, takeaway items, and event-based reuse systems, no coordinated financial mechanisms exist.

Several stakeholders noted that EPR schemes are viewed as a necessary financing tool for reuse, but ambiguity remains around how reusable packaging fits within existing EPR categories. SMEs, in particular, face practical barriers to participating in reuse due to the absence of shared infrastructure and coordinated financing (Leibus & Filipova, 2024).

"EPR should have a role... but it depends what's included and not included in the system."

Local government, P38

Without stronger national direction, stakeholders expect reuse financing to remain inconsistent and largely dependent on voluntary investment by private operators (IEEP, 2022).

3. Policy implementation and outcome

Policy outcomes

The implementation of Latvia's reuse policies has produced promising outcomes within the beverage sector but limited systemic progress beyond that. The DRS has delivered practical infrastructure for reusable bottles and high return rates for beverage packaging overall (TOMRA, 2024; Packaging Europe, 2024). However, wider reuse outcomes remain largely dependent on isolated municipal measures and voluntary private initiatives.

Identified outcomes include:

- Introduction of standardised reusable glass beer bottles within the DRS, with infrastructure in place for participating producers (Brizga et al., 2024)
- High return rates for beverage packaging, though reuse uptake remains constrained by market preference for single-use cans (Dace et al., 2013; Packaging Europe, 2024)
- Emergence of private reuse service providers offering reusable cups and food containers at events and festivals, though coverage is fragmented (P36; P32)
- Local reuse requirements introduced at public events in Riga and other municipalities, though awareness and enforcement are weak (P38)
- Early-stage development of national hygiene standards for reusable packaging, led by food safety authorities (P38)

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In parallel, private actors have introduced digital deposit and token systems to improve consumer convenience, particularly in events settings. While these developments support reuse, their scale and interoperability remain limited.

Despite these steps, no binding national reuse targets are in place, and reuse beyond the beverage sector remains patchy (Brizga et al., 2024; European Commission, 2022). Stakeholders emphasised that current policy has yet to generate significant, measurable reuse uptake in foodservice, takeaway, or retail contexts.

"We could make a lot stronger policies with deadlines... but we're not there yet."

Local government, P38

The absence of national targets, enforcement mechanisms, and financial support continues to limit progress. Interviewees described SMEs as particularly disadvantaged in adapting to reuse requirements, with few coordinated solutions or resources available.

Stakeholder perceptions

Stakeholders expressed broadly positive views regarding the role and performance of the DRS, describing it as a successful example of system coordination and reuse integration. Producers, NGOs, and policymakers were generally supportive of its design and implementation, though concerns persist regarding economic incentives that favour single-use over refillable options.

Beyond the DRS, perceptions of Latvia's reuse policy landscape are more mixed. While national strategies reference reuse, the absence of binding targets, deadlines, and coordinated infrastructure has led to frustration among system operators and local governments (Brizga et al., 2024). Reuse beyond beverage packaging is seen as underdeveloped and reliant on voluntary action, with limited practical support from national authorities.

"There is no consistency between municipalities. Everyone is doing their own thing. It's very fragmented. I think the intention is there, but without coordination it doesn't work."

Reuse-facilitating NGO, P32

Local governments have shown willingness to support reuse, particularly at events, but described poor enforcement and limited public awareness as ongoing challenges.

"People don't even know they have to do it... so it doesn't work properly."

Local government, P38

Reuse service providers expressed frustration at the lack of national coordination, with many relying on commercial solutions that are not interoperable across venues or municipalities. SMEs were seen as particularly disadvantaged, lacking the resources to navigate reuse system requirements independently.

Overall, stakeholders welcomed the direction set by the PPWR but emphasised that Latvia remains at an early stage of practical system development for reuse, with significant gaps in policy design, infrastructure, and enforcement (European Commission, 2022).

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Business adaptations

The extent of business adaptation to reuse requirements in Latvia has been limited and uneven. Within the beverage sector, some producers initially engaged with reusable glass bottles through the DRS, but economic incentives have since led to a shift towards single-use cans (Lakhan, 2024; Packaging Europe, 2024). The reuse potential of the DRS remains underutilised as a result.

In other sectors, reuse implementation has largely been voluntary and confined to specific contexts such as festivals and large events. A small number of reuse service providers have introduced digital deposit and return systems, designed to align with Latvia's preference for electronic payments (Brizga et al., 2024).

However, SMEs face considerable barriers in adapting to reuse requirements due to a lack of national coordination, financial support, and shared infrastructure (Leibus & Filipova, 2024; IEEP, 2022). Stakeholders reported that small businesses are hesitant to act in isolation, with many awaiting clear national deadlines or system-wide solutions.

> *"You cannot expect a small coffee shop or event organiser to come up with their own solution."*
>
> ***Local government, P38***

Some businesses have taken steps to engage with reuse at events, but adoption remains inconsistent, particularly among smaller operators unfamiliar with requirements or unable to shoulder the costs independently (European Commission, 2022).

Unintended consequences

Some unintended consequences have emerged from Latvia's reuse policy landscape, particularly due to weak enforcement, gaps in regulation, and market incentives that undermine reuse efforts.

A notable issue raised by stakeholders is the labelling of single-use plastic items such as forks and spoons as 'reusable' (The Parliament of the Republic of Latvia, 2021), which allows these products to circumvent existing bans while continuing to be used in practice as disposable items.

> *"We have these plastic forks and spoons with 'reusable' written on them... and they're actually used only once."*
>
> ***Local government, P38***

The lack of strong financial incentives to favour reusable packaging has also led some beverage producers to shift from refillable glass bottles to single-use cans (Lakhan, 2024; Leibus & Filipova, 2024), despite the DRS infrastructure supporting reuse.

Additionally, inconsistencies in how reuse is implemented across different events and municipalities, combined with limited consumer awareness, have contributed to confusion and variable outcomes (Brizga et al., 2024). Several stakeholders highlighted that without clear national guidance and coordinated systems, businesses face uncertainty, leading to fragmented and often short-lived reuse initiatives.

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4. Lessons learned and recommendations

Lessons learned: enablers

Inclusive consultation built legitimacy for system design. The development of Latvia's DRS demonstrated the value of broad consultation, bringing together producers, NGOs, and public authorities to design a system that was both practical and broadly supported. This collaborative approach helped to secure buy-in from key actors and ensured that the system reflected technical, logistical, and economic realities. While the DRS remains the only fully operational reuse-enabling system to date, its design process highlighted how inclusive consultation can build legitimacy and lay the foundations for effective implementation.

Clear regulatory scope supported system clarity. The DRS legislation clearly defined packaging types, system responsibilities, and producer obligations, creating legal certainty for businesses and system operators. This level of regulatory precision enabled practical implementation and reduced ambiguity, particularly for reusable beverage packaging. Stakeholders noted that such clarity helped to align expectations and provided a stable foundation for operational planning, even as gaps remain for other packaging types.

Political leadership at the local level created entry points for reuse. In the absence of national mandates, municipalities such as Riga have played an important role in introducing reuse requirements, notably through the rule mandating reusable cups at permitted public events. Though enforcement has been inconsistent, these initiatives have demonstrated how local political will can create entry points for reuse, raise awareness, and encourage early business and consumer engagement. Stakeholders pointed to such local measures as useful examples of how targeted interventions can complement national policy development.

Integration of reuse within waste management legislation created policy entry points. Reuse has been incorporated into Latvia's Waste Prevention Programme and Circular Economy Strategy, providing initial policy entry points for system development. While these strategies remain high-level, their inclusion of reuse as an objective legitimised its role within the waste management agenda and created a basis for more detailed system design to follow.

Tailoring solutions to local conditions supported business participation. Reuse service providers have adapted system design to Latvia's specific context, notably by introducing digital deposit and token-based return systems to align with the country's preference for electronic payments. This type of local adaptation has supported business participation by removing practical barriers and increasing consumer convenience. Stakeholders highlighted that ensuring reuse systems are affordable, easy to understand, and practically suited to the national context is critical to securing uptake, particularly among SMEs.

Early focus on standardisation increased system efficiency. The introduction of a universal reusable glass bottle format for beer within the DRS simplified system design, improved interoperability across producers, and reduced costs associated with sorting and processing. Standardisation at the design stage helped create operational efficiency, which stakeholders identified as an important enabler for business participation and consumer understanding.

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Lessons learned: barriers and challenges

Absence of binding national targets has limited system ambition. While reuse is included in Latvia's strategic documents, the lack of binding national targets for reuse beyond beverage packaging has left the policy landscape fragmented and lacking urgency. Without clear deadlines or measurable obligations, businesses and system operators face uncertainty, and reuse remains largely voluntary outside the DRS.

Economic disincentives have undermined reuse uptake. Policy design has failed to sufficiently address the economic advantage of single-use packaging, particularly for beverage cans. As a result, despite the DRS enabling reuse infrastructure, many producers have opted for cheaper single-use options. This pricing imbalance has significantly undermined the practical impact of reuse-supportive policy design.

Poor enforcement has weakened local reuse measures. Where local reuse requirements exist, such as the rule mandating reusable cups at events in Riga, weak enforcement has limited their effectiveness. Stakeholders reported that many businesses are unaware of their obligations, and inconsistent monitoring has contributed to uneven implementation. This has undermined trust in the system and slowed behavioural change.

Regulatory loopholes have enabled market circumvention. Ambiguities in policy design, particularly regarding product definitions, have allowed some businesses to circumvent reuse objectives. The labelling of single-use plastic forks and spoons as 'reusable' highlights how regulatory loopholes can be exploited, undermining policy intent and creating confusion for consumers and businesses.

Lack of national coordination has left SMEs without practical support. In the absence of a nationally coordinated reuse framework beyond the DRS, SMEs face significant barriers to participation. Policy design has not yet provided shared infrastructure, financial support mechanisms, or clear operational guidance, leaving small businesses unable to adapt independently. This has reinforced market fragmentation and slowed wider system development.

Reuse beyond beverages has lacked integration into core policy frameworks. While the DRS incorporates reuse for beverage containers, policy design has not embedded reuse requirements into packaging legislation or EPR frameworks. This has created a disconnect between national waste management obligations and practical reuse system development, limiting coherence and leaving reuse dependent on isolated initiatives.

Fragmented policy responsibilities have slowed coordinated system development. Reuse policy design has been spread across multiple ministries and agencies, including the Ministry of Climate, food safety authorities, and local governments. This fragmentation has delayed decision-making, created inconsistent approaches to reuse system design, and contributed to gaps in policy alignment.

Failure to address financial responsibility in EPR design has created uncertainty. The exclusion or unclear status of reusable packaging within Latvia's EPR system has left cost responsibility ambiguous. As a result, businesses lack clarity on who should finance reuse infrastructure, and operators face uncertainty when designing systems. This design flaw has been identified by stakeholders as a key barrier to scaling reuse beyond isolated pilots.

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Recommendations for an effective reuse policy framework

Drawing on lessons from Latvia's reuse policy experience, the following core elements represent key components of an effective national reuse policy framework:

- Legally binding reuse targets for key packaging types, beyond beverage containers, to provide a clear signal to businesses and support national coordination efforts.
- Collaborative system design processes, as demonstrated by the DRS development, which involved producers, NGOs, and authorities and helped secure buy-in and alignment.
- Standardised packaging formats and clear technical guidance, such as those developed for reusable glass bottles in the DRS, to support system efficiency and reduce costs for producers.
- Clarification of financing responsibilities for reuse within EPR schemes, to enable predictable support for infrastructure and address current gaps facing SMEs and service providers.
- Defined institutional roles and improved coordination between ministries and local governments, to avoid fragmentation in system development and implementation.
- Integration of reuse within waste prevention strategies, ensuring it is not treated as an isolated goal but embedded in national circular economy policy frameworks.
- Stronger enforcement mechanisms and clearer legislative definitions, to prevent circumvention (e.g. through mislabelling of disposables) and support consistent implementation.
- Full and timely transposition of EU-level requirements, particularly the PPWR, to ensure alignment, set clear expectations, and create a stable legal foundation.
- Support for the development of hygiene and safety standards, enabling reuse models to comply with food safety requirements and build consumer trust.
- Targeted public and business awareness campaigns, to increase understanding of reuse rules and obligations, particularly in areas where local measures exist but uptake is low.

Strength of evidence

The Global Plastics Policy Centre is committed to transparency in our research findings, which includes identifying the specific and persistent knowledge or evidence gaps. The following table summarises the state of evidence available for Latvia during the research period.

Literature search	Interviewees	Peer review	Total evidence strength
Low - moderate: coverage of key national policies, academic reviews, policy reports; limited peer-reviewed effectiveness data.	Low: 4 interviews from 4 organisations	Findings have been peer reviewed.	Low - Moderate

Annex 3: Country case studies Latvia

References for Latvia

Brizga, J., Ulme, J., & Larsson, A. (2024). Impact of the Implementation of the Deposit Refund System on Coastal Littering in Latvia. Sustainability (Switzerland), 16(16). https://doi.org/10.3390/SU16166922

Dace, E., Pakere, I., & Blumberga, D. (2013). Analysis Of Sustainability Aspects Of The Packaging Deposit-refund System In Latvia. WIT Transactions on Ecology and the Environment, 173, 729–740. https://doi.org/10.2495/SDP130611

European Commission (2022) Country Report - Latvia https://commission.europa.eu/system/files/2022-05/2022-european-semester-country-report-latvia_en.pdf

EU. (2025). Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC (OJ L 40, 22.1.2025). European Parliament & Council of the European Union. Official Journal of the European Union. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_2025_040

IEEP. (2022). Packaging tax in Latvia. Institute for European Environmental Policy. https://ieep.eu/wp-content/uploads/2022/12/LV-Packaging-Tax-final.pdf

IFCO Systems. (2024). Latvia's Natural Resources Tax. Retrieved June 3, 2025, from https://www.ifco.com/latvia-natural-resource-tax-explained/

Lakhan, C. (2024). Evaluating the effectiveness, costs, and challenges of deposit return systems for beverage containers: A meta-analysis. Https://Wjaets.Com/Sites/Default/Files/WJAETS-2024-0397.Pdf

LSM+ (2021). Latvia recycles little more than a third of its plastic packaging waste. Retrieved June 3, 2025, from https://eng.lsm.lv/article/society/environment/latvia-recycles-little-more-than-a-third-of-its-plastic-packaging-waste.a427150/?

TOMRA (2024). Latvia's Successful Deposit Return Scheme. Retrieved June 5, 2025, from https://www.tomra.com/reverse-vending/media-center/feature-articles/latvia-deposit-return-scheme?

Leibus, I., & Filipova, L. (2024). Natural resource tax as an instrument for sustainable environmental governance. Economic Science for Rural Development: Proceedings of the International Scientific Conference, 58, 12–19. Latvia University of Life Sciences and Technologies. https://doi.org/10.22616/ESRD.2024.58.001

Packaging Europe (2024). Latvia's deposit return system yields 80% return rate in two years | Retrieved May 16, 2025, from https://packagingeurope.com/news/latvias-deposit-return-system-achieves-80-return-rate-two-years-in/10960.article?

The Parliament of the Republic of Latvia (Law on the Reduction of Consumption of Products Containing Plastic)., 2021 https://likumi.lv/ta/en/en/id/323733-law-on-the-reduction-of-consumption-of-products-containing-plastic?

Reloop Platform. (2023). Consumer participation in deposit return systems: Drivers, barriers, and implications. Factsheet. Available at: https://www.reloopplatform.org/wp-content/uploads/2023/05/Consumer-participation-in-DRS-factsheet.pdf

Vuk, A., Szucs, I., & Bauerné Gáthy, A. (2023). Packaging waste and recycle in EU. International Review of Applied Sciences and Engineering, 14(3), 402–412. https://doi.org/10.1556/1848.2023.00615

Annex 3: Country case studies

Annex 3D: Reuse policy in Spain

1. Reuse context

Spain can be considered 'in transition' when examining their journey towards national reuse. Critical steps forward have been taken in recent years to mainstream the reuse agenda into national policy and culture. Progress has been slow to start, with many acknowledging that it is too early to conclude the success of the policies definitively. With the additional complexities of the recently agreed EU Packaging and Packaging Waste Regulations (PPWR), Spain recently suspended critical reuse legislation to align national priorities with regional targets. Given these considerations, the evolution of reuse in Spain is in motion and presents an interesting case for analysis. One interviewee in particular suggested that the journey to reuse in a Spanish case may take time, and that this is not necessarily a failure:

"I always...use the same metaphor, this is like building the cathedrals. It took 100 years to build a cathedral. It will take 100 years, probably not so much, but a long time to change people's minds in order to move from a single-use solution to a reutilization model. But in the end, this is the best option. So we have to be humble and to consider that this will take time"

Reuse system operator, P37

Reuse history

Spain culturally has a limited reuse history or heritage, with several interviewees stating that there were no informal reuse practices in Spanish culture. A deposit return system was in place in the 1980s, which included the return of glass bottles.

Reuse system structure

At present, there are no specific reuse systems in Spain as a result of the policy landscape. DRS will be introduced if the current separation collection systems do not meet the recycling targets of 77% by 2025 (Mendoza, 2025), but this is at a nascent stage.

Evolution of policy landscape, including regional drivers

Spain has committed to the reduction of plastic packaging and waste, which has led to the development of several indirect and direct reuse supporting measures policies (Food Packaging Forum, 2022).

Royal Decree (RD 110/2015) sets a national binding target for the reuse of electrical appliances and IT equipment, with 3% of household appliances and 4% of IT equipment needing to be prepared for reuse from 2018. Collection points are required to have a space dedicated to reusable goods (European Environmental Bureau., 2020). The Decree also requires producers to provide information necessary to provide products for reuse (European Environmental Bureau., 2020).

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The Law on Waste and Contaminated Soil for a Circular Economy (("Act 7/2022") ("Ley 7/2022, de 8 de abril, de residuos y suelos contaminados para una economía circular") was passed in 2022. The Law's main focus is reducing waste, which includes direct and indirect reuse supporting measures. Direct measures include measures for the sale of bulk products, the sale and use of reusable containers, and food retailers must accept refillable containers if requested by the consumer. Grocery stores over 400m2 are also required to "allocate at least 20% of their area of sales to the offer of products presented without primary packaging, including sale in bulk or through reusable packaging." The law also bans the use of phthalates and bisphenol A (BPA, CAS 80-05-7) in packaging, which is expected to support the provision of reusables. Limited independent information regarding the implementation of this policy could be identified.

The law also introduced a tax on non-reusable plastic packaging, which came into force in 2023, at a rate of €0.45/kg for non-recycled plastic. The policy has had a mixed level of success; in 2023, Spain collected roughly €596 million from the plastic packaging tax, contributing to an 8 (Instituto Nacional de Estadistica, 2023). The tax indirectly supports reuse by disincentivising single-use packaging.

On December 27th 2022, **the Royal Decree 1055/2022 on packaging and packaging waste** (RD 1055/2022, Real Decreto 1055/2022, de 27 de diciembre, de envases y residuos de envases) was established. The Decree aims at preventing and reducing the environmental impact of packaging through the management of packaging waste throughout its life cycle through several measures that both directly and indirectly support reuse. The decree contains waste prevention targets and specific reuse measures for food retail outlets and HORECA. The Decree also sets reuse targets for beverages packaging. By 2030, 40% of bottled water, 85% beer containers and 70% of soft drinks sold through the HORECA should be reusable (RETEMA., 2024).

The Decree also establishes a new EPR which aligns with European directive EU 2018/852 and extends beyond household packaging to include industrial and commercial packaging. Mandatory labelling for reusable products and the establishment of a deposit return scheme (DRS) for reusable packaging are also introduced. The obligations for DRS is in part motivated by a failure to reach recycling targets set by the EU, which necessitated that by 2023, 70% of the weight of single-use plastic containers on the market should have been recycled, increasing to 77% in 2025 and 90% in 2029 (Mendoza, 2025). The DRS will extend to single-use bottles of up to 3 litres if the recycling targets established in Article 10.4 of the Decree as not met. Until a producer responsible organisation establishes a DRS, packaging is considered single-use (EPR Global, 2025).

The provisions of the Decree came into force on 29 December 2022, except the obligation for labelling on reusable packaging, which entered into force on 1 January 2025 (KPMG, 2023). As such, the policy is still in its implementation phase, and measurable outcomes of the policy have yet to be released.

From a regional perspective, the Packaging and Packaging Waste Regulations (2025) have added additional challenges to reuse in Spain. PPWR introduces binding reuse targets by packaging type, including:

- 10% reuse by 2030 for beverage packaging
- 40% reuse by 2030 for transport packaging in e-commerce
- 10% reuse by 2030 of grouped packaging in the form of boxes (excluding cardboard)
- Additional sector-specific reuse benchmarks (PPWR, 2025)

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PPWR was regarded in Spain as a critical push for reuse regionally. Interviewee P23 noted its importance at supporting reuse across Europe:

"...the ambition of the original legislation (PPWR) has been substantially watered down. We still think that is the only legislation in Europe that enshrines reuse and hopefully we'll be able to help loop the needle for reuse"

Reuse system operator, P23

The Spanish Ministry for the Ecological Transition and the Demographic Challenge (MITECO) will be tasked with synergising PPWR and existing legislation. One interviewee stated that as of 2025, the Spanish Royal Decree 1055/2022 is being derogated to ensure alignment between national priorities and European targets part of PPWR. However, this could not be independently verified, and plans to synergise the Decree and PPWR have not yet been made publicly available. Interviewees expressed confusion regarding whether an amendment to the Decree would be issued or what further information would be needed to ensure alignment. One interviewee expected:

"...there will be some additional legislation to come in order to expand these two documents, mainly the PPWR document, defining, for example, targets for reutilization depending on the material. But this will come in 2027..."

Reuse system operator, P37

Additional challenges around PPWR were identified, including the lack of clarity between translations regarding obligations and compulsory targets. Interviewee P37 stated that:

"...because in some cases, for example, the reutilization target in Article 46 in the PPWR is not clearly defined, and even in the translations in two different languages, the translation is not completely accurate. If you compare the Spanish or the English translation, some of the compulsory targets are not completely the same. In some cases, it seems to be aspirational, not compulsory, in other cases, they are clearly compulsory."

Reuse system operator, P37

In summary, the evolution of Spain's reuse policy reflects:

- Spain has enacted key legislative frameworks to support reuse, including Royal Decree 110/2015 and Act 7/2022, requiring infrastructure for reusable goods, promoting bulk sales and refillable packaging in retail environments, and a single use plastic tax.
- Royal Decree 1055/2022 introduced reuse targets for beverage packaging in the HORECA sector and extended the Extended Producer Responsibility (EPR) scheme to industrial and commercial packaging, with mandatory labelling and a conditional deposit return system
- PPWR established binding reuse targets across packaging types, prompting an ongoing process of harmonisation with national legislation, though interviewees highlighted uncertainties around the legal integration and clarity of targets.

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Policy map

The figure below provides a policy map of the key legislative and regulatory instruments shaping the reuse policy landscape in Spain, highlighting their relationships and points of interaction.

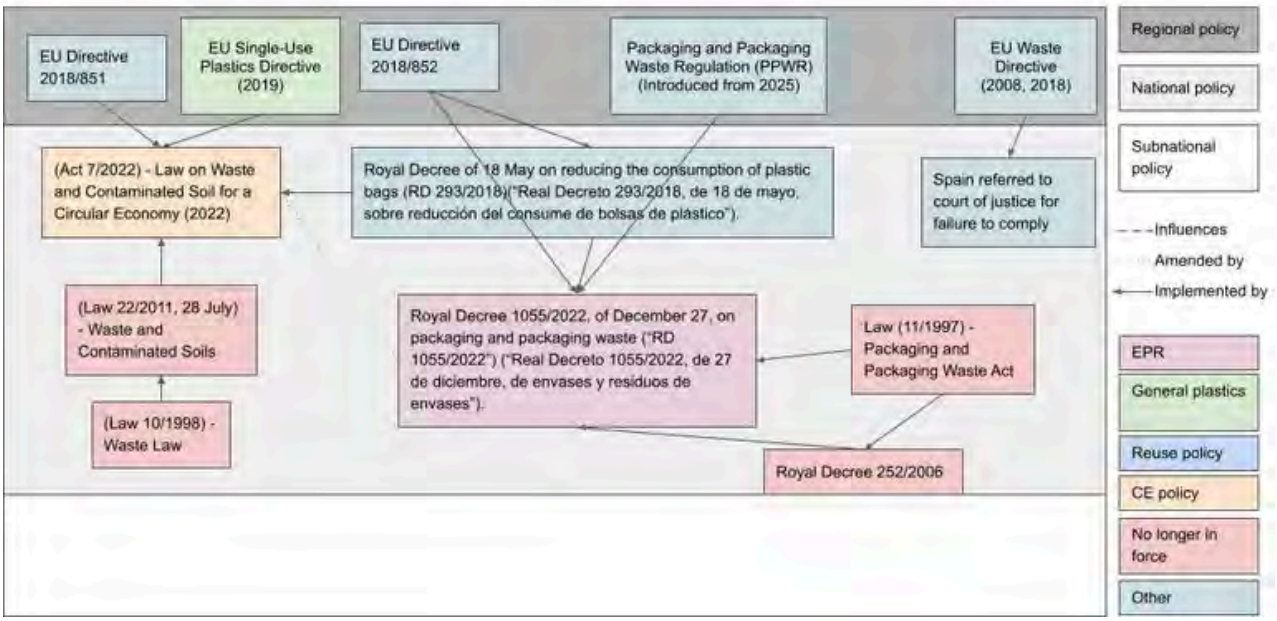

Figure 4. Policy map of Spain's reuse policy landscape, showing the links between core national and EU-level policies.

2. Policy design and process

Process of policy design

The evolution of Spanish reuse is being primarily driven by top-down policy and regulation. A consultation was held in two stages: the first was a prior consultation to gather perspectives on objectives, scope, and alternatives before drafting the policy. The second stage, Audiencia e información pública, involved publishing the draft online and inviting stakeholders to submit formal written feedback. The consultation process led to a delay in Article 13's enforcement from 2022 to 2025. Interviewees noted that it was difficult for SMEs to become involved in the consultation processes, and that the main concerns were timelines for implementation and targets, and the costs associated with implementing reuse. Feedback and insights from different stakeholders were incorporated into the policy design.

Table 5. Primary reuse related policies in Spain

Policy	Year	Comments
Law on Waste and Contaminated Soil for a Circular Economy ("Act 7/2022") ("Ley 7/2022, de 8 de abril, de residuos y suelos contaminados para una economía circular").	2022	Focuses on reuse in the food and beverage sector - including supermarkets - By charging customers for single-use packaging and allocating shop floor space to products with no single-use packaging

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Table 5 (continued). Primary reuse related policies in Spain

Policy	Year	Comments
("RD 1055/2022") ("Real Decreto 1055/2022, de 27 de diciembre, de envases y residuos de envases").	2022	Sets reuse targets. By 2030, 40% of bottled water, 85% beer containers and 70% of soft drinks sold through the HORECA should be reusable.
RD 293/2018, "Real Decreto 293/2018, de 18 de mayo, sobre reducción del consume de bolsas de plástico"	2018	Aims set to prevent the production of packaging waste and promote reuse, packaging waste.

Financing

There was limited information identified from publicly available literature and interviews regarding funding to implement the reuse policy landscape, focused primarily on the need for funding rather than evaluating existing funding programs. In general, funding for reuse is largely nascent, and interviewees shared this lack of knowledge. Instead, general funds were identified that can be applied for by organisations that are not specific to reuse.

"No, there were not specific grants or something like that... They can apply to some grants, but I think they are not specific for reuse"

Policymaker, P25

Regional funding was also identified by interviewees as being a potential opportunity, but these are often not reuse-specific. Opportunities for transboundary funding, particularly in the context of multinational organisations, could be explored.

"We have the next generation funds that come from Europe. And there are different programmes on funding in this next generation, but they are not focused on reuse, and the idea is that specific companies or specific producers propose a project and apply for the funds"

Policymaker, P24

EPR, particularly reflecting the French model, was identified by two interviewees as a potential source of financing to enable reuse systems. Modelling on France's AGEC Law, where 5% of EPR funds are dedicated to reuse, would enable consistent funding to be leveraged to support businesses and trial large-scale pilots and behaviour change initiatives.

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3. Policy implementation and outcome

Policy outcomes

The single-use plastic tax has had mixed success, and generated €596 million in 2023 (Instituto Nacional de Estadistica, 2023). A survey led by the National Association of Plastics Manufacturers (ANAIP) identified that 70% of companies within the plastics processing sector are unsure if their products are affected by the tax, citing a lack of clarity in the regulations (ANAIP, 2025). Additional difficulties have also been identified in HORECA, such as challenges in accrediting the recycled content, understanding across transboundary supply chains the amount of plastic used, and a lack of clarity regarding what constitutes 'reuse' (Giménez, 2024). Additionally, one interviewee felt that the single-use tax would disincentivise reuse, and instead promote exempted materials such as cardboard.

"And yeah, I think that my fear will be the distortion of the internal market. And so, for example, some clients at the end can say, OK, so I go to the single use packaging of the cardboard because it's exempted from the reuse obligations and so I will have to comply with"

Reuse system operator, P29

Limited independent evidence regarding progress towards the targets in the Royal Decree could be identified, owing in part to its relatively recent enforcement and complexities introduced by PPWR. Interviewees often reiterated this when asked about what progress was being made towards the decree:

"I mean the obligations and the objectives and the measures started to apply from the 1st of January of this year. So it's still really, really early to analyse it. So far, we know that the sector is not really happy with the measures"

Policymaker, P24

Despite the fact that the policy is relatively new, several interviewees identified that progress was still too slow and was not having the desired impact. In part, this was linked to finance, consumer awareness, and a lack of clear guidance about how to implement the policy.

"We thought that it was going to significantly help us with the reuse. However, we haven't seen an update on reducible packaging solutions, so we don't think that law has accomplished what it was said to do"

Policymaker, P24

Stakeholder perceptions

A generally held perception was that few companies were following the Royal Decree, despite the targets being imminent:

"For the local one, the Royal Decree, the targets are for 2025. And I think a small amount of companies are following the targets and following the percentages of reutilization required. So, the efficiency at this stage is very low"

Reuse system operator, P37

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Stakeholder perceptions largely mirrored the transitional status of reuse in Spain, with many identifying concerns regarding its implementation. In general, interviewees were supportive of the policy approach, but identified confusion regarding how the policy would actually be achieved, and what support would be available to support its achievement. One interviewee summarised their concerns:

> *"So, the reuse targets are great, but how to put it into force?"*
>
> ***Reuse system operator, P30***

Concern amongst interviewees hinged on several key factors:

- A DRS scheme has not yet materialised [P37, Reuse System Operator; P30, Reuse System Operator]
- A lack of guidance regarding policy implementation [P24, Policy maker, P30, Reuse System Operator]
- A lack of clarity regarding exceptions for reuse in the current policy [P24, Policy maker], (Pazos, 2020)
- How alignment to PPWR would be pursued [P23, Reuse System Operator] [P29, Reuse System Operator] [P30, Reuse System Operator] [P34, Reuse System Operator] [P37, Reuse System Operator]

Business adaptations

Interviewees stated that it was too early to identify specific business adaptations to reuse.

Unintended consequences

Given the lack of implementation identified by interviewees and independent literature, unintended consequences of the policies could not be identified.

4. Lessons learned and recommendations

Lessons learned: enablers

Open policymaking was identified as a positive aspect of the policy formulation. The policy was created through extensive stakeholder consultation, and the formulation of specialised technical committees supports ongoing implementation. Public consultation helped support the reuse targets to be ambitious.

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Lessons learned: barriers and challenges

The policy landscape is regarded as complex, with loopholes regarding what is included or exempt from taxes or targets. The single-use tax, introduced as part of the Law on Waste and Contaminated Soil for a Circular Economy ("Act 7/2022"), is determined by the amount of non-recycled content used in non-reusable packaging. Cardboard is exempt from the tax, leading to concerns that reuse may not be incentivised as a result of the tax:

"And yeah, I think that my fear will be the distortion of the internal market. And so, for example, some clients at the end can say, OK, so I go to the single-use packaging of the cardboard because it's exempted from the reuse obligations"

Reuse system operator, P29

PPWR has caused significant confusion for businesses, which has slowed the implementation of the existing policy. The Spanish government's response has been to issue interpretative notes regarding their implementation, yet these are still unclear for many and lack concrete implementation.

"Yeah, the Spanish Ministry of Environment, what it's doing is issuing interpretative notes about the provisions of the Royal Decree and the mixing with the PPWR... but these provisions lack some clear information"

Reuse system operator, P29

Lack of clarity regarding policy implementation. Businesses in particular were concerned regarding the lack of guidance for the implementation of the targets identified in the Royal Decree. One interviewee suggested that a potential solution is the creation of phased policy targets that can enable businesses to scale up efforts over time [P37, Reuse System Operator]. Clear and consistent guidelines were identified as a way to support implementation [P25, Policy maker]. Phased targets would also provide regulatory certainty over a longer-term horizon, which would support businesses in their transition. Coupling the lack of clarity regarding policy implementation is a lack of support to businesses, particularly SME's, to comply with the new targets.

"And putting a target out there without really accompanying the businesses to do the transition, I think it's going to create a lot of confusion and a lot of [inaudible] in the market towards packaging"

Reuse system operator, P23

Funding is limited and poorly defined. Interviewees highlighted a lack of dedicated reuse funding, with existing opportunities often being general, fragmented, or regionally scoped. Next Generation EU funds and EPR systems were mentioned as potential but untapped sources. A reuse-specific funding stream, like France's 5% EPR allocation under the AGEC Law, was viewed as a model to emulate.

Reuse is not a part of Spanish culture, so consumer awareness is low. Significant investment in public awareness campaigns needs to be undertaken to drive demand for and acceptance of reuse systems (Pazos, 2020).

Annex 3: Country case studies Spain

Recommendations for an effective reuse policy framework

Drawing on lessons from Spain's reuse policy experience, the following core elements represent key components of an effective national reuse policy framework:

- Address regulatory uncertainties in policy, such as exemptions from taxes and targets to avoid confusion in implementation
- Ensure coherence across diverse policy measures
- Clarify exemptions and obligations to prevent market distortions and unintended shifts toward non-reusable alternatives.
- Align national policy with EU PPWR to reduce confusion and create coherent regulatory expectations.
- From policy enforcement, issue clear implementation guidance to support businesses, particularly SME's in adapting to targets and priorities
- Establish dedicated reuse funding streams, learning from models like France's AGEC Law 5% EPR allocation.
- Improve access to financial support by simplifying and centralising reuse-relevant funding opportunities.
- Invest in public awareness campaigns to increase consumer understanding and cultural acceptance of reuse.

Strength of evidence

The Global Plastics Policy Centre is committed to transparency in our research findings, which includes identifying the specific and persistent knowledge or evidence gaps. The following table summarises the state of evidence available for Spain during the research period.

Literature search	Interviewees	Peer review	Total evidence strength
Low: limited independent, peer-reviewed articles; limited independent analyses	Moderate: 7 interviewees across 6 organisations	Findings are pending peer-review.	Low - Moderate

References for Spain

ANAIP - Consecuencias del impuesto al plástico tras dos años de aplicación. (2025). Retrieved July 9, 2025 from . https://anaip.es/comunicacion/impuesto-al-plastico-problemas-de-aplicacion-y-perdida-de-competitividad

EPR Global - New EPR rules for domestic and commercial packaging from 2025 (2025). Retrieved April 11, 2025, from https://erp-recycling.org/news-and-events/2025/01/new-epr-rules-for-domestic-and-commercial-packaging-from-2025

European Environmental Bureau. (2020). *No time to waste: Europe's new waste law*. https://eeb.org/wp-content/uploads/2020/05/No-time-to-waste_Europes-new-waste-prevent_web.pdf

Annex 3: Country case studies Spain

Giménez, A.N. - The impact on hotels, restaurants and cafés of the Spanish Special Tax on Non-Reusable Plastic Packaging: main challenges | Hospitality & Leisure Law Blog - Garrigues. (2024). Retrieved July 9, 2025, from https://blogturismo.garrigues.com/en/legislation/the-impact-on-hotels-restaurants-and-cafes-of-the-spanish-special-tax-on-non-reusable-plastic-packaging-main-challenges

Instituto Nacional de Estadistica - Press Release: Environmental Accounts: Environmental Taxes Account. (2023) Retrieved July 9, 2025, from https://www.ine.es/dyngs/Prensa/en/CIA2023.htm

KPMG - Royal Decree 1055/2022 of 27 December 2022, on Packaging and Packaging Waste (2023). https://assets.kpmg.com/content/dam/kpmg/us/pdf/2023/02/tnf-spain-feb8-2023.pdf

Mendoza - Spain could return to the 1980s with a bottle deposit payment system | Sur in English. (2025). Retrieved July 9, 2025, from https://www.surinenglish.com/spain/spain-returns-the-1980s-with-payperpackage-return-20250127070604-nt.html

Pazos, R. (2020). Journal of European Consumer and Market Law. 9(5), 212–215. https://web.upcomillas.es/webcorporativo/RegulacionRepositorioInstitucionalComillas.pdf

PPWR - Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC (2025) Retrieved July 9, 2025, from https://eur-lex.europa.eu/eli/reg/2025/40/oj

RETEMA - Challenges, opportunities, and pending issues in the implementation of the Royal Decree on Packaging | RETEMA. (2024). Retrieved April 17, 2025, from https://www.retema.es/actualidad/desafios-oportunidades-y-cuestiones-pendientes-en-la-implantacion-del-real-decreto-de

Spain passes comprehensive waste reduction regulation, eases the way for reuse | Food Packaging Forum. (2022). Retrieved May 14, 2025, from https://foodpackagingforum.org/news/spain-passes-comprehensive-waste-reduction-regulation-eases-the-way-for-reuse