**Unpacking the circular economy: Reuse and refill in packaging solutions - Call for evidence**

**Introduction**

Policy Connect, alongside the All-Party Parliamentary Sustainable Resource Group and the Sustainable Resource Forum, is gathering written evidence for its inquiry *‘Unpacking the circular economy: reuse and refill in packaging solutions’*, which investigates the role of these packaging systems in bringing about a more circular economy in the UK.

This Call for Evidence seeks to gather evidence and insights from industry professionals, academics, and members of civil society on the topic of reuse and refill systems, including the environmental, social, behavioural, consumer, and hygiene factors which contribute to the success of reuse; challenges across the whole value chain and how these can be overcome; how reuse models would work in the current and developing policy context; and examples of existing best practice for reusable and refillable packaging.

We will use your insights, including any practical case studies, to inform recommendations to government in a forthcoming report.

**Background**

The Government’s recent [Resources and Waste Strategy](https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england) sets out a blueprint to *“preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England.”* Reusable packaging systems will be an important part of achieving this ambition.

In the waste hierarchy, which ranks waste management options based on what is best for the environment, reuse is the second-best option, after prevention, in terms of its environmental impact. Shifting from single-use packaging to reusable packaging has the potential to reduce overall environmental impact by prolonging the packaging lifecycle, reducing resource consumption, and delaying recycling or disposal. However, transitioning to reuse and refill packaging models presents several challenges, including consumer attitudes toward them, safety and hygiene concerns, lack of standardisation of packaging design, and the investment and adaption required across the supply chain to deliver successful reusable and refillable packaging schemes.

While the value of reusable packaging systems in bringing about a more circular economy has been recognised by the Government, further policy steps are required to enable reusable packaging systems to reach their full potential.

Key policy activities this inquiry is seeking to explore include the implementation of the [Extended Producer Responsibility for Packaging](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1063589/epr-consultation-government-response.pdf), which began at the start of this year (January 2023) with new requirements for reporting packaging data, and the introduction of a [Deposit Return Scheme](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1130296/DRS_Government_response_Jan_2023.pdf) for England, due to commence in 2025. While both focus on increasing packaging recycling at present, there may be a role for them in facilitating greater uptake of reusable packaging. The government have also indicated they will establish some measures, either in the form of targets or obligations on producers, to encourage the use of reusable packaging, with these proposed to be introduced from 2025.

**Instructions**

Policy Connect is gathering evidence through ongoing roundtable sessions, interviews with expert stakeholders, and this written call for evidence. Please find the questions below. **We appreciate that you may prefer to respond only to the questions in your area of expertise.**

Please feel free to send any additional evidence or information that might support our inquiry but has not been covered in our research questions, including reports that you or your organisation have completed, and **case studies** which **show what works and what does not**.

The deadline for submission of evidence is 11:59pm, Friday 26th May 2023.

Evidence should be submitted to: [katy.haigh@policyconnect.org.uk](mailto:katy.haigh@policyconnect.org.uk)

For more information about Policy Connect or the inquiry, please [visit our website](https://www.policyconnect.org.uk/) or contact [katy.haigh@policyconnect.org.uk](mailto:katy.haigh@policyconnect.org.uk)

**Questions**

# Defining reuse

The UK Government has sought views on a definition of reusable/refillable packaging in a recent [consultation](https://www.gov.uk/government/consultations/packaging-and-packaging-waste-introducing-extended-producer-responsibility) on the introduction of the Extended Producer Responsibility for packaging and packaging waste.

While the responses highlighted a slight preference for the definition established in the [EU Packaging and Packaging Waste Directive,](https://eur-lex.europa.eu/EN/legal-content/summary/:~:text=Directive%2094%2F62%2FEC%20sets%20out%20the%20EU%20%E2%80%99s%20rules,of%20packaging%20and%20packaging%20waste%20on%20t) which uses “reusable packaging” and defines this as *“packaging which has been conceived, designed and marketed to carry out multiple trips in its lifetime by being refilled or reused for the same purpose for which it was conceived,”* overall there was a lack of consensus among those consulted as to how best to phrase and define this type of packaging.

The inquiry steering group have identified that consumers can confuse ‘reuse’ with ‘repurpose’ (using something for a different purpose than it was originally made for). This raises safety concerns, for example, reusing a soft drink bottle to store bleach and then someone mistakenly drinks from it. It was felt that ‘refill’ may be less confusing for consumers and could more effectively encourage them to fill packaging with the same material for which it was designed.

1. In your view, what is a definition for reusable packaging that:

a) is specific and accurate in wording;

b) ensures safety for consumers;

c) works in the context of the existing waste hierarchy; and

d) takes account of the Extended Producer Responsibility and other relevant policy developments.

## Public engagement

1. What are the key barriers to consumers’ use of reusable packaging? We would welcome any specific evidence regarding current levels of uptake of reusable packaging system options among consumers.
2. What are consumers’ attitudes to reusable packaging solutions? How do these vary by context and demographics?
3. How can social equity and accessibility be embedded in reuse systems?

## Safety, hygiene, and practicability

1. What are the safety, hygiene and practicability implications of reuse models?
2. Who holds or should hold the liability for the quality of containers (e.g., their cleanliness) in various reuse scenarios? What policy levers are required to maintain accountability?

## Environmental considerations

1. How can we assess the overall environmental impact of reusable packaging? What are the benefits and limitations of these?
2. How can good design help realise the environmental benefits of reusable packaging and prevent unintended negative consequences?
3. In which cases are reusable packaging solutions better than their single use counterparts? In which areas do reusable packaging not offer a feasible alternative to single use?
4. What measures are needed to ensure reuse claims do not lead to ‘greenwashing’?

## Value chains

1. What operational and commercial challenges do you expect to face with the introduction of reuse systems into the supply chain?
2. What impact will the transition to reusable packaging systems have on jobs and the skills they require?
3. Packaging standardisation has been highlighted as a key tool to facilitating reuse. How can this be incentivised? How does brand identity interact with standardisation?
4. What knowledge and data gaps need to be filled to enable the manufacturing and adoption of environmentally beneficial reusable packaging?

Policy

1. What best practices exist for reusable packaging? What lessons can be learnt from reusable packaging models that have already been launched, both in the UK and abroad?
2. What policy and/or financial incentives would be needed to encourage reuse?
3. The waste hierarchy confirms that reuse should be prioritised over recycling. How could recent policy developments such as the Extended Producer Responsibility (EPR) for Packaging incentivise reuse?
4. What impact could the introduction of Deposit Return Schemes across the UK have on reuse systems?

## Targets and metrics

1. What would be the appropriate targets for reuse obligations? The Department for Environment, Food & Rural Affairs is planning to introduce such obligations from 2025.
2. What metrics can help effectively track progress on the shift to circular packaging solutions across supply chains?

**Additional Evidence**

Please feel free to send any additional evidence or information that might support our inquiry but has not been covered in our research questions.

**Submission Permissions**

Kindly let us know whether we have your permission for the following:

1. Do you give permission for the report to quote your submission?
2. May we attribute the submission to the organisation you belong to?
3. May we attribute the submission to you personally, listing your job role?