

# GLOBAL INSIGHTS ON PACKAGING REUSE FOR THE UK

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IN PARTNERSHIP WITH





## **The UK packaging market is evolving, with all four nations prioritising circularity.**

Long-awaited policies on extended producer responsibility (EPR), improved collections for recycling, bringing England more in line with the devolved nations, and a deposit return scheme for single use beverage containers (DRS) are finally here. But the potential for positive change goes even further.

City to Sea's Reuse Manifesto, ahead of the 2024 General Election, identified reuse as a key opportunity for investment, innovation, and truly sustainable packaging.

Reusable packaging systems are already in place, at local and national scales, all over the world. However, starting over from scratch is tough. The UK's current packaging system favours single-use packaging thanks to economies of scale in investment, policy, and entrenched consumer behaviours.

The challenge is in the transition – to bridge the gap between where we are and where we want to be.

**The next generation of packaging will undoubtedly be reusable – the question is how to scale up fast enough, and smart enough, to unlock environmental benefits. We are not alone; the UK debate can learn from and lead global progress in the transition to reuse.**

## WHAT IS HAPPENING ELSEWHERE?

**Creating a reusable system at speed and scale requires collective action from policymakers, businesses, campaigners, and citizens.** It is unfair to ask lone pioneers to take all of the risks. Policymakers in the EU and several US states are ahead of the curve, and while more progress is desired, these are steps in the right direction. The UK must keep up to maintain credibility as a world leader in net zero and plastic pollution efforts and, crucially, to keep its businesses competitive.

**Mandatory, sector-specific targets to promote reuse are being adopted worldwide,** but the right definitions and metrics are still being debated. Some actors continue to challenge the value of reuse altogether, as the intense lobbying against reuse targets in the EU's Packaging and Packaging Waste Regulation demonstrated.

In considering how the European reuse requirements will actually be implemented (by retailers, producers, and regulators) **it becomes clear that shifting to reuse will require significant investment and coordinated changes in infrastructure, logistics, and design.** UNESDA estimated that transitioning to a reuse model for the soft drinks sector would cost €18.7 billion to achieve 20% reusable PET bottles in the EU by 2030. Clearly, setting targets without a clear implementation plan can cause confusion, and potentially dilute or even negate the potential environmental benefits.

**We don't just need reuse systems – we need good reuse systems.**

### CASE STUDY

#### Single-use and reuse – deposit return required?

##### *How it works*

Germany's deposit scheme for single-use beverage containers, launched in 2003, runs alongside an older, industry-driven system for reusables. The deposit for single-use packaging is higher than for reusables. Both systems boast high performance, and the DRS for reusables sees 97-99% return rates, with refillable plastic and glass bottles used up to 25 and -50 times respectively.

##### *Lessons for the UK*

- Single-use and reuse are not competing on a level playing field and the market share for reusables has fallen over time, from 66.3% in 2004 to 41.2% in 2018.
- Recycling of single-use bottles is seen as simpler and cheaper by businesses, partly due to the lack of regulatory support for the refillable system, which relies on producer cooperation. For example, the law mandates that retailers of single-use containers accept returns of any type of container they stock, while there is no such provision for reusables: this makes it easier to businesses to opt out and makes return less convenient for consumers.
- Producers also have a greater incentive to manufacture single-use containers, and there have been no sanctions for failure to meet reuse targets over the years.

**Incentivising reuse through extended producer responsibility (EPR) is a clear opportunity to unlock funding for widespread implementation.** New ways of working will be needed, but there is an opportunity to learn from other jurisdictions, such as the Netherlands and France, which have implemented similar measures.

This could include lower EPR fees for reusables relative to single-use, and further reductions for those operating closed-loop systems (and already bearing the costs of end-of-life management as a result). Earmarking a small proportion of EPR income to fund the transition to reuse unlocked €100 million for reuse projects in France in 2024 alone, though questions remain about how the funds will be allocated, and the limits of the Producer Responsibility Organisation's role.

**Strict definitions and criteria for reuse and recognising the importance of the whole operational system and its performance alongside container design specifically have been essential to avoid greenwashing.**

## CASE STUDY

### Key 'take-aways' from France's fight against disposables

#### How it works

Since January 1, 2023, catering establishments (fast food restaurants, but also corporate catering, school canteens, museum and airport cafeterias, etc.) serving at least 20 guests must use washable and reusable tableware for eat-in meals. ADEME estimates this could eliminate 130,000 tonnes of disposable packaging. Additionally, since 2021, customers have the right to use their own reusable container for takeaway (so long as it is clean and suitable for the product), and customers that bring their own reusable cup for takeaway drinks receive discounted prices.

#### Lessons for the UK

- Before the law came into force, industry was asked to spread awareness and develop action plans for implementation.
- Multiple ministries coordinate to support enforcement through annual inspections, and there is a consumer portal to report non-compliance.
- A key challenge has been to find space to put in dishwasher facilities, or to clean the cups and plates, and also deploy staff to stop customers throwing them away or taking them home. This has sparked innovation in mobile and automated dishwashing services as well as centralized cleaning and distribution models.

# A RECIPE FOR SUCCESS?

To achieve the necessary scale of finance, innovation and collaboration for a successful reuse transition, **EPR and reuse targets are essential, but insufficient on their own.** It is crucial to further leverage 'carrot and stick' measures such as charges and bans on single-use items, alongside implementing new policies and standards that foster collaboration across supply chains and with consumers.

While there is no one size fits all, and best practice is still emerging, some key requirements for a successful transition are set out below.

## TARGETS

Mandatory sector and product specific targets for reuse and refill, set in a realistic and progressive way to kickstart change. Higher targets can help to ensure the size of the reuse market is sufficient to achieve scale.

## STANDARDS

Industry technical and quality standards to ensure compliance, consistency and best practice. These will be necessary for both reusable items and reuse systems to avoid greenwashing and 'reuse' in name only.

## POOLED SYSTEMS

Shared assets and logistics at the right points in the supply chain to improve cost-efficiency, lower risks to individuals and increase fairness. This is not a one-size-fits-all approach, and different pools may operate differently.

## INDUSTRY INCENTIVES

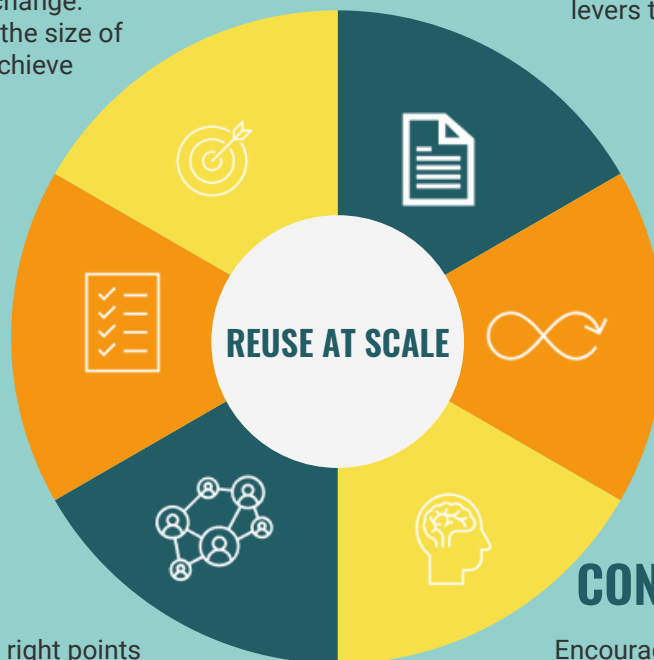
Leveraging existing frameworks for EPR and single-use bans, and exploring other fiscal levers to make reuse more attractive where environmental benefits are clear.

## TAKE-BACK REQUIREMENTS

Recognising the role of retailers and distributors in providing an effective network for consumers to refill and return. If designed well, this can also enable robust data gathering and consumer engagement.

## CONSUMER ENGAGEMENT

Encouraging consumer behavior change and making reusable options more accessible through clear communications and incentives such as deposits, penalties, rewards and impact reporting.



# HOW TO MOVE FROM VISION TO REALITY?

UK customers, brands and retailers know that reuse is the future – it's just a matter of time. Businesses ahead of the curve have implemented a patchwork of reuse pilots (refill and return, with and without deposits and penalties), gaining vital insights into what works and how. Now, we need to think bigger, and smarter, to scale up efficiently and reap the rewards.

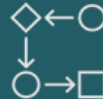
## Build Coalition

- Moving beyond pilots
- Collaboration and R&D
- Unified voice



## Grow Systems

- Pooling and standardisation
- Risk sharing and funding
- PROs and system operators




## Widen Horizons

- Refill and return
- Packaging and beyond
- Smart technologies



Over the last decades, single-use systems of production, distribution and end of life management have received significant investment and are optimised nationally and internationally. While this shows positive progress, it cannot deliver the scale of material use reduction and circularity we need for the 2030s and beyond. In comparison, small scale reuse efforts might generate local successes, but won't achieve their full potential for environmental and economic benefits if they cannot scale up. We need a strategic approach to the transition.

Building coalitions and pooling resources will be key. The Government could facilitate business collaboration by addressing competition concerns. And businesses need to share investments and risks –in many contexts standardised national systems will be the best option and no single actor wants to bear the start-up costs alone. **Everyone stands to benefit from an open system, since the bigger the scale of reuse, the lower the costs per container will be.** The first step will be the hardest and most risky, and we must support industry to cross that gap. Pilots are great as proof of concept, but face numerous challenges associated with developing new behaviours, ad-hoc logistics, and lack of uptake because of poor access and/or understanding. Moving to a system-at-scale is a big undertaking, but once it is up and running, it will be easier and less resource intensive per *container* than a pilot situation.



Governance may sound boring to some but will be critical to deliver these national systems. In single use recycling systems, Producer Responsibility Organisations (PROs) take responsibility for delivering shared outcomes (both in terms of recycling performance and regulatory compliance) on behalf of their members. This is likely to be a feature of reuse systems too. Individual businesses would meet reuse PRO requirements for their containers and logistics, and the PRO would manage the system (including proving system performance was meeting national specifications and requirements). Businesses of all sizes can benefit, and the PRO can be created as a non-profit, with supply chain representation.

Looking forward, reuse doesn't stop (or start) with consumer facing beverage, or even food packaging more generally. A huge range of products can benefit from reusable packaging, and existing and future supply chains also have huge scope for reuse in business-to-business transactions 'behind the scenes'. In addition, reuse is enabled by two consumer journeys. Return systems with a centralised borrowed container, such as home delivery ecommerce systems and cup schemes, are likely to live alongside refill systems where the consumer brings their own container.

City to Sea has championed Refill with shopping bags, water bottles, hot drinks and zero waste shopping – but there is significant consumer appetite and opportunities for growth in both refill and return categories. The time has come to think beyond pilots and make long term commitments, so that business investment and effort can be streamlined, and consumer demand can be met. **75% of UK consumers polled in February 2025 by City to Sea\* believe that reusable packaging must replace single-use packaging to tackle single-use plastic waste.**

### From 'either/or' to 'and/and'

Government goals to improve recycling of single-use packaging are admirable and necessary. We fully support them, and even suggest some should go further, faster! But what's next? It takes time to develop and deliver policy. To continually improve the environmental performance of packaging, we must plan the next steps even as we are rolling out current commitments.

Improving recycling of single-use packaging is necessary but will not be enough to transform our relationship with packaging, or achieve our vision for the new reuse economy. Reducing resource consumption is critical to circular economy and climate goals, and offers exciting opportunities to innovate and invest. Reuse is a crucial enabler of this.

**We need strong recycling policy *and* ambitious reuse policy – this is an 'and/and' choice, not 'one or the other'.**

\*Polling by City to Sea (Feb 2025) carried out by Yonder of 2,067 UK adults



## WHAT'S NEXT?

The time for action is now.

In the UK, as we develop the seventh carbon budget, champion a global plastics treaty, and seek to stay competitive in terms of investment, innovation, and skills, we have to picture the future we want, and work out what changes we need to make now to get there.

Some other countries and jurisdictions are ahead of us on reuse. We can learn from them – and we can also tailor our approach to our needs. The same is true of all jurisdictions and businesses around the world.

**This paper is not a detailed policy prescription, but it does highlight key policy considerations in rethinking how our packaging system is working, regardless of setting or location. We look forward to continuing the conversation.**



## ABOUT US

This paper was prepared by Eunomia for City to Sea as part of preparations for the Global Reuse Summit, supported by Ecosurety in Bristol in March 2025.



Eunomia is a B-Corp certified independent environmental research consultancy, headquartered in Bristol and operating globally. We have particular expertise in circular economy and packaging, and are world leaders in thinking about reuse, where we advise government, businesses, and NGOs at local, regional, national, and international levels.



City to Sea is an award-winning environmental charity on a mission to prevent plastic pollution at source. Our campaigns tackle the most polluting single-use items with upstream solutions and behaviour change interventions. Leading in this space for almost a decade, we work with communities, businesses, and policymakers to accelerate the transition to a circular economy and champion reuse, refill and return.