

# Defining “Reuse” in EPR & DRS

EPR and DRS are the perfect policy instruments for scaling reusable packaging, but it’s important to include clear definitions to ensure program success. Most importantly, distinguishing between *returnable reusable* versus *refillable* packaging is key.

**Returnable Reusable Packaging** is designed to be recirculated multiple times for the same or similar purpose in its original format in a system for reuse, and is owned by producers or a third party and returned to producers or a third party after each use.



**Refillable Packaging** is designed to be refilled by consumers multiple times for the same or similar purpose in its original format, and is sold or provided to consumers once for the duration of its usable life.

## Why separate definitions?

**Refillables** are relatively familiar: These are business models that include bringing your own container to a bulk aisle or purchasing a refillable bottle and buying concentrate to refill it with. These can be great formats for many products, and they likely result in waste prevention.

*Challenges with scaling refill:* While many companies have begun exploring refill models, they often cite challenges such as lack of retail space or needed consumer behavior change that present barriers to scale. More critically, **refillable packaging does not guarantee waste reduction if it doesn’t replace single-use packaging**. Many refillable models on the market today also use single-use packaging for refills.

**Returnable Reusables** more closely map to current patterns of consumption and sales because they can mimic single-use packaging. In addition, they involve industrial cleaning, rather than at-home cleaning, which can alleviate health-code concerns. Ultimately the biggest advantage of returnables is that they take most of the work away from consumers and put it back into the hands of producers—and they can fully replace disposable packaging, ensuring waste prevention.

## Policy recommendations for scaling reusable packaging

- **Include both forms of reusable packaging.** Instead of being exempt, returnables and refillables should simply pay lower fees than disposables.
- **Incentivize reusables via eco-modulated fees.** To further incentivize returnables over refillables and reward producers who choose returnables—which can be more challenging to implement but have a greater environmental benefit—there should be an even greater incentive for returnable packaging (ie, even lower fees) than for refillables.
- **Distinguish between returnable and refillable packaging in performance targets.** If refillables and returnables all count toward one overarching

“reuse target,” we are likely to see most or all efforts going to refillables, rather than returnables. Instead, include a distinct target for the percentage of products sold in returnable reusable packaging.

- **Accompany returnables target with a minimum return rate** to ensure the system performs. Allow time for the system to achieve this rate — ideally no less than 90% after a few years to optimize the environmental benefits of reuse.
- **Ensure transparency through separate reporting on returnables vs. refillables.** If we’re distinguishing between return and refill, then these should be reported separately.



### For more information

- Upstream’s [Policy Principles for Reuse in EPR & DRS](#)
- Zero Waste Europe’s [Reuse Vanguard Report](#), which includes the latest definitions of reuse & refill from the EU.
- Ellen MacArthur Foundation’s [Reuse: Rethinking Packaging](#), which introduces the 4 refill/return models above.