

# Large home appliances at risk of becoming a collateral damage of new EU packaging rules

**Brussels, 7 December 2023** - With no research or study conducted around the purpose of their packaging, large home appliances risk becoming a collateral damage of Europe's Packaging and Packaging Waste Regulation (PPWR). With its vote on 22 November, the European Parliament sent a strong signal recognising the protective and exceptional nature of fragile, heavy large home appliance packaging and supporting that a life cycle assessment is run to check if reuse is the most sustainable option. Member States should now build on the good progress, to truly square a solution that is good for the environment and for consumers alike.

New packaging rules provide an opportunity to contain increasing amounts of packaging waste and open up a new scenario where single use and reuse coexist. However, "reusable packaging is not a one-size-fits-all solution for all sectors and products," said APPLiA Environment Policy Officer Franziska Decker. Large home appliances like fridges, washing machines or dishwashers are heavy and fragile goods. This is why a tailored, protective packaging is needed to ensure their safe transport. "Product packaging is subject to truck vibrations, loading and unloading, dropping and climate shocks among others for which each appliance gets tested in the factory and based on which, protection levels, material type and amounts of packaging are determined."

Interestingly, Decker explained that reuse systems have already been explored in the past for large home appliances, but that comes with "environmental trade offs" as it involved higher material use to fill in the empty spaces of a standardised box and increased energy and water use - especially since containers may have to travel long distances to be restored by the original company. Packaging commuting alone would result in +10 to 40% CO2 emissions, according to a study published by McKinsey. This makes it very difficult to make an environmental case for reuse.

## Assessing reusable transport packaging for large appliances targets by employing the MEERp methodology or an horizontal Life Cycle Assessment (LCA).

A thorough environmental and economic impact assessment is required to check the feasibility and true sustainability advantages of reuse for large home appliances. "Using the Methodology for Ecodesign of Energy-related Products (MEERp), established under the current Ecodesign Directive, would make a sound and evidence-based approach," explained Decker. The MEERp methodology is a well-established tool that has been used successfully to set eco-design requirements for a wide range of energy-related products. It is a comprehensive and stakeholder-driven process that ensures that Ecodesign requirements are based on sound scientific evidence and are achievable for the sector.



Alternatively, she pointed out that a horizontal life cycle assessment (LCA) could be used to assess the environmental impacts of reuse targets, from the collection and transportation of used packaging to the cleaning and processing of reusable packaging. This would ensure that the assessment is conducted in a fair, objective, transparent, and scientifically solid manner.

## Minimum reuse targets to endanger the Single Market.

Setting minimum reuse targets would create an unjustified obstacle to the free movement of goods within the internal market. More ambitious States would in fact adopt higher targets, versus less ambitious States which would instead opt for lower ones. This fragmentation would impede the placing on the market of any packaging which does not comply with the specifications of its country of destination, hampering the smooth functioning of the Single Market.

Member States are expected to adopt their position on the proposed PPWR at the Environment Council on 18 December.

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