

# 1. Regulations impede the reuse of products

Friday 16 October 2015

There are five different bins in my home, because we're required to present different waste streams (paper/cardboard, glass, plastic, food and garden waste and other waste) for collection separately. That's a good idea, since it's easier to recycle the materials when families have already separated the various streams at home.

You will also have noticed that a large proportion of the waste consists of used packaging. As part of the move towards a 'circular economy' the EU member states are being encouraged to recycle packaging material as much as possible. Agreements about this in the Netherlands have been set out in the Packaging Framework Agreement 2013-2022 (Raamovereenkomst verpakkingen 2013-2022). Businesses that use packaging (producers and importers of packaged products), central government and the Association of Dutch Municipalities are jointly guaranteeing ever rising annual material recycling percentages.

## **Respect**

As the largest manufacturer and hirer of wooden pallets in Europe, the Faber Halbertsma Group supports the ambitions of the Framework Agreement. Respect for people and the environment is of great importance in this family business, in which I am following in the footsteps of my father and grandfather. It's in our own interest to ensure a constant supply of good quality wood for our pallets. Hence we only buy wood that originates from sustainably managed forests, often PEFC™ or FSC® certified. That makes it possible to reuse the wooden pallets time and again: nowadays a pallet lasts about ten years.

## **Environmental performance**

However, our efforts to boost sustainability are being impeded by the regulations arising from that same Framework Agreement. The annual progress report shows that the recycling of wood has been falling instead of increasing in recent years: from 38% in 2009 to 22% in 2013. That's no surprise: because we are able to reuse the entire product again, we have fewer and fewer pallets to offer a recycling plant. Strict application of the recycling rules makes it appear that wooden packaging is not achieving the required environmental performance. It has even led to us receiving an official warning from the Inspectorate. That's irritating in itself, but what I

am particularly upset about is that this state of affairs is smothering a move towards further sustainability in the sector.

### **Milk bottles**

The problem is that the Framework Agreement does not have a category for 'product reuse'. I don't think that it has kept up with developments. It's also causing us genuine problems: it harms our company's reputation and it costs us money. As long as there is no incentive for product reuse, too many pallets are leaking out of the system. We are having discussions with the ministry and hope to find a solution. I would thereby give the state secretary the following example: Imagine that there's a system under which we could fill our own bottles with milk from a tank in the market, at the cheese shop or in the supermarket. After use we can clean them ourselves and refill them in return for payment. I think that would save us a lot of packaging waste. It wouldn't even be such a bad idea in these times when we're on the brink of a circular economy. Just as with the reuse of pallets, such a system is discouraged by the current regulations. We are obliged to recycle the glass, because reusing the bottle does not equal recycling according to the rules...

***Ingrid Faber is the CEO of Faber Halbertsma, Europe's largest supplier of wooden pallets.***