REVIEW OF EPR FOR PACKAGING WASTE IN BELGIUM

FAIR RESOURCE FOUNDATION

Paper 1
Prevention and Reuse

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Waste prevention and reuse are at the top of the waste hierarchy, but have not been the focus for municipal packaging wate in Belgium. In this paper we look at how PROs can play a vital role in prevention waste and scaling reuse systems.

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Summary

This paper is the first of a series with the goal of elevating the discussion on producer responsibility for packaging and stimulating better policy making. In this paper, we explore one specific element of Extended Producer Responsibility (EPR) for municipal packaging waste in Belgium, namely the **policy for prevention and reuse.** While EU and Belgian legislation specifies that priority needs to be given to prevention and reuse, the Belgian policy implementation mostly focuses on collection and recycling.

In this report we will show that the amount of packaging and packaging waste is increasing, while the **amount of reusable packaging is decreasing.** Prevention addresses the root causes of waste generation, and reduces the quantity and harmfulness for the environment and human health of a product before it becomes waste. There is a growing amount of research showing that reuse has environmental (and often financial) benefits compared to single-use alternatives, so we argue that it is not just about the letter of the law, but in the spirit of the legislation to reduce the environmental impact of packaging. Producer Responsibility Organisations (PROs) such as Fost Plus, and government organisations like the Interregional Packaging Commission (IVC), should be doing as much as they can to encourage and facilitate prevention and reuse.

Belgian activities on packaging waste prevention and reuse discussed in this report include:

- Companies are obliged to submit prevention plans to the IVC, but it is not public what they entail and it is unclear what the IVC does with them. It gives the impression of a bureaucratic exercise without effect or consequence;
- There is a contact point to report examples of overpackaging, but the contact point is difficult to find and there doesn't seem to be monitoring of what is reported. It would be a miracle if any lessons are learned;
- The law states that the share of reusable packaging versus single use packaging is not supposed to go down, but nonetheless has been for the last 20 years.

Oversight of activities seems to be minimal, and the IVC doesn't seem to intervene when legal requirements are not being met. We conclude this report with recommendations on a way forward for Belgium towards a circular economy where prevention and reuse a prioritised:

1. There should be more transparency on prevention activities undertaken.
2. The prevention activities should include mandatory monitoring of outcomes.
3. Fost Plus should be required to produce a Belgian municipal packaging prevention plan with and on behalf of its members.
4. The eco-design support offered by Fost Plus should have a mandatory prevention and reuse stage.
5. The requirement for an overpackaging contact point should be renewed in the new accreditation for the PRO, with increased education and communication to consumers.
6. Like the French PRO Citeo, Fost Plus should have a mandatory budget for supporting the transition to reusable packaging.
7. Fost Plus should have statutory reuse targets that exceed those in the PPWR.
8. Fost Plus should implement further eco-modulation to slow the decline in reusable packaging, and reverse this trend to meet the reuse targets.
9. By funding communication and education campaigns for the glass bottle reuse system, Fost Plus could increase the reuse rate.
10. The potential implementation of a DRS for single-use beverage containers should be seen as a pathway to reuse, and such system should be designed to incorporate the current reuse system.

1. INTRODUCTION

This paper is the first of a series with the goal of elevating the discussion on producer responsibility for packaging, pushing it to a higher level, and stimulating better policy making. This series of papers is intended to inform policy makers in Belgium, and in Europe, to review EPR with the ultimate goal of making it more environmentally effective.

Legislative context

For over 30 years the EU's legislative framework for waste, including packaging waste, has been built on implementing the waste hierarchy. By 1994, the **Packaging and Packaging Waste Directive** (PPWD[1], Directive 94/62/EC) stated in its recitals that "the management of packaging and packaging waste should include as a first priority, prevention of packaging waste and, as additional fundamental principles, re-use of packaging, recycling and other forms of recovering packaging waste and, hence, reduction of the final disposal of such waste."

Subsequent legislation reinforced and solidified the position that packaging and packaging waste should be moved up the waste hierarchy in a transition to a more circular economy. For example, the EU's **Waste Framework Directive** (WFD, 2008/98/EC) establishes the current (since 2008) waste hierarchy, which prioritizes waste prevention over recycling, and recycling over energy recovery.

More specifically, Article 9, Paragraph 1 of the WFD requires member states to take measures to prevent waste generation, including packaging waste, and promote a circular economy approach. The organisations responsible for packaging waste, including **Producer Responsibility Organisations** (PROs), have historically focussed on recycling. Recycling is an invaluable component of the circular economy, but is one of the lowest steps on the 'circular economy hierarchy,' famously visualized in the 9R-diagram[2] shown in Figure 1. In this diagram R0-R2 could be called 'prevention strategies', while R3-R7 could be called 'strategies for a longer lifespan of products'; only R8 is recycling, just before R9 recovery.

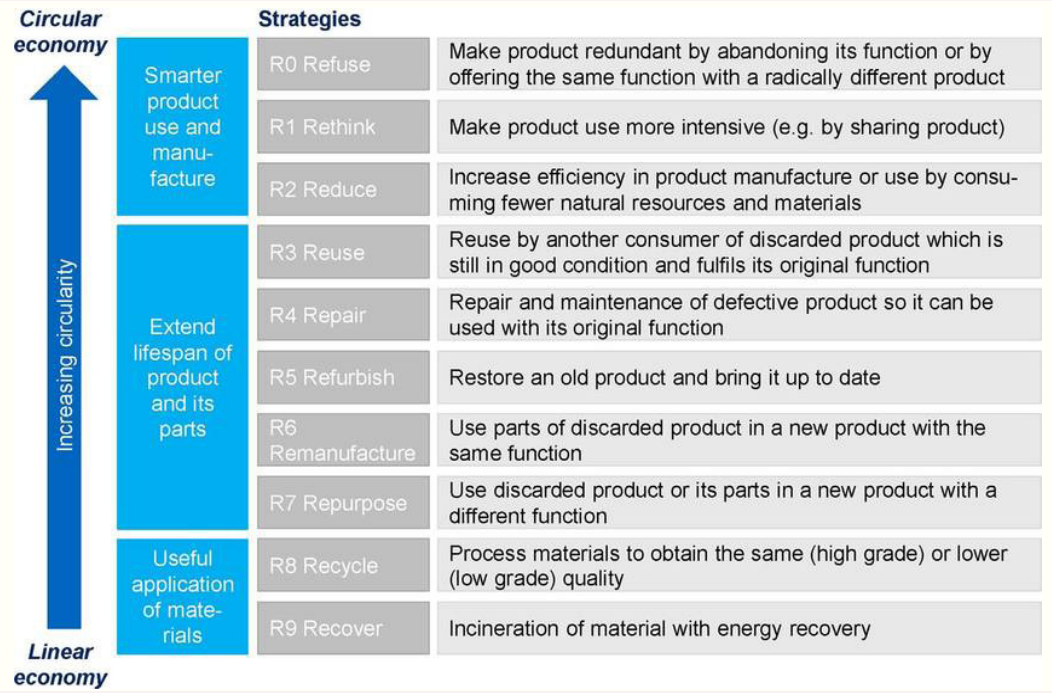

Figure 1: The 9R diagram

1 The most recent amendments to the 1994 Packaging and Packaging Waste Directive were in 2018. The consolidated version, still referred to as the PPWD, can be found here: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A01994L0062-20180704.

2 https://www.researchgate.net/figure/The-9R-Framework-Source-Adapted-from-Potting-et-al-2017-p5_fig1_320074659

Waste Prevention

In Belgium, waste management is a regional competence, and thus the responsibility of the three regions: Brussels Capital Region, Flanders, and Wallonia. The three regions have jointly signed the **Cooperation Agreement on the prevention and management of packaging waste**[3], which sets out the creation and responsibilities of the Interregional Packaging Commission (Interregionale Verpakkingscommissie, IVC), the government body responsible for overseeing and implementing packaging waste regulations. The Cooperation Agreement reiterates that "the top priority for the management of packaging waste is the prevention of packaging waste," followed by reuse, and the very first objective of the Cooperation Agreement (Article 3, Paragraph 1) is to prevent or reduce the production or the harmfulness of packaging waste.

Since the EU regulations related to packaging waste are frequently updated, for example with **Extended Producer Responsibility** (EPR) now being much more clearly defined in Article 8 of the Single-Use Plastics Directive (SUPD, 2019/904), the roles of the packaging PROs must evolve with it.

Fost Plus is the Belgian PRO for municipal packaging waste, and is accredited every five years by the IVC. Via this accreditation, the Belgian government delegates responsibility for implementing some of the EU legislation for municipal packaging waste to Fost Plus.

In this paper, we explore one specific element of EPR for municipal packaging and packaging waste in Belgium, namely the policy for prevention and reuse, and its implementation. For context, Figure 2 shows the data reported by the IVC to Eurostat for the last 10 years (2011-2020) on all packaging waste generation in Belgium. Here we can clearly see an upward trend in the tonnage of packaging waste, even before the sharp rise in 2020 due to the Covid-19 pandemic. When population growth is accounted for, the kilograms per inhabitant also show an increasing – even accelerating – trend. Although the European Environment Agency concluded that Belgium is not at risk of missing the targets for municipal waste and packaging waste set in EU legislation for 2025[4], we argue that Fost Plus is not doing as much as it could be in relation to waste prevention and reuse, and should strive to do more in its role as a leading PRO in Europe.

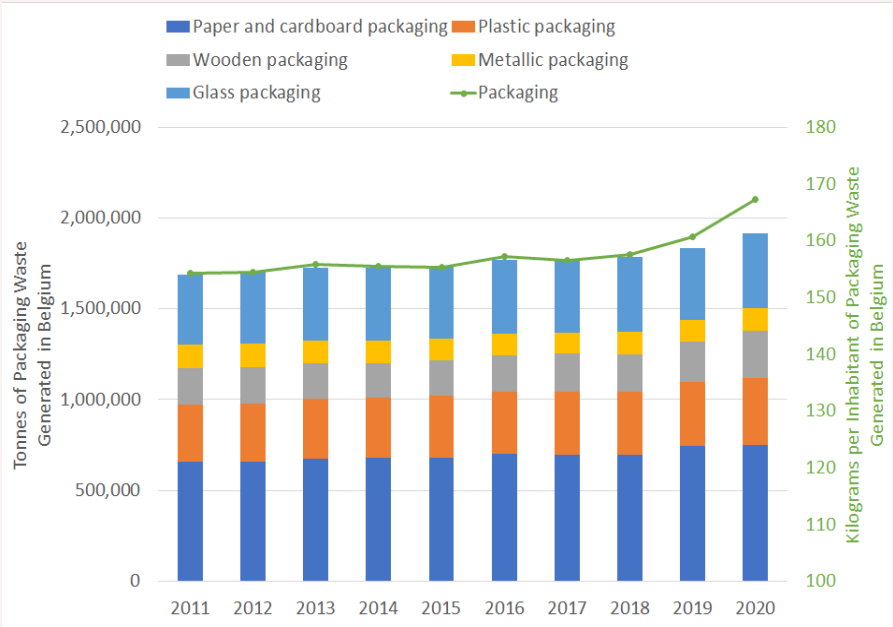

Figure 2: Eurostat Packaging Waste Data for Belgium for the last 10 Years (from 2011-2020)

3 Cooperation agreement of 04-11-2008 on the prevention and management of packaging waste and the Fost Plus accreditation of 20 December 2018 can be found here: https://www.ivcie.be/en/category/downloads-en/

4 https://www.eea.europa.eu/publications/many-eu-member-states/early-warning-assessment-related-to

Definitions of Prevention and Reuse

Waste prevention is defined in the WFD (which also applies to packaging through the PPWD) as the reduction of the quantity and harmfulness for the environment and human health of a product before it becomes waste. It is sometimes understood that waste prevention can be achieved by reducing waste through recycling. This is incorrect by the WDF definition, as prevention averts a product or packaging from becoming waste, so it comes before any possibility of recycling – something can only be recycled after it becomes waste.

Waste prevention has many different facets addressed in EU legislation, for example:

- **Prevention programmes:** EU member states can establish prevention programmes that encourage waste prevention measures by producers, distributors, and consumers.
- **Eco-design:** For packaging, concepts of 'design for recycling' and some elements of prevention, such as lightweighting, follow from the PPWD's essential requirements.
- **Reuse:** Waste prevention can also be achieved through reuse, and Article 5, Paragraph 1 of the PPWD requires member states to take measures to encourage reuse. Reusing an item can replace a lot of single-use items, hence leading to less waste being generated.

Article 4, Paragraph 1 of the PPWD clearly states that prevention measures can also consist of incentives through EPR schemes, i.e., through PROs, to minimize the environmental impact of packaging.

In addition, the EU is currently in the process of revising the PPWD[5]. This to include prevention targets to be achieved by member states, and a range of reuse and refill targets for different sectors and packaging formats, to be met by 2030 and 2040. Details are still being finalized as this revision goes through the legislative process, but the intention is clearly for the EU to become more circular. As such, **Belgium should be looking ahead to how it can transition to a more circular approach to minimise the impact of packaging, by giving prevention and reuse priority.**

5 https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI(2023)745707

Advantages of Prevention and Reuse

In comparison with other member states, Belgium reports high recycling figures, which is one reason why Fost Plus is considered a leading PROs in Europe – many think that Fost Plus has the recycling problem solved, and so they also have the environmental problem solved. However, the motivation behind the legislation is to reduce the environmental and human health impacts of packaging, and this can be achieved much more effectively through prevention, including reuse, than through recycling.

While recycling remains crucial for managing waste and conserving resources, prevention addresses the root causes of waste generation, and reuse is a direct and immediate approach to reducing waste, both minimizing environmental impact from the outset. Extending the life of products through reuse, for example, maximizes their value, conserves resources, complements recycling efforts, and contributes to a more sustainable and circular economy where materials are used efficiently and waste is minimized throughout the entire lifecycle of products. And there is a **growing amount of research showing that reuse has environmental (and often financial) benefits compared to single-use alternatives**, and that recycling alone is not enough. Some examples include:

- A 2020 Zero Waste Europe (ZWE) report combines multiple studies on reuse, stating among other numbers that reusable glass has 85% less emissions than its disposable counterpart[6] (See Figure 3);
- In 2021, WWF published a report on the way forward for Germany's packaging approach and indicated that business as usual (including recycling) is not suficient, and reuse is needed[7];
- The 2021 'Realising Reuse' paper by Rethink Plastic Alliance lists an overview of the benefits of reuse compared to single use in different sectors, such as financial savings, reductions in resources used, water saved and CO2 emissions reductions[8];
- A Eunomia study from 2023 states glass, aluminium, and PET pose a threat to achieving net

6 https://zerowasteeurope.eu/wp-content/uploads/2020/12/zwe_reloop_executive-summary_reusable-vs-single-use-packaging_-a-review-of-environmental-impact_en.pdf

7 https://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/Unternehmen/WWF-Report-Pathways_to_a_circular_plastic_packing_system_in_Germany.pdf

8 https://rethinkplasticalliance.eu/wp-content/uploads/2021/07/Realising-Reuse-Final-report-July-2021.pdf

zero emissions by 2050 – e.g, recycling glass still requires 75% of the energy needed for virgin glass production – with the conclusion to opt for reuse[9];

- The energy cost for production of virgin glass was also very evident in the energy crisis when factories were closed because of the high energy bill[10];
- That recycling is insufficient has also been stated in this literature overview from 2018[11]. This report concludes that there is no consistent correlation between the recyclability of a product and its reduction in environmental impact, so the full life cycle and actual end of life management (recyclable and recycling are not the same thing) needs to be considered;
- An analysis in the Netherlands from 2022 also shows that most packaging in the to-go sector, for example, are not actually recyclable and are thus burned[12].

The New ERA summarizes the key benefits of reuse nicely on their new rEUse campaign website[13]: each European disposes of 180 kg of packaging waste per year, and this figure continues to increase despite packaging becoming lighter. Based on a thorough review of scientific literature (with references available on their resources page), if 50% of all parcels, containers for food and beverage on the go, and household care products were reusable, we would save up to 3.7 Mt CO2e, 10 billion cubic meters of water (see Figure 4[14]), and nearly 28 million tonnes of material per year – those are big numbers and it only covers a few sectors. The systems already implemented in the EU show, and science agrees, that reuse value chains contribute to saving resources by circulating them in truly closed loops while enabling economic growth and creating jobs.

As such, we argue that it is **not just about the letter of the law**. In the spirit of the legislation – to reduce the environmental impact of packaging – and the growing body of evidence that we are overreaching the resource capacity of our planet, PROs such as Fost Plus should be doing as much as they can to encourage and facilitate prevention and reuse.

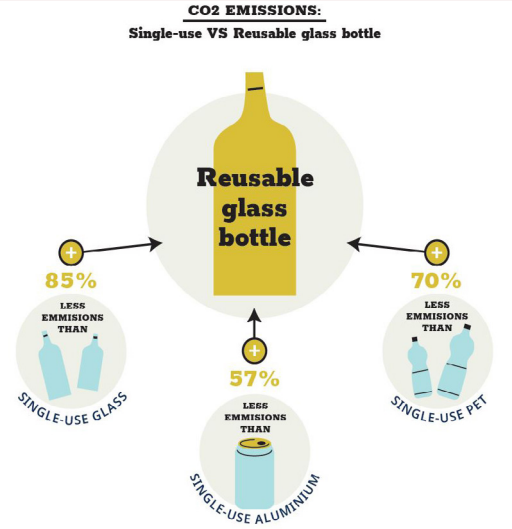

Figure 3: Infographic from ZWE study on reusable vs. single-use packaging

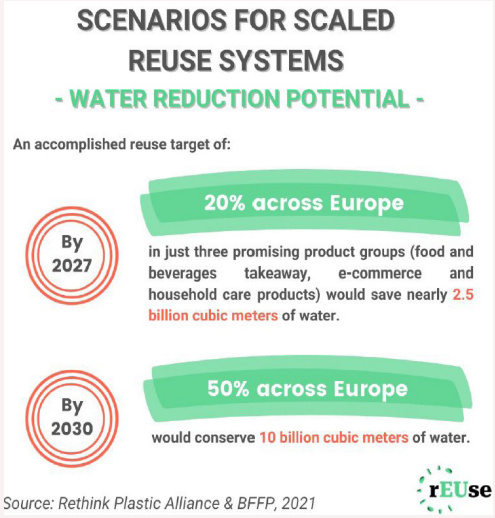

Figure 4 : New ERA rEUse campaign infographic showing water savings of reuse compared to single-use packaging

9 https://zerowasteeurope.eu/wp-content/uploads/2023/04/Decarbonisation-of-Single-Use-Beverage-Packaging-v2.0.pdf
10 https://nos.nl/artikel/2447590-wereldberoemde-duralex-fabriek-maanden-dicht-door-hoge-energierekening
11 https://www.oregon.gov/deq/FilterDocs/recyclable.pdf
12 https://natuurenmilieu.nl/app/uploads/Onderzoeksrapport-To-go-verpakkingen.pdf

13 https://www.newreusealliance.eu/reuse
14 https://www.linkedin.com/posts/new-era-new-eu-ropean-reuse-association_save-water-go-reusable-activity-7095324078433001472-3sVC

2. ROLE OF PROS IN WASTE PREVENTION AND REUSE

The concept of EPR from the onset was broader in scope and not just about managing packaging waste, however PROs have historically been set up for producers to collectively meet the requirements for managing the end of life of their products and packaging. For packaging PROs, this means collection, sorting, and recycling of packaging waste, and this has been the status quo for almost 30 years. Current PRO budgets in many countries rely on the sale of high value materials like PET and aluminium, so any significant changes to tonnages of materials through waste prevention could result in significant changes to their funding and operations. Simply put, EPR and the PROs that deliver it, were not designed to reduce the amount of packaging waste.

As a result, prevention conflicts with their business models, and PROs are understandably reluctant to change their ways of working. A good example of this is that many PROs lobby against Deposit Return Systems (DRSs) for beverage packaging because some of these key, high value materials, would be collected separately from the current municipal packaging and may no longer be in their remit[15]. Similarly, reuse systems, if done correctly, would significantly reduce the amount of single-use packaging waste.

There is not only a conflict with the business model of the PRO, but also with that of its members. The moment a PRO starts working on prevention and reuse, it starts to address the business model of the producers and retailers that steer the PRO. To achieve prevention or reuse, the business model would need to shift away from the current linear business model to, for example, a new service-based models for reusable packaging. Even though this creates opportunities, most businesses are reluctant to change; and the issue is that the way PROs currently work is to serve the interests of the producers through waste management downstream, not by changing the way they do business. As such, prevention and reuse are not at the top of PROs' agendas.

What Should the Role of PROs be in Prevention and Reuse?

It is Recycling Netwerk's view, as is substantiated by EU and Belgian legislation, that PROs should minimise the environmental impact of the products that fall under their scope and should prioritise the 7 upper strategies of the 9R-framework (see Figure 1 above). These strategies are about prevention and reuse, and the WFD obliges member states to give priority to these strategies. Therefore, the goal of the PRO is not simply to manage waste, but to reduce the broad environmental impact of the products to the best of their ability; that includes measures that intervene in production and distribution of the products. To do so, cooperation and dialogue with stakeholders such as municipalities, NGOs, producers, and service providers, is key.

15 This depends on how the DRS is governed; in theory with a DRS the PRO could still become the owner of the material, but not necessarily so.

Prevention and Reuse Activities of PROs across Europe

Unsurprisingly, there are not a lot of examples of PROs actively encouraging prevention and reuse activities across Europe. However, Citeo is a good example of a PRO that is pushing forward the prevention and reuse agendas in France. Like Fost Plus, they have a strong focus on collection, sorting, and recycling; however, within Citeo's Strategy, Innovation, Customers and Operations Team, two of the four departments focus on eco-design, and reuse[16]. Their recent (May 2023) call to action[17] asks all actors for unity in the activation of many levers to reduce the impact of municipal packaging, listing the removal of unnecessary packaging first and building reuse systems at scale second.

But Citeo goes well beyond simply calling its members to action. In January 2023 they announced that the Citeo Group would invest €50M per year, or 5% of their annual budgets, for the next seven years (2023-2029) to support the development of reuse systems at scale (see Figure 5)[18], including the development of standard ranges of reusable packaging for catering, fresh produce, and beverages, starting with glass but also in stainless steel and plastic.

In May 2023 it was announced that the first large scale reusable glass packaging was being produced with two French glassmakers, and was being tested by brand partners such as Andros, Carrefour, Ecotone and Heineken[19] – this was the result of a significant amount of work on engaging with and coordinating producers, including a 2022 consultation of reusable packaging[20] The Citeo initiatives are a significant step in PRO intervention on reuse, and their work continues – they currently have an open call for proposals for spending the proposed reuse budget[21].

CITEO

Press release January 24, 2023

Citeo and Adelphe invest 50 million euros in 2023 to develop large-scale reuse

While consumer expectations are changing, and French and European laws are getting stronger concerning the reuse of household, industrial and commercial packaging, the Citeo group (composed of Citeo and its subsidiary Adelphe) will invest 50 million euros per year, i.e. 400 million on the next approval 2023 – 2029, to support its development on a national scale.
Its objective: to enable all of its customers to define and implement their action plan to develop reuse. This investment, corresponding to 5% of the eco-contributions collected by Citeo (in accordance with the Agec law), is part of its overall ambition to reduce the environmental impact of household and paper packaging.

Figure 5: Citeo press release announcing their €50M per year investment in scaling reuse systems in France

16 The other two focussing on selective collection, and recycling services.
17 https://bo.citeo.com/sites/default/files/2023-05/CP%20Citeo%2015%20mai%20VDEF_0.pdf
18 https://bo.citeo.com/sites/default/files/2023-01/Citeo_CP%20r%C3%A9emploi_20012024.pdf
19 https://bo.citeo.com/sites/default/files/2023-05/Citeo_CP%20ReUse%20Day_09052023%20VDEF.pdf
20 https://www.citeo.com/le-mag/vers-des-emballages-standards-pour-repondre-aux-defis-du-reemploi
21 https://www.citeo.com/encore-plusdereemploi

Figure 6: Specially designed TOMRA RVM to be used in the Aarhus pilot

In other countries, the main driver for prevention and reuse is the national, regional, or local government. For example, in 2021 Germany updated its Kreislaufwirtschaftsgesetz[22] to include a requirement for businesses that offer freshly prepared food to offer reusable packaging free of charge (only a deposit can be levied). This includes restaurants, cafés, canteens, bistros, supermarkets, and other businesses serving freshly prepared food, with a sales area of more than 80 square meters and more than 5 employees. The law has some limitations, such as only requiring business to offer alternatives for containers made (partially) from plastics. This led to McDonalds, for example, continuing to use paper packaging. Thus, the law is missing out on an opportunity to tackle another great source of waste that is generally not recycled, and often littered. The reuse law in Germany also lacks a clear enforcement plan, but is nonetheless an important step in the right direction.

At the more local level:

- Tübingen introduced a tax on single-use food and beverage packaging, and provides subsidies to transition to reusable packaging[23];
- Aarhus city has partnered with Tomra to implement a city-wide deposit system for takeaway food packaging (see Figure 6)[24];
- Zero Waste Europe is working on the ReuSe Vanguard Project with cities all over the continent, like Berlin, Paris, and Rotterdam on scaling reuse systems[25] – in Belgium, Leuven and Ghent will be involved; and
- In Italy, the national association of municipalities is working together with municipalities to develop a manifesto to stimulate climate reduction strategies and consolidate reuse models.

These national, regional, and local initiatives have little or no involvement from PROs, which seems like a missed opportunity for producers to take responsibility for the packaging waste they produce, and for governments, producers (including PROs on their behalf), and consumers to collaborate to tackle the climate crisis together.

22 https://www.bmuv.de/gesetz/kreislaufwirtschaftsgesetz
23 https://zerowastecities.eu/bestpractice/the-story-of-tubingen/
24 https://www.tomra.com/en/news-and-media/news/2023/tomra-and-aarhus-city-enter-collaboration-to-create-innovative-reuse-system
25 https://zerowasteeurope.eu/project/reuse-vanguard-project-rsvp/

3. FOST PLUS ACTIVITIES ON PREVENTION

The most effective way to reduce waste is not to create it in the first place. As set out in Section 1 above, there are many facets to waste prevention, and the EU legislation on waste prevention is transcribed onto Belgian law via the Cooperation Agreement, which refers to the accreditations of the PROs regarding their roles and responsibilities. For Fost Plus, the most recent 2018 Accreditation has a section on reuse (Section 7), and so here we focus on the content of this section, namely:

- prevention programmes,
- eco-design, and
- overpackaging

Prevention programmes

The Cooperation Agreement allocates responsibility for producing prevention plans to the **three regions**. The waste prevention country profile for Belgium published by the European Environment Agency (EEA) reviews these three prevention plans[26] and concludes that "although a longer time series is needed to solidify a decoupling conclusion, Belgium does not seem to be on track to decouple total waste generation from economic growth" (see Figure 7)[27]. The regional governments rely heavily on communication campaigns and encouraging residents to make more sustainable consumption choices (i.e., consumer behaviour change). But since the regional governments have limited control over what is placed on the market, these campaigns can have only a limited impact when consumers are faced with a monoculture of single-use packaging in the shops.

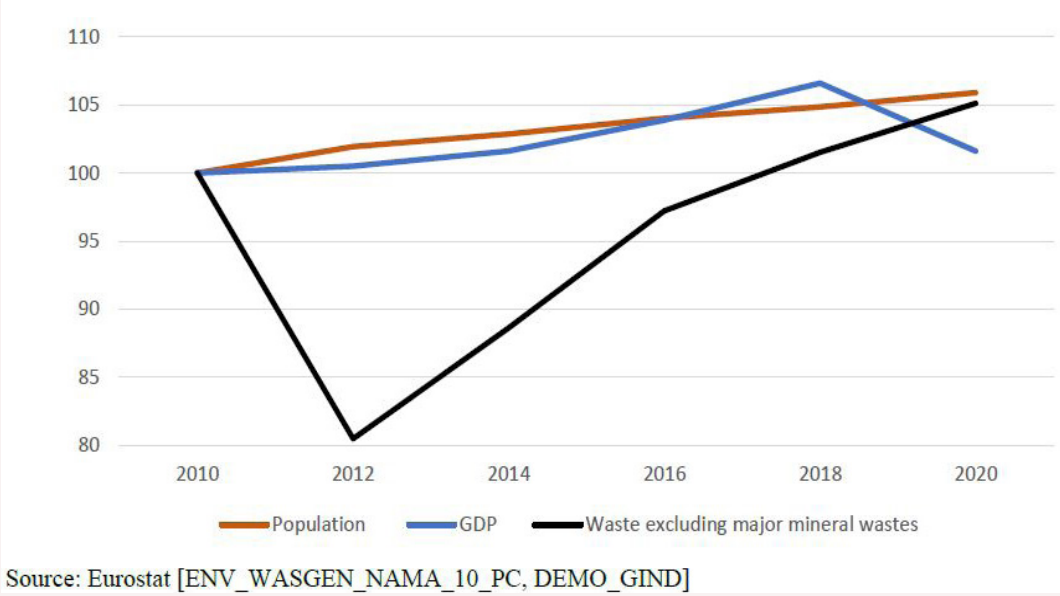

Figure 7: Reproduction of Figure 2 in the EEA waste prevention country profile for Belgium showing that waste arisings are not yet decoupling from GDP

26 The EEA is mandated by the WFD to publish, every two years, a report reviewing the progress made in implementing waste prevention programmes for each member state.

27 https://www.eea.europa.eu/themes/waste/waste-prevention/countries/2023-waste-prevention-country-fact-sheets/belgium_waste_prevention_2023/view

The Cooperation Agreement also allocates responsibility for producing prevention plans to the **companies that place packaging on the market,** and these prevention plans must be submitted to IVC[28]. In 2021, IVC did a study on the effectiveness of these prevention plans. This report concluded that although there are advantages to companies producing prevention plans and they should not be eliminated, most companies believe that they are merely a legal obligation and the benefits would be realized without the prevention plans[29].

The 2021 IVC report also concluded that federations that produce prevention plans on behalf of groups of companies, on the other hand, found the process much more useful and impactful. They found producing prevention plans stimulated a dynamic at the sector level that can be motivating for all companies in that sector. It also encourages less developed companies to take action.

Fost Plus currently has no responsibility for prevention programmes; Section 7, Article 33, Paragraph 2 of the 2018 Accreditation states that Fost Plus may not get involved in the development of prevention plans. Although the current governance structures steer in the other direction, Fost Plus could reduce the amount of packaging placed on the market in the same way that the federations are. With and on behalf of their members, **Fost plus could launch a Belgian, municipal packaging prevention plan,** which could stimulate action that actually reduces the amount of packaging placed on the market. Fost Plus is better placed to work with packaging producers to reduce waste than the regional governments. If such a plan were mandated, it would need to have quantified improvement measures, a plan for tracking the impact of those measures, company or sector specific targets, and penalties through modulated producer fees, or a bonus/malus system, for non-compliance and not reaching those targets.

In order to secure the ambition of this prevention plan, it would need to be aligned with the prevention targets that the three regions already have in place. For example, the Brussels Capital Region has specified a 5% reduction in household waste per capita by 2023, and 20% by 2030[30]. The targets within each region are obviously much wider than just packaging, but the packaging sector cannot be allowed to continue to increase the amount of packaging placed on the market, while the regions strive to reduce the amount of waste being produced – all parties need to align and move in the same direction together. Details of how the targets are established would need to be investigated further.

Individual companies would still need to develop their own prevention plan, but these would need to be more specific and address how they will contribute to the Belgian prevention plan. Having a national prevention plan to guide individual prevention plans would solve some of the issues associated with the current individual plans, such as that not all companies being equally ambitious, and that no means exist to enforce them.

Further, these prevention plans should be made publicly available on the IVC website. At the moment, there is zero public idea that these prevention plans exist, let alone about what the prevention plans are and whether they have any effect. It is a black box at the level of the IVC, with no transparency for Belgian residents or the government on what is being planned or achieved. Additional transparency would hold companies to account.

In the meantime, the IVC should use its power to reject prevention plans that do not include quantified improvement measures: prevention plans with no quantified measures, or no measures at all, should never be approved. This criterion could be made even more strict over time, as the Belgian plan is developed.

28 https://www.ivcie.be/verplichtingen/preventie/

29 https://www.ivcie.be/wp-content/uploads/2021/05/Finaal-rapport-evaluatie-preventieplan.pdf

30 https://environnement.brussels/citoyen/nos-actions/plans-et-politiques-regionales/plan-de-gestion-des-ressources-et-dechets-pgrd

Funding Prevention

Paragraph 1 of Section 7, Article 33 of the Fost Plus 2018 Accreditation states that Fost Plus can fund the communication and information campaigns of the responsible companies regarding prevention at the source of packaging and reuse of packaging, and also training on prevention to help disseminate knowledge. This has to be reported to IVC each year in September. The IVC shared the 2022 report (for activities in 2021) with us, and not one of them related to prevention or reuse; everything was about recycling and design for recycling, which are not prevention activities.

In the Netherlands, for example, the government tracks actions in relation to each of the 9R strategies. There are questions around how an action is defined, but they still have some monitoring that they keep in mind when planning activities. Back in 2017, the vast majority of activities were in relation to recycling (R8); and even recovery (R9) had more actions than higher priority prevention activities (R1, R3-R7)[31]. However, in the most recent report, it is clear that activities in relation to prevention and reuse are increasing; conversely activities in relation to recycling saw a sharp drop in 2020, and recovery has been steadily declining year after year[32].

Fost Plus should do similar monitoring of its own activities, and those of its members (via a survey, for example), and report the results in their annual report. The next accreditation could have a requirement to fund prevention campaigns, a requirement that the number (or percentage) of projects related to prevention and reuse increases over time, and a requirement that the budget spent on prevention and reuse increases over time. This would complement the requirement discussed above of having a Belgian, municipal packaging prevention plan by providing concrete evidence of activities being undertaken to implement the plan.

Eco-Design - Design for Recycling

The PPWD includes essential requirements for packaging design to fulfil specific functions (e.g., containment, protection) while ensuring the minimum amount of material necessary and the ability to be reused, recycled, or recovered. The concept of 'design for recycling' (DfR) that follows from this considers the entire lifecycle of packaging, from production to disposal, and aims to minimize environmental impacts throughout that lifecycle. Some design characteristics such as lightweighting are prevention, but these can conflict with DfR, which is about making packaging more recyclable; in some cases (e.g., multilayer flexible plastic), lightweighting actually makes recycling more difficult.

Fost Plus is doing some work on DfR, which is also covered by Section 7, Article 33, Paragraph 1 of the accreditation. However, this section – on prevention – wrongly includes the promotion of easy-to-recycle packaging and the use of recycled materials as prevention activities.

Reviewing all DfR activities on the Fost Plus website, there are two main eco-design resources:

Design4Recycling guidelines[33]

Pack It Better: Belgian hub for eco-designed packaging[34]

Under the first, the **Design4Recycling guidelines,** Fost Plus offers companies help with improving the sustainability and recyclability of their packaging. This includes a guidance document, packaging diagnosis (free of charge advice before putting new packaging on the market), workshops for companies (targeted at knowledge development across various departments, including purchasing, marketing, logistics or R&D), benchmarking (of existing packaging put on the market with a view to phase out non-recyclable packaging), and a style guide for labelling packaging and the correct disposal thereof. However, there is no mention of prevention or even lightweighting, so these guidelines are clearly not in the scope of prevention.

31 Figure 3 of https://www.pbl.nl/sites/default/files/downloads/pbl-2018-circulaire-economie-wat-we-willen-weten-en-kunnen-meten-2970.pdf

32 Figure 4.5 of https://www.pbl.nl/sites/default/files/downloads/pbl-2023-icer-2023-4882.pdf

33 https://www.fostplus.be/en/projects/design4recycling-guidelines

34 https://www.fostplus.be/en/projects/pack-it-better

Figure 8: Fost Plus Design4Recycling guidelines

The **Pack It Better design hub**, on the other hand, states that "the focus is on both quantitative and qualitative prevention and on better recyclability and circular applications." The aim of Pack It Better is to stimulate the use of sustainable packaging by exchanging and sharing knowledge by facilitating contacts between companies looking for solutions. It includes a webinar on reducing material use in packaging[35], and showcases a few projects on reusable packaging[36], but the focus is clearly on recyclability, single use packaging, and the linear economy. The vast majority of the content about sustainability is about recyclability, and not about prevention or reuse.

Finally, there are case studies on the **Fost Plus blog**[37] related to design for recycling – six already this year related to packaging placed on the market: two from Coca-Cola, and one each from of Pringles, Carrefour, Colruyt Group, and Senseo. Only two of these mentions prevention. Carrefour is replacing fruit and vegetable stickers b laser printing[38] (but no tonnage impact is attributed to this change), and is reducing the size of some labels resulting in a 16 tonnes reduction in packaging[39]. Coca-Cola is saving 30 tonnes of raw materials by removing handles from multipacks of beverage bottles[40]. Out of the 1.9M tonnes of packaging placed on the market in Belgium in 2020 (see Figure 7), this is a tiny amount. And these 16 tonnes of prevention mentioned by Carrefour will be more than offset by an increase in tonnage due to another example in the same blog that talks about replacing stickers on apples with protective cardboard packaging. It would be great to see more case studies of Fost Plus activities (or those of their members) in relation to prevention and reuse including concrete and measurable initiatives being implemented.

Overpackaging

Overpackaging is another big issue when it comes to packaging waste prevention. Many products can be found packaged in multiple layers of unnecessary packaging, such as multipacks and promotions, and small format packaging like individual servings or sachets[41]. Figure 3 shows two examples of these types of overpackaging in Belgian supermarkets today. Overpackaging in the ecommerce sector is another big issue[42], which has been growing as a result of the pandemic. Social media hashtags like #overpackaging or #suremballage show the scale of these issues. **Fost Plus should be working with its members to identify and reduce unnecessary overpackaging** to prevent packaging waste from arising.

To this end, Section 7, Article 35 of the 2018 Accreditation states that Fost Plus will set up an **overpackaging contact point**, where consumers can report flagrant examples of overpackaging. This resource was indeed set up, and still exists on the Fost Plus website[43], but is not easy to find; it is currently almost hidden on the website with no links or signposting. Widespread communications should have been implemented to ensure that the public knows about this contact point as soon as possible after its launch in 2018. No evidence of communication can be found – the contact point is not even mentioned in the Fost Plus annual reports of subsequent years. Without proper communications to consumers about the contact point, it would be surprising if anyone uses it.Nonetheless, we submitted the two examples of overpackaging in Figure 9 via this contact point in June 2023. According to the articles of the 2018 Accreditation, "Fost Plus shall investigate any reported cases, if necessary refer them back to the members who placed the packed goods on the market and, where possible, give feedback to the consumers who reported the matter." It is interesting to note that the process on

35 https://www.packitbetter.be/en/webinar-ecodesign-of-packaging-reduce/
36 https://www.packitbetter.be/en/projects/
37 https://www.fostplus.be/en/blog
38 This waas legislated in Flanders from 1 January 2021 https://www.idewe.be/-/stickers-groenten-en-fruit
39 https://www.fostplus.be/en/blog/carrefour-improves-its-fruit-and-vegetable-packaging-part-of-its-act-for-food-programme
40 https://www.fostplus.be/en/blog/small-change-saves-30-tonnes-of-raw-materials
41 https://friendsoftheearth.eu/wp-content/uploads/2018/04/over-packaging_fact_sheet.pdf
42 https://www.rtbf.be/article/mais-pourquoi-donc-ces-colis-sont-ils-a-ce-point-suremballes-comment-pourrait-on-faire-autrement-10393012
43 https://www.fostplus.be/en/reporting-form-superfluous-packaging

the Fost Plus website is slightly different from what is in the Accreditation; on the website[44] it says that Fost Plus "will send your report (and accompanying personal details) to the producer concerned. The producer concerned will then contact you and respond to your report," so the role of Fost Plus seems to be significantly reduced, not actually involving any investigation by Fost Plus**. We are yet to receive a response from the producer.**

And the Accreditation requires no reporting on the overpackaging contact point. It would be interesting to know if people use it, how many responses Fost Plus had, what was done with the responses, and what the producers have done in response to the cases. Without monitoring the impact of initiatives like these, no one knows what the time and money being spent is achieving.

Consumers are a useful resource to combat overpackaging – they are directly engaging with it daily, so using them to identify and address overpackaging is a great idea. However, if a contact point hidden on Fost Plus's website, without much (if any) communication to consumers is not yielding results, then other methods to solicit consumer engagement should be mandated. In other words, this type of initiative needs to be implemented properly. Continued outreach and communication are needed for consumer awareness. Management of the responses and reporting of the results of Fost Plus's activities is also needed; this will give consumers the confidence that their time spent reporting issues actually leads to action. And the results need to be evidenced transparently with data showing that the amount of packaging being placed on the market is reducing.

Figure 9: Examples of overpackaging in Belgian supermarkets (May 2023): waffles packed in three separate layers of plastic packaging; a multipack of dish soap in a full-sized plastic film wrapper

44 This was also confirmed by Fost Plus after submitting an overpackaging example via the website. The procedure confirmed by Fost Plus sends an e-mail to the member with the remark of the consumer; they have to answer directly to the consumer with Fost Plus in cc so that they can close the case; and if the member doesn't answer within a month, Fost Plus sends a reminder.

4. FOST PLUS ACTIVITIES ON REUSE

Complementary to prevention activities are reuse systems. The PPWD encourages the development and promotion of reusable packaging systems. Reusable packaging is defined as: packaging that is intended to achieve a minimum number of rotations in its life cycle; and to be refilled or used for the same purpose; until it is no longer subject to reuse at which point it becomes waste. Member states are required to encourage the use of reusable packaging where appropriate and economically feasible, and the currently ongoing revision to the PPWD (referred to as the **PPWR**) is likely to solidify this with reuse targets and performance objectives of the reuse system. Germany is well underway in implementing mandatory reusable packaging systems in various sectors already, while Belgium lags behind.

Figure 10: Reusable packaging in Belgium

The Cooperation Agreement contains a clause (article 3, paragraph 1, bullet point 2) that states the objective "to guarantee that the proportion of reusable packaging for the same goods placed on the market does not fall in comparison with the previous year and that the total weight of one-way packaging for the same goods placed on the market is reduced in comparison with the previous year." In other words: the **proportion of reuse cannot go down**, and the tonnage of single use must go down for each category of goods. The third objective in this paragraph goes on to set out an ambition to increase the share of reusable packaging, before the promotion of recovery and recycling.

To this end, the IVC reports the tonnage of reusable packaging placed on the market annually by Fost Plus and Valipac each year. Looking back at historical data, the amount of commercial and reusable, industrial packaging (both as a percent and in total tonnes) reported by Valipac has been going up since 2003 when the time series began, while the amount of reusable, municipal packaging reported by Fost Plus has been going down. So, it is clear that the requirement in the Cooperation Agreement is not sufficient, because it is not being met for municipal packaging.

Reusable Packaging Data

Section 7, Article 34 is the only part of the 2018 Accreditation that mentions reusable packaging. It requires Fost Plus to provide IVC with data for annual monitoring of reusable packaging (Paragraph 1); and to look at how the reusable packaging market is developing, and identify market drivers (paragraph 2). Fost Plus is required to prepare a detailed report on this subject every two years, starting on 1 March 2020, which shall also contain measures to increase the market share of reusable packaging, and this report is meant to be widely circulated.

The data on reusable packaging is indeed reported to the IVC every year, and published in their annual reports. Figure 11 shows a reproduction of this data from 2000 to 2020. The design of the IVC annual report and the presentation of this data has changed over the years. Until the 2018 activity report, the data back to 2000 was reported; this was changed to 2003 in the 2019 and 2020 activity reports; and was changed again to only five years (back to 2015) in the 2021 activity report. The 2022 activity report maintained the same time period back to 2015. The reduction in the time period hides the extent to which reuse tonnage has been reducing over the years, and draws attention away from the fact that the legal requirement in the Cooperation Agreement is not being met.

These changes in reporting seem to have also resulted in an increase in the amount of reuse of between 10 and 50 tonnes per year (a 3-9% difference). Taken at face value, these changes would

appear to be an understatement and misrepresentation of the scale of the decrease in reusable packaging over the years. These design changes make the data harder to understand and are potentially misleading in other ways.

This was queried with the IVC, who explained that there are two different calculation methods for reusable beverage packaging: one based on data reported by members, and the other consolidated data after verification by Fost Plus. The change in 2018 was due to the IVC switching from the first metric to the second. It makes sense to report consolidated and verified figures; but in terms of data transparency, a note on the change should have been made in the 2018 activity report.

A step in the direction of transparency was made in the 2022 IVC activity report, with the publication of annual tonnages, rather than a chart; spreadsheets with data supporting the activity report would be another way to communicate the data to those that are interested, without overwhelming the more casual reader who is only interested in headline figures.The tonnes of reusable packaging placed on the market could be decreasing for other reasons, such as lightweighting; and once a reuse system reaches its full potential, we would expect the percentage of reusable packaging placed on the market to level off, so the metrics should change. Fost Plus and IVC should be reporting the tonnage and number of units placed on the market for the first time, as well as the total tonnage and number of units of reusable packaging placed on the market. Figure 12 shows number of units of reusable (i.e., refillable) compared to single-use (i.e., non-refillable) beverage packaging placed on the market in Belgium, based on an analysis of GlobalData PLC undertaken by the Reloop Platform[45]. Here we can again clearly see the same decreasing trend as above, from close to a 50/50 split at the turn of the century, to only about one third of beverage packaging being refillable in 2019.

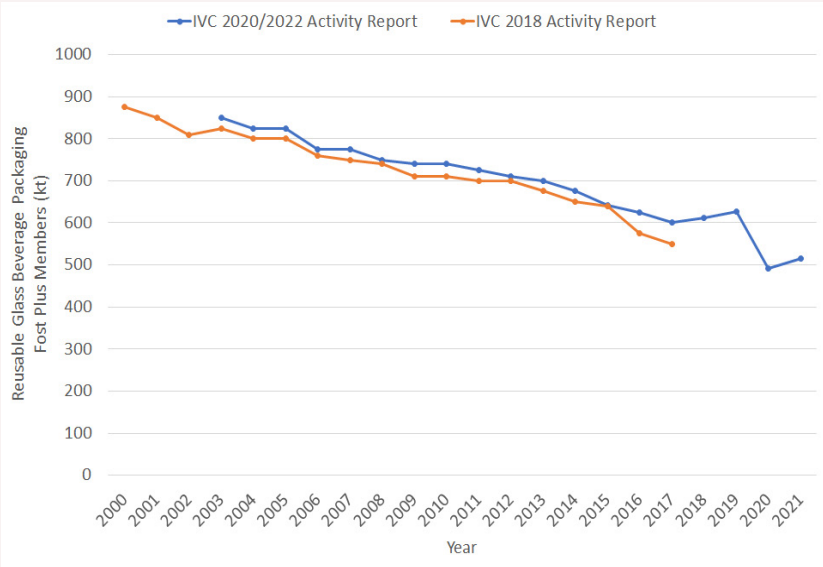

Figure 11: Tonnage (kt) of reusable glass packaging reported in various IVC Activity Report (2018 - data 2000-2017; 2020 - data 2004-2017; and 2021 - data 2018-2020)

45 https://www.reloopplatform.org/what-we-waste/what-we-waste-dashboard/

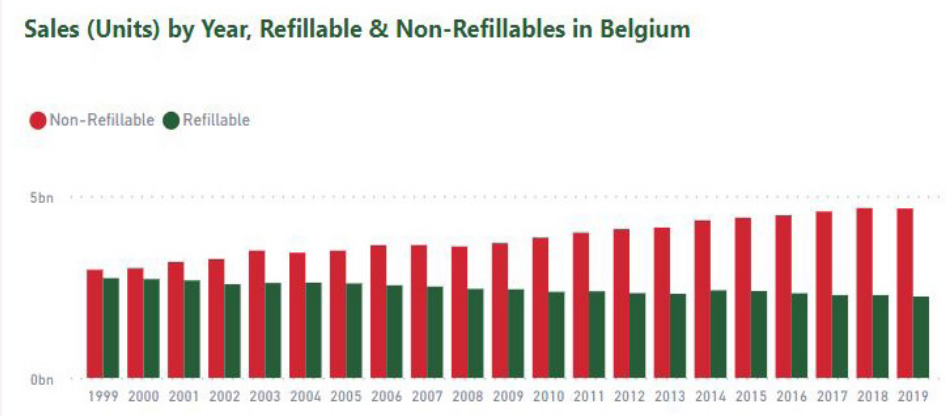

Figure 12: "What we Reuse" data for Belgium from the Reloop Platform "What we Waste" dashboard the ast 10 Years (2011-2020)

Market Trends

The second requirement of the 2018 Accreditation is that Fost Plus produces a report on the market trends for reusable packaging. The IVC shared with us their 2022 report, which looked at the trends from 2019-2021; and the Covid-19 pandemic and closure of the catering industry (which is the sector where by far the largest tonnages of reusable packaging is marketed) is used as an explanation for the decline in reusable packaging over these years. The fact that it was only over three years, again overlooks the fact that the decreasing trend in reusable packaging has been carrying on for 20 years, and the pandemic cannot be used as an explanation for this market trend.

According to producers, a lack of willingness among consumers to purchase products in reusable packaging is a limitation in them marketing more such products. However, the report also contains some interesting results of a consumer survey of 1,000 Belgians conducted in April 2022. Almost 40% of those surveyed said that they do not buy reusable packaging because products are not available. **This suggests that we are stuck in a chicken-and-egg situation, that can only be broken out of by producers.** The majority of people believe they can personally do something better for the environment, and consider the environment when buying. Consumers are ready for more sustainable options; but awareness of reuse systems is low, there is confusion about what reusable packaging is, and under half of those surveyed consider reusable packaging as a determining factor.

Fost Plus should be directly involved in funding communications and education campaigns related to the current (and any future) reuse systems in Belgium, like they are in recycling systems. The current reuse system is not well communicated to consumers, and a significant proportion of the single-use glass recycling stream is made up of reusable bottles, at least in part because people don't realize they should be returned for reuse. Especially in Brussels, and in border areas, where there are transient populations and foreign language speakers, significant gains could be made in promoting reuse (and reducing single-use).

No matter which data we look at, the fact that Fost Plus and the IVC seem to not be meeting the requirement to prevent the reduction in the share of reusable packaging suggests that some sort of action needs to be taken.

No matter which data we look at, the fact that Fost Plus and the IVC seem to not be meeting the requirement to prevent the reduction in the share of reusable packaging suggests that some sort of action needs to be taken. **Fost Plus is ideally placed to engage with members on increasing the share of reusable packaging.** If Fost Plus were to act in collaboration with its members to properly look at how the reusable packaging market is developing over a longer time period to identify market drivers, this process would clearly stimulate discussion and innovation in the packaging industry. This sort of facilitated cross-sector collaboration would have the potential to quickly turn around the decreasing trend. At-scale systems for reuse are already in place for some products in Belgium and this could readily be built upon. This system is primarily business-to-business (i.e., HORECA sector), but is fully established at a business-to-consumer level for beer. It could be expanded to more products as well, so the reducing trend cannot really be justified any longer.

Ecomodulation

Producers pay Fost Plus a producer fee (often known as a green dot fee) for each tonne of single-use packaging material placed on the market. Fundamentally this should encourage producers not to use more packaging than needed, but these fees also vary by material and packaging format in order to encourage more recyclable materials being used – this is referred to as ecomodulation. For example, in 2023 the fee for plastic beverage bottles (per kg) is almost 30 times that for metal packaging, and even within plastic there are different fees for different polymers depending on the recyclability[46].

Ecomodulation in Belgium also extends to reusable packaging. Producers pay nothing (other than the annual contribution to be a member) for reusable packaging placed on the market[47]. However, from the data in Figure 11 above, it is clear that this is not enough to prevent reusable packaging tonnage reducing, let alone shifting packaging back the other way from single-use to reusable.

The WFD requires producer fees be modulated taking into account their durability, reparability, re-usability, and recyclability – with which Fost Plus is obviously compliant – but could they go further? A bonus/malus system could be implemented for producers where the proportion of reusable packaging increases/decreases in comparison with the previous year for the same goods placed on the market. This would be a simply way to pass the legal requirement in the Cooperation Agreement on to producers, via Fost Plus.

Other Reuse Initiatives

Other reuse initiatives that should be included in the next Fost Plus accreditation, or be implemented by Fost Plus and IVC could include:

- The Fost Plus **design for recycling support should have a mandatory reuse stage.** Fost Plus is ideally placed to work proactively with members to increase reuse, particularly the glass bottle reuse system that is already in place. To begin with, any time a member places a single-use glass bottle on the market, Fost Plus should consult with them on switching to reusables. Over time, this should be expanded to include reusable plastic bottles. Belgium is a small country, so supply chains for locally produced products are inherently short, making it an ideal place to lead the way in the EU for reuse.
- After the success of their work with single-use packaging recycling – having some of the lowest producer fees in Europe is evidence of their optimisation skills – **Fost Plus should work with producers to implement and optimise reuse systems** too. It is obviously possible to design a packaging reuse system that is worse for the environment than an optimised linear supply chain, so a lot of innovation will be required to transform the currently linear supply chains to circular ones that are truly environmentally beneficial. PROs with years of experience coordinating cooperation between producers at various stages of the packaging supply chain to deliver a common objective are ideally suited to make this happen.
- **Fost Plus should be required to prioritize reuse in its own activities** as well. Although not in scope of this paper, the Fost Plus proposal on the implementation of a DRS for single-use beverage containers in Belgium takes no account for the current reuse DRS already in place. A DRS should be considered a pathway to reuse, and any such system should be designed to incorporate the current reuse system so as to not confuse consumers between the two parallel DRSs, and futureproofed to account for reuse in the future.

46 https://www.fostplus.be/en/media/700/download

47 This zero fee also applies to labels and crown caps/lids for the reusable bottle; it does not apply to single-use multi-pack packaging, for which the normal single-use packaging fees apply.

5. THE WAY FORWARD

Fost Plus is actively positioning themselves in favour of prevention and reuse (Figure 13), and we are in agreement that PROs can play a vital role in scaling reuse systems… so let's see it happen!

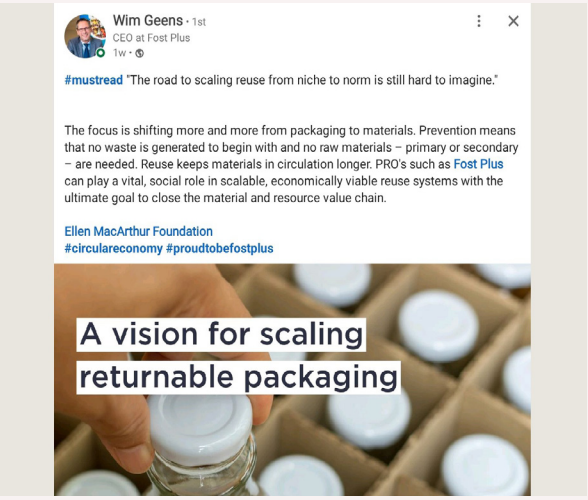

Figure 13: Fost Plus positioning themselves in favour of prevention and reuse

The environmental crisis demands that every actor takes a big step forward – governments, producers (including PROs on their behalf), and consumers. Historically, EPR has evolved to deal with the end of life of products and packaging. But as we have seen in this paper, the legislation is intended to move waste up the hierarchy to reuse and prevention, so it is the view of Recycling Netwerk that the role of PROs needs to evolve in this direction as well. Without the engagement of PROs, producers will simply continue with the status quo, and the linear economy will continue to grow, causing more and more unnecessary damage to the environment and human health.

The 2018 Fost Plus activity report ambitiously states:

At the end of 2018, the Belgian Interregional Packaging Commission approved our new accreditation, which will run from 2019 to 2023. Our ambitions are an integral part of the agreement, with tangible objectives and a clear roadmap to develop a circular packaging economy.

A circular economy is one where prevention and reuse a prioritised. However, as we have seen in this report, the packaging data shows the opposite has happened in Belgium – rather than developing a circular packaging economy, the linear economy has been growing. In our opinion, the accreditation doesn't go far enough in giving Fost Plus responsibility for the transition to a circular economy, since the accreditation is what specifies the role and responsibilities of Fost Plus; and Fost Plus isn't doing enough with the responsibilities it already has.

Despite the prevention activities that Fost Plus is undertaking, and the monitoring that is in place for the glass beverage bottle reuse system, the tonnage of packaging is going up and the tonnage of reuse is going down in Belgium. As such, it is clear that Fost Plus is not fulfilling its role in delivering the objectives of the EU and Belgian legislation that it is responsible for.

Every policy implemented or action taken by Fost Plus should first, clearly and transparently, consider prevention and reuse as options, before relying on recycling as the default approach. In the upcoming accreditation, Recycling Netwerk would like to see the spirit of the EU legislation put into action more concretely and decisively, in a way that leads to actual change.

In relation to packaging waste prevention, we would like to see the following:

- **More transparency on prevention activities undertaken by Fost Plus.** All of the prevention, communication and information campaigns Fost Plus funds as part of this requirement in their current accreditation are actually recycling campaigns. This should be included in their annual report, so that stakeholders are aware of what is being done.
- Fost Plus should start funding actual prevention activities, as it is required to do in the 2018 Accreditation.
- The prevention activities that are supported by Fost Plus should include mandatory monitoring of outcomes. If a prevention activity plans to reduce packaging by a certain amount, there should be a requirement for Fost Plus to follow up on this.
- If prevention activities do not achieve the planned effect, there should be a penalty, for example, to pay back the cost of the campaign plus a penalty to cover the opportunity cost of that money having funded a different, more effective campaign.
- Fost Plus should be required to produce a **Belgian municipal packaging prevention plan** with

and on behalf of its members. If such a prevention plan were mandated, then it would need to have quantified measures, a plan for tracking the impact, ambitious company or sector specific targets, and penalties for non-compliance and not reaching targets. Since this would make Fost Plus directly responsible for preventing packaging waste, there should also be penalties for Fost Plus if the packaging tonnage (per inhabitant) does not start to go down.

- The **eco-design support offered by Fost Plus should have a mandatory prevention and reuse stage**. Discussions around recyclability have been happening for years, but only now are producers acting. Change is happening too slowly to make the necessary contribution to curtailing the climate crisis. There are many more opportunities to make packaging lighter and more recyclable, or prevented altogether, that could be implemented quickly. Fost Plus is ideally placed to work proactively with its members to make this happen.
- The **requirement for an overpackaging contact point should be renewed in the new accreditation.** This should include consumer education on overpackaging, enhanced and continued promotion of the overpackaging contact point, and transparency to consumers about the number of reports and actions taken, for example, in the annual report. But the key to this is that action needs to be taken by Fost Plus and its members in response to the feedback from consumers, and in such a way that it reduces the amount of packaging placed on the market.

In relation to packaging reuse, we would like to see the following:

- Like Citeo, **Fost Plus should have a mandatory budget of at least 5% of its annual turnover for supporting reuse projects** and the transition to more reusable packaging in Belgium. The allocation of the budget should be governed in such a way that it is not influenced by commercial interests, but by environmental interests.
- Fost Plus and its members should have **statutory reuse targets that exceed those in the PPWR.** The recycling targets set in the Fost Plus accreditations have always been higher than those in the EU legislation, so the next accreditation should do the same for reuse.
- Fost Plus should **implement further ecomodulation in order to slow the decline in reusable packaging** in Belgium, and turn this trend in the other direction to meet the reuse targets. Rather than the legal requirement for reusable packaging not reducing only being in the Cooperation Agreement, it should be passed on to producers who are responsible for the packaging placed on the market. A bonus/malus system could be implemented where the proportion of reusable packaging increases/decreases in comparison with the previous year for each producer.
- Reuse is higher on the waste hierarchy, is mandated by EU and Belgian legislation, yet Fost Plus does very little to work with producers, let alone encourage them, to move from single-use packaging to reusable alternatives. By **funding communication and education campaigns for the glass bottle reuse system,** for example, Fost Plus could directly increase the reuse rate like they have with recycling.
- Although not in scope of this paper, the potential **implementation of a DRS for single-use beverage containers should be considered a pathway to reuse,** and any such system should be designed to incorporate the current reuse system so as to not confuse consumers between the two parallel DRSs, and futureproofed to account for reuse in the future.