Berlin, 18. November 2026

Brief political assessment EPT as transport packaging based on papers prepared by Ramboll on behalf of the EU Commission

Ramboll is currently conducting a study to technically assist the Commission in drafting the delegated act pursuant to Article 11(2) of the Packaging and Packaging Waste Regulation (PPWR). As part of this study, the minimum number of circulation cycles for the most commonly used reusable packaging formats in the reuse sector is being determined. On 18.11.2026, after several previous working meetings, a final workshop was held with stakeholders from all over Europe. The Initiative Recyclweg Foundation also participated. Sharing the entire paper is currently not permitted, so the key points for the EPT have been summarized here.

Article 29 of the PPWR lists various load carriers that fall under transport packaging and thus under the regulations.

Article 29 states:

"Art. 29
Reuse targets
(1) From 1 January 2030, economic operators using transport packaging or sales packaging intended for the transport of products, including products distributed via electronic commerce, shall ensure, within the territory of the Union, in the form of ***pallets, foldable plastic crates, crates, trays, plastic crates, bulk packaging, buckets, barrels, and canisters of any size and material, including flexible forms or pallet wraps or strapping bands to stabilize and protect products transported on pallets****, that at least 40% of such packaging used is reusable packaging within a reuse system.*
From 1 January 2040, these economic operators shall endeavor to use at least 70% of the packaging referred to in the first subparagraph in a reusable format within a reuse system."

Ramboll has now worked out these named packaging groups in detail. Under the section Trays, the plant trays, like EPT Trays can also be found

D. Trays

- No ISO standard identified
- **Definition by IEIC**: rigid or semi-rigid packaging unit designed primarily for the containment, protection or transport of products during logistics operations (loading, storage, handling, transport), with a solid bottom and/or semi-elevated side walls, ensuring the stabilisation of products while allowing product viewing
- **Definition by ADR[4]**: sheet of metal, plastics, fibreboard or other suitable material which is placed in the inner, intermediate or outer packaging and achieves a close-fit in such packaging. The surface of the tray may be shaped so that packaging or articles can be inserted, held secure and separated from each other;

Table 1-7: List of packaging formats defined as trays

Material	Subcategory	Subcategory description	CN Code	Illustration
Paperboard	moulded tray for eggs		4823 70 10	
	paperboard tray		4819 10 00	
Wood			4415 10 10	
Plastic	plastic tray	Reusable, cleanable, repairable, made of corrugated plastic sheets with all edges sealed. Foldable inside and stackable for transport.	3926 90 97	
	plant tray	Tray shaped so that plants can be inserted, held secure and separated from each other		
	bottle tray	Tray shaped so that bottles can be inserted, held secure and separated from each other		

E. Plastic crates

- **Covered by ISO 18616-1:2016, alongside boxes**: rigid packaging with rectangular or polygonal sides, usually completely enclosing the contents, made of plastic

(2) Notwithstanding paragraph 1 of this Article, economic operators using transport packaging or sales packaging, in the forms listed in paragraph 1 of this Article, which serve to transport products within the territory of the Union between different locations where the operator carries out their activity, or between each of the locations where the operator carries out their activity and the locations of other affiliated or partner companies within the meaning of Article 3 of the Annex to Recommendation 2003/361/EC as applicable on 11 February 2025, shall ensure from 1 January 2030 that such packaging is reusable within a reuse system.

(3) Notwithstanding paragraph 1, economic operators who use transport packaging or sales packaging intended for the transport of products, including products distributed electronically, in the forms listed in paragraph 1 to supply products to another economic operator within the same Member State, shall, from 1 January 2030, ensure that such packaging is reusable within a reuse system.
(4) The obligations set out in paragraphs 1, 2, and 3 do not apply to transport packaging or sales packaging,
a) used for the transport of dangerous goods in accordance with Directive 2008/68/EC;
b) used for the transport of large machinery, equipment, and goods, for which packaging is designed according to the individual requirements of the contracting economic operator;
c) used in a flexible format for transport and in direct contact with food and feed within the meaning of Article 2 and Article 3(4) of Regulation (EC) No 178/2002 or ingredients within the meaning of Article 2(2)(f) of Regulation (EU) No 1169/2011 of the European Parliament and of the Council;
d) in the form of boxes made of cardboard or cardboard.

In most supply chains, from 01.01.2030, 100% reusable trays must be used for plant transport.