



IK Industrievereinigung
Kunststoffverpackungen e.V.

Customer notice regarding the reuse requirements set out in Article 29(1) to (3) of the PPWR for drums used in industrial and commercial applications

The following information explains why standard plastic drums, as shown in the illustration (see below), do not generally fall within the scope of the reuse requirements set out in EU Regulation 2025/40 on packaging and packaging waste (PPWR).

Under Article 29(1) to (3) of the PPWR, so-called economic operators who use certain types of industrial and commercial packaging – including, for example, drums – in the form of transport packaging or ‘sales packaging used for transporting products’ will be required to reuse such packaging from 2030 onwards, with the reuse rates varying depending on the intended use. In the guidelines published on 30 March 2026 (C(2026) 2151 final), the European Commission has clarified the scope of the reuse requirements: Firstly, it has clarified that drums are sales packaging and not transport packaging. Furthermore, it has defined two conditions under which “sales packaging used for transporting products” must be reused. Although the Commission’s guidelines are not legally binding, they may be used to interpret the PPWR requirements, including to ensure a uniform interpretation across the EU.

1. Who is required to do this?

Firstly, it is important to note that the **reuse requirements apply only to so-called *economic operators*** who use the packaging referred to in Article 29(1) of the PPWR. Economic operators include, for example, producers (e.g. bottlers), distributors (e.g. retailers), importers, etc. (see definition in Article 3(1)(12) of the PPWR). In the guidelines (Chapter 20), the Commission proposes that only the ***producer, distributor or importer*** who places the (packaged) product on the market, i.e. makes it available in the EU for the first time, is obliged to ensure its reuse. One thing is clear in any case: **end-users are not economic operators** within the meaning of the PPWR. An end-user is any natural or legal person established in the EU to whom a [packaged] product is supplied – by another person – either as a consumer or as a professional end-user in the course of their commercial or professional activities, and who does not [packaged] product does not make available on the market again in the form in which it was supplied to them (Art. 3(1)(23) PPWR). A company that receives filled drums and empties them in the course of its commercial or industrial activities is therefore a professional end-user and is thus not obliged to reuse the packaging.

2. How are drums treated under the PPWR?

a) Sales packaging, not transport packaging

Under the PPWR, drums are generally not classified as transport packaging but as **sales packaging**, because they “constitute a sales unit consisting of products and packaging to the end user at the point of sale” (see Section 3(1)(5) PPWR). Drums are generally in direct contact with the respective contents and thus form a sales unit comprising the product/contents and packaging. When filled, they are made available to ‘professional’ end users (within the meaning of Art. 3(1)(23) PPWR), i.e. commercial or industrial end customers who do not ‘re-supply the contents on the market in the form in which they were delivered to them’ (ibid.), for example because they use the contents in their own production. By contrast, *transport packaging* serves to facilitate the “handling and transport of one or more sales units [i.e. one or more packaged products] or a combination of sales units” (cf. Art. 3(1)(7) PPWR). Unlike sales packaging, transport packaging therefore has no direct contact with the contents.

b) What is „sales packaging for transporting products“?

The PPWR leaves open the question of what is meant by “sales packaging for transporting products”. The term is difficult to reconcile with the definition of sales packaging and creates uncertainty regarding the distinction from the concept of transport packaging. Consequently, in Chapter 18 of the Guidelines, the Commission has developed two criteria that must be met for sales packaging to fall under the reuse requirements of Article 29(1) to (3) of the PPWR: The packaging must

- have an ‘evident transport function’ and
- the cleaning must be proportionate to the contents.

As explained below, neither of these criteria generally applies to drums used for industrial or commercial purposes, meaning that drums do not normally fall under the reuse requirements.

(1.) “evident transport function”

According to the Commission’s guidelines, only sales packaging that has an “evident transport function” is covered by the reuse requirements in Article 29(1) to (3) of the PPWR. Indications of this may be provided by the “specific design, shape or size of the packaging” (see Chapter 18 of the Guidelines). In practice, this means that only sales packaging that is **specifically designed for the transport of products** falls within the scope of application, i.e. where the transport function clearly outweighs the other functions of the packaging.

Technically speaking, many standard plastic drums are robustly constructed and, in principle, suitable for multiple uses. However, drums generally lack the ‘obvious transport function’ because they are not specifically designed for the transport of products. They do not, as a rule, have any particular design, shape or size that differs from other sales packaging. Furthermore, in the case of drums, the transport function is not a key function that goes beyond the delivery function of other sales packaging and other packaging functions, in particular product protection, handling, presentation and storage. In fact, drums have several packaging functions, the prominence of which varies depending on the distribution channel:

- **Protective function:** Drums protect their contents from environmental factors such as light, oxygen, moisture and pests. In this way, they make a significant contribution to maintaining quality and product safety.
- **Handling function:** Drums are suitable for handling media capable of withstanding overpressure and underpressure and can be available in special designs for sterile pharmaceutical and food applications. Mobile dosing and mixing systems, such as pumps or agitators, can often be mounted directly. Heating or temperature control of the contents (oil, resin, etc.) in heatable or externally heated drums is also possible.
- **Storage function:** Drums enable the space-saving and safe storage of liquids, powders and granulates. Aspects such as contamination prevention, spill protection through tightly sealing lids, explosion protection through antistatic variants and fire protection play an important role. UV protection and materials designed to prevent contamination are used for sensitive products to extend their shelf life. All of this makes drums explicitly suitable for the safe storage of hazardous substances (dangerous goods, solvents, waste).
- **Presentation function:** Drums are key carriers of product and manufacturer information, including markings such as hazardous goods labels and RFID tags, and meet customer-specific design requirements. With special labels, for example, they provide information on environmental aspects or take-back schemes, thereby supporting customer communication.

(2.) Proportionality of cleaning depending on the contents

The Commission acknowledges that the **reusability of sales packaging depends largely on the contents**. Using the example of plastic buckets containing ‘paints, chemicals or sauces’ that alter the properties of the container, the Commission explains that the cleaning required to remove ‘residues and odours from the interior’ of the used bucket consumes large quantities of water, energy and chemicals, depending on the contents. Reusing the bucket is only a “viable option” if this intensive cleaning **“do not result in disproportionate costs and resources”** (see Chapter 18 of the Guidelines).

These examples can be applied to drums: contents such as pesticides, pigments, paints, fillers or adhesives could either make the reuse of drums impossible or only allow it at disproportionately high costs and resource consumption, e.g. because fillers harden in the packaging after opening or migrate into the packaging material and contaminate it. Drums are explicitly mentioned in this context in the Guidelines.

Other examples in the Guidelines illustrate cases where the Commission assumes that reuse of the sales packaging is possible under proportionate conditions, e.g. in the case of

- Solid foodstuffs such as *breakfast cereals* in drums,
- *sand and rocks* in “flexible intermediate bulk carrier bags” (presumably FIBCs)
- *fresh fruits* in “plastic boxes or crates” (presumably “collapsible plastic crates” and “plastic boxes”).

3. Conclusion and recommendation

The proportionality of reusing drums must therefore be assessed on a case-by-case basis, particularly with regard to the specific contents and the cost of cleaning, including transport. We recommend that the obligated **economic operator** (bottler, distributor or importer) documents internally that the drum (1.) is sales packaging not specifically designed for transporting products, and/or (2.) the contents require a disproportionate amount of cleaning effort in relation to the reuse of the drum.



Description of a drum used for commercial or industrial purposes, to which the reuse requirements set out in Article 29(1) to (3) of the PPWR apply only if it constitutes “sales packaging for transporting products”.

Bad Homburg, May 2026