

# Practical Guide: How to declare reusable packaging

## STEP 1:

- Check that your packaging can be considered reusable,
- Check that you are familiar with the requirements and implications of having a reusable packaging management system.
- If you believe you comply, you must sign the Addendum for Reusable Containers if your contract is prior to September 2025 (for later contracts, there is no need to sign the Addendum).  
([See requirements and implications here](#)).

## STEP 2:

Collect the necessary data regarding your packaging.

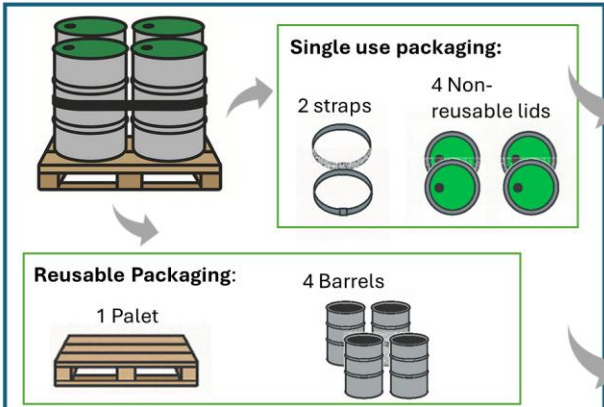
## STEP 3:

Include this data in the Procircular Packaging Declaration.

## STEP 2:

Collect the data on the **parameters requested in the declaration for reusable packaging**. Below we detail the data with an example format that includes reusable and single-use packaging:

**PRACTICAL EXAMPLE OF A DECLARATION FOR REUSABLE CONTAINERS**



**Single use packaging:**

2 straps      4 Non-reusable lids

**Reusable Packaging:**

1 Pallet      4 Barrels

**DATOS:**

- Annual sales of 100,000 drums of product
- Reusable stock: **1,000 drums** and **300 pallets**
- **250 drums** and **75 pallets** are purchased annually to replenish stock

**Single-use containers**, indicating the following mandatory information:

- Flow: Industrial
- Type of use: Single use
- Type of container: Lid and strap
- Unit weight of container (g)
- Total sales of format: 100,000 lids and 50,000 straps
- Material
- Hazardous

**Reusable packaging**, indicating the following mandatory information:

- Flow: Industrial
- Type of use: Reusable
- Type of packaging: Drum and pallet
- Unit weight of packaging (g)
- No. of packaging units in the format
- Total sales: 100,000 drums and 25,000 pallets
- Material: Steel and wood
- Hazardousness
- Replacement of stock (units added to stock/year)
- Average life (months)
- Cycles per year (rotations)
- and voluntarily:
- Total stock (units)
- No. of new replacement containers

- **Total sales of the format:** Refers to the number of sales made in reusable packaging.

*In our example: 100,000 product drums per year and 25,000 pallets.*

- **Replacement of stock:** This only applies to containers that are added to stock each year.

*In our example: This year we have purchased 250 drums and 75 pallets to replace those that are lost or damaged.*

- **Total stock** or number of reusable containers available to the company. This is a **voluntary information field**; if not completed, it is calculated as Sales / Turnover.

*In our example: Total stock of 1,000 drums and 300 pallets.*

- **Cycles/year or Rotations:** A rotation is the cycle completed by reusable containers from the moment they enter the market accompanying a product until the moment they are ready to be reused again. **The number of times the container is put back into circulation in a one-year period** must be declared.

*In our example: Each drum is used 100 times per year (100,000 drum sales/year/1,000 drums = 100 rotations/year) and each pallet 83 times (100,000 drums / 4 drums per pallet / 300 pallets = 25,000/300 = 83.3 rotations/year).*

- **Average life in months:** This is a theoretical figure calculated by dividing the total stock by the number of containers I add to my stock each year, and multiplying the result by 12 to express it in months.

*In our example: Total stock of 1,000 drums / 250 drums that I replace during the year = 4 years or 48 months, and total stock of pallets 300 / 25 pallets that I replace during the year = 12 years, or 144 months.*

- **Number of new replacement containers (not recovered):** The total number of containers purchased during the year, which are newly manufactured.

*In our example: I purchase 75 pallets to replace broken or lost ones. 15 are recovered and repaired pallets and **60 are new**. Of the 250 drums I purchase each year to replenish the stock, 50 are recovered and **200 are new**.*

- **Type of use:** Reusable

### STEP 3:

#### How it would be reflected in the DECLARATION:

In our example, formats 1 & 2 (drum strapping and lids) are declared as **single-use**, and only the **mandatory orange** or **orange** and **blue** fields need to be filled in if the declaration is detailed.

Referencia del Artículo (agrupación de envases del formato)	Info adicional del Artículo (EAN, SKU..)	Descripción del Artículo	Tipo de Producto contenido	Flujo	Tipo de Uso	Función de Envase	Tipo de Envase
1			Motor, vehículos y Lubricar Industrial		Un solo uso	Primario	Elementos de fijación y prot
2			Motor, vehículos y Lubricar Industrial		Un solo uso	Primario	Tapones, tapas
3			Motor, vehículos y Lubricar Industrial		Reutilizable	Primario	Bidón, barril, bombona, gar
5			Motor, vehículos y Lubricar Industrial		Reutilizable	Secundario	Paletas

The packaging units in the format cannot be less than zero.

Peso o Volumen de producto contenido en el envase (ml o g)	Peso UNITARIO del envase (g)	Unidades de envase en el formato	Ventas totales del formato (ud)	Ventas Horeca (ud)	Ventas de Auto-Importación (C/I) (ud)	Material	Agrupación de las líneas que componen un envase Multimaterial	Contenido material Reciclado (%)	Color
20.000	1.000,00	1	100			METALES ACERO			
20.000	1.000,00	1	100			METALES ACERO			
20.000	1.000,00	1	100			METALES ACERO			
60.000	20.000,00	1	33			MADERA/CORCHO Madera			

The orange and brown fields are mandatory for commercial and industrial reusable packaging.

The three brown columns are for mandatory data when declaring reusable packaging.

Peligrosidad	Reposición del parque (ud incorporadas al parque en el año)	Vida media (meses)	Ciclos por año (Rotaciones)	Parque total (ud)	Número de envases de reposición nuevos (no reacondicionados)
No					
No					
No	1.000	250	100	10.000	500
No	150	25	83	10.000	70

**Note:** The deadline for submitting the declaration each year is 28 February of the following year.

### STEP 1:

A container shall be considered 'reusable' if it meets the conditions set out in the legislation:

- It has been **conceived, designed and marketed to undergo multiple cycles or rotations** throughout its lifecycle, being refilled or reused for the **same purpose** for which it was conceived.
- A company or group of cooperating companies owns the reusable packaging and **circulates it through a closed loop** (a reuse system in which a company or group of cooperating companies circulates the reusable packaging while retaining ownership).
- **One or more systems for the collection, reconditioning and redistribution of containers** have been implemented and **the operating conditions** have been **communicated to customers**: how to treat and where to deposit the container or packaging for reuse.
- There is some kind of **financial mechanism in place to guarantee the return of reusable packaging**, such as a deposit or bond, a paid usage or rental agreement, etc.
- The company or group of companies is obliged to **accept reusable packaging** if it has been used in accordance with the established specifications.
- **Packaging materials** that are no longer reused and must therefore be removed from the system **must be recoverable** in accordance with the requirements of one or more of the EN 13430, EN 13431 or EN 13432 standards.
- A **system** is in place **to monitor their use in accordance with the established specifications**, to ensure that they are reused.

\* If you have reusable packaging that is used in an **open circuit** (a reusability system in which the reusable packaging

circulates among an indeterminate number of participants, and the ownership of the packaging changes at one or more points in the process), please contact Procircular.

If you meet these requirements, you have reusable packaging and you can manage it through the [one-stop shop agreement that Procircular has signed with an authorised SCRAP for reusable packaging](#). To do so, you must:

1. Sign [the Addendum for Reusable Packaging \(Annex I.B of the Agreement\)](#), if your contract with Procircular is prior to September 2025. If it is subsequent to this date, it is not necessary to sign it.
2. [Sign an Approval document for each of your reusable systems](#), which consists of a self-assessment questionnaire. You can find more information about this [here](#)

Containers that are reused but **do not meet these requirements will be considered single-use containers** and declared as such. However, for these containers, **you will only need to declare the containers you purchase during the year.**

More information on reusable packaging:

[Interpretative note on the status of waste and reuse systems in Article 46 of Royal Decree 1055/2022 of 27 December on packaging and packaging waste](#)