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# Letter to the Editor

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# Without enabling reuse, the Treaty risks locking in disposability

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## Abstract

As negotiations on the Global Plastics Treaty progress, the extent to which reuse is embedded in the Treaty will serve as an indicator of its ambition to transform plastic systems rather than merely manage their waste outputs. Reuse is one of the most powerful yet underutilised interventions to achieve circularity, and is essential for reducing plastic production, lowering emissions and disrupting the dominance of single-use models. However, the current Treaty text reflects only limited and ambiguous references to reuse, often coupled with recycling, raising concerns that this cornerstone of circularity is at risk of being sidelined. This article argues that the Treaty's effectiveness, both as a regulatory instrument and as a tool for transformation, will depend on whether it embeds the enabling conditions required to make reuse viable at scale. Drawing on recent research by the Global Plastics Policy Centre, we explore two core areas where progress is urgently needed: first, the limitations of setting numerical reuse targets without the underlying systems, infrastructure and regulatory clarity needed to implement them; and second, the persistent structural and regulatory barriers that prevent reuse systems from scaling. Without system-wide enablers, the Treaty risks repeating the common policy pattern of prioritising headline commitments over operational feasibility. Numerical targets, while politically attractive and symbolically important, do not create the conditions needed for sustained reuse uptake. Effective systems require regulatory mandates alongside design standards, infrastructure investment and mechanisms for tracking performance and ensuring compliance. At the global level, structural barriers include divergent regulations, inconsistent standards, a lack of harmonised definitions and metrics and financing systems that favour single use. Extended producer responsibility schemes, still skewed towards recycling, have not adequately incentivised reuse. The Treaty presents an opportunity to address these barriers through common standards and policy signals that support reuse as the default. To realise reuse as a transformative pillar of circularity, the Treaty must go beyond aspiration and commit to building the conditions under which reuse can thrive, which would shift plastics governance towards systems that value durability, more equitable responsibility and reform.

#### Impact statement

This article contributes timely evidence and policy insight into one of the most underdeveloped yet potentially transformative components of the Global Plastics Treaty: reuse. Drawing on recent research we've been conducting at the Global Plastics Policy Centre, this article outlines the risks of treating reuse as a numerical target rather than a structural transition, and calls for Treaty provisions that embed enabling systems such as infrastructure, regulation and finance. It identifies specific gaps in the current Treaty text and proposes concrete areas for policy development to support the scaling of reuse at national and global levels.

The work is grounded in both academic analysis and applied policy engagement, including ongoing consultations with Treaty negotiators, civil society and national governments. As such, it bridges a critical gap between international ambition and implementation reality. Its findings have direct relevance for Treaty negotiators and stakeholders seeking to ensure the Treaty does not replicate existing policy shortcomings, particularly the over-reliance on recycling and headline commitments without delivery mechanisms.

Beyond its immediate relevance to the Treaty process, this letter offers transferable lessons for national policymakers and donors involved in plastics regulation, circular economy transitions and infrastructure planning. By foregrounding reuse as a systems issue, this letter challenges prevailing narratives that frame reuse as a consumer choice or niche intervention. Instead, it positions reuse as a barometer of the Treaty's ambition to shift away from disposability and towards a genuinely circular plastics economy. This letter also has the potential to shape further dialogue on reuse metrics, policy architecture and international cooperation, offering both conceptual clarity and practical guidance at a critical moment for global plastics governance.

#### Introduction - reuse as the Treaty's litmus test

The current Global Plastic Treaty negotiations represent a once-ina-lifetime opportunity to radically rethink societal relationships to plastics. The Treaty is a unique opportunity to cultivate system shifts that address multiple parts of the plastic lifecycle with a coordinated global action. Concepts and interventions that embody this radical restructuring of global economies and consumption patterns rarely gain a global stage. One such concept is the circular economy, which is gaining traction as a holistic narrative that redefines the linear value chain of plastics. Achieving a truly circular economy, whereby materials are kept in use and waste is minimised, cannot rely on waste management interventions alone (Johansen et al., 2022). Sitting at the heart of the transition to a circular plastics economy, reuse represents both an economic and social shift emblematic of the transformations needed to meaningfully reduce plastic pollution. It is the most direct challenge to the linear systems of plastic production and consumption (UNEP, 2021), yet remains one of the most vulnerable and overlooked elements of circularity ambitions in Treaty negotiations to date.

Reuse is a concept that has existed formally and informally across diverse product and material categories throughout history (Hajoary et al., 2024). Reuse, defined here as the repeated use of a product for its originally intended purpose (March et al., 2024), has significant benefits to diverse environmental objectives, including climate and environmental health. Reusable packaging has 85% less carbon emissions than single-use alternatives (Zero Waste Europe, 2020), and reusing 10% of plastic products can prevent the equivalent of half of annual plastic ocean waste (WEF, 2021a). In their seminal report, Turning off the Tap, UNEP (2021) positions reuse as one of the most impactful changes that need to happen in a systems transformation towards a sustainable plastics future (UNEP, 2021).

The Global Plastics Treaty presents a rare opportunity to embed reuse within a global regulatory framework and provide the infrastructure for transboundary and multinationally coordinated reuse systems to be established. We argue that how the Treaty addresses reuse will be a key marker of whether it aims to transform plastic systems upstream or simply manage plastic waste downstream. While circularity is increasingly referenced as a guiding principle of the Treaty process, there remains a risk that circularity is reduced to recycling or waste management, rather than a structural rethinking of plastics production, use and disposal. While the scope of the negotiations remains hotly contested, a true lifecycle approach should prioritise actions that address multiple components of the plastics lifecycle.

In the latest iteration of the Chair's text, developed in the last round of negotiations in Busan, reuse is mentioned in passing, often co-joined with recycling and, much like the rest of the Treaty text, is heavily bracketed and therefore still up for debate. Reuse (or reusability) is mentioned four times in total. Article 3.1, which details measures on plastic products, includes a potential reference to materials that can be reused. Article 5.1, which concerns plastic product design in pursuit of a circular economy, includes an imperative to improve plastics product design 'by increasing reuse or recycling', improving reusability and fostering research and innovation into plastic alternatives taking into account their potential for 'waste reduction and reuse'. A Treaty that embeds reuse into its fabric must not only set ambition but also establish the systems and frameworks to achieve it (Northen et al., 2023). Without these, reuse will remain marginal, fragmented and difficult to scale.

Given the relatively light emphasis on reuse in the current Treaty text, the opportunities that national advocacy and implementation offer are critically important. Efforts to establish reuse from a national policy level through explicit targets are limited. Countries such as Germany, Spain and Colombia include national targets for reuse in specific product streams in national legislation, representing an early commitment to the creation of reuse systems. However, significant progress needs to be made to ensure that targets are grounded in the reality of reuse, meaning that supporting infrastructure is developed in a contextually meaningful and appropriate way and that incentives and enforcement deliver lasting change (Global Plastics Policy Centre, 2023). As such, the Treaty represents a potential tipping point for the creation of transboundary reuse systems.

As argued above, reuse is the litmus test of the Treaty's ambition because it requires such profound transformation, which includes new business models, redesign of products and packaging, investment in infrastructure and behavioural shifts among producers and consumers. It challenges entrenched disposable systems and disrupts the dominance of single-use packaging that has come to define modern plastics consumption. As with any systems transformation, the scaling up of reuse systems is vulnerable to resistance, inertia and superficial commitments (Evans et al., 2024). If reuse is addressed only through narrow numerical targets or voluntary pledges, without embedding the enabling conditions that make reuse viable, the Treaty risks institutionalising a weak form of circularity that leaves the core structures of disposability intact (Dixon and Geßner, 2022).

In this letter, we examine two core areas where the Treaty must take action to enable effective reuse at national levels: the limitations of target setting without supporting policy frameworks, and the structural and regulatory barriers that must be addressed at a global level.

## The risk of target setting without enabling regulatory frameworks

There is growing momentum within the Treaty negotiations to include explicit reuse targets, mirroring a growing trend in reuse targets in national policy. For example, the Nordic Council of Ministers (2023) advocates for a reuse target of 25% of sales volumes in high-income regions and 15% in low- and middleincome regions for beverage containers, and WWF (2024) have called for specific quantitative targets and commitments to increase or mandate the adoption of reuse across product categories, sectors and closed-loop systems. Driven by regional forces, such as the European Packaging and Packaging Waste Regulation 2025/40 (which mandates reuse into sectors such as transport packaging, e-commerce and beverages), reuse policy is rapidly evolving. Countries with specific reuse targets, created independently of the Treaty, include France, Germany and Spain (Table 1). Ongoing analyses by the Global Plastic Policy Centre seek to identify the specific enabling environments necessary to create the system environments required for reuse at a national scale (Northen et al., 2023; March et al., 2024; Evans et al., 2025).

While reuse targets are imperative to include in the Global Plastic Treaty to fundamentally alter societal dependencies on plastic, there is a significant risk of failing to incorporate the necessary foundations for effective reuse systems and inadvertently creating an environment in which reuse will fail. Much of the advocacy emphasis and national action relies on establishing numerical targets, which are useful for signalling ambition and tracking progress (Northen et al., 2023). However, our early research findings demonstrate that numerical targets alone are

Table 1. Summary of severa	l existing European	national	reuse policies
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Country	Target
France	<ul> <li>In the anti-waste law for a circular economy (AGEC) (2020):</li> <li>5% reuse of packaging by 2023, 10% by 2027.</li> <li>Bans disposable tableware for on-site dining in food service establishments (essentially mandating reusables) (Article 77).</li> <li>Requires retailers &gt;400 m<sup>2</sup> to offer reusable containers (Article 43).</li> <li>Introduces a reuse observatory (Article 9).</li> </ul>
Spain	<ul> <li>In Royal Decree (RD) 1055/2022:</li> <li>Sets targets of reuse by 2030, for 40% of bottled water, 85% of beer containers and 70% of soft drinks.</li> </ul>
Germany	<ul> <li>In the Packaging Act (VerpackG) (2019):</li> <li>70% of beverage packaging is to be reusable by 2024.</li> <li>From 2023, there are obligations for reuse in restaurants and final distributors of single-use plastic food packaging and single-use beverage cups. Vendors must also offer reusable packaging options for food and beverages intended for immediate consumption (Umwelt Bundesamt). Smaller establishments with fewer than five employees or less than 80 m<sup>2</sup> of store area are exempt.</li> <li>Regulations on deposit and return for disposable beverage packaging.</li> <li>Obligation for the final distributors to indicate whether the packaging is disposable or reusable.</li> </ul>

insufficient in catalysing the fundamental changes required to create an effective reuse system, and are also insufficient at overcoming the barriers faced by scaling reuse systems, including achieving cost parity of single-use and reuse, the creation of new infrastructure or consumer behaviour change.

A systemic approach to incentivising and mandating reuse is required, with interventions that drive and unlock reuse being made across the lifecycle. Specific opportunities for the Treaty to either pave the way for or mandate reuse are numerous. For example, the New European Reuse Alliance (New ERA, 2024) identify five pillars that must be incorporated into the Treaty to ensure that reuse reaches its full potential: (1) a take-back obligation, requiring producers or retailers to accept the return of reusable packaging after use; (2) incentives, such as financial mechanisms or fee modulation to make reuse economically viable; (3) mandatory targets, to ensure that reuse is not left to voluntary uptake alone; (4) consumer information, including labelling and awareness campaigns to support participation and uptake; and (5) data collection, monitoring and enforcement, to track progress, ensure compliance and adjust policy measures over time. Research conducted by the Global Plastics Policy Centre has identified several critical factors that enable reuse systems to be effective (Global Plastics Policy Centre, 2023), including clear and harmonised definitions of reuse, regulatory frameworks that mandate or incentivise reuse-ready packaging, coordinated investment in collection and return infrastructure, mechanisms to facilitate reverse logistics and alignment with wider economic and social policies. Standardised measurement of reuse rates, system performance and packaging rotations is also critical to establish at a global scale (WEF, 2021b). An effective Treaty must establish a framework that requires Parties not only to commit to reuse outcomes but to put in place the enabling measures that support reuse delivery (Northen et al., 2023).

Without such provisions, reuse risks being relegated to pilot projects, niche applications or isolated markets, falling short of its potential as a transformative pillar of circularity.

In summary, the tendency to focus on targets without the required systems design reflects a broader policy pattern: a preference for headline commitments that are politically palatable but operationally shallow. Reuse risks falling into a similar trap without an 'all-in' commitment that encompasses diverse policy interventions. Bold action is not about setting ambitious numbers alone; it is about curating a system within which reuse can thrive, through laying the regulatory, institutional and financial groundwork that makes those numbers achievable. The Treaty risks replicating these shortcomings if reuse is treated as a numerical goal rather than a systemic transition requiring coordinated policy interventions.

# The need to address structural and regulatory barriers at the global level

The unique opportunity of the Treaty lies in its ability to globally harmonise the solutions to diverse challenges. Reuse systems face persistent structural and regulatory barriers that have constrained their scalability and effectiveness globally. Unlike recycling, which can be integrated into existing linear supply chains, reuse requires transformational shifts in packaging design, logistics, retail practices and consumer participation, which differ substantially across borders. These shifts are made more complex by the globalised nature of plastic value chains, where packaging and products cross borders subject to divergent standards, regulations and market dynamics (World Bank, 2022).

A key structural barrier is the absence of harmonised packaging standards that enable reusable items or packaging to function across jurisdictions and supply chains. Differences in material requirements, labelling rules, hygiene standards and design specifications create friction for businesses attempting to scale reuse models beyond local or national markets (EMF, 2023). This fragmentation reduces the efficiency and interoperability of reuse systems, increasing costs and limiting the potential for economies of scale. Without globally aligned standards for reusable packaging, reuse risks remaining confined to isolated markets and failing to achieve its potential as a systemic solution.

Stakeholder consultations conducted by the Global Plastics Policy Centre on designing effective reuse policy highlight persistent challenges in aligning reuse with existing extended producer responsibility (EPR) frameworks (March et al., 2025). EPR has become a prominent policy tool under consideration in the Treaty negotiations; however, it has historically prioritised recycling over reuse, reinforcing single-use models rather than driving systemic change. The Treaty offers an opportunity to redesign EPR to incentivise reuse, including proposals for reuse-specific targets, differentiated EPR fees based on packaging rotations and independent oversight to ensure fair allocation of funds.

Financing presents another structural challenge. The establishment of reuse systems requires upfront investment in infrastructure for collection, cleaning, sorting, storage and redistribution. These investments are difficult to justify in the absence of policy certainty, regulatory mandates or clear financial incentives. Evidence from plastics policy evaluations shows that infrastructure has tended to emerge only where strong policy signals (such as deposit return requirements, mandatory quotas or public funding support) have de-risked investment (March et al., 2022). Without such signals, private actors have been reluctant to finance the infrastructure needed to underpin reuse at scale.

Regulatory environments can inadvertently create barriers to reuse through misaligned or contradictory rules. Packaging laws that prioritise recyclability over reusability, or public health regulations that impose restrictive requirements on reusable containers without clear guidelines, can unintentionally disadvantage reuse models (Global Plastics Policy Centre, 2023). Liability concerns have also emerged as a deterrent for businesses considering reuse, with unclear responsibilities for product safety and hygiene across multiple use cycles (March et al., 2025).

Without addressing structural and regulatory barriers, the Treaty risks leaving reuse progress fragmented, marginal and reliant on voluntary leadership from a small group of actors. A globally coordinated framework is needed to dismantle the systemic constraints that have limited reuse despite widespread recognition of its potential to reduce plastic pollution.

# Conclusion – a bold Treaty is a reuse-ready Treaty

The Global Plastics Treaty has been framed as an opportunity for transformative action in how plastic is used and valued as a resource. Yet transformation will only be possible if the Treaty is willing to confront the underlying structures that have made disposability the norm and challenge deeply entrenched systems of a linear economy. Reuse in this sense is the litmus test of global commitment towards a sustainable plastic future. To achieve this, the Treaty must go 'all-in' for reuse, and create incentives, interventions and support across the lifecycle of plastic. Reuse sits at the intersection of ambition and delivery: it is both a symbol of systemic change and a practical pathway towards reducing plastic production.

Integrating reuse into the Treaty's core provisions will require more than technical fixes or incremental adjustments. It demands a rethinking of how materials flow, how products are designed and how responsibilities are shared across supply chains. Embedding reuse as a foundation within the Treaty, rather than a future aspiration, can shift the burden away from managing waste and towards designing systems that avoid it. At this pivotal moment, the Treaty's approach to reuse will reflect the depth of its commitment to circularity. Whether reuse is positioned as a central pillar or left to fragmented national initiatives will shape the trajectory of global plastic policy for decades to come.

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