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# Mainstreaming Reuse: Policy Recommendations for Reuse and Refill Systems in the Philippines

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# *The Plastic Crisis: Reduced Production is More Critical than Waste Management*

At the root of the plastic pollution crisis is the overproduction of plastic, which is driven by the fossil fuel industrial complex and corporations' systemic dependence on single-use plastics. In the Philippines, the plastic problem has progressively worsened since the introduction of single-use plastics, especially sachets.. A study by the Global Alliance for Incinerator Alternatives (GAIA) reported that Filipinos use 163 million plastic sachet packets, 48 million shopping bags and 45 million thin film bags every day.[1] The plastic crisis in the country has been exacerbated by other trends such as increased e-commerce and food deliveries.

The plastic crisis is more than a waste issue, as it intersects with other environmental and social issues, exacerbating harms and inequalities felt by affected communities. The impact of plastics across its entire lifecycle on public health, food security and social equality, among others, are often overlooked as the focus remains on managing plastic waste.

Despite the notable impacts across the lifecycle and the urgency of the plastic crisis, the majority of solutions are less effective downstream measures while interventions in the upstream and midstream stages (collectively called upstream solutions) remain uncommon. Huge volumes of plastic production and continued corporate dependence on single-use plastics make the problem impossible to resolve with waste management alone. Even with numerous and good waste management systems and strategies in place, developed countries have not prevented worsening plastic pollution. They still rely on waste trade to lower-income countries like the Philippines, effectively externalizing the costs and responsibility for their plastic pollution to developing states.

Seeing the ineffectiveness of downstream solutions without necessary changes in the upstream and midstream phases through production reduction and adoption of reuse, the European Union and several other countries have begun to enact policies and programs to reduce production, ban single-use plastics, and establish reuse and refill systems. Upstream solutions, such as reuse and refill systems, are significantly more effective in addressing the plastic crisis because they curb the volume of single-use plastics in circulation and eliminate harmful outcomes in both upstream and downstream stages of plastic's life. They address plastic pollution at source before it creates environmental, social and health problems.

Reuse and refill systems can reduce impacts of the plastic crisis, as well as provide environmental and socioeconomic benefits to communities and stakeholders across the value chain. Various studies have projected the decrease in impacts through lifecycle assessments and modelling of reuse scenarios, showing the environmental and socioeconomic benefits of reuse and refill models. These can also help create economic opportunities for stakeholders and build zero waste, reuse-based business models within a broader slow circular economy, which Greenpeace describes as an economy that closes the loop and slows the flow through a decrease in resource extraction, overall production patterns and consumption.[2]

As it is the policy of the state to protect Filipinos and advance their right to a balanced and healthy environment, it is imperative that the government respond to the plastic crisis with full consideration of the life cycle impacts of plastic and mandate adoption of upstream solutions. This includes reuse and refill systems which require a strong, fair and environmentally sound policy framework. As such, Greenpeace Philippines has prepared a paper detailing measures and recommendations for establishing a robust policy framework that will institutionalize and mainstream reuse and refill systems.

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[1] Global Alliance for Incinerator Alternatives (2020). Sachet Economy: Big Problems in Small Packets. https://www.no-burn.org/wp-content/uploads/2021/11/Sachet-Economy-spread-.pdf

[2] Greenpeace (2020). "Slowing the Circular Economy". https://www.greenpeace.org/international/story/44079/slowing-the-circular-economy/

For example, targets to shift 25% of plastic packaging (based on sales units) to reuse and refill formats by 2028 and 50% by 2030 are recommended for large and medium enterprises, with progressively increasing annual targets after 2030 until phase out of single-use plastic packaging is achieved. This is particularly crucial for the fast-moving consumer goods sector which is a primary driver for the Philippines' sachet economy; however, other sectors and retailers should also be expected to contribute to the transition from single-use plastics with several actions related to reduction and adoption of reuse and refill systems. These policy measures aim to mainstream viable reuse and refill models suitable for the Philippine context.

# *The Case for Reuse and Refill Systems*

## Why We Need Reduction, Redesigned Systems and Reuse

The plastic pollution crisis is an environmental justice issue with detrimental impacts arising from every stage of plastic's full lifecycle irrespective of country borders. Examining the industrial operations, materials and chemicals utilized and resulting risks across the entire plastic lifecycle, it has been found that the plastic crisis intersects with other environmental and social problems, not only creating and increasing negative impacts for people and nature but also exacerbating inequities already present in affected communities.

From its health threats to its contribution to the climate crisis, the plastic crisis presents problems on multiple fronts. To better understand the full extent of the issue's effects, the following areas can be examined further:

- **Climate**. Plastic poses a threat to vulnerable communities and ecosystems due to its contribution to the climate crisis. A 2024 study revealed that the global greenhouse gas (GHG) emissions of the plastic lifecycle in 2019 amounted to 2.24 billion tons of CO2 equivalent (CO2e) or 5.3% of total GHG emissions excluding agriculture and land use.[3] Researchers identified that increased production in coal-based, newly industrialized economies as the main cause of plastic's rising carbon emissions. Greenpeace also identifies the importance of mitigating emissions from the extraction and transportation of fossil fuel feedstocks used in the production of 99% of plastics.[4]
- **Health**. Plastic is responsible for health risks and increasing exposure to hazardous substances. A study by the Center for International Environmental Law concluded that plastic threatens human health on a global scale.[5] The findings revealed the distinct risks to public health in each phase of plastic's life - from the moment fossil fuels are extracted to the point of disposal and waste management. This includes carcinogenic other hazardous by-products, food system contamination and leaching of toxic chemicals in the environment and human bodies.
- **Nature and Biodiversity Loss.** Plastic pollution contributes to nature and biodiversity loss through its destruction of ecosystems and direct harm to wildlife. It does so through a number of effects which include aggravating climate impacts, toxic contamination of ecosystems, ingestion of plastic waste and the disruption of the growth and development of flora and fauna. A 2020 review of scientific literature found that 354 different species had become entangled with marine plastic, while ingestion of marine plastic has been documented in 701 different species.[6]
- **Social Inequalities**. In a report, the United Nations Environment Programme goes into detail about how the plastic pollution crisis results in environmental injustices and disproportionately affects vulnerable and

[3] Nihan Karali, Nina Khanna, Nihar Shah.Climate Impact of Primary Plastic Production (2024). https://escholarship.org/uc/item/12s624vf

[4] Greenpeace USA (2021). Climate Emergency Unpacked. https://www.greenpeace.org/philippines/publication/10918/the-climate-emergency-unpacked/

[5] Center for International Environmental Law (2019). Plastic & Health: The Hidden Costs of a Plastic Planet. https://www.ciel.org/plasticandhealth/

[6] Susanne Kühn, Jan Andries van Franeker, Quantitative overview of marine debris ingested by marine megafauna, Marine Pollution Bulletin, Volume 151, 2020, 110858, ISSN 0025-326X, https://doi.org/10.1016/j.marpolbul.2019.110858

marginalized populations across the globe.[7] Women, for example, have higher exposure to toxic substances in plastic because of household responsibilities and the use of disposable feminine hygiene products. Communities that are predominantly populated by low-income groups or people of color are also more affected by the plastic crisis, because production and incineration facilities are more often built in their areas in comparison to other locations.

Inaction around changing the most carbon-intensive phases in plastic's value chain will negatively impact the Philippine government's efforts to mitigate climate change and tackle plastic pollution, including commitments associated with multilateral environmental agreements. Without explicitly mandating or implementing upstream solutions, plastic producers will also continue their unrestrained production and polluting activities at the expense of people and the environment.

## Reuse and Refill: Solutions for People and Planet

### Upstream Solutions

With negative outcomes such as these produced all throughout the plastic lifecycle, it is necessary to respond to the plastic pollution crisis at source and invest in upstream solutions. Upstream solutions are interventions which occur in the upstream and midstream phases[8] of the plastic lifecycle, and which result in the reduction of plastic production and use of single-use plastics and other disposables. Upstream solutions cover material selection, product design, business models, distribution or transport, and a product's intended use.[9]

In changing problematic systems, materials and packaging involved, interventions in the upstream phases reduce or eliminate harmful impacts that begin in the extraction and production phases of a supply chain. Upstream solutions also prevent or decrease negative outcomes in subsequent stages, intervening before the environmental, social and health problems can develop. On the other hand, downstream interventions largely concentrate on resolving problems only in the post-consumer phase and primarily linked to waste, overlooking the notable effects on people, climate and nature in the earlier phases of the lifecycle.

### Reuse's Potential in Addressing Plastic Pollution, Climate Change and Environmental Degradation

Upstream measures such as reuse models, redesigned packaging and products, and reduction in plastic production are significantly more effective in comparison to waste management. A comparative analysis in Europe between refilled reusable packaging and a typical single-use bottle for detergent showed that the refill system modelled had 12 times less impact than a single-use system in the household care category.[10] Additionally, upscaling reuse to replace 50% of plastic packaging in the food and beverage sector by the year 2030 can potentially decrease resource usage by 27.1 million tons. This would create savings for the businesses after initial investment, require less extraction for virgin plastics and other raw materials and curb the generation of waste.[11]

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[7] United Nations Environment Programme (2021). NEGLECTED: Environmental Justice Impacts of Marine Litter and Plastic Pollution. https://wedocs.unep.org/bitstream/handle/20.500.11822/35417/EJIPP.pdf

[8] The upstream phase covers extraction and the chemical processes which involve the production and consumption of virgin plastic polymers. The midstream phase includes product design, manufacturing of plastic products and use.

[9] Ellen MacArthur Foundation. Upstream Innovation.https://www.ellenmacarthurfoundation.org/upstream-innovation/overview

[10] Rethink Plastic; Break Free from Plastic (2021). Realising Reuse: The potential for scaling up reusable packaging and policy recommendations.https://rethinkplasticalliance.eu/wp-content/uploads/2021/07/Realising-Reuse-Final-report-July-2021.pdf

[11] Greenpeace (2021). "The world is ditching plastics with reuse and refill laws and practices" https://www.greenpeace.org/international/story/51843/plastics-reuse-and-refill-laws/

In terms of waste prevention, one report by the World Economic Forum estimates that shifting only 10-20% of plastic packaging to reuse models could potentially reduce 45-90% of plastic ocean waste and 10-25% of plastic landfill waste. Based on data and targets from sources including Greenpeace, the report goes further by modeling a scenario wherein 40-70% of plastic packaging are shifted to reuse, which can potentially eliminate all ocean plastic waste and cut down landfill plastic waste by 50-85%.[12]

# *Establishing Reuse and Refill in the Philippines*

## Defining Reuse and Examining Existing Reuse Models

With the rising concerns around plastic pollution and increased demand for sustainable business models from consumers, it is only reasonable to begin investing in, adopting and advancing reuse models. A variety of reuse and refill systems are already implemented worldwide with commercial success. In fact, reuse models have existed as a part of people's lives well before the introduction of single-use plastics in the last century. In the Philippines, our tingi-tingi culture was first based on the use of reusable containers and refilling from larger storage receptacles. Purchasing goods at local markets involved using bayongs, bags or baskets made of indigenous materials.

The Making Reuse a Reality report done by the University of Portsmouth in collaboration with the Break Free from Plastic movement recognizes this definition of reuse - a system in which reusability is a deliberate objective and in which the packaging item is used multiple times for its originally intended purpose.[13] In addition, the ISO Reuse Standard notes that the term reuse only applies when reusable packaging is used several times for the same purpose for which it was originally conceived and it must be designed to last a minimum number of rotations within a reuse system.[14] Considering these various definitions, the researchers at University of Portsmouth defined a reuse system for packaging as "a comprehensive system for the multiple rotations of reusable packaging which remains within the ownership of the system and is loaned to the consumer."[15] Reuse will have a positive environmental impact once the sustainability breakeven point has been exceeded.[16] To surpass that point and be environmentally sound, researchers recommend return rates at 90%.[17]

Below are four models of reuse according the Ellen MacArthur Foundation[18], with examples:

1. *Refilling at/from home*: Consumers refill reusable containers at home with purchased goods. Examples for this are the use of concentrated versions of products in reduced packaging to be diluted with water, refilling of printer ink cartridges and mobile refilling stations with vehicles equipped with dispensers.

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[12] World Economic Forum (2021). The Future of Reusable Consumption Models. https://www3.weforum.org/docs/WEF_IR_Future_of_Reusable_Consumption_2021.pdf

[13] Europen (2021). Essential Requirements for Packaging in Europe. The European Organization for Packaging and the Environment. https://www.europen-packaging.eu/wp-content/uploads/2021/08/EUROPENGuide-to-Using-the-CEN-Standards.pdf

[14] ISO (2012). ISO 18603:2013(en) Packaging and the environment — Reuse. https://www.iso.org/obp/ui/#iso:std:iso:18603:ed-1:v1:en

[15] University of Portsmouth (2023). Making Reuse a Reality. https://plasticspolicy.port.ac.uk/wp-content/uploads/2023/05/Making-reuse-a-reality-report_GPPC.pdf

[16] Dixon, C., & Geßner, L. (2022). Convention on Plastic Pollution; Plastics Treaty Essential Elements: Reuse. Environmental Investigation Agency. https://eia-international.org/wp-content/uploads/Essential-Elements-Reuse-SINGLES.pdf

[17] University of Portsmouth (2023). Making Reuse a Reality. https://plasticspolicy.port.ac.uk/wp-content/uploads/2023/05/Making-reuse-a-reality-report_GPPC.pdf

[18] Lendal, A., & Lindeblad Wingstrand, L. (2019). Reuse Rethinking Packaging. Ellen MacArthur Foundation. https://emf.thirdlight.com/file/24/_A-BkCs_aXeX02_Am1z_J7vzLt/Reuse%20%E2%80%93%20rethinking%20packaging.pdf

2. *Refilling on the go*: Consumers purchase or provide their own reusable containers, refill at a dispensing point in retail outlets. They clean the containers at home after the product runs out to again be used in refilling. Examples are dispensing systems in groceries and zero waste stores.
3. *Return from home*: Consumers get a product delivered to their residence, and either swap the used containers or return empty containers to the business at a later date. Containers are cleaned by the business. Examples for this model include Loop in the US and Europe, and
4. *Return on the go*: Consumers purchase a product in a reusable container and return the empty container to the store or drop-off point. The business is responsible for cleaning the containers. Examples are deposit-return schemes employed by beverage companies using glass bottles and water refilling stations in the Philippines.

## Enabling Policies for Reuse

Greenpeace recommends the creation of policies and public programs to institutionalize and mainstream reuse and refill systems in the country. Through these policies we can transform relevant industries, scale viable models already existing in communities, incentivize shifts to these systems, and increase public awareness of upstream solutions suitable for their community.

To enable reuse and refill systems to reach their full potential, reuse policies and solutions must be complemented with regulation which aims to decrease resin production and manufacturing of plastics products, phase out single-use plastics and prohibit detrimental waste management practices like thermal treatment. Decreasing production through reduction targets and plastic bans will reduce the volume of plastic packaging in circulation and lower the market's dependence on single-use plastics to make reuse more competitive. Harmful waste treatment practices must also be prohibited as these enable the continued use and production of plastics.

In developing all policies, it is also recommended that policymakers use these environmental principles as guidance: Prevention Principle, Precautionary Principle, Polluter Pays Principle, and Rectifying Issues at Source.

## Establishment of Refilling Systems Through Policy

### Products Covered

Greenpeace recommends transition to refill systems for frequently purchased food, cosmetic[19], and household products which are packaged in single-use plastics, particularly sachets. Reducing the latter's volume will have a significant effect as it comprises 52% of the Philippines' residual plastic waste stream.[20]

Based on the findings of a community survey conducted by Greenpeace through its partners in Pasig, transition from sachets can begin with the following commonly purchased products:

- Food products: Cooking oil, soy sauce, vinegar, salt, monosodium glutamate, powdered drinks (juice and coffee)
- Cosmetics: Shampoo, bath and handwashing soap
- Household: Dishwashing product, laundry detergent

[19] Cosmetic products as defined by the FDA are any substance or preparation intended by its manufacturer to be placed in contact with the various external parts of the human body with a view exclusively or mainly to cleaning them,perfuming them, changing their appearance, correcting body odors, protecting them or keeping them in good condition.
[20] Global Alliance for Incinerator Alternatives (2020). Sachet Economy: Big Problems in Small Packets. https://www.no-burn.org/wp-content/uploads/2021/11/Sachet-Economy-spread-.pdf

The shift away from sachets should not be limited to these product lines alone, but they serve as a starting point to reduce the many of the most commonly sold sachet products. In addition to these, we recommend the inclusion of fabric conditioners or softeners, hair conditioners, lotions, facial cleansers, condiments, snack items and all-purpose, kitchen and bathroom cleaners. Currently, there are refilling stations for these products as well as the others mentioned above in several cities in the Philippines.

## Elements for Producer Responsibility

**Obligated Enterprises.** Large-scale enterprises and medium-scale enterprises[21] which manufacture goods packaged single-use plastics identified in the previous section should be required to transition to refilling as a product delivery system. Distributors involved in packaging or repackaging the identified manufactured goods in single-use plastic for final sale to consumers are recognized in the scope of producers. While not required, micro and small enterprises are encouraged to invest in reuse models.

**Establishing Reuse and Refill with Targets.** In order to make a significant reduction in impacts created by production and disposal of plastic, these enterprises must reach required reuse and refill targets. A certain percentage of the total sales units of products packaged in single-use plastic must utilize reuse and refill models in delivering goods to end consumers by 2030. Greenpeace recommends mandating companies to have an overall target of 50% of the total sales units of products previously packaged in plastic be delivered to consumers through reuse and refill models by 2030, with a progressively increasing annual target until a full transition is achieved.

Reuse and refill targets must be separated and sectoral targets can be identified. For reuse, the percentage is based on the annual volume of sales units of products in reusable packaging within a reuse system and with a minimum number of rotations, considering the rapid increase in production and consumption. A refill target could be in the form of a percentage of total sales units shifted from single-use formats to refilling formats, as well as space at retailers' premises dedicated for refill.

For the former, policy can mandate a percentage of current product sales units be distributed through refilling systems as one mode of product distribution. This will apply to specific fast-moving consumer goods for manufacturers and retailers to comply with as a replacement to single-use delivery systems or pre-packaged formats, not as additional product lines or sales units. Obligated enterprises must be required to design and invest in the establishment of refilling systems to deliver the refillable goods they will produce. They may directly manage the refilling systems through manufacturer-operated refilling stations or may provide retailers with the products and necessary equipment for dispensing and storing products. It is recommended that systems be harmonized and implementation be done in coordination with retailers and other manufacturers to reduce the needed investment of each entity.

**Ensuring Competitiveness.** Reuse and refill systems must be competitive in comparison to their single-use counterparts for them to be adopted, scaled or replicated by producers and gain widespread acceptance among consumers. To make refilling stations more cost-competitive, it is recommended to incorporate a provision similar to Germany's packaging law which states the final distributors may not offer the sales unit consisting of goods delivered to the end consumer through refilling at a higher cost or less favorable terms than the sales unit of the same goods in disposable packaging. This measure can be applied to both producers and retailers.

[21] The Magna Carta for Micro, Small and Medium Enterprises (MSMEs) defines medium-scale or sized enterprises as businesses with total assets ranging from Php 15,000,001 to 100,000,000. Large-scale enterprises are those with total assets Php 100,000,001 and above.

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## Elements for Retailer Responsibility

**Refilling space.** Retailers selling the identified products in plastic packaging have an important role in that they manage the day-to-day operations of refilling systems and ensure compliance with relevant regulations after receiving refillable goods from manufacturers or producers. For the initial introduction of refill systems, retailers classified as large and medium enterprises will be required to establish refilling stations in their establishments, while micro and small enterprises (MSMEs) have the option to adopt designated refilling spaces. In addition to allocating a space in their retail establishments for refilling stations, obligated retailers must provide the necessary equipment to implement refilling activities in their establishment and train the necessary number of staff to operate refilling stations according to the proper guidelines.

**Consumer-owned containers.** Reusable containers brought by end consumers for refilling must be prioritized, although retailers may offer reusable containers for sale if consumers do not have their own. Consumers' own reusable packaging will be used as a default, provided that the container meets standards for sanitary refilling. A discount for consumers using their own containers must be mandated to minimize repeated consumption of reusables (see incentives below).

**Informing Consumers.** It is recommended to require retailers to inform end consumers of the available refilling systems in-store and their associated incentives (e.g. discounts, promos). The retailer must display clearly visible and legible signs reflecting this information in the appropriate product sections of the establishment and the point of sale. For delivered goods, this notice must be given in the respective platform, digital or otherwise, where purchases are made.

## Standards, Regulations and Addressing Safety Concerns

National legislation, regulatory mechanisms and policy frameworks are necessary to enable a just transition to reuse and refill systems, as well as to accelerate the scaling of existing models.

Standards and guidelines set by laws and regulatory bodies will allow for the development of resource efficient, environmentally impactful and safe alternative distribution systems in the fast-moving consumer goods industry and other sectors which utilize single-use plastic. The inclusion of hygienic and safety regulations is necessary in a policy framework to mainstream refilling systems in order to protect consumers, maintain product quality and prevent cross-contamination or leakage. Another key benefit for standards and guidelines is that these would drive more systemic approaches and strategic implementation within an industry or sector, as opposed to isolated projects or proprietary programs.

The Food and Drug Administration (FDA) safeguards public health by ensuring the safety and efficacy of commercially available products as mandated by the Implementing Rules and Regulations of The Food and Drug Administration Act of 2009 (Republic Act No. 9711). With the issuance of proper guidelines for reuse and refill, the national government through the FDA can advance the transition to business models, product designs and reusable packaging which will decrease single-use plastics in circulation. For example, the FDA can release regulations for washing and sanitation for refillable containers, container standards, sanitation protocols and good practice guidelines for refilling stations. Furthermore, legislators can amend existing regulations:

- **Refilling License and Permits.** Refilling is classified under "filling", which is grouped together with formulating, processing and compounding, among others, as a manufacturing activity which requires a license to operate granted only if an establishment fulfills all the requirements in the Revised Guidelines on the Unified Licensing Requirements and Procedures of the FDA (Administrative Order No. 2020-0017) and Good Manufacturing Practices.

It is assumed that all the packaging and raw materials come from the manufacturer; however, the creation of refilling stations at retail establishments means both retailers and consumers can provide packaging. Therefore, the requirement for a license to operate will apply for the manufacturer, brand owner and distributor of the products, while refilling stations will be required to adhere to good practice and sanitation guidelines for the execution of refilling activities. The refilling stations must explicitly allow for packaging coming from customers to be used provided they are compliant with regulations.

Greenpeace proposes that a new term (e.g. “Refilling Stations”) be developed for refilling within a retail outlet similar to how RONPD (Retail Outlets for Non-Prescription Drugs) were developed.

- **Separate Process for Refilling Systems.** To protect consumers’ health while accelerating the widespread adoption of refill and reuse systems, it is recommended that refilling stations have separate and specific application requirements for enterprises engaging in refilling. These can be determined under legislation or administrative orders for refilling systems. These separate regulations must be reflected through an amendment to Administrative Order No. 2020-0017, or the Revised Guidelines on the Unified Licensing and Procedures of the FDA. The proposed requirements are as follows:

    a. Business permit for the manufacturer or business entity providing products to refilling stations
    b. Sanitary permit for the manufacturer or business entity providing products to refilling stations
    c. License to operate for the manufacturer, brand owner, distributor and/or other business entity providing products to refilling stations
    d. Products for refilling must be FDA-approved (both cosmetics and household products)
    e. Authorized representatives to routinely evaluate refilling practices:
        i. For large/medium enterprises acting as manufacturers directly operating refill systems or retailers, employees assigned to routinely check refilling stations must be trained to comply with safe and sanitary refilling;
        ii. For manufacturers not operating refill systems but distributing products, trained and certified representatives from manufacturers or distributors may cover a designated area consisting of multiple stations dispensing products via micro and small enterprises.
    f. Present refilling procedures in accordance good practice and sanitation guidelines to ensure the safety of refilling
    g. Payment - The fee for the refilling License to Operate should be a reasonable flat rate instead of being based on business capital, similar to those required by other government agencies (e.g. Bureau of Animal Industry and Philippine Drug Enforcement Agency).

    To create conditions to make refilling stations for food, cosmetic and household products as widely accessible as water refilling stations while ensuring public safety, we propose guidelines comparable to those for water refilling stations:

| Water Refilling Station | Proposed Refilling Stations for Food, Cosmetic & Household Goods |
|---|---|
| Under LGU Jurisdiction | Under FDA Jurisdiction |
| Required to secure sanitary permit | Manufacturers, brand owners and distributors providing products to be refilled at refilling stations must be required to secure license to operate (separate from manufacturing LTO) |
| No Finished Goods registration | Finished Goods must be notified |

| | |
|---|---|
| Station is enclosed | Refilling dispensers are properly designated within the area of an establishment where refilling station personnel can ensure it is not tampered with. |
| Specific frequency for water testing is required | Products are tested randomly before distribution for a minimum number of instances in a year and issued a Certificate of Analysis (COA) |
| Container is cleaned by the station personnel prior to refilling | Refilling containers, dispensers and other equipments where products are stored are washed and sanitized by manufacturers, distributors and/or refilling stations depending on the refilling system design. Washing and sanitation of equipment may happen at multiple points (e.g. bulk containers for transporting cleaned by manufacturers, portable dispensers cleaned by manufacturers, in-store dispensers cleaned by stations, measuring equipment cleaned by stations, etc.).<br><br>Product containers to be filled at the point of sale are cleaned by the consumer, and the condition and cleanliness of the container is assessed by the station personnel prior to refilling. Good practice guidelines will include how to assess suitability of the consumer-owned containers. |
| Station personnel is trained in-house on their specific tasks | Based on the station's classification, trained personnel will comply with Good Handling Practices and will perform their tasks based on standard sanitary refilling procedures<br><br>Micro and small enterprises performing refilling will either have employees trained, and will be covered by manufacturers providing these refilling products. |

- **Labelling Requirements for Reusable Containers Used in Refilling.** Considering the minimum mandatory labelling requirements of cosmetics, food and household products, Greenpeace proposes an amended guideline for reusable containers meant for refilling.

  For empty product containers or reused packaging for the same product being refilled, the minimum mandatory information is already on the label and only needs to be updated to reflect information for the current manufacturing batch of the product and expiration. A sticker or stamp indicating the Batch No. and Expiration Date will be placed on the container for every refilling transaction.

  In cases where the container to be refilled is different from the original product packaging, the minimum mandatory requirement for labels should be clearly displayed at the refilling stations. The proposed minimum mandatory labelling requirement to be stickered or stamped on the packaging to be used for refilling are:
  1. Product Name
  2. Batch No.
  3. Expiration Date
  4. Special Precautions to be Observed and/or Caution/Warning (Hazard Statement) when applicable, including Food Allergen Information for food products

## Incentivizes for Enterprises and Consumers

Greenpeace recommends Fiscal and Non-Fiscal Rewards and Incentives for Reusables and Reuse and Refill Systems. These can incentivize the development, scaling and replication of reuse and refill systems to align with the national strategy to shift away from a linear economy. As previously mentioned, it is essential that reuse

models are competitive for them to be mainstreamed, which is why incentives and government support mechanisms for these systems and reusable items are crucial. These allow producers and retailers to overcome challenges, such as capital investment for refilling stations.

Incentivising the creation of and investment in these systems has multiple benefits. It would minimize economic disruptions when phasing out single-use plastic or other disposable products and packaging, and establish new markets and a reuse economy. It will also realign the incentive system to place a higher value on waste prevention and reduction instead of waste management, recycling and recovery.

A reuse economy depends on redistributing value across local, national or global systems or value chains, and that redistribution can be done through government subsidies and tax incentives, which can be provided during the transition phase. The creation and design of enabling infrastructure and systems for reuse and refill models can also be done through regulation, such as mandating shared infrastructure and standardized packaging. The government can also work together with the private sector to maximize existing public infrastructure and waste management systems (including informal sectors) to enable or support reuse and refill systems.

**Financial and Non-Financial Incentives for Enterprises.** Obligated enterprises are entitled to the appropriate financial and non-financial incentives outlined in the Extended Producer Responsibility Act, as refilling systems, product redesign for reusability and adoption of reusables are among the accepted strategies for reduction of single-use plastic packaging.

**Discounted Rates for Consumers.** Utilizing a scheme similar to Taiwan's discount policy for reusable cups, we recommend that retailers offer end consumers bringing their own reusable or refillable container with a discount. This not only motivates consumers to continue this new purchasing behavior but also offsets any consumer investment in reusable containers for refilling. A proportionate discount based on volume should be given per product refilled through authorized refilling stations.

**Reward or point system.** One method of incentivization would be to give consumers points for transactions at refilling stations. The credits or points can be provided per overall transaction or per product purchased, depending on the incentivization scheme created. Ideally, this scheme would be streamlined into one or multiple platforms/system to give consumers a variety of rewards to choose from. Examples are in-store credits, discounts and digital applications set up by brands or retailers as part of their loyalty program. Greenpeace recommends that the redemption points should 1) be widely available (e.g. redeemable in multiple retail outlets or collection points in all provinces), 2) be located in areas easily accessible for public transport, and 3) help sustain the refilling system by prioritizing credits and points for future refills. Other rewards should ideally be plastic-free or zero waste versions of products or non-tangible (e.g. experiences, subscriptions).

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