



RPA Industry Development Committee

Position Statement: *Product Stewardship Policy and Framework Principles*

Approved January 27, 2010 by the RPA Board of Directors

The Reusable Packaging Association (RPA) promotes the value and expansion of reusable materials as preferred packaging solutions across supply chains, private or public. As part of this mission, RPA shares the objective of product stewardship policies to reduce solid waste and waste management burdens of local governments and communities.

Product stewardship, as defined by the U.S. EPA, is a product-centered approach to environmental protection. Also known as extended producer responsibility (EPR), “product stewardship calls on those in the product life cycle - manufacturers, retailers, users, and disposers - to share responsibility for reducing the environmental impacts of products.” The primary role and responsibility is placed with the producer to make development and marketing decisions focusing on efforts to reduce the environmental footprint of their product.

Standards for product stewardship policy, most recognized as the “Framework Principles” endorsed by major product stewardship organizations, set forth recommendations for: (1) producer responsibility, (2) shared responsibilities with retail, government and consumer participants, (3) governance of activities, (4) financing of programs, and (5) environmental considerations. The intent of the “Framework” is to establish one common policy among government entities with the flexibility to address multiple products.

RPA views the current “Framework” as an acceptable approach to guide public policymaking for the reduction of solid waste liabilities on municipalities. However, RPA’s endorsement of any resulting EPR policy will occur on a case-by-case basis depending on the actual regulatory use and interpretation of the Framework principles. The identification of a “covered product” is a central component to effectively assess the application and suitability of any policy, and the policy’s incentive toward a covered product’s reusability is an important regulatory element to strengthen its effectiveness in source reduction and waste prevention. Reusable packaging can be a valuable tool in achieving product stewardship, and public policy seeking EPR should promote reusable packaging as a means to advance product stewardship goals.

RPA members manufacture, market, distribute, manage, and/or retrieve and recondition reusable packaging systems for the continuous and lasting use of packaging products and services, primarily in business-to-business applications. By explicitly designing for reuse and eventual recycling, RPA members work to close the loop and satisfy a product’s lifecycle impact and end-of-life management in everyday development and commercial practices. These actions are consistent with the objectives of product stewardship policies, and as such encourage RPA and its members to support regulatory initiatives adopting similar approaches to foster effective waste management programs.