



**MANUAL FOR PRODUCERS ON HOW TO REPORT
REUSABLE PACKAGING OR PACKAGING
MATERIAL**

Guidelines are in accordance with regulation 10A of S.L. 549.43 – the Waste Management (Packaging and Packaging Waste) Regulations.

Should you require further assistance please contact us on:

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Kindly take into consideration the following points when completing **Sections 3.1 and 4.2** of the 'Renewal Form as a Producer of Packaging or Packaging Material – **Form H**' or the 'Deregistration form as a Producer of Packaging or Packaging Material – **Form I**'.

Step 1: When should I declare my packaging as reusable?

For reusable packaging which is being reused, it is required that **ALL** of the following occur **simultaneously**:

- a) Packaging is designed to be reusable;
- b) A reuse system is in place: this means that arrangements (organisational, technical and/or financial) are in place to ensure reuse (e.g. signed agreement between companies); and
- c) The reusable packaging in question performs at least 2 rotations (i.e. it is not discarded after the first use).

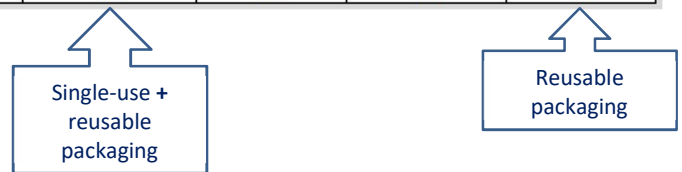
Step 2: Compilation of Form H or I in relation to reusable packaging.

1. Reusable packaging must be declared as “*placed on the market*” under **Section 3.1** of Form H or I, only when it is made available for the first time on the national market, together with the goods it is intended to contain, protect, handle, deliver or present.
2. Reusable packaging placed on the market for the first time shall be reported in **Section 3.1.** of Form H or I under:
 - ‘ALL packaging placed on the market for the first time’; and
 - ‘REUSABLE packaging placed on the market for the first time’.

The reason is that the former includes single-use as well as reusable packaging placed on the market for the first time (i.e. Total packaging placed on the market in a given year), while the latter caters for reusable packaging only.

- **Example:** a producer who places 100 kg of single-use wooden transport packaging and 2000 kg of reusable wooden transport packaging, for the first time on the market of Malta.

	ALL Packaging placed on the market for the first time			REUSABLE packaging placed on the market for the first time (if applicable)		
	Sales packaging ⁽¹⁾ [in kg]	Grouped packaging ⁽²⁾ [in kg]	Transport packaging ⁽³⁾ [in kg]	Sales packaging ⁽⁴⁾ [in kg]	Grouped packaging ⁽⁵⁾ [in kg]	Transport packaging ⁽⁶⁾ [in kg]
PLASTIC	0.00	0.00	0.00	0.00	0.00	0.00
WOOD	0.00	0.00	2100.00	0.00	0.00	2000.00
FERROUS METAL	0.00	0.00	0.00	0.00	0.00	0.00
ALUMINIUM	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL METAL	0.00	0.00	0.00	0.00	0.00	0.00
GLASS	0.00	0.00	0.00	0.00	0.00	0.00
PAPER AND CARDBOARD	0.00	0.00	0.00	0.00	0.00	0.00
OTHER	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL:	0.00	0.00	0.00	0.00	0.00	0.00




- Reusable packaging which is discarded after its first rotation shall be declared as single-use packaging placed on the market for the first time in **Section 3.1** of Form H or I.
- Reusable packaging (e.g. wooden pallets) which was re-exported directly in the same manner it was imported, remaining unchanged in its weight, shall not be declared as having been “placed on the market” in **Section 3.1** of Form H or I.
- Reusable packaging which is directly reused with goods and is made available again on the market must not be declared again as ‘placed on the market’ under **Section 3.1** of Form H or I.
- Reusable packaging (e.g. wood pallets or gas cylinders) that is directly reused with goods (even if it has been subject to reconditioning/repair activities as part of a rotation) **must not** be declared as packaging waste that has been recycled or recovered in **Section 4.1** of Form H or I.

SECTION 4.1 PREPARATION FOR REUSE, RECYCLING AND RECOVERY						
Packaging Waste Material	Recycling [in kg]			Repair of wooden packaging [in kg]	Energy Recovery ⁽¹⁾ [in kg]	Other recovery ⁽²⁾ [in kg]
	Recycled in Malta	Recycled in other	Recycled outside the			
PLASTIC						
WOOD						
METAL	Ferrous metal					
	Ferrous metal from IBA ⁽³⁾					
	Aluminium					
	Aluminium from IBA ⁽⁴⁾					
	Total					
GLASS						
PAPER AND CARDBOARD						
OTHER						
TOTAL						


- The amount of wooden packaging repaired in a permitted waste management facility should not be added under the recycling columns in **Section 4.1** of Form H or I, but under column ‘Repair of wooden packaging’. Such amounts may be taken into account in the calculation for the attainment of the applicable recycling

targets subject that the facility is permitted for end-of-waste and attains the relevant criteria for end of waste.



SECTION 4.1 PREPARATION FOR REUSE, RECYCLING AND RECOVERY							
Packaging Waste Material		Recycling [in kg]			Repair of wooden packaging [in kg]	Energy Recovery ⁽¹⁾ [in kg]	Other recovery ⁽²⁾ [in kg]
		Recycled in Malta	Recycled in other	Recycled outside the			
PLASTIC							
WOOD							
METAL	Ferrous metal						
	Ferrous metal from IBA ⁽³⁾						
	Aluminium						
	Aluminium from IBA ⁽⁴⁾						
Total							
GLASS							
PAPER AND CARDBOARD							
OTHER							
TOTAL							


8. Reusable packaging – other than wooden packaging – that have become waste, and which undergoes ‘preparation for reuse’ (i.e. packaging is checked, cleaned or repaired in a permitted waste management facility), so such reusable packaging can be re-used must be declared under **Section 4.1** of **Form H or I** as packaging waste that has been recycled (in Malta, in other Member State or outside the EU).



SECTION 4.1 PREPARATION FOR REUSE, RECYCLING AND RECOVERY							
Packaging Waste Material		Recycling [in kg]			Repair of wooden packaging [in kg]	Energy Recovery ⁽¹⁾ [in kg]	Other recovery ⁽²⁾ [in kg]
		Recycled in Malta	Recycled in other	Recycled outside the			
PLASTIC							
WOOD							
METAL	Ferrous metal						
	Ferrous metal from IBA ⁽³⁾						
	Aluminium						
	Aluminium from IBA ⁽⁴⁾						
Total							
GLASS							
PAPER AND CARDBOARD							
OTHER							
TOTAL							

9. Once reusable packaging becomes waste and undergoes recycling or recovery operations, it must be declared under **Section 4.1** of Form H or I as packaging waste that has been recycled (i.e. [in Malta], [in other Member State] or [outside the EU]) or recovered (i.e. [Energy Recovery] or [Other recovery]). This needs to be sustained by a Waste Packaging Certificate issued by the end facility.

10. The number of rotations performed by reusable packaging must be declared under the specific column of **Section 4.2** of Form H or I (in order to consider that reusable packaging has been reused, the number of rotations must be greater than or equal to 2).



SECTION 4.2 REUSE			
	REUSABLE transport packaging placed on the market for the first time ⁽¹⁾	Rotations*	
		Reusable transport packaging ⁽²⁾	Number of rotations
PLASTIC	0.00	0.00	
WOOD	0.00	0.00	
FERROUS METAL	0.00	0.00	
ALUMINIUM	0.00	0.00	
TOTAL METAL	0.00	0.00	
GLASS	0.00	0.00	
PAPER AND CARDBOARD	0.00	0.00	
OTHER	0.00	0.00	
TOTAL:	0.00	0.00	

11. Material entrusted to third parties for reuse will be declared as reused if reusable packaging is entrusted through a signed agreement to an entity, which can provide the number of rotations, as well as the weight of material repaired. The signed agreement shall also apply to companies that export their packaging to the same company located in a different country. If its traceability is not possible, it shall be assumed to have been discarded.
12. Submitted information on reusable packaging that is reused shall be accompanied by a signed declaration indicating the number of rotations and the methodology applied to determine the number of rotations.

Differentiation between '*preparation for reuse*' and '*reuse of wooden packaging*'

Wooden packaging can either be reported as reusable packaging in **Section 3.1** or under '*repair of wooden packaging*' in **Section 4.1**.

In order to report wooden packaging under '*repair of wooden packaging*' (in **Section 4.1**), it must have become waste prior to being prepared for reuse. In particular, wooden pallets may be considered as being prepared for reuse when they are collected as waste, prior to subsequent repair by a **permitted waste management facility** and reuse.

On the other hand, wooden pallets which are directly reused or undergo reconditioning/repair activities **during a rotation** would not be considered as '*prepared for reuse*' since they are not collected as waste and would thus be reported as reusable packaging in **Section 3.1**.
