

PPWR and the classification of systainer® products

In the context of the European Packaging and Packaging Waste Regulation (PPWR), there is currently ongoing discussion as to whether systainer® products and inlays should be classified as packaging or as standalone products.

Based on our current assessment, the relevant criteria largely indicate that systainer® products and inlays should be regarded as standalone products or as components of a durable system and organisation concept.

Why TANOS has reached this assessment

The systainer® is far more than just a container for a product. It is a cross-manufacturer, connectable case system with intrinsic utility and established market acceptance in professional applications.

Typical features of the systainer® include:

- Organisation of tools, accessories and equipment
- Compatibility with existing systainer® systems
- Integration into existing system environments
- Standalone, durable product that can be reused independently of the product it originally contained
- Integration into vehicles, workshops and existing storage systems
- No typical disposal after removal of the original contents
- Clear distinction from single-use and short-term packaging in light of the regulatory purpose of the PPWR
- Storage throughout the entire service life
- Transport in professional applications

Many OEM partners deliberately choose the systainer®, even though lower-cost alternative solutions such as cardboard boxes or simple, non-connectable cases are available. The systainer® does not lose its function once the product it originally contained has been removed or used up. It typically remains with the user, is reused for different types of content and is integrated into existing workshop, vehicle, warehouse and logistics structures. The key factors are, in particular, the system's compatibility, interoperability, reusability and high level of acceptance. The focus is therefore not on single-use product packaging, but on long-term use as a standalone system product.

Filling by OEM customers

Even when filled by OEM customers, TANOS considers that the basic product and system function of the systainer® remains unchanged.

The mere filling of the systainer® does not automatically alter its function as a durable organisation, storage and transport system. The specific intended purpose and actual use in each individual case remain the decisive factors.

Note

This information reflects the TANOS's current assessment and is not a substitute for an assessment of individual cases. The legal assessment may depend on the specific circumstances and on future administrative and judicial practice.

TANOS is closely monitoring further developments regarding to the PPWR and will update this information as required.

