SEFA's position on re-use of steel drums (regarding PPWR)

Who we are

SEFA is the leading organization representing Europe's steel drum industry. Its members specialize in manufacturing steel **drums** and a range of other **industrial sales packaging** for various sectors, including lubricants, chemicals, agrochemicals, and food.

Introduction

Steel drums have been re-used in industrial applications for over 50 years. In Europe, approximately four million large steel drums (200-220 L) are reconditioned and re-used every year within an open loop system. In practice, however, aspects like filling products, handling and the overall condition of the used drum determine whether a drum is suited for re-use.

Drums are used to package a wide variety of filling products. These may include, for example, the following:

- Chemicals: acids, alkalis, solvents
- Oils & fats: mineral oils, lubricants, fuels, hydraulic oils
- Foodstuffs: juices, wine, oils, syrup, molasses, cocoa or fruit pastes, concentrates
- Industrial products: paints, varnishes, adhesives, sealants
- Solid substances: powders, granulates, pigments

and many more.

In addition, there are numerous applications that place demands on drums potentially exceeding the specific limits of the drums. It is important to note that a drum may only be reused if

- there is no rusting through or cracks
- the wall thickness is sufficient
- the flange and beads are undamaged
- the closures close tightly
- there are no impermissible residues.

Even though steel drums have a long-standing history of re-use, whether a drum can actually be re-used depends on the parameters described above and needs to be determined carefully on a case-by-case basis.

Transport function of steel drums

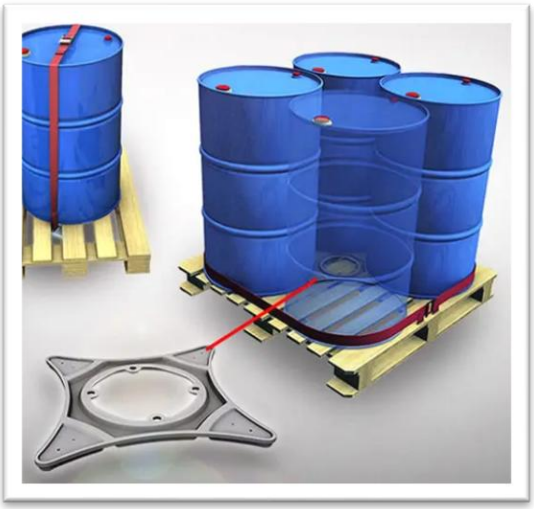
Article 29 (1) of Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) stipulates that economic operators using certain packaging formats, including drums, must meet re-use targets from 2030 onwards, provided that these are either transport packaging or "sales packaging used for transporting products". In its Guidance document on Packaging and Packaging Waste Regulation (PPWR) Annex (18., see Page 38) the EU Commission clarifies that **only sales packaging "with an evident transport function"** is covered by the term “sales packaging used for transporting products” and therefore subject to re-use targets. The Commission further explains that the transport function may be apparent from a special design or size of the packaging.

Conventionally available drums generally do not have an "evident transport function"

The PPWR describes sales packaging as packaging that constitute a sales unit consisting of products and packaging to the end user at the point of sale (see Art. 3 (1.) (5) PPWR). Transport packaging, on the other hand, is designed for the transport of one or more sales units (see Art. 3 (1.) (7) PPWR). Drums are sales packaging used for industrial or commercial purposes that are in direct contact with the respective contents and form a sales unit together with their contents. As a rule, drums are not specifically designed for the transport of products and do not have any corresponding design features. Rather, drums and their contents only become shippable as a sales unit with the aid of transport packaging.

Accordingly, filled drums are mainly transported on a pallet (transport packaging) and secured with shrink wrap or strapping (also transport packaging).

In addition, there are even special fastenings for securing the drums to transport packaging:



Other packaging functions prevail

The evident function of steel drums is their **protective function:**

> Throughout their entire service life, drums serve as protective containers for their contents. Their protective function covers a wide range of application scenarios, such as filling, handling, storage and emptying and transport. Drums provide optimum protection for their contents against external influences and, at the same time, protect the environment from the packaged products.

In addition, other packaging functions are also significant for steel drums and can be considered equally important to each other:

- **Handling**
  Drums should be able to be filled, moved, lifted, tilted, and emptied safely. They can act as intermediate buffers in the production flow or, in special designs, for sterile pharmaceutical/organic food applications. Mobile dosing and mixing systems, such as pumps or agitators, can often be mounted directly. Heating/temperature control of contents (oil, resin, etc.) in heatable or externally heated drums is also possible.

- **Storage**
  Drums enable space-saving and safe storage of liquids, powders and granulates. Aspects such as contamination prevention, spill protection through tight-fitting lids, explosion protection through antistatic variants and fire protection play an important role. UV protection and materials for contamination prevention are used for sensitive products. All of this makes drums explicitly suitable for the safe storage of hazardous substances.

- **Presentation**
  The external appearance of the drums can be customised to individual customer requirements. Various decoration options allow for the creation of distinctive drum designs.

- **Transport**
  Drums must, of course, also ensure the safe transport of their contents. However, transport is not their "evident function", which is why separate transport packaging such as pallets, stretch film or tension belts (see pictures above) are also used to transport the drums.

The above explanations clearly show that conventionally available steel drums typically are sales packaging that do not have an evident transport function.

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