



A BRIEFING NOTE ON BEER KEGS

A CRITICAL BEST PRACTISE IN SUSTAINABLE BEVERAGE PACKAGING THAT SHOULD BE INCENTIVISED AND NOT DISCOURAGED

Excluding beer kegs, which can have a lifespan of thirty years, from the measurement of sales packaging reuse targets, or failing to take their size into account in the reuse target calculation, would discourage use by breweries and the on-trade of one of the best practise examples of reusable beverage containers and result in more packaging, leaving a bigger environmental footprint.



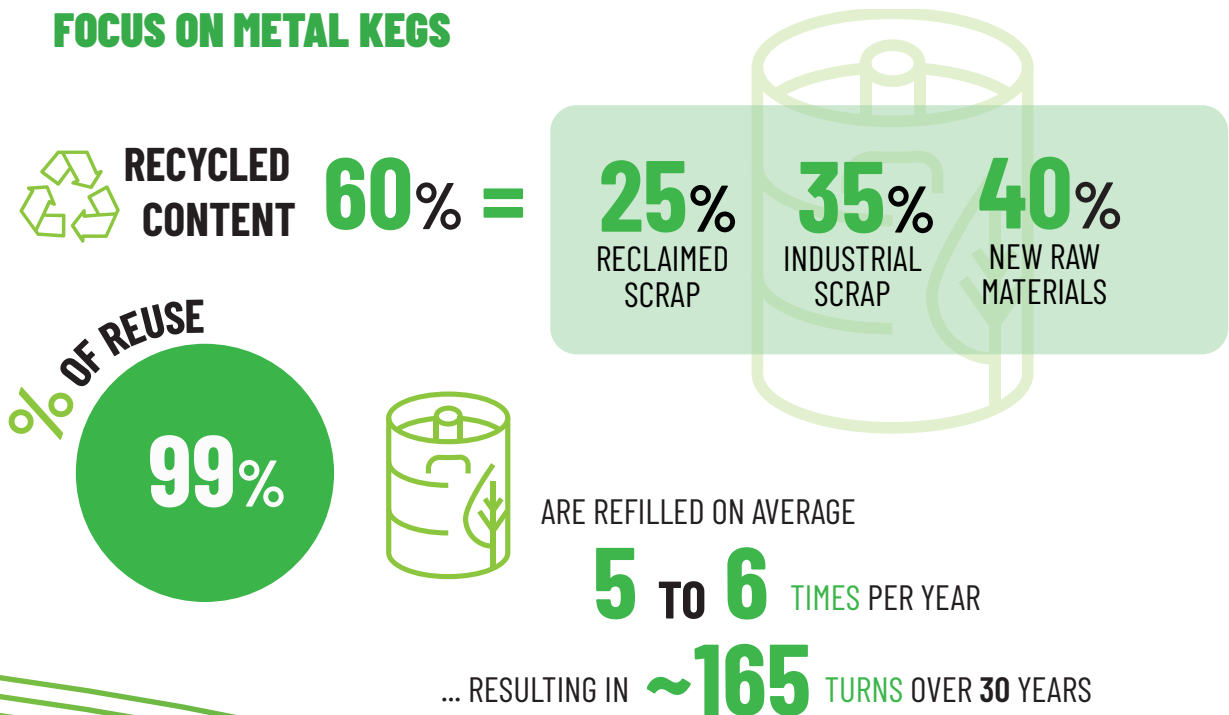
**+30 years lifecycle
before being
crushed and recycled**

BEER KEGS AS BEST PRACTICE SUSTAINABLE PACKAGING

In bars, cafés, restaurants, events and festivals, the so-called on-trade or hospitality sector, beer is often sold on draught. It is usually dispensed from metal kegs, many of which can be re-used for 30 years or even more before being crushed and recycled for further use.

Kegs represent on average nearly 14% of the beer volumes sold in the European Union. However, this varies principally due to the size of the on-trade beer hospitality sector. Depending on the Member State, this ranges from 5% to 60% of the total (on- and off- trade) beer market.

FOCUS ON METAL KEGS



KEGS ARE SALES PACKAGING

COHERENCE WITH OTHER EU LEGISLATION

Without the packaging – be it bottles, cans or kegs – there is no beer. Supplies of beverages to the hospitality sector are therefore covered by the EU Regulation on the provision of Food Information to Consumers (FIC)¹, which applies to sales packaging. In the draft Packaging and Packaging Waste Regulation (PPWR), kegs should also fall within the definition of sales packaging.

Kegs are clearly different from crates and pallets, which are defined as transport packaging since they carry multiple sales packages.

¹ Regulation (EU) No 1169/2011 on the provision of food information to consumers of the European Parliament and Council of 25 October 2011

DEFINITION OF TRANSPORT PACKAGING: UNFIT FOR A BEER KEG

According to article 3 (4) of the PPWR proposal, transport packaging “means packaging conceived so as to facilitate handling and transport of a number of sales units or grouped packages, including e-commerce packaging but excluding road, rail, ship and air containers, in order to prevent physical handling and transport damage”.

This definition clearly refers to the transport of single sales units. A keg, though, is only one unit which holds multiple servings. Consequently, the transport packaging definition does not fit beer kegs. They should rather qualify as beer sales packaging and count towards the achievement of sales packaging re-use targets.

KEGS: CALCULATION OF THE ATTAINMENT OF REUSE TARGETS

Whilst smaller kegs also exist, most beer kegs typically hold from 20 up to 50 litres, the most common size in many on-trade establishments. It would therefore not make sense for a keg to be measured as a single packaging unit just like any other beverage package for the purpose of the re-use target calculation. If this were to be the case, the legislation could have the perverse impact of incentivising brewers, in order to increase the number of reusable packaging units, to replace large reusable keg volumes by smaller, less sustainable packaging units.

For example, a 50 litre reusable keg could be packaged in two hundred 25cl bottles, but would result in more packaging, and ultimately more waste, being placed on the market.

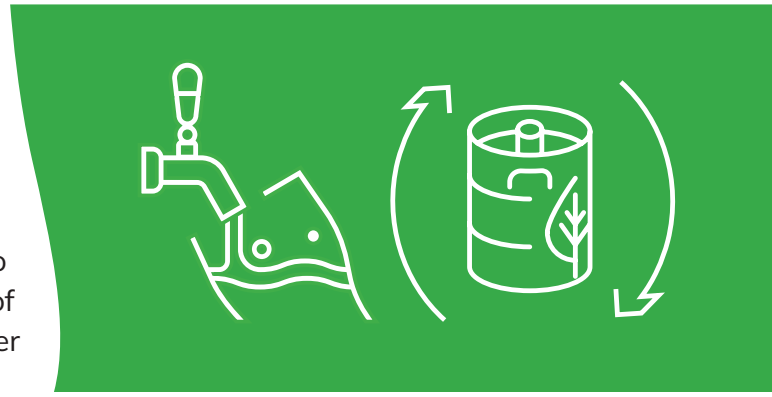
Therefore it is essential that, for measurement, kegs be converted into volume or a number of equivalent smaller packaging units in order to recognise and incentivise best practise sustainable beer packaging. The means of measurement or the size of such equivalent units would need to be defined via the implementing act establishing calculation rules and methodology regarding the targets referred to in Article 27(4).

Some beverage manufacturers produce a variety of drinks categories across a range of different packaging types. It is therefore furthermore important that the manufacturer have the option to implement and calculate the attainment of any targets across its full portfolio of products and packaging rather than per category of drink or package type.



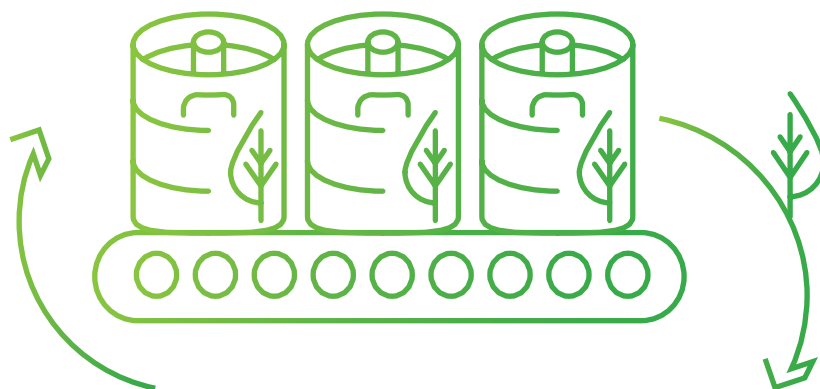
IMPORTANCE OF KEGS FOR THE ON-TRADE AND SMALLER BREWERIES

To oblige these bars and pubs, many of which are small businesses set up to accommodate the storage and dispense of draught beer, to switch from reusable beer kegs to other packaging would:



- 1** generate more packaging, which goes against the philosophy of the legislation;
- 2** increase the environmental footprint of bars/pubs, let alone due to the additional cooling required;
- 3** represent important financial investments for a sector that still has not fully recovered from the covid pandemic (see [2023 EUROSTAT data on business registrations and bankruptcies](#)), creating an existential threat to draught beer culture.

Furthermore, many small and medium-sized breweries only have one production line. This is often kegs for those with limited or no access to retails channels and for whom the on-trade market is critical. If kegs cannot count towards the achievement of sales packaging reuse targets, they have neither the resources (financial, human) nor the possibility (limited infrastructure) to add in an extra production line.



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