

President of the European Commission
Ms Ursula von der Leyen

Commissioner for Environment, Water Resilience and a Competitive Circular Economy
Ms Jessika Roswall

Strasbourg, 01/04/2025

Subject: Reuse obligations for industrial and commercial packaging in the Packaging and Packaging Waste Regulation

Dear President,

Dear Commissioner,

In the final trilogue negotiations on the Packaging and Packaging Waste Regulation (PPWR), serious changes were agreed. The new paragraphs 1-3 of Article 29 significantly extended the reusable quotas for many industrial and commercial transport and sales packaging formats without justifying this with a scientific analysis or an impact assessment. Paragraphs 2 and 3 even prescribe reuse quotas of 100% for packaging used for transport between companies in a member state or for intra-company transport in the EU. This poses several problems that need to be urgently addressed.

Firstly, there are no practical reusable solutions for some of the targeted packaging formats. This is particularly the case for pallet wrapping and straps. As these are essential for securing loads, the reuse quotas jeopardise important supply chains throughout Europe. To a similar extent, the extension to sales packaging for the transport of products is highly problematic, as this packaging, unlike transport packaging, has direct contact with the contents (such as paint or dairy products), and this contamination makes full reuse impossible in many cases. In its original proposal, the Commission had deliberately limited the scope of the reuse quotas to transport packaging. The extension to sales packaging for the transport of products therefore waters down the well-established distinction between sales and transport packaging (sales packaging is generally not only used for the transportation of products, but also for product protection, storage and use of the product as well as for the information and safety of users) and does in no way take into account the different aforementioned purposes of these packaging formats and their respective reusability.

Finally, the 100% re-use quotas in paragraphs 2 and 3 contradict the basic principles of the EU internal market. SMEs in particular, which predominantly serve the domestic market, are more affected by this and are therefore at a clear disadvantage compared to bigger companies.

In response to the concerns raised by many stakeholders, then Environment Commissioner Sinkevičius gave written and verbal assurances that he would submit a delegated act exempting pallet wrappings and straps from the scope of paragraphs 2 and 3. This is important, but is by no means enough. The Commission also needs to tackle the uncertainty created by the term of sales packaging for the transport of products and limit the scope of reuse quotas to transport packaging as originally intended.

The current text of Article 29, paragraphs 1-3 of the PPWR creates complexity and threatens supply chains all over Europe at a time when enhancing competitiveness is crucial and the stated goal of the Commission as laid out in the Competitiveness Compass and the Clean Industrial Deal. It is therefore essential that the Commission immediately carries out an impact assessment for all packaging formats mentioned in Article 29, paragraph 1, and then uses delegated acts to exclude those packaging formats from the scope of paragraphs 1-3 for which reuse quotas do not make ecological and economic sense.

I look forward to hearing from you.

Sincerely,

Andreas Glück MEP

Jan-Christoph Oetjen MEP

Marie-Agnes Strack-Zimmermann MEP

Svenja Hahn MEP

Moritz Körner MEP

Angelika Niebler MEP

Joachim Streit MEP

Sabine Verheyen MEP

Ralf Seekatz MEP

Christine Schneider MEP

Peter Liese MEP

Stephen Nikola Bartulica MEP

Christine Singer MEP

Massimiliano Salini MEP

Beatrice Timgren MEP

Engin Eroglu MEP

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Katri Kulmuni MEP

Verena Mertens MEP

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