

Ms Teresa Ribera Rodríguez
Executive Vice-President for a Clean, Just and Competitive Transition
European Commission
Rue de la Loi 200
1049 Brussels
Belgium

Brussels, 22 July 2026

Subject: Eurochambres calls for the postponement of the Packaging and Packaging Waste Regulation

Dear Executive Vice-President Ribera,

Eurochambres expresses serious concerns regarding the implementation of the Packaging and Packaging Waste Regulation (PPWR). Smaller businesses in particular are struggling with the regulation's complex requirements and the absence of key secondary legislation, resulting in high compliance costs and legal uncertainty. **The chamber network therefore calls for the PPWR's entry into application to be postponed by at least two years.**

Our members remain committed to the objectives of the PPWR to reduce packaging waste, strengthen circularity, and harmonise packaging rules across member states. The chamber network also acknowledges the European Commission's efforts to support the implementation process through guidance and targeted adjustments, including the exemption for pallet wrappings and straps. However, these measures fall far short of providing businesses with a practical, proportionate and predictable framework.

The absence of key delegated and implementing acts represents a major implementation challenge, as businesses will be required to meet core obligations from 12 August 2026 while the technical architecture for demonstrating compliance remains incomplete. This is particularly problematic for labelling obligations. As harmonised EU labelling rules have not yet been adopted, there is a substantial risk that manufacturers will be required to redesign and relabel their packaging more than once, instead of carrying out a single, harmonised transition.

Similar concerns arise with recyclability requirements, where businesses are expected to adapt packaging before the future PPWR-specific recyclability criteria and assessment methods are fully established. In addition, the lack of harmonised EU testing methodologies for PPWR obligations relating to per- and polyfluoroalkyl substances (PFAS) creates the risk that companies will invest in measures that may later need to be adjusted. The current implementation approach effectively requires businesses to make design and investment decisions before knowing with sufficient certainty how those decisions will ultimately be assessed.

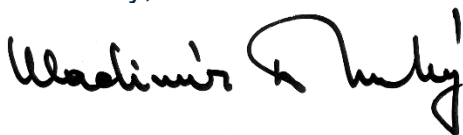
The chamber network considers this approach neither proportionate nor workable, as it creates unnecessary costs, undermines investment certainty and exposes businesses to legal uncertainty despite their efforts to act in good faith. SMEs are particularly affected, as they are already burdened by the complexity of the PPWR and have limited resources to repeatedly adjust to changing rules and criteria. There is also a serious risk of fragmentation across the single market as long as harmonised EU-wide rules are not fully in place.

Eurochambres therefore urges the European Commission to take the following steps to ensure that the PPWR is both effective and workable:

- **Postpone the entry into application of the PPWR by at least two years.** This would provide critical time to finalise secondary legislation, allow for a targeted simplification of the regulation and give businesses and public authorities the necessary time to adapt.
- **Accelerate and prioritise the adoption of delegated and implementing acts.** This is essential to provide businesses and public authorities with legal and investment certainty and to avoid additional costs at a later stage due to changing or incomplete requirements. These efforts should be accompanied by a clear and consolidated timetable for the preparation and adoption of all delegated and implementing acts under the PPWR. Particular priority should be given to resolving the legal and technical uncertainties linked to packaging labelling obligations, recyclability requirements and PFAS-related obligations.
- **Conduct a targeted simplification of the PPWR.** A postponement alone will not resolve the underlying issue of excessive administrative burdens. The additional time should be used to streamline requirements linked to technical documentation, reporting, conformity assessment, recyclability and reuse, as recommended in [Eurochambres 60+ simplification proposals](#).

Eurochambres remains committed to the shared goal of aligning sustainability with competitiveness. Delivering a workable and predictable PPWR is essential for achieving this objective and for ensuring that businesses across Europe can contribute effectively to the transition towards a circular economy. We remain available to discuss with you how the chamber network can contribute constructively to this process.

Yours sincerely,



Vladimír Dlouhý
Eurochambres President

cc: Commissioner Jessika Roswall, Environment, Water Resilience and a Competitive Circular Economy