

Brussels, 1st July 2024

To:

Florika Fink-Hooijer, Director-General of DG Environment

Cc:

Rozalina Petrova, Member of Commissioner Sinkevičius' cabinet

Aurel Ciobanu Dordea, Director of DG Environment

Mattia Pellegrini, Head of Unit B.3., DG Environment, Waste Management and Secondary Materials

Subject: Industry call for a timely PPWR implementation

Dear Director-General Fink-Hooijer,

We are writing to you on behalf of the European packaging industry value chain to express our strong support for the swift and timely preparation and finalisation of the secondary legislation and subsequent actions required under the Packaging and Packaging Waste Regulation (PPWR). Given the complexity of the Regulation and the need for the industry to be fully prepared for its prompt application, the scope and complexity of the tasks ahead are substantial and demand immediate attention and adequate resources to ensure timely progress.

The importance of the PPWR in achieving the EU's circular economy goals cannot be overstated. The extensive work required to develop and adopt the numerous implementing and delegated acts¹ necessitates massive efforts from regulators to enable a smooth implementation, which we acknowledge and stand ready to support through direct involvement of industry experts. Any delays in this process could lead to legal uncertainty, impacting businesses' preparedness and their ability to comply with the new requirements. Given the broad reach of the Regulation, which applies to nearly every sector of the EU economy, the timely adoption of evidence-based secondary legislation, harmonised standards, and guidance documents is critical to the uninterrupted functioning of the value chains that depend on packaging for the commercialisation of products in the European market.

It is key that the momentum is maintained and that all necessary steps are taken to facilitate the timely and effective implementation of all PPWR secondary legislation, including the swift adoption of design for recycling criteria that will be used to define the recyclability of all packaging placed on the EU market. Ensuring that the process remains on track will not only provide clarity and stability for businesses but also favour enforcement by competent authorities, reinforcing the EU's commitment to its environmental objectives. We urge the European Commission to prioritise this matter with the utmost urgency. By doing so, the Commission will support a smoother and harmonised transition of our industries to greater circularity.

We appreciate the ongoing efforts and dedication of the Directorate-General for Environment and stand ready to assist in any way necessary to achieve a successful implementation of the Regulation.

We look forward to our continued collaboration.

¹ The PPWR preliminary agreement foresees the adoption of over 40 acts of secondary legislation, which adds to ongoing implementation work under Directive (EU) 2019/904, Regulation (EU) 2024/1157 and Regulation 2023/1542.

Sincerely,



ACE - The Alliance for Beverages Cartons and the Environment



Afera - The European Adhesive Tape Association



AGMPM - Association of the Greek Manufacturers of Packaging & Materials



AIM - European Brands Association



A.I.S.E - International Association for Soaps, Detergents and Maintenance Products



The Aluminium Closures Group



AmCham EU - American Chamber of Commerce to the European Union



ARAM - Romanian Association for Packaging and the Environment



AVU - Allianz Verpackung und Umwelt



The Brewers of Europe

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CEFLEX - A Circular Economy for Flexible Packaging



CEO - Comité Européen de l'Outillage



CEPE - European Council of the Paint, Printing Ink and Artists' Colours Industry



Cepi - Confederation of European Paper Industries



CICPEN - Czech Industrial Coalition for Packaging and the Environment



CLECAT - European Association for Forwarding, Transport, Logistics and Customs Service



Cosmetics Europe



DerGrünePunkt



EAFA - European Aluminium Foil Association



ECMA - the European Carton Makers Association



EGMF - The European Garden Machinery Industry Federation



EKO-PAK



ENVALORA - Spanish Collective Extended Producer Responsibility System for industrial and commercial packaging in various sectors



EPLF - European Producers of Laminate Flooring Association



EPRO - European Association of Plastics Recycling and Recovery Organisations



EPTA - European Power Tool Association



ESA - European Snacks Association

europa**bioplastics**

EUBP - European Bioplastics



EUMEPS - European Manufacturers of Expanded Polystyrene



EuRIC - European Recycling Industries' Confederation



EUROPATAT - European Potato Trade Association



EUROPEN - The European Organisation for Packaging and the Environment



EVA - European Vending & Coffee Service Association



FDE - FoodDrinkEurope



FEA - European Aerosol Federation



FEFCO - The European Federation of Corrugated Board Manufacturers



FEICA - Association of the European Adhesive & Sealant Industry



FEPA - Federation of European Producers of Abrasives



FESI - Federation of the European Sporting goods Industry



FEVE - European Container Glass Federation



FINAT - The association for the European label industry



FPE - Flexible Packaging Europe



Hotrec - Hospitality Europe



INCPEN - The Industry Council for Packaging & the Environment



Independent Retail Europe



Intergraf - European Federation for Print and Digital Communication



Istituto Italiano Imballaggio



LE - Lighting Europe



MMFA - Multilayer Modular Flooring Association



MPE - Metal Packaging Europe



NATRUE - The International Natural and Organic Cosmetic Association



NMWE - Natural Mineral Waters Europe



PAKKAUS - The Finnish Packaging Association



PCEP - Polyolefin Circular Economy Platform



Petcore Europe



PET Europe - Producers' Association



Plastics Europe



Plastics Recyclers Europe



Policy Hub - Circularity for Apparel & Footwear



PostEurop - Association of European Public Postal Operators



Pro Carton - European Association of Carton and Cartonboard manufacturers



PRO Europe - Packaging Recovery Organisation Europe



PROsPA - Producer Responsibility Organisations Packaging Alliance



SfPE - Steel for Packaging Europe



spiritsEUROPE



SZZV - Slovak Association for Branded Products



TE - Tobacco Europe



TIE - Toy Industries of Europe



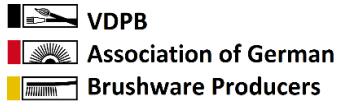
UCIMA - Italian Packaging Machinery Manufacturers Association



UNESDA - Soft Drinks Europe



VCI - Verband der Chemischen Industrie



VDPB - the Association of German Brushware Producers