

Urgent Call for Legal Clarity and Enforceable Implementation of the PPWR

Joint Industry Statement on Packaging and Packaging Waste Regulation

For the past years, the packaging value chain has constructively engaged with EU legislators to ensure the adoption of an ambitious yet workable Packaging and Packaging Waste Regulation (PPWR). Throughout this process, the packaging industry has demonstrated its full commitment to the PPWR's environmental goals and to accelerating the transition to a fully circular economy in Europe, striving for a harmonised, clear and future-proof legislative framework.

We stand fully behind the transition envisioned by the PPWR. However, with key sustainability requirements due to apply as early as August 2026, the window for effective implementation is rapidly closing. In order to comply with the Regulation, particularly where obligations will determine market access for packaging, companies urgently require legal clarity and full transparency regarding the definitions, methodologies, and criteria that will underpin the PPWR targets. The transition cannot be achieved overnight. Legal certainty is essential now to enable industry to plan, adapt, deploy investments and work with Competent Authorities on effective enforcement.

Despite having engaged - and continuing to engage - in good faith with the European Commission to advance the secondary legislation and guidance documents essential for the PPWR implementation, the current pace and direction of progress are cause for concern. Companies are facing increased uncertainty and unresolved questions. Even in areas where preparatory work began early and should now be nearing completion, such as harmonised sorting instructions and some of the reuse targets under Article 29 of PPWR, we have yet to see meaningful progress. In addition, responses provided on issues that industry had flagged at an early stage as difficult or unenforceable, such as the ban on unintentionally added PFAS in food-contact packaging, reuse targets for transport packaging or certain obligations linked to packaging minimisation, such as the identification of 'the most common packaging types and formats' under Article 10, have thus far been inadequate. This lack of concrete answers and tangible advancement on secondary legislation and guidance documents is a serious concern. It undermines industry's ability to prepare effectively and risks delaying or compromising the implementation of the PPWR as intended.

This is a call for a framework that is clear, enforceable and ultimately workable. For the Regulation to succeed, both in terms of environmental impact and enforceability, we must have certainty on the scope, requirements and methodologies of all PPWR provisions, without delay. The focus must remain on enforceable, effective, and harmonised measures across the EU.

We urge the Commission to engage with industry and other relevant stakeholders in the coming weeks to identify jointly the most critical open issues, assess their enforceability, and define a structured process and indicative timeline for resolving them. This would offer a clear path forward, provide much needed clarity and predictability for business ahead of the imminent implementation deadline of 12 August 2026, and help ensure PPWR delivers on its environmental objectives in a legally sound and implementable way.

Cosignatories



Afera - The European Adhesive Tape Association



AGMPM - Association of Greek Manufacturers of Packaging & Materials



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



AIM - European Brands Association



Aluminium Closures Group



AnimalhealthEurope



APPLiA - Home Appliance Europe



ARAM - The Association for Packaging and the Environment in Romania



AVU - Allianz Verpackung und Umwelt



CEC - European Footwear Confederation



CEFLEX - A Circular Economy for Flexible Packaging



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



CICPEN - Czech Industrial Coalition for Packaging and the Environment



Cosmetics Europe - The personal care association



EAFA - European Aluminium Foil Association



Ecommerce Europe



EDANA - The Voice of the Nonwovens Industry



EDRA - European DIY Retail Association



EFIC - European Furniture Industries Confederation



EGMF - The European Garden Machinery Federation



EKO-PAK - Packaging Industry Union of Employers



ELIPSO - Les entreprises de l'emballage plastique et souple



EPLF - European Producers of Laminate Flooring Association



EPPA - European Paper Packaging Alliance



EPTA - European Power Tool Association



ESA - European Snacks Association



ETMA - European Tube Manufacturers Association



EUMEPS - European Manufacturers of Expanded Polystyrene



EuPIA - The European Printing Ink Association



EuromContact - The European Association of Manufacturers of contact lenses and lens care



Europatat - European Potato Trade Association



EUROPEN - The European Organisation for Packaging and the Environment



EXPRA - Extended Producer Responsibility Alliance



FDE - FoodDrinkEurope



FEA - European Aerosol Federation



FEICA - Association of the European Adhesive & Sealant Industry



FEPA - Federation of European Producers of Abrasives



FEPE - Federation of European Producers of Envelopes and Light Packaging



FESI - Federation of the European Sporting Goods Industry



FINAT - The Association for the European Label Industry



FPE - Flexible Packaging Europe



FTA Europe - The European Flexographic Printing Industry



GROW International - Federation of Wooden Lightweight Packaging



HOTREC - Hospitality Europe



IK - Industrievereinigung Kunststoffverpackungen



INCPEN - The Industry Council for Packaging & the Environment



Independent Retail Europe



Intergraf - European Federation for Print and Digital Communication



Istituto Italiano Imballaggio



LightingEurope



MMFA - Multilayer Modular Flooring Association



MPE - Metal Packaging Europe



NATRUE - The International Natural and Organic Cosmetic Association



PAKKAUS - The Finnish Packaging Association



Petcore Europe



PET EUROPE - Producers' Association



Plastics Europe



RUCODEM - Romanian Union of Cosmetics and Detergents Manufacturers



SCS - Styrenics Circular Solutions



SEMI Europe



spiritsEUROPE



SfPE - Steel for Packaging Europe



SZZV - Slovak Association for Branded Products



TIE - Toy Industries of Europe



UCIMA - Italian Packaging Machinery Manufacturers Association



UNESDA - Soft Drinks Europe



ZVEI e.V. - Electro and Digital Industry Association