

To the attention of: Jessika Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Brussels, 18 March 2026

Re: Critical clarifications needed on PPWR rules

Dear Commissioner, Dear Jessika,

Over the past months, the EPP Group has constructively engaged with your Service on the implementation of the Packaging and Packaging Waste Regulation (PPWR), to ensure the Legal Notice and the Delegated Acts provide clarity and crucial guidance to industry. Our request throughout this process has been to ensure that these acts fully align with the co-decision agreement and reflects the careful balance struck by the co-legislators. Despite our continued cooperation, the Delegated Act recently published do not properly address our concerns and the draft Notice recently circulated appears to go beyond the legal agreement reached in 2024 while not addressing key questions on the Regulation.

First, while we welcome the delegated act proposed by the Commission, we are surprised that it does not provide a complete solution to plastic wrapping. The recent Commission Delegated Decision introducing an exemption for pallet wraps and pallet straps from the 100% reuse targets set out in Article 29(2) and (3) of the PPWR is a step in the right direction but do not fully address the problem by not exempting also Art. 29(1). Indeed, given the current technological advances and the lack of proven reusable alternatives for these packaging formats, we believe it appropriate to consider extending this approach to all reuse targets applicable to these types of packaging. We are always open to dialogue, aware that this delegated act was initially requested by us. For this reason, we are also surprised that there hasn't been a constructive dialogue regarding its content. We therefore invite the Commission to consider a second Delegated Act, to be published with the outmost urgency, to completely exempt pallet wraps and pallet straps to all reuse targets.

Second, the draft Notice that has been circulating states that the packaging restrictions of Annex V do not only cover items made of 100% plastic material. However, during the negotiations, references to composite packaging were deliberately removed by the co-legislators. This clearly indicates the intention to exclude composite packaging, irrespective of its plastic content, from the scope of the Annex V bans. The draft also unnecessarily expands the relationship between the Single-use Plastic Directive (SUPD) and the PPWR, while this is already governed by several recitals and provisions of the Regulation. The draft Notice indicates that Member States may adopt national measures to reduce consumption, including bans on on-site or takeaway use, for single-use packaging containing 5% plastic or less. This position is based on Article 4 of the SUPD (paragraphs 18, 19 and 20 of the draft Notice), in clear contradiction with the political agreement reached under PPWR and the true intentions of the co-legislators. Regarding recyclability requirements, the reference to the Packaging Directive that will soon be repealed risks creating confusion. The Notice should instead clearly

recall that compliance with the recyclability requirement only applies as of January 2030. We therefore invite the Commission to revisit the draft Legal Notice to ensure that it provides timely and clear guidance to industry, remains fully aligned with the agreement reached by the co-legislators, and addresses the outstanding issues for which European businesses have been calling for urgent clarification.

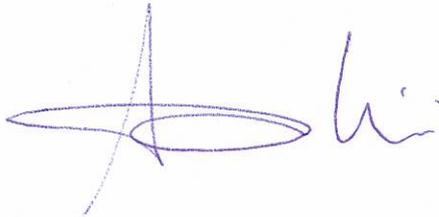
The EPP Group is firmly committed to relaunching Europe's competitiveness and therefore believes it is essential to respond to industry's questions and provide the clarity needed to support the effective implementation of the PPWR and the achievement of its objectives.

Yours sincerely,

Peter LIESE

A handwritten signature in blue ink that reads "Peter Liese". The signature is written in a cursive style with a prominent initial 'P'.

Massimiliano SALINI

A handwritten signature in blue ink that reads "Massimiliano Salini". The signature is written in a cursive style with a prominent initial 'M'.