

**A Europe-wide appeal from European companies, business associations, national chambers of commerce,
local authority associations and professional associations
regarding the implementation of the EU Packaging and Packaging Waste Regulation (PPWR) 2025/40**

Dear Prime Ministers of the nation states, the Member States of the European Union,
Madam President von der Leyen,
Dear President Metsola,
Dear President Costa,

As representatives of business and local government associations across various sectors of the European economy, with a focus on our consumers and citizens, we are fully aware of industry's role in building a sustainable EU economy. The packaging and packaging waste sector is also part of this transformation, as the vast majority of products on the EU market are packaged to maintain the safety, quality and environmental benefits of these products. We continue to support the ambition to develop the circularity of packaging and are constructively engaged in efforts to make the PPWR Regulation practicable and effective. We have already invested significantly in preparations; however, in light of current developments, we must highlight the following facts:

- **Extreme costs and risks:** The Regulation is exceptionally complex. The European Commission's impact assessment has estimated the costs of implementing the Regulation over a three-year period at €18 billion. However, should repeated changes to packaging be required by the Regulation, the actual figure could be double that amount or even higher. Due to the lack of a systematic approach and the different deadlines for various obligations, it will be necessary to relabel packaging at least twice. Most of the costs caused by changes to packaging labelling offer no direct environmental benefit, simply because different deadlines have been set for different obligations and it is not possible to change packaging gradually. The estimated implementation costs mean that **every EU citizen** will pay €80 (CZK **2,000**) solely due to changes in product packaging labelling. Further significant costs may arise as a result of the requirement for packaging to be recyclable in accordance with European Standard 13430, which is due to come into force on 12 August this year.
- **Lack of legal certainty:** Key definitions and methodologies remain unclear even after the publication of guidance documents and frequently asked questions. This uncertainty creates unacceptable risks for investment and regulatory compliance. Instead of harmonisation, there is a risk of fragmentation of the single market, with Member States interpreting the rules in their own way. At the same time, the situation exposes companies to increased risk from supervisory authorities, as they may in principle be penalised for actions where obligations are not sufficiently clear or predictable, which is contrary to the principle of legal certainty. However, the solution is by no means, and cannot be, merely a postponement of state supervision and the non-enforcement of sanctions. Such an approach would only lead to further legal uncertainty and the erosion of the enforceability of the law. It is first necessary to ensure a comprehensive legislative framework and unambiguous interpretations of individual obligations. Only then is it possible to make the regulation effective.
- **Impact on small and medium-sized enterprises:** For small and medium-sized enterprises, meeting all the requirements is extremely difficult, and their awareness of all the new obligations remains very low given their limited capacity.
- **Lack of time:** There are less than two months remaining until the set date of entry into force (12 August 2026). Due to ambiguities in the basic concepts, businesses are unable to prepare in time for the obligations to be introduced in such a short period.

In the European Council conclusions of 19 March 2026, EU leaders called on the institutions to apply a 'single market' approach, to maintain the momentum of simplification and to reduce the burden arising from existing legislation, and confirmed these steps as key to restoring Europe's competitiveness. We expect these calls to be applied in the case of the PPWR Regulation as well. The effective and uniform application of efficient legislation on packaging management requires practical and enforceable rules that industry can implement in accordance with the principles of legal certainty, proportionality and the proper functioning of the single market.

In view of the above, the undersigned companies and organisations appeal to the European Commission and the Member States regarding the need for legal clarity, feasibility and fairness of the defined obligations. In the current situation, we therefore urgently call on the European institutions to:

- **postpone the effective date of 12 August 2026 by at least 24 months** to allow for the resolution of outstanding issues related to the entry into force of the Regulation,
- **carry out a targeted review of key provisions** to ensure they are practical, enforceable and in line with the objectives of the PPWR (we provide some examples in the annex).

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We remain committed to the goals of a sustainable economy and are ready to work together to ensure that the regulation is implemented in a way that safeguards both the competitiveness and circularity of packaging in the EU. However, it is now absolutely essential to postpone the entry into force of the PPWR and to use the time gained to work intensively on its practical feasibility.

Yours faithfully,

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Annex

1. Legal uncertainty and the risk of market fragmentation

- The PPWR Regulation refers to approximately **30 future delegated acts**, the final parameters of which are not yet known, creating an environment unsuitable for responsible investment.
- The absence of clear methodologies forces Member States to devise their own ad hoc solutions, which, rather than harmonisation, leads to the fragmentation of the single market.
- Postponing state supervision or sanctions is not a solution; without a comprehensive legislative framework, such an approach would lead to a further deterioration in legal certainty and a devaluation of the law.

2. Enormous economic and social impacts

- **The total implementation costs are estimated by the Commission itself at €38.7 billion**, which represents a huge burden, particularly for small and medium-sized enterprises (SMEs), which form the backbone of the European economy.
- In the area of plastic packaging, costs could rise by billions of euros annually, which will trigger further inflationary pressures and inevitably be reflected in the prices of food and everyday goods for EU citizens.
- The re-labelling of packaging alone, without harmonised rules, would cost **the industry** approximately **€18 billion**, with the risk that this process would have to be repeated due to mismatched deadlines for various obligations. Although the explanatory memorandum states that with such a short timeframe (until 12 August), there is a risk of disproportionate costs arising. Companies would have to modify or dispose of packaging already produced and purchased for stock, and in extreme cases even the products themselves, which cannot be repackaged. A longer transition period beyond the minimum requirements, on the other hand, reduces costs. It allows companies to combine the mandatory changes with planned label redesigns, which businesses carry out regularly even without new regulations.
- Inadequate impact assessments and disregard for expert comments - The regulation was adopted without comprehensive, sector-specific and realistic impact assessments. Expert reservations across Member States were not adequately addressed. A number of entities from various Member States have therefore also brought actions for annulment against the PPWR Regulation before the Court of Justice of the European Union. Actions have been brought, for example, by Germany, Italy, France, Romania and the Czech Republic.
- A significant negative impact on the EU's competitiveness – European firms are subject to strict obligations, whilst non-European competitors are not subject to similar regulation. The result is a further weakening of European industry.

3. Technological impracticality and health risks

- Requirements for recycled content (e.g. 65% for certain plastics) are technically unachievable in many sectors without compromising product safety.
- In the area of PFAS, there is no harmonised testing methodology; there is a risk that companies will spend **€9–18 billion on tests** that will later not be recognised. PFAS in food contact packaging: There is currently no harmonised testing methodology. The industry may not receive guidance until June 2026, with no guarantee that it will be recognised by the competent authorities, given its non-binding nature. This would leave a mere two months to test hundreds of thousands of products, which risks market disruption and the withdrawal of compliant products. Detailed guidance on conformity assessment procedures is also lacking.
- The artificial enforcement of recycled content in food packaging entails not only high costs but also potential serious health risks to human health (micro- and nanoplastics). There are a number of academic studies from Western universities that warn of the impacts of recycled plastics in food packaging, for example with regard to the very high levels of micro- and nanoplastics they contain. It is rather worrying that the European Commission has legislatively prohibited the use of recycled materials in PET bottles for infants, yet conversely enforces the use of recycled materials in PET bottles for the rest of the population, without any studies on the safety of recycled packaging's impact on food. The precautionary principle is not sufficiently reflected here.

4. Disruption of functional systems and administrative burden

- The mandatory introduction of deposit-refund schemes, regardless of existing successful models (e.g. in Italy, Belgium or the Czech Republic), threatens the economic stability of municipal waste management systems.
- New administrative requirements (CAD/CAM data, certification of every type of packaging) mean a massive increase in bureaucracy without any demonstrable environmental benefit. The principle of reducing the bureaucratic burden is not respected here. What is important is the certification of the material used to manufacture the packaging and any potential modifications to it. Not testing the same material for all types of products made from it.
- The logistical demands of reuse may, in some cases, generate higher emissions (transport, washing) than the high-quality recycling of single-use packaging.
- Percentage targets for packaging reduction penalise efficient countries – Countries with lower per capita packaging production will be forced to reduce already low figures, whilst countries with high production will remain relatively high. This model is economically and environmentally illogical and unfairly penalises those who have already achieved the required performance in prioritising waste prevention. If targets for reducing packaging are to be set, they should be in absolute terms (not as a percentage) so that they are clearly comparable between countries.
- Annex V (line 1) – ban on single-use plastic packaging from 2030: Despite industry proposals, the definition of terms such as 'necessary to facilitate handling' remains unclear. In the event of a total ban, compliance would cost the industry billions and take years, particularly given the lack of large-scale alternatives. The guidelines should reflect the compromise reached by the co-legislators, which allows for an exemption for packaging necessary for handling.
- Annex V (line 4) – ban on single-use plastic packaging from 2030: By 2030, there will be no viable, scalable and safe plastic-free alternatives available for single-portion packaging containing liquids (e.g. sauces, jams, coffee creamers). To avoid disproportionate impacts on the food industry and the HORECA sector, this measure should be suspended or limited to dry products only. The guidelines should take into account the need for a certain proportion of plastic in packaging.
- Article 7 – targets for recycled content: Terms such as 'any plastic part' or 'average per production plant' remain unclear and will lead to operational uncertainty, increased administrative burdens and risks of non-compliance.
- Article 10(3) – minimisation of packaging: Mandatory standardised design specifications for 'the most common types and formats of packaging' are neither feasible nor forward-looking. It will weaken Europe's leading position in packaging and product design, creativity and premium manufacturing in key sectors, ranging from spirits and gourmet foods to cosmetics and perfumes.
- Article 29(14) – reuse targets: An exemption based on recycling is not practicable and runs counter to the co-legislators' intention. The transition to reuse requires billions in investment and infrastructure changes, whilst businesses lack legal certainty and clear guidance on how exemptions will be applied. This undermines investment decisions. All pallet wrap and strapping should be completely exempted from reuse obligations.

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- Article 32 – Refill obligations in the takeaway sector: The alleged environmental benefits of the obligation to accept containers brought by customers are not supported by evidence and do not outweigh the significant risks to food safety, the necessary investments and operational complications.
- Article 33 – Obligation to offer reusable packaging in the take-away sector: Available life-cycle analyses, including studies by the Joint Research Centre (JRC), repeatedly show that the mandatory introduction of reusable packaging in this sector may have negative environmental impacts, calling into question the proportionality and effectiveness of this measure.

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Space for logos of signatories to the appeal from all European countries

"If you wish to add your company's logo, please send an email expressing your support for the letter and including your logo to this address: regulationppwr@mailfence.com "

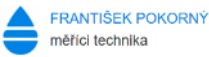
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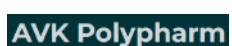
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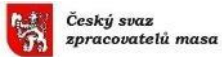
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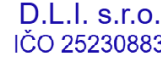
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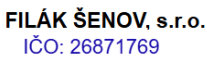
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