

Industry reaction to the Commission's Delegated Act under Article 29 PPWR

The Commission's decision to introduce a derogation for pallet wrappings and straps from the 100% reuse targets set out in Article 29(2) and (3) of the Packaging and Packaging Waste Regulation (PPWR) represents a welcome recognition of the operational challenges consistently raised by the European packaging value chain throughout the legislative process. By acknowledging these practical constraints, the Commission affirms the evidence provided by businesses across sectors, demonstrating that these packaging formats are not suitable for reuse and that, to date, no proven reusable alternatives exist at scale that can guarantee an equivalent level of load stability, product protection, transport safety, and operational reliability. Therefore, the decision to restrict this derogation exclusively to the 100% target, leaving the 40% reuse target of Article 29(1) untouched, is both inconsistent and disappointing.

Maintaining the 40% reuse target under Article 29(1) for these very same formats effectively reintroduces the same concerns regarding feasibility, safety and functionality that were acknowledged in the context of the 100% reuse targets. These challenges arise wherever palletised goods require reliable load securing during transport, storage, and handling. Pallet wrapping films must be cut upon receipt at which point they immediately lose their structural integrity and functional capacity. Similarly, pallet straps are engineered for single-use stabilisation and cannot reliably maintain performance once removed. In many industrial logistics applications, pallets carry very high loads, undergo multiple handling operations, travel long distances, and must meet strict safety requirements. In such contexts, even minor reductions in load-securing performance can create unacceptable risks for workers, compromise product integrity, and endanger transport infrastructure. These challenges are widespread and affect numerous sectors and critical European value chains.

EU Leaders have committed to simplification, enhanced competitiveness, and a regulatory framework that reinforces its industrial base. Granting a targeted exemption from the 40% reuse target for specific transport packaging formats, prioritising recyclability or recycled content where reuse is technically unsuitable, is essential to delivering on these commitments in a coherent and practical manner.

A fragmented approach would lead to a framework that is difficult to apply consistently, raises questions around legal certainty and proportionality, and creates real implementation challenges for companies. We therefore call on the Commission to prioritise the swift adoption of a delegated act exempting pallet wrappings and straps, as well as comparable transport packaging solutions, from the 40% reuse target under Article 29(1), in accordance with Article 29(18)(a) to (c). This is a necessary step to ensure that the PPWR remains workable, proportionate, and fit for purpose.

The undersigned associations:



Afera - The European Adhesive Tape Association



AGMPM - Association of Greek Manufacturers of Packaging & Materials



AHPI - Association of Hellenic Plastics Industries



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



ANAIP - Asociación Española de Industriales de Plásticos



AnimalhealthEurope



APPLiA



AVU - Allianz Verpackung und Umwelt



Bundesverband Baustoffe - Steine und Erden e.V.



BEHV - Bundesverband E-Commerce und Versandhandel Deutschland e.V.



Cepi



CICPEN - Czech Industrial Coalition for Packaging and the Environment



CITPA - The International Confederation of Paper and Board Converters in Europe



Cosmetics Europe - The personal care association



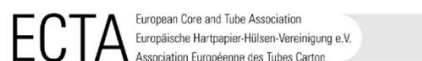
DBC - Deutsche Bauchemie



Der Grüne Punkt



ECMA - The European Carton Makers Association



ECTA - European Core and Tube Association e.V.



EDANA - The Voice of the Nonwovens Industry



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



Essencia



EUBP - European Bioplastics



EuPC - European Plastics Converters



EuPF - European Plastic Films



EuPIA - The European Printing Ink Association



EuroCommerce



The European Association of Internal
Combustion Engine and Alternative
Powertrain Manufacturers

EUROMOT - The European Association of Internal
Combustion Engine and Alternative Powertrain
Manufacturers



EUROPEN - The European Organisation for Packaging
and the Environment



EXPRA - Extended Producer Responsibility Alliance



FBCA - The Food & Beverage Carton Alliance



FCIO - Fachverband der Chemischen Industrie Österreichs



FDE - FoodDrinkEurope



FEFCO - The European Federation of Corrugated Board Manufacturers



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



Federation of the European
Sporting Goods Industry

FESI - Federation of the European Sporting Goods Industry



FEVE - The European Container Glass Federation



FINAT - The Association for the European Label Industry



GROUP'HYGIENE - Syndicat des fabricants de textiles sanitaires pour l'hygiène, la santé et l'essuyage



I&P Europe - Imaging and Printing Association e.V.



IHO - Industrieverband Hygiene und Oberflächenschutz e.V.



IK - Industrievereinigung Kunststoffverpackungen e.V.



IKEM - Innovation and Chemical Industries in Sweden



IKW - Industrieverband Körperpflege- und Waschmittel
e. V. / The German Cosmetic, Toiletry, Perfumery and
Detergent Association



INCPEN - The Industry Council for Packaging & the
Environment



Independent Retail Europe



Industrie-Gemeinschaft Aerosole e.V.



Industrieverband Garten e.V.

Brussels, March 2026



Intergraf - European Federation for Print and Digital Communication



IPV - Industrieverband Papier- und Folienverpackung e.V.



Istituto Italiano Imballaggio



IVA - Der Industrieverband Agrar e. V.



Konfederacja Lewiatan



LightingEurope



Medicines for Europe



MedTech Europe - The European Trade Association for the Medical Technology Industry



Miljöpack



MMFA - Multilayer Modular Flooring Association



Metal
Packaging
Europe

MPE - Metal Packaging Europe



Natural Mineral & Spring Waters

NMWE - Natural Mineral Waters Europe



NRK Verpakkingen



PAKKAUS - The Finnish Packaging Association



Plastics Europe



PRE - Plastics Recyclers Europe



Pro Carton - European Association of Carton and Cartonboard manufacturers



PUOC - Polish Union of Plastics Converters



SEFA - European Association of Steel Drum Manufacturers



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



VCI - Verband der Chemischen Industrie e.V. / German Chemical Industry Association



VDA - Verband der Automobilindustrie e.V. / German Association of the Automotive Industry



VDGH - Verband der Diagnostica-Industrie e.V.



Verband der deutschen Lack- und Druckfarbenindustrie e.V.

Verband der deutschen Lack- und Druckfarbenindustrie e.V.



VMV - Verband Metallverpackungen e.V.



VVK - Verband Vollpappe-Kartonagen e.V.



ZVEI e.V. - Electro and Digital Industry Association



Zentralverband Gartenbau e.V. (ZVG)

ZVG - Zentralverband Gartenbau e. V. / German Horticultural Association