

Recent Developments on the Packaging and Packaging Waste Regulation (PPWR)

PPWR

- **First Meeting of Expert Group on Waste discussing PPWR**

On 17 June, the European Commission's Expert Group on Waste held its first meeting focusing on the PPWR. During the session, the Commission presented an overview of the current status of the regulation. The agenda covered several technical aspects, including the definitions of producers and manufacturers, the implementation of Article 5 concerning PFAS restrictions in food packaging, and the development of implementing acts under Article 12(6) on harmonized waste sorting labels and under Article 44(14) on the format for registration in, and reporting to, the Register of Producers. Additionally, discussions addressed the implementation of Article 9 on packaging minimization, particularly targeting the most commonly used packaging formats. A second meeting of the Expert Group is scheduled for 20 June, which will focus on the Waste Shipment Regulation.

During the meeting, Wolfgang Trunk, policy officer within DG ENV, reconfirmed that the European Commission plans to issue official guidance on the PPWR in the form of a Commission Notice and an FAQ before the summer break.

FoodDrinkEurope participated in the meeting. Our key priorities were not taken on board by the Commission, and we thus envisage to organize higher level political meetings alongside the packaging value chain.

- **Workshop on PFAS Ban Implementation**

On 22 May, the European Commission hosted a workshop with representatives from the packaging sector to discuss the implementation of PFAS restrictions outlined in Article 5(5) of the PPWR. The invitation acknowledged industry concerns, particularly regarding compliance challenges for contact-sensitive packaging, but reiterated the legal obligation to meet the upcoming requirements. The Commission used the session to gain insights into how stakeholders are preparing for the 12 August 2026 compliance deadline and welcomed suggestions to support high-quality plastic recycling within the bounds of the legislation.

Key concerns raised during the workshop included the lack of harmonized and scalable testing methods, limited laboratory capacity, tight timelines for developing PFAS-free alternatives, the potential destruction of compliant materials due to the absence of a stock depletion clause, and the need for recycled materials to also meet PFAS limits. The Commission committed to continuing dialogue with DG SANT, JRC, and the submitters of the REACH restrictions, and invited stakeholders to submit stock depletion proposals by 30 May and broader implementation ideas by 11 June. A follow-up workshop is planned for 26 June 2025. This topic is also expected to be discussed further in the Expert Group on Waste.

FoodDrinkEurope participated in the workshop and is in continued exchange with the Commission.

- **Preliminary Findings from Deloitte on SUP Pallet Wraps and Straps**

The European Commission's DG ENV has commissioned Deloitte to assess potential derogations for single-use plastic (SUP) pallet wraps and straps from PPWR reuse targets. Preliminary findings suggest reuse may be feasible only under specific conditions such as standardized loads and existing return systems. Stakeholders have raised concerns about the study's depth and may formally request a more comprehensive evaluation. The final report is expected by July. You will be separately be consulted on a joint letter of the European Plastic Converters on this matter to assess whether FoodDrinkEurope can co-sign.

Meanwhile, a German industry alliance of 22 trade associations has [called](#) for clearer, legally certain rules on PPWR reuse obligations, specifically seeking exemptions for pallet wraps and strapping bands, citing technical and economic challenges.

- **Targeted Stakeholder Consultation on Waste Sorting Labels**

On 19 May 2025, DG Environment and the European Commission's Joint Research Centre (JRC) launched a targeted stakeholder [consultation](#) to gather expert feedback on the design and application of harmonized waste sorting labels under the PPWR. This consultation builds on a previous one held in September 2024 and aims to refine the visual design and structural features of the labels. Stakeholders were invited to submit comments by 16 June 2025. The ultimate objective is to implement these labels by 12 August 2028, from which date all packaging placed on the EU market will be required to display the EU harmonized sorting label. Concurrently, any misleading national or regional labels will need to be removed. Municipalities and waste management operators will also be obliged to apply these labels on public waste receptacles.

FoodDrinkEurope participated in the consultation and is consulting members on a Joint Industry Statement on Waste Sorting Instructions coordinated by European to see whether FoodDrinkEurope will co-sign the letter.

SUPD

- **Commission Soon to Launch Public Consultation on Measuring Recycled Content in SUP Bottles / Mass Balance Calculation Method**

In early June, the European Commission launched its internal consultation (aka "interservice consultation") on a draft Implementing Act concerning the methodology for measuring recycled content in single-use plastic (SUP) bottles (secondary legislation following the Single Use Plastics Directive – SUPD). This consultation marks the transition of the draft from a DG Environment-led initiative to a text representing the broader Commission's position.

The proposed methodology is based on a mass balance approach and, while it currently applies only to recyclates used in SUP bottles, it could set an important precedent for future legislation — including under the PPWR — where recycled content targets are being introduced or revised.

A four-week public consultation on the draft Implementing Act is expected to begin on 2 July 2025. A final vote by Member States, with no further amendments possible, is anticipated in October or November this year.

FoodDrinkEurope is monitoring the developments and will participate in the consultation.

Circular Economy Act

- **Circular Economy Act**

At the 17 June 2025 Environment Council meeting, Commissioner Jessika Roswall reaffirmed the European Commission's plan to adopt the Circular Economy Act by the end of 2026. Member States largely agreed on the need to incentivize the use of secondary raw materials, support recyclers, and implement EU-wide extended producer responsibility (EPR) schemes. Key challenges highlighted include energy costs, market volatility, price imbalances between recycled and primary materials, and unfair competition from imports. The Commission plans to establish a

regulatory framework and invest in circularity infrastructure to address these issues, alongside funding opportunities through the Innovation Fund and Horizon Europe.

Looking ahead, the Circular Economy Act will likely proceed under the ordinary legislative procedure, with the Commission expected to launch a 4-week call for evidence this summer (tbc) and a 12-week public consultation at a later stage (timing tbc) before finalising an impact assessment. Once published, the legislative proposal will undergo parliamentary and Council scrutiny, and negotiations to establish a common EU position.

FoodDrinkEurope shared a first position paper with members of the CIRCECON working group and will have a meeting with DG ENV on 8 July 2025 to discuss further.