



**EUROPEAN
CARTON MAKERS
ASSOCIATION**



**President von der Leyen
Executive Vice-President Šefčovič
European Commission**

Brussels, 20 December 2023

Dear President von der Leyen,

Dear Executive Vice-President Šefčovič,

We are contacting you on behalf of the cosignatories to ask for your support in reaching a balanced agreement on the Packaging and Packaging Waste Regulation in view of the trilogue discussions in January 2024. In particular, we are concerned that the agreed respective approaches of the European Parliament and Council are too diverging to reach an agreement that will be implementable at European scale while ensuring environmental protection safeguarding economy's industrial competitiveness and respecting the principles of a unified European internal market, in which packaging and packaged goods can move freely across EU borders. In addition, the Member States have very divergent views on the Regulation despite the apparent support for a general approach.

As previously mentioned in a joint statement initiated by EUROOPEN with over 100 cosignatories including Cepi, the success of the Packaging and Packaging Waste Regulation (PPWR) will be measured against its ability to create a workable legislative framework. This means delivering an ambitious yet workable EU packaging law, which sets the direction of travel for packaging manufacturers and packaging users to achieve Europe's sustainability goals while preserving packaging's key role in protecting consumers, products and the viability of Europe's supply chains.

Reuse and recycling are complementary and the European Commission has agreed that in the Circular Economy Action plan "all packaging should be reusable or recyclable by 2030".

An essential improvement to meet the above parallel requirements would be the adoption of a material neutral horizontal exemption in Articles 22 and 26 from the bans and reuse targets on the condition that packaging can achieve an 85% collection for recycling rate or when reuse is not the option that delivers the best environmental outcome on the basis of a life cycle assessment in line with Article 4.2 of the Waste Framework Directive. These requirements are also in line with the position approved in the European Parliament at the first reading.

We remain open for clarifications and further information also in view of the finalisation of the JRC study for which we have provided updated data. We hope that, in view of the will to conclude inter-institutional

negotiations before the European elections, the European Commission can play the role of honest broker and facilitate a balanced agreement between the Council and the European Parliament.

Yours sincerely,

The cosignatories

Jori Ringman
Director General
Cepi

Mike Turner
Managing Director
ECMA

Matti Rantanen
Director General
EPPA

Horst Bittermann
Director General
Pro Carton



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