



14 November 2023

PACKAGING AND PACKAGING WASTE REGULATION

CALL FOR HARMONISATION AND COMPLEMENTARITY OF REUSE AND RECYCLING

European businesses are fully committed to accelerate the circular economy transition and have already made extensive efforts to shift to more sustainable packaging solutions, including major investments in the recyclability of packaging. While recognising that improvements of the text have been made, BusinessEurope is highly concerned about several measures remaining in the proposal for a Packaging and Packaging Waste Regulation (PPWR) and introduced in the report adopted by the European Parliament's ENVI Committee in October 2023. We call on MEPs to take the below concerns into account, to avoid harming the internal market, the circular and green transition as well as European competitiveness.

ENSURE COMPLEMENTARITY OF REUSE AND RECYCLING

Reuse and recycling are complementary solutions to achieve circularity and should be treated as such in the regulation. The reuse and refill targets otherwise risk undermining the important role of recycling, and sideline efforts and investments made by businesses to increase recyclability of packaging. Reusable and refillable solutions are moreover not the environmentally preferred solution in all situations and for all packaging.

We therefore strongly encourage MEPs to **table amendments for horizontal exemptions from the reuse obligations in situations where single-use packaging is more environmentally sustainable than re-use**. Such exemptions can either be linked to a lifecycle assessment, a certain recycling rate or a collection rate. We support that such exemptions were included in the alternative compromise amendments tabled by EPP and ECR ahead of the vote in ENVI, as well as in the ITRE Opinion adopted in July 2023.

SUPPORT INCREASED HARMONISATION

Divergent national sustainability and information requirements lead to additional operational costs and administrative burdens for companies. Moreover, they prevent the development of a circular economy by undercutting economies of scale and investments in innovation because of the increasing market fragmentation.

We therefore strongly encourage MEPs to:

- **Reject the proposal to add 'at least'** in the reuse targets in Article 26, as it implies that PPWR sets minimum reuse targets while allowing divergent systems and targets across member states.
- Table amendments to **remove the possibility for member states to maintain or introduce national sustainability or information requirements** in Article 4(4).
- Table amendments to **remove Article 45(2)(c)** which allows member states to introduce reuse targets for other products than those covered by Article 26.
- **Reject the change of wording from 'may' to 'shall' in Article 11(8)**, to avoid mandating the introduction of national labelling requirements for EPR schemes.
