

Joint Call to Protect the Integrity of the Packaging and Packaging Waste Regulation

25 November 2025

Dear Executive Vice-President Séjourné,

Dear Commissioner Roswall,

We, the undersigned organisations representing the full value chain of European packaging and resource management as well as non-governmental organisations, write to express our **serious concerns regarding any reopening of the Packaging and Packaging Waste Regulation (PPWR)** as part of the forthcoming Environmental Simplification Package, expected in December.

The PPWR is a cornerstone of the European circular economy. It establishes the necessary, comprehensive framework that enables truly reusable and recyclable packaging across the Single Market by 2030. By setting ambitious, binding rules for design, collection, and recycled content, the PPWR provides the legislative certainty that economic operators urgently need to unlock significant, long-term investments in European production and recycling infrastructure.

While we recognise that the intense trilogue negotiations resulted in complexities within the final text, reopening the PPWR, even for minor amendments, would create crippling uncertainty. Any renewed negotiation process risks significant delays, removing the crucial deadlines upon which operators base their investment projections. Worse still, the possibility that key provisions could be altered would trigger market immobilism, effectively paralysing investments until the rules are unequivocally clarified.

Maintaining the integrity of the existing Regulation is essential to delivering on Europe's strategic goals, including the Clean Industrial Deal's target to double the circular material use rate to 24% by 2030. This ambition is wholly dependent on market stability and predictable legislation.

We therefore urge the European Commission to uphold the agreed political commitment, without resorting to re-opening the core legislative text.

We stand ready to support your Cabinets in identifying practical, non-legislative ways to exploit the existing text's flexibility and simplify compliance.

Respectfully yours,

Trade Organisations, Industry Associations and National Associations

Aluminium Closures Group
Asociación ES REUTILIZA
Asociación Nacional de Recicladores de Plástico (ANARPLA)
Chemical Recycling Europe
Environmental Paper Network
European Moulded Pulp Producers Federation (EMPPA)
European Aluminium
European Aluminium Foil Association
European Sustainable Business Federation (Ecopreneur)
European Waste Management Association (FEAD)
Flexible Packaging Europe
France Consigne
Kaya
Mach Mehrweg Pool e.V.
Mehrwegverband Deutschland e.V.
New European Reuse Alliance
Plastics Recyclers Europe
Polish Recycling Association
Private Brauereien Deutschland e.V.
Verband zur Förderung von Mehrwegverpackungen e.V. (PRO MEHRWEG)
Reusable Packaging Europe
Réseau Vrac et Réemploi
Roundtable for Reusable Containers Trays and Pallets
TecPart - Verband Technische Kunststoff-Produkte e.V.
The Circular Economy for Flexible Packaging initiative (CEFLEX)
Verband des Deutschen Getränke-Einzelhandels e. V.

Individual Companies

ALPLA Werke Alwin Lehner GmbH & Co KG
ALPAL
BOCOLOCO
Borro
BOTTLESS
Bout A Bout
Cartonplast Holding GmbH
Circl' it
Consign'Up
Container Centralen A/S
CORPLEX
Cup Service GmbH
Cupstack
dotch GmbH
Dutch Cups B.V.
DW Reusables
ECKLO

Embalajes Capsa SL
ETERNITY Systems
FAERCH
Genossenschaft Deutscher Brunnen eG
GRIN AS
Heket Packaging
LE FOURGON
L'INCASSABLE
Ma Bouteille s'appelle Reviens
Movopack SB Srl
New Loop
Opopop
pacoon Sustainability Concepts GmbH
Pampa consigne
PAKT
PANTER
Pandobac
Petainer
Promeco SpA
Ravioli Logistik UG (haftungsbeschränkt)
RECUP
Recirculate Systems Limited
RE-ZIP
Relevo GmbH
Retoornado & reboottle
reCIRCLE
Royal LC Packaging
Runden Group
SEA ME GmbH / Zerooo
sykell GmbH
TOMRA
Twintag NV
UZAJE
VYTAL Global GmbH
WECARRY GmbH
WOBZ REUSE SOLUTIONS
Worldbag B.V.

NGOs & Environmental Groups

Africa Circular
Bad Vilbel Plastikfrei
Canopea
Circular Economy Coalition
ConsumAction
CYCLING RECYCLING (Dominik Dobrowolski)
Deutsche Umwelthilfe e.V.
Društvo Ekologi brez meja

ECOS

Eko krog - društvo za naravovarstvo in okoljevarstvo

Za Zemiata

European Environmental Bureau

Fair Resource Foundation

Friends of the Earth Croatia

Friends of the Earth Cyprus

Green Group Romania

Green Liberty

Legal Center for the Protection of Human Rights and the Environment

Plastic Change

Reloop

Rehab Republic e.V

Rethink Plastic Alliance

Rodzice dla Klimatu

Stichting Hergebruik Nu

Stiftung Initiative Mehrweg

VOICE Ireland

ZERO - Association for the Sustainability of the Earth System

Zero Waste Bad Vilbel

Zero Waste Europe

Zero Waste France

Zero Waste Germany e.V.

Zero Waste Itzehoe e.V.

Zero Waste Köln e.V.

Zero Waste Latvia NGO

Zero Waste Nederland

Our signatories

 rehab republic

 PRO MEHRWEG

 ETERNITY
SYSTEMS

 ALPLA

 reloop 10

 ecos

 GDB
Genossenschaft
Deutscher Brunnen eG



 ZELENA AKCIJA
FRIENDS OF THE EARTH CROATIA

 MMP
MACH MEHRWEG POOL

 Réseau Vrac
& Réemploi

 Initiative
Mehrweg

 zero.

 ZERO
WASTE
GERMANY

 Pandobac

 new loop

 new era

 REUSABLE
PACKAGING
ASSOCIATION GERMANY

 MCVO

 ALPAL™

 PLASTICS RECYCLERS EUROPE

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RECYCLING

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 Ravioli

 POLSKIE STOWARZYSZENIE
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WASTE

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legal center for the
protection of human
rights and the
environment

 CANOPEA

 zero
waste
NEDERLAND

 Relevo

 REZIP

 RODZICE
DLA KLIMATU

 RCTP
ROUNDTABLE FOR REUSABLE
CONTAINERS TRAYS
AND PALLETS
COMMITTED TO CIRCULAR PLASTICS

 PROMECO®
CHEMICAL
RECYCLING

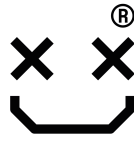
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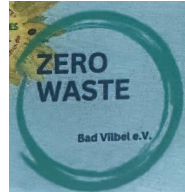
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 Polish Recycling
Association

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SUSTAINABILITY + CONCEPTS

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L'INCASSABLE

