

13 May 2026

To:

President von der Leyen,
President Metsola,
President Costa,
Executive Vice-President Ribera,
Executive Vice-President Séjourné,
Commissioner Roswall,
Minister Panayiotou,

PPWR: Keep the August 2026 application date and uphold the Regulation's key requirements to ensure effective and compliant implementation

As civil society organisations, companies championing reuse, consumer protection organisations, academics and universities, and communities impacted by PFAS and plastic pollution, we urge you to reject any last-minute calls to delay the application of the Packaging and Packaging Waste Regulation (PPWR) and reopen key provisions, including those set out in the letter sent by certain industry representatives on 29 April.

The PPWR is a key element of the EU's circular economy ambitions. By banning PFAS in food packaging, harmonising packaging labelling and setting legally binding targets for waste prevention, reuse, recyclability and recycled content, it has the potential to become a landmark circular economy law that protects public health and the environment, while promoting the long-term competitiveness of the packaging sector. We are therefore calling on you to proceed with the timely and full application of this important Regulation.

Democratic legitimacy and respect for the EU legislative process

The PPWR is the result of a full and rigorous co-decision process during which it underwent extensive scrutiny, public consultation and democratic debate. Calls to reopen the Regulation or delay its application undermine the legitimacy of that process and the integrity of EU policymaking. Revisiting political compromises already reached would set a dangerous precedent, weakening trust in EU law and creating permanent regulatory instability.

The Commission, through the publication of its PPWR Guidance and FAQ documents, has already provided clarity for companies to navigate and comply with the Regulation. Well-designed secondary legislation will also be important to ensure its smooth and ambitious implementation. The complexity of developing such secondary legislation must not be exploited in bad faith as an excuse to evade agreed obligations, weaken core provisions on prevention and reuse, or undermine the democratic legislative process.

Signatories of CEO letter dated April 29 do not represent the packaging value chain

The CEO letter dated 29 April consists of a long list of specific lobbying demands, calling for further derogations for single-use packaging, weakening of waste prevention and reuse obligations, and the dilution of key environmental and health safeguards. This is a blatant attempt to extract additional concessions that would allow some of the biggest polluters in the packaging value chain to continue their business-as-usual practices, rather than a request for regulatory clarity to be provided via high-quality secondary legislation in support of implementation.

Importantly, the companies behind that letter do not speak for the European packaging value chain as a whole. Many packaging businesses, including large corporations which are members of the trade associations involved in this last-minute lobbying push, chose not to sign and remain committed to the successful and timely implementation of the PPWR.

Across Europe, thousands of companies are making investments in anticipation of the PPWR and are expecting regulatory stability. Any backtracking at this stage would punish frontrunners and discourage investment and innovation. This must be avoided; the competitiveness of European industry requires predictability, not uncertainty.

PPWR as a cornerstone of EU circular economy policy

The PPWR, if fully implemented, has the potential to significantly reduce packaging waste and position the EU as a global leader in sustainable packaging. In particular, we wish to reaffirm the importance of the following core elements:

- **Ban on PFAS in food-contact packaging:** PFAS exposure is linked to serious health problems including cancer, infertility, birth defects and immune system disorders. At a time when PFAS pollution crises are escalating across EU Member States, the ban on PFAS in the PPWR is a critical measure to help protect EU citizens and the environment from these harmful “forever chemicals”. Any delay in the implementation of this ban would pose a major risk to the health of European consumers and threaten the safe circularity of secondary materials. The application date of 12 August 2026 must therefore be upheld. We commend the Commission's PPWR Guidance document for proposing a very pragmatic and cost-efficient stepwise approach to enforce the PFAS restriction, an approach that is supported by scientific evidence and laboratory analyses of selected food packaging. This approach should be consistently enforced across Member States until a harmonised EU testing methodology is established.
- **Bans on unnecessary and avoidable single-use plastic packaging:** The market restrictions laid down in Article 25 and Annex V of the PPWR were designed to
















reduce waste at the source. The PPWR’s impact assessment identified them as especially problematic because they generate high amounts of packaging waste, are difficult or impossible to recycle, and often add only marginal functional value. In addition, alternatives (packaging-free products, reusable packaging or refillable packaging) exist for all the banned single-use packaging items.

- **Waste prevention and reuse requirements:** The waste prevention and mandatory reuse obligations in the PPWR are key milestones in the EU’s transition to a circular economy. The pushback against mandatory reuse obligations under the PPWR reflects a continued effort by the single-use packaging industry to delay structural change. Claims that investment in reuse is prohibitively expensive overlook the fact that the sector has long benefited from massive public support for fossil fuels, virgin plastics, and chemical recycling. Requiring investment in reuse is therefore not an unfair burden, but a necessary correction that begins to internalise the real costs of disposable packaging. This transition should also be understood as an economic opportunity rather than simply a cost. Scaled, efficient reuse systems can quickly become cost-effective while delivering the substantial waste reductions that recycling alone has repeatedly failed to achieve.

We are committed to making the PPWR a success. We stand firmly alongside EU institutions in resisting this last-minute lobbying push and offer support on meaningfully implementing this crucial piece of legislation so that the EU successfully tackles the packaging waste crisis. We remain fully engaged in supporting the development of high-quality secondary legislation, so that the PPWR is implemented effectively and on time.

Sincerely,

 <p>ALIANZA RESIDUO CERO</p> <p>Alianza Residuo Cero (Spain)</p>	 <p>Amigas da Terra</p> <p>Amigas da Terra (Spain)</p>	 <p>ANEC <i>Raising standards for consumers</i></p> <p>ANEC, the European consumer voice in standardisation (Belgium)</p>
 <p>AWHHE Armenian Women for Health and Healthy Environment</p> <p>Armenian Women for Health and Healthy Environment (Armenia)</p>	 <p>ARNIKA</p> <p>Arnika - Toxics and Waste Programme (Czech Republic)</p>	 <p>Associação Juvenil Claro (Portugal)</p>

 <p>Associazione "Vivere in Valdisieve"</p> <p>Associazione "Vivere in Valdisieve" (Italy)</p>	 <p>Associazione APS Rifo' (Italy)</p>	 <p>Associazione Guide Turistiche di Lucca (Italy)</p>
<p>Associazione per i Diritti dei Cittadini (ADiC Toscana APS) (Italy)</p>	<p>#BreakFreeFromPlastic</p> <p>Break Free From Plastic (Global)</p>	 <p>Bulgarian Association for Alternative Tourism (Bulgaria)</p>
<p>Bulgarian Biodiversity Foundation (Bulgaria)</p>	 <p>CANOPEA (Belgium)</p>	 <p>CEGROBB - Alliance of European Drink Distributor Associations (Belgium)</p>
 <p>Centar za životnu sredinu</p> <p>Center for Environment (Bosnia and Herzegovina)</p>	 <p>Center for International Environmental Law (CIEL) (Switzerland)</p>	 <p>Centro di ricerca Rifiuti Zero (Italy)</p>
 <p>CEPTA (Slovakia)</p>	 <p>ChemSec (Sweden)</p>	 <p>CHEMTrust Protecting humans and wildlife from harmful chemicals CHEM Trust (United Kingdom)</p>
 <p>Child Rights International Network (Belgium)</p>	 <p>CILSA ASSOCIAZIONE ECOLOGISTA (Italy)</p>	 <p>Circular Economy Portugal (Portugal)</p>

 <p>City to Ocean (Belgium)</p>	<p>ClientEarth </p> <p>ClientEarth (Belgium/Global)</p>	 <p>Collesalviamo l'ambiente (Italy)</p>
 <p>Comitato Milanese Acquapubblica (Italy)</p>	 <p>Comitato Salviamo la collina dal cemento (Italy)</p>	<p>SARZANA, CHE BOTTA!</p> <p>Comitato Sarzana, che botta! (Italy)</p>
 <p>Community Action Against Plastic Waste (CAPWs) (Austria)</p>	 <p>Consumentenbond Consumentenbond (The Netherlands)</p>	 <p>Corporate Europe Observatory Corporate Europe Observatory (Belgium)</p>
 <p>Deutsche Umwelthilfe Deutsche Umwelthilfe e.V. (Germany)</p>	 <p>ECOCITY (Greece)</p>	 <p>Ecomente (Italy)</p>
<p>ECONGOOD Switzerland, Project PLASTIKFASTEN (Switzerland)</p>	 <p>ECOS (Belgium)</p>	 <p>Ecoteca (Romania)</p>














 <p>Ekologi brez meja (Slovenia)</p>	 <p>environmental investigation agency Environmental Investigation Agency (United Kingdom)</p>	 <p>Environment Engineering Group INŽENJERI ZAŠTITE ŽIVOTNE SREDINE Environment Engineering Group (Serbia)</p>
 <p>Environmental Paper Network Environmental Paper Network (Global)</p>	 <p>ES Reutiliza ES Reutiliza (Spain)</p>	 <p>LONGTIME® INDEPENDENT LABEL Ethikis - LONGTIME® Label (France)</p>
 <p>EEB European Environmental Bureau European Environmental Bureau (Europe)</p>	 <p>ERI European Research Institute European Research Institute Foundation (Italy)</p>	 <p>EVERGREEN BRESCIA EVERGREEN BRESCIA - APS (Italy)</p>
 <p>EVERYDAY PLASTIC Everyday Plastic (United Kingdom)</p>	 <p>EXIT PLASTIK Exit Plastik (Germany)</p>	 <p>Fair Resource Foundation (The Netherlands)</p>
 <p>FEBED FEBED - Federatie van Belgische Drankenhandelaars (Belgium)</p>	 <p>CECU Federación de Consumidores y Usuarios CECU (Spain)</p>	 <p>FRANCE NATURE ENVIRONNEMENT France Nature Environnement (France)</p>

 <p>Frasco a Frasco (Portugal)</p>	 <p>Friends of the Earth Cyprus (Cyprus)</p>	 <p>Priatelía Zeme SPZ Friends of the Earth - SPZ (Slovakia)</p>
 <p>FORBRUGER RÅDET tænk Forbrugerrådet Tænk (Denmark)</p>	 <p>FORUM TOSCANO DEI MOVIMENTI PER L'ACQUA Forum Toscano Movimenti per l'Acqua ODV (Italy)</p>	 <p>GALLIFREY FOUNDATION Gallifrey Foundation (Switzerland)</p>
 <p>G. A. S. 1000piedi (Italy)</p>	 <p>Générations Futures (France)</p>	 <p>GIACIMENTI URBANI (Italy)</p>
 <p>GLOBAL 2000 FRIENDS OF THE EARTH AUSTRIA GLOBAL 2000 - Friends of the Earth Austria (Austria)</p>	 <p>Greenpeace Global (Global)</p>	 <p>Green Transition Denmark Green Transition Denmark (Denmark)</p>
 <p>Greenzone Environmental Association (Hungary)</p>	 <p>Health Care Without Harm Europe (Belgium)</p>	 <p>Health and Environment Justice Support (HEJSupport) (Germany)</p>








 <p>Hogar SinTóxicos</p> <p>Hogar sin Tóxicos (Spain)</p>	 <p>HUMUSZ szövetség</p> <p>Humusz Szövetség (Hungary)</p>	 <p>NO PFAS MANCHING</p> <p>IG NO PFAS Manching e. V. (Germany)</p>
 <p>Il Mondo di Irene</p> <p>(Italy)</p>	 <p>INSTITUT CIRKULÁRNÍ EKONOMIKY</p> <p>Institute of Circular Economy (Czech Republic)</p>	 <p>ΚΕΠΚΑ</p> <p>KEPKA - Consumers' Protection Centre (Greece)</p>
<p>LPN </p> <p>liga para a protecção da natureza</p> <p>Liga para a Protecção da Natureza (LPN) (Portugal)</p>	 <p>LUONTOLIITTO</p> <p>Luontoliitto (The Finnish Nature Association) (Finland)</p>	<p>Mamme no pfas (Italy)</p>
 <p>MARCHE A RIFIUTI ZERO</p> <p>Marche a rifiuti zero ETS (Italy)</p>	<p>Medical University of Gdansk & Gdansk University of Technology (Poland)</p>	 <p>Medicina Democratica MOVIMENTO DI LOTTA PER LA SALUTE</p> <p>Medicina Democratica (Italy)</p>
 <p>MIO-ECSDE</p> <p>Mediterranean Information Office for Environment, Culture and Sustainable Development (MIO-ECSDE) (Greece)</p>	 <p>MINIMALISTAS DO LIXO</p> <p>Minimalistas do Lixo (Portugal)</p>	 <p>Mission Reuse (The Netherlands)</p>

 <p>NABU (Naturschutzbund Deutschland) e. V. (Germany)</p>	 <p>Naturvernforbundet (Norway)</p>	 <p>New European Reuse Alliance (Belgium)</p>
 <p>New Loop (Denmark)</p>	 <p>NGO Zero Waste Lutsk (Ukraine)</p>	 <p>No Plastic In My Sea (France)</p>
 <p>Notre Affaire à Tous (France)</p>	 <p>Oceana (Europe)</p>	 <p>Ocean Alive (Portugal)</p>
 <p>Ocean. Now! (Germany)</p>	 <p>OceanCare (Switzerland)</p>	 <p>OPAA - OCEAN PATROL ASSOCIATION, Conservation & Sustainability (Portugal)</p>
 <p>Palombar - Associação de Conservação da Natureza e do Património Rural (Portugal)</p>	 <p>Plastic Soup Foundation (The Netherlands)</p>	 <p>Plastic-Free Türkiye Platform (Türkiye)</p>




<p>POLSKIE STOWARZYSZENIE ZERO WASTE Polish Zero Waste Association (Poland)</p>	 <p>RECUP (Germany)</p>	 <p>RELOOP PLATFORM (Belgium)</p>
 <p>réseau environnement santé <i>Notre environnement, c'est notre santé</i> Réseau Environnement Santé (France)</p>	 <p>Réseau Vrac & Réemploi Réseau Vrac & Réemploi (France)</p>	 <p>Rete NO PFAS Brescia (Italy)</p>
 <p>Rete Zero Pfas Veneto (Italy)</p>	 <p>ReteGas Vicentina aps (Italy)</p>	 <p>Rethink Plastic Alliance (Belgium/EU)</p>
 <p>Retorna (Spain)</p>	<p>Rezero (Spain)</p>	 <p>RIAS (Portugal)</p>
 <p>rrreefs (Switzerland / Germany)</p>	 <p>Sciaena (Portugal)</p>	 <p>Seas At Risk (EU)</p>






 <p>SEPANSO (France)</p>	 <p>Surfrider Foundation Europe (Belgium)</p>	<p>sykell sykell GmbH (Germany)</p>
 <p>Tara Recuperavel.org (Portugal)</p>	 <p>The Climate Reality Project EUROPE The Climate Reality Project Europe (Germany/Europe)</p>	 <p>Danmarks Naturfredningsforening The Danish Society for Nature Conservation (Denmark)</p>
 <p>BEUC The European Consumer Organisation The European Consumer Organisation (BEUC) (Belgium/Europe)</p>	 <p>Transition Town Augsburg eV - Forum Plastikfrei (Germany)</p>	 <p>Trash Hero World (Switzerland)</p>
 <p>United Kingdom Without Incineration Network (UKWIN) (United Kingdom)</p>	<p>Université Catholique de Louvain (Belgium)</p>	 <p>Vivir sin plástico (Spain)</p>
 <p>VOICE (Ireland)</p>	 <p>VšĮ Žiedinė ekonomika (Lithuania)</p>	 <p>vzw Climaxi (Belgium)</p>

 <p>ASBL WeAreNature.Brussels (Belgium)</p>	 <p>Women Engage for a Common Future, WECF (Germany)</p>	 <p>За Земята Приятели на Земята България Za Zemiata (Bulgaria)</p>
 <p>Zelena Akcija (Croatia)</p>	 <p>ZERO - Association for the Sustainability of the Earth System (Portugal)</p>	 <p>Zero Waste Austria (Austria)</p>
<p>Zero Waste Bad Vilbel e.V. (Germany)</p>	 <p>Zero Waste Belgium (Belgium)</p>	 <p>Zero Waste Estonia (Estonia)</p>
 <p>Zero Waste Europe (Europe)</p>	 <p>Zero Waste France (France)</p>	 <p>Zero Waste Germany e.V. (Germany)</p>
 <p>Zero Waste International CIC (Wales)</p>	 <p>Zero Waste Italy (Italy)</p>	 <p>Zero Waste Kharkiv (Ukraine)</p>

 <p>Zero Waste Kiel e.V. (Germany)</p>	 <p>Zero Waste Köln e.V. (Germany)</p>	 <p>Zero Waste Lab (Portugal)</p>
 <p>Zero Waste Montenegro (Montenegro)</p>	 <p>Zero Waste Nederland (The Netherlands)</p>	 <p>Zero Waste Society (Ukraine)</p>
 <p>Zero Waste Zp (Ukraine)</p>		

Given that major corporate players from regions outside Europe, notably the US, are amongst those exerting heavy pressure to delay and weaken the PPWR, the following US groups implore the EU institutions to withstand US industry's efforts to undermine this landmark piece of EU legislation.

 <p>5 Gyres Institute</p>	<p>Breathe Free Detroit</p>	 <p>Californians Against Waste</p>
<p>Center for Coalfield Justice</p>	<p>Cherokee Concerned Citizens</p>	 <p>Just Zero</p>

 <p>PACIFIC ENVIRONMENT Pacific Environment</p>	 <p>Plastic Pollution Coalition</p>	 <p>Recycle Hawai'i Recycle Hawaii</p>
 <p>Society of Native Nations</p>	<p>THE STORY OF STUFF PROJECT The Story of Stuff Project</p>	 <p>Upstream Upstream</p>