

Feedback on the Environmental Omnibus

Feedback from the Rethink Plastic Alliance to the European Commission's Communication on "Simplifying for Sustainable Competitiveness" (Environmental Omnibus).

About Rethink Plastic

The Rethink Plastic Alliance is a coalition of leading European NGOs advocating for ambitious EU policies to tackle the growing crisis of plastic pollution. It brings together the Center for International Environmental Law (CIEL), ClientEarth, the Environmental Investigation Agency (EIA), the European Environment Bureau (EEB), the European Environmental Citizen's Organisation for Standardisation (ECOS), Greenpeace, Seas At Risk, Surfrider Foundation Europe, and Zero Waste Europe. Together, these organisations hold expertise on the entire lifecycle of plastics and represent thousands of active groups, supporters and citizens in every EU member State working towards a future free from plastic pollution.

Feedback on the Omnibus Process

The Rethink Plastic Alliance is seriously concerned about the Commission's Omnibus process. Echoing the recommendation by the European Ombudsman on a previous Omnibus package, the Alliance would like to stress that:

- Omnibuses depart from the principle of good administration;
- There are legitimate expectations of the Commission to conduct a proper impact assessment of the measures proposed in an Omnibus, where any proposed changes to existing laws are evidence-based and where the process is transparent and inclusive.

In the case of the Environmental Omnibus, we wish to stress that the public consultation was insufficient while the potential impacts of the proposed measures were not adequately assessed. The staff working document accompanying the proposal does not constitute a proper replacement for an impact assessment as it focuses only on selective administrative costs while other potential costs or benefits are not considered.

Feedback on Measures Proposed

This section outlines the Rethink Plastic Alliance's feedback on the concrete initiatives proposed in the Environmental Omnibus that are relevant to plastic pollution.

Discontinuation of the SCIP Database

From the Omnibus Communication:

Reducing administrative burden under waste legislation: *The 'SCIP' (8) database has not been effective in informing recyclers about the presence of hazardous substances in products and has imposed substantial administrative costs. It is therefore proposed to repeal the obligation to report SCIP-related data. The EU chemicals legislation, in particular the One Substance One Assessment package as well as the digital product passport will progressively fulfil the envisaged role of the database. When designing the digital product passport for products, the Commission will include data about substances of very high concern in its scope.*

The Rethink Plastic Alliance is opposed to the proposed discontinuation of the SCIP Database, which we believe would undermine the EU's circular economy objectives. We would like to stress that the SCIP Database has important added value: Provisions under REACH or the Ecodesign Regulation (ESPR) are not equivalent to those of SCIP and so these cannot be said to serve an equivalent purpose.

Eliminating the SCIP Database would not only undermine the Union's circular economy objectives but also contradict the stated aim of simplification. SCIP constitutes a pivotal contribution to the digitalisation of the REACH information flow. Its public accessibility ensures low-threshold access, thereby facilitating the broad dissemination and use of data. In their contributions to the Call for Evidence on potential reporting rationalisation, SCIP duty holders highlighted the need for technical and administrative improvements in the usability of the current system.

Instead of eliminating SCIP, the aim of simplification can be achieved by making the Database easier to use and by clarifying the scope of the communication obligations under Art. 33(1) of REACH so as to eliminate any double-work: If the upstream underlying communication obligations for companies are clear and comprehensive enough, it would be possible to implement the "once-only" principle – as set out by the Commission's Communication on Implementation and Simplification – whereby companies should report their data on chemical uses only once and this information is then used to feed data requirements under EU legislation.

Discontinuing SCIP compromises Circular Economy policy goals

The SCIP provisions were introduced to the Waste Framework Directive (WFD) with a view to developing "non-toxic material cycles", while underlining the necessity "to ensure that sufficient information about the presence of hazardous substances and especially SVHCs is communicated throughout the whole life cycle of products and materials"¹. These objectives are reflected in both the Clean Industrial Deal and the European Chemicals Industry Action Plan, with the latter

¹ [Directive \(EU\) 2018/851](#), Recital 38

concluding that “the industry needs to transition to a clean and circular economy model”, thereby continuing the strategic course set by the European Green Deal².

The discontinuation of the SCIP Database would jeopardise the above-stated objectives and amount to a tacit acceptance of toxic recycling. It would deprive waste operators of the opportunity to identify and separate substances of very high concern (SVHCs), thereby exposing waste workers and the environment to risks of toxic contamination, while allowing hazardous substances to persist in materials intended for a second life. This, in turn, would seriously undermine confidence in the quality and safety of secondary raw materials. At a time when the Commission is working on a proposal for a Circular Economy Act to try and boost the demand for secondary raw materials, it seems counterproductive to simultaneously weaken trust in the quality of such materials by discontinuing the key transparency tool that is the SCIP Database.

Optional Authorised Representative for EPR

From the Omnibus Communication:

Reducing administrative burden concerning extended producer responsibility (EPR) schemes:

Producers selling products in Member States other than those where they are based will be able to decide whether to appoint an authorised representative in those Member States in relation to extended producer responsibility (EPR) for waste management requirements. Companies having already designated such representatives can maintain their current set-up. These changes represent a stepping stone to more profound simplification. The Circular Economy Act will further propose to reduce the extent of reporting that producers undertake about the products made available and data on the collection and treatment of waste linked to those products, and by limiting the reporting frequency to a maximum of once per year. Single Market harmonisation and digitalisation of extended producer responsibility envisaged under the Circular Economy Act in 2026. Further simplification in the upcoming Circular Economy Act will also include simplification concerning third country producers.

On the optional appointment of an authorised representative by EU producers:

A full and transparent overview of the European Commission’s plans on the authorized representative topic is needed for the legislative process on this issue to begin.

The Rethink Plastic Alliance acknowledges that the obligation for EU companies to appoint an authorized representative in another EU country is not effective in combating freeriding or ensuring compliance with EPR obligations in other Member States by EU producers when products are placed on the market directly to end users. This is due to a lack of producer incentives to be

² The objectives set out in Recital 38 of Directive (EU) 2018/851 were re-stated in the [Circular Economy Action Plan](#) (Section 4.2) and the [Chemicals Strategy for Sustainability](#) (Section 2.1.2), and form a key part of the [European Green Deal](#)’s goal for the EU to achieve a “clean and circular economy” (Section 2.1.3) while pursuing a “zero pollution ambition for a toxic-free environment” (Section 2.1.8).

compliant with EPR obligations and the very limited sanctioning powers available to national authorities against non-compliant producers.

However this is the only mechanism in place through which national authorities have a certain amount of sanctioning power against the producers non-compliant with the EPR obligations.

We therefore deem it necessary that the Commission fully and transparently explains the envisaged mechanism to ensure that producers from other EU countries shall be audited and sanctioned for non-compliance by national authorities in the absence of an authorised representative. The legislative process on the suspension of the obligation to appoint an authorised representative by EU producers should not start without the full picture of how the EU Commission is planning to handle the audit and sanctioning powers against EU producers without a legal entity in the respective EU Member States.

On the “alternative measures” in connection to third country producers:

Clarification is needed on what are the “alternative means” considered by the EU Commission.

No definition of “alternative means” is provided anywhere in the Omnibus proposal. We consider that this lack of a clear definition leads to a high risk of divergence between EU Member States, which is the exact opposite of proposals’ intentions, namely to *“to harmonise the existing rules effectively and promptly, reducing the associated burdens on such producers”* (Recital 4).

Furthermore, it is unclear whether the “alternative means” constitute an actual option for Member States to enforce instead of the obligation for third country producers to appoint an authorised representative, or whether it represents an alternative compliance method that third country producers themselves may choose in order to fulfil their producer obligations.

In addition, the provisions on “alternative means” across the two Omnibus proposals are inconsistent: the “alternative means” are mentioned in relation to the PPWR, Battery Regulation and WFD in both recitals and the provisions of the Omnibus Proposals.

However, the “alternative means” are not mentioned in connection to the WEEE Directive and the SUP Directive either (i) in the Recital 6 or (ii) in the Omnibus Proposal on WFD, WEEE and SUPD.

This is inconsistent, and clarification is needed as to whether the “alternative means” apply across all EPR regimes in the EU or only to specific ones.

The Omnibus proposals on authorised representative appointment by third party producers contains errors:

Some provisions of the Omnibus proposals on authorised representatives by third party producers do not reflect the correct status of currently enforced EU legislation, namely the Batteries Regulation.

In Article 1 of the Omnibus proposal on PPWR and the Batteries Regulation, it is mentioned that: *“As regards battery producers established in third countries, where Member States do not require the appointment of an authorised representative for extended producer responsibility”*.

This provision is incorrect as the Batteries Regulation in Article 56(3) establishes a general obligation applicable across all Member States to enforce the obligation for third country producers to appoint an authorised representative. In contradiction to Article 1, Recital 6 of the Proposal reflects this situation accurately by stating that in the case of the Batteries Regulation, the appointment is mandatory across all EU for third country producers.

It is possible that there may have been a confusion or error on the part of the Commission, in that the proposed provisions appear to have been reversed between the PPWR and the Batteries Regulation. More specifically, we believe it is possible that Article 1 of the Omnibus Proposal on the PPWR and the Batteries Regulation was intended to apply to the PPWR (thus should have been provided under Article 2 and not Article 1 of the Omnibus Proposal on PPWR and Batteries Regulation) rather than to the Batteries Regulation (as currently provided) and vice versa. This interpretation is supported by the fact that the PPWR allows producers the option to appoint an authorised representative, whereas the Batteries Regulation makes such an appointment mandatory.

Concern about the fragmentation of the legislative process regarding EPR reform and the Circular Economy Act

While we support an EU-wide, harmonised reform of Extended Producer Responsibility (EPR) frameworks, as well as the adoption of a Circular Economy Act, we are concerned about the fragmentation introduced by the Environmental Omnibus between the legislative process concerning the Circular Economy Act and the EPR reform.

Accelerated Permitting Procedures

From the Omnibus Communication:

Speeding up environmental assessments: *The Draghi report pointed to lengthy and uncertain permitting procedures – in particular a lack of administrative capacity and of digitalisation – as major obstacles to the deployment of new power supply and grids, access to critical raw materials and more broadly towards clean and digital transition projects. On 23 October 2025, EU Leaders called on the Commission to intensify its efforts to stress-test the EU acquis including the exploration of proposals to streamline and accelerate planning and permitting procedures in the Member States. Delays in national permitting procedures have been raised by many stakeholders in the call for evidence. To respond to this, and as announced in the Chemicals Industry Action Plan on 8 July, a proposal on speeding up environmental assessments which are core to the permit granting process is tabled as part of the omnibus package. The proposal provides for a simplified and coherent umbrella for faster and better-quality environmental assessments. The proposal will ensure that project developers will benefit from simpler and accelerated procedures with single points of contact co-ordinating complex procedures, cooperation between authorities for environmental assessments with cross-border impacts, digitalisation, ensuring sufficient staffing and capacity of permitting authorities, and limited financial support to cover administrative costs. Further measures to accelerate key energy, digital and industrial decarbonisation projects, including relevant circular economy projects, are also proposed, covering measures such as tacit approval and procedural and judicial prioritisation by the Member States.*

The Rethink Plastic Alliance acknowledges that permitting procedures are often lengthy and can be cumbersome, especially for smaller businesses. We also understand that faster procedures can lead to a quicker deployment of technologies that are necessary for the energy transition and for industries to become more sustainable. However, this should never come at the expense of robust environmental impact assessments which must continue to be guided by the precautionary principle.

In particular, the proposal outlines in the Annex special [provisions](#) for sectors considered strategic, including in future legislation referring to it. Such provisions include overriding public interest and tacit approval in case of lack of answer from national authorities. In the proposed Industrial Accelerator Act, production of petrochemical products such as plastics has already been designated as “strategic” and the proposal refers to the provisions included in the proposed Regulation on Speeding Up Environmental Assessments.

Especially in the case of [plastic production](#), we believe that such measures could lead to a dangerous acceleration of plastic pollution, in addition to the environmental and health impact linked to its full supply chain. While streamlining procedures and supporting overwhelmed national authorities is essential, a faster environmental impact assessment or tacit approvals for petrochemical industries, like plastic production, does not serve the purpose of lightening the administrative burden, nor foster the innovation that is needed in the sector.

Feedback on Potential Future Simplification

The Environmental Omnibus clearly states that the Commission is committed to exploring further simplification possibilities and lists a number of potential initiatives. This section outlines the Rethink Plastic Alliance’s feedback to these possible future measures.

REACH Revision

From the Omnibus Communication:

A targeted revision of the REACH chemicals legislation (as per the 2025 European Chemicals Industry Action Plan).

The Rethink Plastic Alliance regrets the Commission's recent announcement that the revision of the full text of REACH will be delayed and only changes of the Annexes through comitology may be addressed.

Under the banner of industry’s simplification agenda, the Commission has so far stalled progress on chemical protections. Not only has the long-awaited modernisation of REACH has been postponed once again, its implementation and enforcement continue to lag behind. The EU [Restrictions Roadmap is blocked](#): Nearly two-thirds of the 22 restriction files announced in 2022 are today effectively frozen or significantly delayed. PVC, bisphenols, phthalates and flame retardants are highly hazardous chemicals waiting for action by the Commission.

It is urgent to ensure health and environmental protections against the [13,000 chemicals present in plastic's life-cycle](#). In particular, the Commission should oppose chemical industry [proposals](#) for weakening information requirements and slowing down regulatory processes. The Commission should prioritise protections as demanded by 40 European NGO in their joint statement: [Protection first: EU leadership to deliver safe chemicals with high protection of people's health and the environment](#), calling for urgent implementation, enforcement, and modernization of the EU chemicals framework. REACH must prevent the pollution crises such as PFAS contamination, support EU health priorities -including Europe's Beating Cancer Plan- and enable a toxic-free circular economy.

Reform of Extended Producer Responsibility

From the Omnibus Communication:

Circular Economy Act: *The Circular Economy Act in Q3 2026 will deliver simpler, harmonised rules and lower costs for cross-border circular activities and will create a single market for waste and recycled materials. Building on the targeted simplification of the "authorised representatives" regime including the suspension of the provision to have one representative per Member State as part of the omnibus the Commission is assessing the potential for larger scale reform of extended producer responsibility scheme, including for third country producers, advocated by many stakeholders in their submissions to the call for evidence. This includes further harmonisation of Union legislation, simplification and digitalisation of the extended producer responsibility schemes through a digital one-stop-shop for information, registration and reporting.*

Waste Framework Directive: *The Commission will establish a harmonised format for registration in the register of producers for extended producer responsibility under the revised Waste Framework Directive.*

While the Rethink Plastic Alliance supports an EU-wide, harmonised reform of Extended Producer Responsibility (EPR) frameworks, ensuring consistency across Member States and across all EPR regimes, we are concerned about the fragmentation introduced by the Environmental Omnibus. In particular, it puts forward amendments to existing EPR rules separately and in advance of the forthcoming comprehensive EPR reform under the Circular Economy Act.

Including targeted changes to current EPR regimes without presenting a complete and transparent overview of the future reform makes it difficult to fully assess the proposed provisions relating to authorised representatives.

We urge the EU Commission to streamline the publication of the information and the legislative process on the envisaged EPR reform, which will ensure consistency and clarity for all stakeholders involved.

Waste Shipment Regulation Delegated Acts

From the Omnibus Communication:

In order to simplify the business environment and the functioning of the single market for waste and secondary materials, the Commission is currently exploring the potential of green-listing of certain types of non-hazardous waste by adoption of delegated acts under the Waste Shipment Regulation for shipments between Member States. The Commission is also aware of specific concerns raised regarding provisions in the Regulation, restricting the export of mixed municipal waste for recovery from the EU, notably in the case where the geographical situation in certain regions warrants the export of such waste through more sustainable means of transportation to near-by waste management facilities in neighbouring EFTA countries. The Commission will explore with the co-legislators how to address the matter in a timely manner in the Circular Economy Act or through other legislative tools, in line with the objectives of the Waste Shipment Regulation and of the EU decarbonisation agenda.

The Rethink Plastic Alliance wants to recall that the main objective of the Waste Shipment Regulation (WSR) is the protection of the environment and human health, climate neutrality and achieving a circular economy and zero pollution. Therefore, ensuring the environmentally sound management (ESM) of waste and the protection of environment and human health is and should remain at the core of waste trade policies. The WSR should be implemented in a way that supports genuine circularity and ensures non-toxic streams and loops. It should also be implemented in a way that diverts waste and waste exports from incineration and landfill in line with the proximity principle for disposability operation, while supporting waste reduction, reuse, and the improvement of separate collection and mechanical recycling infrastructures.

The Alliance wants to highlight that 70% of waste is already green listed for trade within the EU. In addition, the centralised system DIWASS will simplify notification procedures from May 2026, reducing the administrative process for non-greenlisted waste compared to green-listed waste. Therefore, we don't think it is justified to green-list additional categories of waste.

It is our view that to genuinely boost the internal market for recycling while safeguarding ESM, implementation should prioritise product and system redesign for non-toxicity and recyclability, as well as waste collection and sorting improvement. Incentives should favour higher quality, non-toxic secondary materials, which means alignment of WSR implementation with upstream chemicals policies, separate collection obligations and design for recycling so that waste quality reflects design and sorting performance rather than relying on cross-border movements to remedy poor quality.

Textiles

Regarding textiles waste, the Alliance considers that no waste type containing plastic should be green-listed, in view of the well-evidenced impacts of plastic waste trade on the environment, human health and domestic recycling capacity. The Alliance is deeply concerned that the

Commission is now considering green-listing synthetic-based mixtures of clothing and footwear, because we consider that the conditions are not met to green-list mixtures of clothes and footwear waste. This appears inconsistent with both the spirit and the letter of the Regulation, which explicitly acknowledges that plastic waste has caused significant environmental harm, illegal trade and mismanagement and therefore requires enhanced control through the Prior and Informed Consent (PIC) procedure for all plastic waste (and bans in some cases). Mixtures of textiles and footwear, which are predominantly made of synthetic polymers, pose equivalent material and enforcement risks to those that justified the change in policy for plastic waste

E-Waste

With regard to non-hazardous e-waste, the Alliance considers that there are no grounds to extend green-listing beyond 01 January 2027. E-waste treatment standards differ substantially across European countries, and ongoing illegal cases of e-waste treatment have been evidenced, notably in Romania. The Alliance does not consider that the conditions under Article 79(3) or (4) of the Waste Shipment Regulation for green-listing wastes are met; namely that the waste stream is non-hazardous, managed in an environmentally sound manner throughout the Union, and does not lead to adverse environmental or human health impacts.

Pyrolysis oil from mixed plastics waste

The Alliance opposes the green-listing of pyrolysis oil from mixed plastics waste, which would contradict the Regulation by promoting the movement of an intermediate whose quality varies depending on the pressure and temperature at which it condenses plastic waste. In other words, pyrolysis oil acts as carry-over of multiple contaminants present in the plastics waste and is the synthesis of unsuitable hydrocarbon chemistry.³ In the case of pyrolysing municipal solid waste, 80 % of the PCDD/PCDF product went into the pyrolysis oil, making its toxicity four times higher than the original feedstock before processing.⁴ When considering PAH compounds, it appears that pyrolysis oil would breach REACH regulatory limits for contact-sensitive applications and most likely have acute and chronic aquatic toxicity according to the CLP Regulation.⁵

Packaging and Packaging Waste Regulation

From the Omnibus Communication:

To support the implementation of the Packaging and Packaging Waste Regulation, the Commission will, as a priority, issue a Commission notice and Frequently Asked Questions with guidance on the most frequently raised points in the call for evidence and in bilateral exchanges, including testing for PFAS, application dates, labelling requirements and, reuse targets. The input from the call for evidence will also be used in the context of the adoption of the implementing measures due in 2026 and 2027. When developing harmonised labelling specifications, due

³ Dr. Rollison A., [Leaky Loop Recycling: A technical correction on the quality of pyrolysis oil made from plastic waste](#), 2023

⁴ Mohr, K., Nonn, Ch., Jager, J. 1997. [Behaviour of PCDD/F under pyrolysis conditions](#), Chemosphere, 34 (5-7), pp. 1053-1064.

⁵ Dr. Rollison A., [Leaky Loop Recycling: A technical correction on the quality of pyrolysis oil made from plastic waste](#), 2023

account will be taken of existing systems and specificities of some products and their regulation (e.g. medicines) to protect patient safety and human health. A draft Delegated Act will be published for stakeholders' feedback that would provide an exemption for pallet wrappings and straps from the 100 % reuse targets. The Commission will consider in its implementing measures additional flexibilities for other packaging formats, notably where hygiene and food safety issues prevent the achievement of those targets. The Commission will simplify reporting as much as possible via implementing measures to reduce administrative burdens in close collaboration with stakeholders and Member States in the newly established expert group for packaging.

On the publication of official clarifying guidance by the Commission:

While we appreciate the publication of official guidance interpreting and explaining the provisions of the PPWR as an essential step to ensure its correct implementation, we emphasise that such guidance should not be used to introduce new derogations or more lenient interpretations that are not supported by the legislation in force.

One example is the interpretation in the PPWE Guidance which concludes that plasticised cups and food containers with a plastic content of up to 5% should be de-facto classified under the PPWR as single-use paper-based packaging, whereas under the SUPD the same items are considered single-use plastic packaging. We consider such interpretations not only inconsistent but also counterproductive, as they create confusion for Member States and for companies that must comply with obligations under both the PPWR and the SUPD.

On the adoption of additional flexibilities for packaging formats:

We would like to recall that, in accordance with the PPWR, the Commission is empowered to adopt Delegated Acts granting exemptions from the reuse targets only under very strict conditions. In particular, pursuant to Article 29(18)(b) of the PPWR, the exemptions based on hygiene and food safety issues may be adopted only where all of the following criteria are cumulatively met:

- The exemption applies solely to specific packaging formats;
- It is necessary due to duly demonstrated hygiene and food safety concerns that prevent the achievement of the reuse targets;
- It is justified on the basis of the most recent scientific and economic data and developments. This implies that such data and developments must not have been available at the time of the PPWR's adoption (e.g., information not included in the impact assessment or otherwise unavailable during the legislative process, including the prevailing public and scientific knowledge at that time).

Exemptions adopted under Article 29(1)(a) and (c) are likewise subject to similarly strict conditions.

If any one of the above conditions is not demonstrably fulfilled, the European Commission cannot lawfully adopt the Delegated Act.

As previously noted by RPA in its response to the public consultation on the [Packaging and Packaging Waste – exemptions from the reuse obligations for plastic wrappings and straps \(delegated act\)](#), the Commission did adopt that exemption without the fulfilment of the requirements of Article 29(18)(b). This is because the exemption for plastic wrapping and straps constitute a general exemption, as it does not target a specific sector but rather applies broadly to a packaging format in relation to the reuse targets.

In this context, we urge the European Commission to exercise its power to adopt Delegated Acts granting potential future exemptions strictly within the limits laid down by the PPWR, and in full compliance with the conditions and safeguards set out therein.

On the simplification of reporting:

While the Alliance agrees that reporting on reuse should follow a format that is clear and easy for companies to understand and apply, we would emphasise that it must remain sufficiently granular to achieve its intended objective. Any further simplification that disregards the level of detail needed to assess whether economic operators are fulfilling their reuse obligations would risk rendering the PPWR's reuse provisions ineffective.

Single Use Plastics Directive

From the Omnibus Communication:

Regarding the Single Use Plastics Directive, the Commission will complete an evaluation in 2027 to determine if it has met its objectives to reduce (marine) plastic pollution and to improve circularity. The evaluation will fully assess the possibility to reduce administrative burden. A specific call for evidence and a public consultation will be launched in the coming weeks.

In spite of having been transposed during the Covid pandemic, the Rethink Plastic Alliance maintains that the Single Use Plastics Directive (SUPD) has delivered clear and positive outcomes, notably through effective product bans and design requirements such as tethered caps, which have proven implementable, visible, and impactful in reducing litter and preventing pollution at source. At this stage, simplification of the existing measures is uncalled for since only some single-use products are addressed in the Directive, and a broad revision would be premature, as more time is needed to fully implement EPR measures and gather consolidated, harmonised, and comparable implementation data across Member States. Preserving regulatory stability, while strengthening monitoring and reporting, is therefore essential to preserve legal certainty, maintain investment signals, and safeguard the environmental benefits already set in motion, particularly by maintaining established and enforced measures, including key definitions.

Member States have, in general, demonstrated a solid understanding of the Directive's provisions and expressed support for its level of ambition. The Directive has also been well received by European citizens; revisiting its core elements or further simplifying its measures at this stage would risk undermining public trust in the EU's ability to deliver on its 2030 and 2050 pollution reduction objectives. Moreover, it could jeopardise the progress achieved on environmental claims, as reflected in the Empowering Consumers on the Green Transition Directive.

Furthermore, we strongly recommend that the Commission publish an official interpretation guide clarifying how the SUPD and PPWR should interact and be applied together at the national level. Such guidance is essential, as existing consumption-reduction measures adopted under the SUPD (Article 2) risk being undermined by new measures introduced by Member States under the packaging waste prevention provisions of the PPWR (Article 43).

Recent developments, including initiatives in France led by certain industry actors, have challenged current SUPD measures on the grounds that they exceed the PPWR's waste prevention requirements and should therefore be repealed. These cases highlight the need for an official interpretation which would help ensure coherence between the two frameworks and support national legislators in adopting well-informed, consistent measures in line with the PPWR.

In conclusion, the anticipated challenges linked to the future implementation of the PPWR would not be addressed by reopening the SUPD. On the contrary, such a move would be counterproductive, introducing unnecessary complexity into a legislative framework that is both clear and effective.