

Brussels, 16 April 2021

To:

Frans Timmermans, Executive Vice-President in charge of the European Green Deal  
Virginijus Sinkevičius, Commissioner for the Environment, Oceans and Fisheries

CC:

Diederik Samsom, Head of Vice-President Timmermans' cabinet  
Marius Vaščega, Head of Commissioner Sinkevičius' cabinet  
Florika Fink-Hooijer, Director General of DG Environment  
Mattia Pellegrini, Head of Unit B.3., DG Environment, Waste Management and Secondary Materials

**Subject: The packaging value chain calls on the European Commission to dedicate appropriate time and resources to review the Packaging and Packaging Waste Directive**

Dear Executive Vice-President Timmermans, dear Commissioner Sinkevičius,

The undersigned associations representing the packaging value chain are writing to you to voice their concerns regarding the timing and resources allocated to the review of the Packaging and Packaging Waste Directive.

Our organisations fully support the objectives of the new Circular Economy Action Plan and believe that the upcoming revision of the Packaging and Packaging Waste Directive represents a key opportunity to accelerate and further scale up the circularity of the EU economy. To this end, the ambitious policy goals must be supported by robust legislation, providing a future-proof regulatory framework driving investment in innovation and ensuring stronger enforcement and harmonisation across the EU. A lot is at stake and the review of this Directive is too important to fail.

The complexity of the measures requires a thorough and evidence-based impact assessment. This must be supported by a regular dialogue and effective consultations with all relevant stakeholders. We are concerned that the limited number of planned stakeholder workshops coupled with the indicative timeline raise the likelihood that these conditions cannot be met satisfactorily ahead of the planned adoption of the legislative proposal by the end of this year.

Rushed decision-making processes tend to result in insufficiently defined regulatory measures requiring further clarification through additional provisions. These are often delayed well-beyond the official deadlines set to ensure their timely and harmonised transposition across the EU. The Single-Use Plastics Directive and severe delays with the adoption of its implementing acts and guidelines set a concerning precedent in this regard.

Given the breadth and complexity of the Packaging and Packaging Waste Directive review, and the numerous legislative files being reviewed in relation to the Circular Economy Action Plan, it is essential to

foresee sufficient time and resources, as recently voiced by the European Parliament in its Resolution on the New Circular Economy Action Plan<sup>1</sup>.

We would very much welcome the opportunity to exchange views on these critical issues with you and your services and we remain committed to support the Commission with a successful review.

Yours sincerely,



ACE – The Alliance for Beverage Cartons and the Environment



AGMPM – Association of the Greek Manufacturers of Packaging and Materials



AGVU – Arbeitsgemeinschaft Verpackung und Umwelt e.V., Germany



AIJN – European Fruit Juice Association



A.I.S.E. – The International Association for Soaps, Detergents and Maintenance Products



AMCHAM – American Chamber of Commerce to the EU



APEAL – The Association of European Producers of Steel for Packaging



ARA – Altstoff Recycling Austria



ARAM – Association for Packaging and the Environment, Romania



CEPI – Confederation of European Paper Industries



CICLOPLAST – Spanish Association of Plastics Transformers and Raw Materials Producers for Promoting Plastics Packaging Recycling



CICPEN – Industrial Coalition on Packaging and the Environment, Czech Republic



CITEO



CITPA - The International Confederation of Paper and Board Converters in Europe

<sup>1</sup> European Parliament's Resolution on the New Circular Economy Action Plan (2021/0040)



Cosmetics Europe – The Personal Care Association



CPME – Committee PET Manufacturers Europe



Der Grüne Punkt



EABA – The European Aluminium Foil Association



ECMA – European Carton Makers Association



EKO-PAK – Packaging Association, Poland



ELIPSO – Les Entreprises de l'Emballage Plastique et Souple, France



EPTA – The European Power Tool Association



EUMEPS – European Manufacturers of EPS



EXPRA – Extended Producer Responsibility Alliance



Emballasje foreningen – Norwegian Packaging Association



EPPA – European Paper Packaging Alliance



EUPB – European Bioplastics



EuPC – European Plastics Converters



EUPIA – European Printing Ink Association



EuroCommerce



EUROPEN – The European Organization for Packaging and the Environment



FEA – The European Aerosol Federation



FEFCO – The European Federation of Corrugated Board Manufacturers



FEICA - Association of the European Adhesive & Sealant Industry



FEVE – The European Container Glass Federation



FoodDrinkEurope – The Organisation of Europe's Food & Drink Industry



FPE – Flexible Packaging Europe



IK – Industrievereinigung Kunststoffverpackungen e.V, Germany



INCPEN – The Industry Council for Packaging & the Environment



Independent Retail Europe



INTERGRAF – European Federation for Print and Digital Communication



LE - LightingEurope



Miljöpack – Packaging Association, Sweden



MPE – Metal Packaging Europe



NMWE - Natural Mineral Waters Europe

Natural Mineral & Spring Waters



Pakkaus – Packaging Association, Finland



PCEP – Polyolefin Circular Economy Platform



Petcore - Petcore Europe



PlasticsEurope – Association of Plastics Manufacturers



Sociedade Ponto Verde, S.A. – Packaging Recovery Organisation, Portugal



Pro Carton – European Association of Carton and Cartonboard manufacturers



REPAK



RUCODEM – Romanian Union of Cosmetics and Detergents Manufacturers



SCS – Styrenics Circular Solution



SEPEN – Association for Packaging and Environmental Protection, Serbia



SpiritsEUROPE



SZZV – Slovak Associations for Branded Products



UNESDA – Union of European Soft Drinks Associations



360° Foodservice