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 Plan¹.

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 – Alttstoff 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
Cosmetics Europe – The Personal Care Association

¹ European Parliament’s Resolution on the New Circular Economy Action Plan (2021/0040)
CPME – Committee PET Manufacturers Europe

Der Grüne Punkt

EAFA – 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

EUROOPEN – 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

Independant 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

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

SZZV – Slovak Associations for Branded Products

UNESDA – Union of European Soft Drinks Associations

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