

Question for written answer E-005002/2025
to the Commission
Rule 144
Andreas Glück (Renew)

Subject: Exemptions from reuse targets under Article 29 (1-3) of the Packaging and Packaging Waste Regulation

Article 29(18) of the Packaging and Packaging Waste Regulation empowers the Commission to grant exemptions from reuse targets where these would be disproportionate on account of economic constraints or environmental concerns. However, the delegated act under preparation for pallet wrapping and straps under Article 29(2) and (3) appears to rely solely on the economic criterion. This is despite the findings of a Deloitte feasibility study commissioned by the Commission and a recent peer-reviewed *Institut für Energie- und Umweltforschung Heidelberg* (Heidelberg Institute for Energy and Environmental Research) life cycle assessment, both concluding that replacing optimised single-use pallet wrapping and strapping bands with reusable alternatives would increase greenhouse gas emissions, particularly under longer-distance transport conditions.

Since the Commission is planning to exempt pallet wrapping and straps from the requirements set out in Article 29(2), and since Article 29(1) covers the same territorial scope, these environmental considerations are equally applicable.

In this context, can the Commission clarify:

1. why the delegated act under preparation appears to rely only on economic constraints and not on documented environmental impacts?
2. how environmental findings for longer-distance intra-EU transport will be taken into consideration for potential exemptions from Article 29(1), especially since Article 29(1) covers the same territorial scope as Article 29(2)?

Submitted: 18.12.2025