

(English version)

**Question for written answer E-000460/25
to the Commission**

Julie Rechagneux (Pfe), Barbara Bonte (Pfe), Angéline Furet (Pfe), Pascale Piera (Pfe), Margarita de la Pisa Carrión (Pfe), Nikola Bartůšek (Pfe), Gilles Pennelle (Pfe), Anne-Sophie Frigout (Pfe), Séverine Werbrouck (Pfe), Jorge Buxadé Villalba (Pfe), Philippe Olivier (Pfe)
(3 February 2025)

Subject: Packaging and Packaging Waste Regulation: proportionality, feasibility and health impacts of re-use obligations

The proposal for a regulation on packaging and packaging waste aims to strengthen the obligations related to the re-use and recycling of packaging with a view to reducing waste and promoting a circular economy.

The Commission has said it is considering a delegated act for 2025 to exempt pallet wrapping from the reuse obligation laid down in Article 29(2) and (3) of the Packaging and Packaging Waste Regulation.

However, industry stakeholders claim that the lack of clear criteria for these exemptions is creating regulatory uncertainty, making it difficult for them to adapt to the new rules. Article 29(18) of the regulation stipulates that such exemptions must be based on ‘the latest scientific and economic data’, without specifying the indicators or method used.

There are doubts about the viability of the proposed provisions, given that no in-depth impact assessment was carried out and that only limited consideration was given to economic and technical constraints.

Lastly, substituting one material for another (using paper/cardboard instead of plastic packaging, for example) could have repercussions for public health, especially as regards contact-sensitive products such as medical devices and food.

1. Can the Commission clarify which criteria exactly will be used to assess exemptions under Article 29(18) of the regulation?
2. What kind of scientific and economic data will be taken into account, and in what timeframe, in order to give the companies concerned enough foresight to adjust their investments?
3. Will the Commission ensure that in-depth impact analyses are carried out with a view to preventing alternative packaging materials (such as paper/cardboard) from compromising the safety of contact-sensitive products, like medical devices and food?

Submitted: 3.2.2025

Answer given by Ms Roswall on behalf of the European Commission
(22 May 2025)

The Packaging and Packaging Waste Regulation ⁽¹⁾, adopted by the European Parliament and the Council, has entered into force and will apply from 12 August 2026. However, some obligations, including on reuse targets, will enter into force only as of 2030.

The Commission has launched a study ⁽²⁾ to assess a possible exclusion of pallet wrappings and straps from the reuse targets for transport packaging as laid down in Article 29(2) and (3).

The study relies on literature review and consultation of the relevant stakeholders to get primary information. The methodological approach to assess a possible exemption is based on the Commission’s empowerment outlined in Article 29(18).

Therefore, food safety and hygiene issues, environmental issues and economic impacts (including possible supply chain disruptions) related to the exclusive use of pallet wrappings and straps in transport operations are being thoroughly assessed. In addition, the study is assessing the related administrative burden on concerned stakeholders.

This comprehensive methodological approach ensures a high-quality outcome and a deep analysis of all relevant sustainability aspects.

The study is to be completed by July 2025. Based on its results, the Commission intends to draft and propose the related delegated act under Article 29(18) of the regulation before the end of 2025.

⁽¹⁾ Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, OJ L, 2025/40, 22.1.2025.

⁽²⁾ Study launched under the ordinary Commission’s procurement procedure: Framework Contract No ENV.B.3/FRA/2023/0012.

This timeframe will ensure predictability for economic operators well before the application of the related targets, by 2030.
