

(English version)

**Question for written answer E-005002/25
to the Commission
Andreas Glück (Renew)
(18 December 2025)**

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

**Answer given by Ms Roswall on behalf of the European Commission
(27 February 2026)**

Article 29 of the Packaging and Packaging Waste Regulation (PPWR) ⁽¹⁾ establishes re-use targets for transport packaging.

Article 29(18) empowers the Commission to grant targeted exemptions from the targets by delegated acts where economic operators face specific economic constraints (sub-paragraph a), or where hygiene and food safety (sub-paragraph b), or environmental considerations (sub-paragraph c) prevent achievement of the reuse targets.

The analysis of the Deloitte study ⁽²⁾ the Honourable Member refers to ⁽³⁾ concluded that requiring the exclusive use of reusable pallet wrappings and straps within the same company, or for deliveries within the same Member State in 2030, could lead to disproportionate adaptation costs.

The conditions for an exemption under Article 29(18)a were therefore deemed to be met. The study intended to assess also environmental performance of reusable options, however, this was not possible because the collected evidence was not comprehensive enough ⁽⁴⁾.

The Deloitte study only assessed the 100% re-use targets, and not an exemption of pallet wrappings and straps from the 40% reuse target in the PPWR.

It should be noted that under this reuse target economic operators have operational flexibility to organise their business. For instance, using reusable wrappings for shorter-distance intra-EU transport and single-use wrappings for longer-distance transport, or by using 100% single-use pallet wrappings and other transport packaging formats listed in Article 29(1) in reusable form, while remaining compliant with the overall 40% re-use target.

⁽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⁾ Considering insights and primary information from relevant stakeholders.

⁽³⁾ <https://op.europa.eu/s/Ada1>.

⁽⁴⁾ The study concluded that the environmental performance depends on several dynamic parameters, among others decarbonisation of transport fleet; hence it suggested a specific study on the assessment of the environmental performance of pallet wrappings and straps.