

(English version)

**Priority question for written answer P-002648/26
to the Commission
Susana Solís Pérez (PPE)
(26 June 2026)**

Subject: Legal certainty in the implementation of the Packaging and Packaging Waste Regulation

Regulation (EU) 2025/40 will apply from 12 August 2026. However, several delegated and implementing acts, harmonised standards, testing methodologies and detailed compliance criteria are not yet available.

This creates legal and operational uncertainty for companies that must adapt their supply chains, plan investments and redesign packaging without a complete and stable regulatory framework. Particular concerns relate to the testing and documentation of per- and polyfluoroalkyl substances (PFAS) limits in food-contact packaging, the assessment of substances of concern, the identification of the operators responsible for conformity and extended producer responsibility obligations and the implementation of registration and authorised representative requirements across Member States.

The application of these requirements part-way through the financial year may also increase compliance costs and administrative complexity, particularly for small and medium-sized enterprises (SMEs).

1. When will the Commission provide the necessary implementing measures, harmonised methodologies and technical guidance and will it ensure that companies have sufficient time to comply following their adoption?
2. Has the Commission assessed the cumulative industrial, economic and administrative impact of applying these obligations from 12 August 2026?

Submitted: 26.6.2026

**Answer given by Ms Roswall on behalf of the European Commission
(2 September 2026)**

Ensuring a harmonised and legally predictable implementation of the Packaging and Packaging Waste Regulation (PPWR) ⁽¹⁾ across the EU is a priority for the Commission.

Most provisions will only kick in progressively, and after 2028, with only a limited number of the regulation's rules becoming applicable on 12 August 2026 — notably new restrictions on per- and polyfluoroalkyl substances (PFAS) in food packaging, the need for an authorised representative for the extended producer responsibility scheme, the need for identification of packaging and for manufacturers to issue a declaration of conformity.

To support stakeholders to prepare for the above, the Commission has published guidelines on the implementation of the PPWR ⁽²⁾ for economic actors and Member States, developed a common understanding on how to verify compliance with PFAS requirements, which contains a guide for manufacturers and control authorities, updated the Frequently Asked Questions ⁽³⁾ initially published in March 2026 to address additional questions raised by stakeholders in the lead up to application of the first rules, and continued to engage in intensive dialogue with stakeholders and authorities to support their preparations for the PPWR, including in the context of the Waste Expert Group for packaging, for which relevant industry associations can request membership.

In addition, to reduce burden, in December 2025 ⁽⁴⁾ the Commission proposed to suspend the above-mentioned need for an authorised representative until 2035, and negotiations with the co-legislators are ongoing.

The cumulative industrial, economic and administrative impact of the PPWR's requirements were assessed in the impact assessment that accompanied the PPWR proposal ⁽⁵⁾.

⁽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⁾ https://environment.ec.europa.eu/topics/waste-and-recycling/packaging-waste_en.

⁽³⁾ https://green-forum.ec.europa.eu/packaging-and-packaging-waste-regulation-implementation_en.

⁽⁴⁾ https://ec.europa.eu/commission/presscorner/detail/en/ip_25_2997.

⁽⁵⁾ Commission Staff Working Document, Impact Assessment Report Accompanying the document Proposal for a regulation of the European Parliament and the Council on packaging and packaging waste, amending Regulation (EU) 2019/1020, and repealing Directive 94/62/EC.