

To: Executive Vice-president Frans Timmermans,
Commissioner for Environment, Oceans and Fisheries Virginijus Sinkevičius,

31 January 2022

Joint letter
Austria, Denmark, Luxembourg, Netherlands, Sweden

Upcoming Revision of the Packaging and Packaging Waste Directive

Dear Executive Vice-President,
Dear Commissioner,

We fully share your view that the circular economy is vital for a sustainable future and essential to fight climate change. An ambitious implementation of the circular economy action plan is therefore of great importance. Both the European Commission and the Member States have their responsibilities to achieve this. To effectively support the circular transition, we believe ambitious policy at the European level is necessary. It is in this spirit that we write you on the upcoming revision of the EU Packaging and Packaging Waste Directive.

In this letter we would like to share our views on this upcoming revision. As Member States we wish to underline the importance of an ambitious revision with clear targets as an important opportunity to make significant progress in achieving a circular packaging value chain.

In our view, the upcoming revision of the Packaging and Packaging Waste Directive should follow the waste hierarchy and should therefore focus on **prevention, re-use, recycling**, and the use of **recycled content**.

Prevention is the most important and first step. Unnecessary (over)packaging should be prevented and we ask the Commission to set an ambitious target for reduction of packaging placed on the market on the EU-level. Packaging design criteria should be ambitious and legally binding. We wish to see a review of the current essential requirements, that also aims to prevent over-packaging.

Reuse plays an important role in prevention. In order to ensure that all packaging on the EU market is re-usable or recyclable in an economically viable way by 2030, as foreseen in the Green Deal and the New Circular Economy Action Plan, we call on the Commission to set mandatory **reuse targets** for specific product groups, including those which already have a logistical infrastructure.

When packaging becomes waste at the end of the life-cycle it should be **recycled**. Therefore we ask to set measurable and ambitious targets on the recyclability of packaging with the goal of all packaging to be recyclable in 2030. When considering recyclability, it is important that packaging is recyclable within an existing recycling scheme and not only in theoretic or future schemes. In addition, the essential requirements should steer towards high quality recycling.

Plastic packaging should contain a certain minimum amount of **recycled content**. The formulation of a minimum requirement on recycled post-consumer content in plastic packaging will strengthen the market for secondary raw materials.

In addition to the revision of the Packaging and Packaging Waste Directive, we ask the Commission to study in close cooperation with EU Member States the possibility to further harmonize on subjects like waste collection and sorting, eco-modulation and consumer information by creating guidance documents and sharing best practices.

In summary, we would like to call for an **ambitious and circular revision** of the Packaging and Packaging Waste Directive and we offer our support to achieve that goal. As a contribution to that process, we have prepared more detailed input, which you will find attached to this letter.

Attachment 1: Signatures

Attachment 2: Proposed policy options