

PACKAGING INDUSTRY MANIFESTO

for the 2024–2029 EU political term

EUROPEN, the European Organisation for Packaging and the Environment, stresses its key priorities and lays out policy recommendations for the packaging industry for the legislative term 2024–2029.

We are dedicated to driving sustainability, innovating and enhancing the competitiveness of our industry while ensuring consumer protection and product availability. Packaging is key to the functioning of essential value chains as it ensures products' integrity through transportation, handling and distribution. Its use in different sectors guarantees consumers' health and safety while also increasing products' shelf-life, reducing product losses and food wastage. Policy measures driving the sustainability of the packaging value chain must ensure these functionalities are fully preserved.

Our industry is committed to improving the sustainability of packaging solutions and is already actively working towards this goal, for instance by investing in innovative, recyclable and reusable designs and the integration of cutting-edge digital technologies. This transition goes hand in hand with a system change, capable of triggering investments in collection, sorting, recycling and reuse infrastructure across Europe.

In a fast-changing world racked by global crises, geopolitical tensions and economic instability, investing in the circular transition presents enormous benefits. To support the EU institutions in increasing European capacity to shift towards a truly sustainable, competitive and prosperous Europe, our industry is keen to work alongside policymakers on the following priorities:

- 1 ▶ Better regulation and swift implementation of legislation adopted under the Green Deal**
- 2 ▶ Strengthen the Single Market and deploy an industrial strategy for competitiveness and decarbonisation**
- 3 ▶ Enhance Social Cohesion, Skills and Consumer Protection**

1.

Better regulation and swift implementation of legislation adopted under the Green Deal

The European packaging value chain is committed to supporting the EU sustainability and circular economy goals. We now look forward to a timely implementation of the legislation adopted under the EU Green Deal and Circular Economy Action Plan, while ensuring coherence with upcoming files and the creation of enabling frameworks to meet those goals.

▶ **Swift Implementation of Packaging and Packaging Waste Regulation (PPWR)**

Given the reach of the regulation, which applies to nearly every sector of the EU economy, the swift adoption of evidence-based secondary legislation and guidelines is critical to the undisrupted functioning of the value chains that depend on packaging for the commercialisation of products in the European market. We urge the European Commission and national regulators to move swiftly with the implementation of this regulation, building on industry technical expertise, and establish a regulatory framework that provides clarity for industry and supports sustainable growth without imposing unworkable constraints. This includes a swift setting up of a dedicated Expert Working Group to ensure extensive stakeholders' consultation. EUROOPEN stands ready to be a full partner in this effort.

▶ **Ensure Policy Coherence**

EU legislators must ensure that the upcoming Waste Framework Directive (WFD), the Green Claims Directive (GCD), and other regulations planned for review in the new mandate, such as REACH and the Food Contact Materials legislation, are fully aligned and avoid overlap with PPWR. This alignment will provide legal certainty to economic operators and address the limits of past approaches, which often resulted in fragmented and inconsistent regulations. New and upcoming legislation must be underpinned by data-driven impact assessments and fully recognise the role that packaging plays across different value chains in ensuring consumer safety, sustainability, food security, and product integrity. Coherence must also be maintained in labelling policies. The EU should continue to support harmonised and non-discriminatory labelling policies that help consumers make informed choices and correctly sort, promoting high separate collection rates.

▶ **Create Enabling Frameworks**

Our industry is constantly innovating to ensure that packaging design supports packaging waste prevention and reduction, while guaranteeing functionality and products' protection. However, we cannot succeed alone, and upcoming legislation must set the right conditions to foster investments in infrastructures and ensure access to secondary raw materials. Persistent failure by member states to meet existing waste collection and recycling targets of the WFD and PPWD*, if not urgently addressed, will jeopardise compliance with the recyclability at scale requirements set out in the PPWR by 2035. Achieving the recyclability and reuse goals of the PPWR requires a real step-change and substantial investments in collection, sorting and recycling and reuse infrastructure. The EU must provide targeted support to enhance the collection and processing of all packaging materials, which should be achieved by setting up robust and cost-efficient EPR schemes. The recognition of the earmarking principle in the WFD revision would also be critical to enable such investments. Additionally, the EU must lay out the conditions to move existing reuse pilots from niche to large scale distribution systems. Furthermore, establishing a well-functioning Single Market for secondary raw materials based on harmonised end-of-waste criteria, the legal recognition and full deployment of all recycling technologies, will be key to the attainment of the PPWR recycled content targets.

A new Circular Economy Act, as envisioned in the Political Guidelines for the new legislative mandate, must reflect these priorities. Moreover, keeping the decarbonisation and sustainability goals on track will be fundamental to ensure that the efforts and investments that our industry has undertaken to achieve net-zero and sustainable solutions do not dissipate.

* On 25 July 2024, the European Commission opened infringement procedures for failure to meet waste collection and recycling targets against all 27 member states. [July infringement package: key decisions \(europa.eu\)](https://ec.europa.eu/commission/presscorner/detail/en/ip_24_1234)

2.

Strengthen the Single Market and deploy an industrial strategy for competitiveness and decarbonisation

As emphasised in the reports by Enrico Letta* and Mario Draghi** a robust European market is essential for the competitiveness of European businesses. It can drive economic growth and innovation by creating scale, removing unnecessary red tape and fostering an enterprise-friendly environment.

To maintain its leading position in global markets, the EU needs its industry to transition towards climate neutrality, with decarbonisation and competitiveness going hand in hand. For this transition to succeed, EU policymakers must create a more supportive environment that facilitates scaling up and securing the EU's industrial leadership by continuing to attract investments in R&D and innovation.

▶ **Driving Competitiveness and Sustainability in Packaging**

Europe needs a strong industrial strategy for technologies and value chains that drives competitiveness, sustainability, and innovation. This strategy must develop a coherent vision that enhances skills and prioritises a regulatory framework with science-based policies and thorough impact assessments, providing businesses with the stability they need for long-term planning.

Significant investment in new technologies, infrastructure, R&D and innovation is indispensable for achieving a resilient and sustainable economy and packaging industry. Targeted investments in sorting and recycling infrastructure, supported by efficient EPR schemes and the legal recognition of new technologies, such as chemical recycling, are essential to enhance packaging circularity.

▶ **Deepening the European Single Market to Drive Growth and Innovation**

Preserving the integrity of the Single Market is key to ensure that packaging materials, including secondary raw materials, and packaged goods can move freely across the EU to reach European consumers and businesses. Over the past years, EU leaders have called on EU institutions to enhance legislative efforts and for Member States to implement the necessary measures to achieve a fully integrated Single Market. However, enforcement at the national level has been uneven and our industry has witnessed an increase in national trade barriers in the

form of divergent packaging requirements. These flaws are significantly hampering the ability of our industry to scale circularity in Europe.

In the upcoming legislative mandate, policymakers must uphold the Single Market principles across all EU policies and legislation. To achieve this, coherence in policy-making and harmonisation in the implementation of EU legislation are essential, together with sanctioning of infringements of internal market rules. Policymakers need to ensure the timely and uniform adoption of EU laws across all Member States, reduce bureaucratic hurdles to make the Single Market more accessible and efficient, promote digital solutions to facilitate cross-border trade and operations, and strengthen mechanisms for monitoring and enforcing compliance to ensure all Member States adhere to agreed regulations while ensuring compliance from third countries placing packaging and packaged products on the EU market.

* Enrico Letta - [Much more than a market \(April 2024\) \(europa.eu\)](#)

** Mario Draghi - [The Future of EU Competitiveness \(September 2024\) \(europa.eu\)](#)

3.

Enhance Social Cohesion, Skills and Consumer Protection

Europe is keen on promoting social cohesion, protecting consumers and developing skills so that everybody is ready for the green and digital transition.

▶ **Assess the Social Impact of Green Policies**

Our industry is fully aligned with these goals, therefore investing in skills and ensuring consumer protection remain top priorities for the packaging industry. Most importantly, it is necessary to assess thoroughly the social impact of green policies and create solutions that, in a context marked by inflation and high-living costs, do not impinge on low-income households but rather serve society at large, without compromising our journey towards decarbonisation.

▶ **Preserve packaging functions to protect consumers**

Packaging is an integral and essential part of any product supply chain. The lack of availability of sufficient and appropriate packaging can put at risk the security of essential systems such as the food, pharmaceutical, hygiene and personal care sectors, while also disrupt products' distribution and availability across the entire EU. Policy and legislative measures to further drive the sustainability of the packaging value chain must ensure that packaging functions are not undermined.

▶ **Investing in the Packaging Industry of the Future**

To close the competitiveness and innovation gap between the EU packaging industry and global competitors, and create the packaging industry of the future, Europe must nurture young talents and invest in reskilling and upskilling its workforce. We urge EU institutions to engage in a strategic partnership with the private sector to foster vocational schools and dedicated training programmes with technical universities.