

PPWR Guidance: Remaining questions for retailers and wholesalers highlight the need for greater clarity

With only five months to go before the first parts of the Packaging and Packaging Waste Regulation (PPWR) kick in, the Commission published on 30 March 2026 a guidance document and a Frequently Asked Questions document. After initial review by EuroCommerce, the association representing retailers and wholesalers still has several open questions and sees gaps that remain unsolved, underscoring the need for further clarification and flexibility in the application of the rules.

Christel Delberghe, EuroCommerce Director General, said: “As our sector, the supply chain and member states are getting closer to implementation, companies expect clear answers to practical problems when it comes to packaging and packaging waste. We also ask member states to fully exploit the regulation’s built-in flexibility and exemption mechanisms, while maintaining a coherent overall approach in the Single Market.”

As retailers and wholesalers prepare for implementation, they raised strong concerns over the continued lack of clarity surrounding the Packaging and Packaging Waste Regulation. They stress the urgent need for additional guidance from the European Commission, alongside the swift adoption of the secondary legislation foreseen under the PPWR, as well as clear implementation provisions at national level.

Exploiting the regulation’s built-in flexibility and exemption mechanisms is essential to protect well-functioning systems already in place and to avoid unnecessary and costly double investments in new infrastructure. Waste collection and return schemes differ widely across Member States, shaped by varying economic structures and local realities, such as the impact of tourism – specifically in southern Europe. In several countries, effective systems are already delivering strong results, such as the return system in Germany or the collection system in Belgium, and must be preserved. These differences, EuroCommerce underlines, must be properly reflected in future guidance and secondary legislation.

“To ensure the PPWR can be implemented in a realistic and workable way, further clarification from the Commission is urgently needed,” said Christel Delberghe. “This includes clearer rules for reusable beverage packaging and unambiguous definitions of key concepts, such as the role of the manufacturer. We are ready to support this process by sharing practical experience from our sector.”

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Contact:

Daniela Haiduc | Director of Communications, haiduc@eurocommerce.eu

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