

Retailers warn of disruption risks as EU packaging rules deadline is approaching: call for clarity and grace period of 12 months to address remaining issues

With less than two months before the first provisions of the EU's Packaging and Packaging Waste Regulation (PPWR) start to apply, Europe's retail and wholesale sector is raising urgent concerns about gaps in guidance and the practical feasibility of implementation.

Retailers and wholesalers are calling on EU Environment Ministers, meeting in Luxembourg on 25 June, to agree on a clear and realistic plan for rolling out the new rules. Without further clarification and support, the sector warns of potential supply disruptions, unnecessary costs, and unintended environmental consequences.

Need for clarity and workable timelines

The PPWR introduces a completely new set of requirements for businesses and national authorities. However, key technical details remain unclear just weeks before implementation.

To ensure a smooth transition, the sector is urging:

- Clear, practical guidance from the European Commission on outstanding technical issues.
- Realistic timelines that reflect operational supply chain constraints
- and strong stakeholder consultation.

Retailers stress that an enabling framework is essential, one that recognises technical limitations while maintaining flexibility for implementation.

Christel Delberghe, Director General of EuroCommerce representing Europe's retailers and wholesalers, commented: *"We are just weeks away from implementation, yet key questions remain unanswered. This is not sustainable. EU ministers must now provide clarity, flexibility, and a realistic transition period to avoid serious disruption across Europe's supply chains."*

Call for 12-month transition period

Given the imminent deadline of 12 August, the sector is calling for a minimum 12-month grace period. This would allow businesses and authorities to:

- Understand and interpret new requirements
- Test and adapt to the new rules
- and address unforeseen challenges

During this period, the association says focus should be on guidance and support, rather than enforcement and punitive action.

Key implementation concerns

The sector highlights several priority issues that require urgent clarification:

- **Food packaging**, including empty packaging, transferred to a European economic operator before 12 August 2026 should not be subject to PPWR rules, even if filled afterwards.
- **Clearer guidance on compliance requirements**, particularly regarding:
 - the Declaration of Conformity
 - and the implementation of the PFAS restriction under Article 5.Such guidance should reflect the diversity of contractual relationships within the supply chain and provide clear, practical compliance pathways.
- **PFAS restriction** under Article 5: in the absence of a harmonised EU testing method, the association urges Member States to recognise the Commission guidelines as well as the methodology under preparation by the PFAS Task Force as a temporary reference. Without these, companies face legal uncertainty and delays in issuing Declarations of Conformity.
- **Adequate transition periods** must be ensured between the adoption and application of all future secondary legislation.
- **Feasible requirements and exemptions are needed for reuse to avoid investment risks:** Significant investments are already underway across Member States to build and expand DRS schemes. The sector warns that overlapping requirements on reuse could result in
 - Duplication of infrastructure
 - Increased costs
 - Inefficient allocation of resources
 - Potential negative environmental outcomes.

Retailers are calling for further structured dialogue on this issue, particularly with regard to the application of exemption mechanisms under Article 29(18).

A call for coordinated action

Retailers and wholesalers are urging EU institutions and Member States to work closely with businesses in the coming months to ensure that the PPWR delivers its intended environmental benefits without disrupting Europe's supply chains or placing disproportionate burdens on operators.

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