

PPWR, representation of the European plastics industry and decision-making processes in Brussels

Thomas De Meester, Head of European Plastic Films (EuPF) | Think Circular, LINPRA, 18 November 2026

AGENDA

From Brussels decisions to factory floor

01	**Who we are**	EuPC and its plastic films sector group, EuPF
02	**How EU decisions are shaped**	PPWR implementation, the Waste Expert Group and the Commission’s consultants
03	**EuPF priorities**	Priority files and the latest from the Waste Expert Group
04	**Circular Economy Act**	What to expect and what it should deliver

WHO WE ARE

European Plastics Converters (EuPC) is the Brussels-based trade association representing plastics converters at EU level.

EuPC's mission is to give plastics converters a strong, united voice in EU policymaking, to lead the industry's transition to a circular and climate-neutral economy, and to secure a competitive, innovation-friendly regulatory environment in which converters can thrive.

1989
Year established

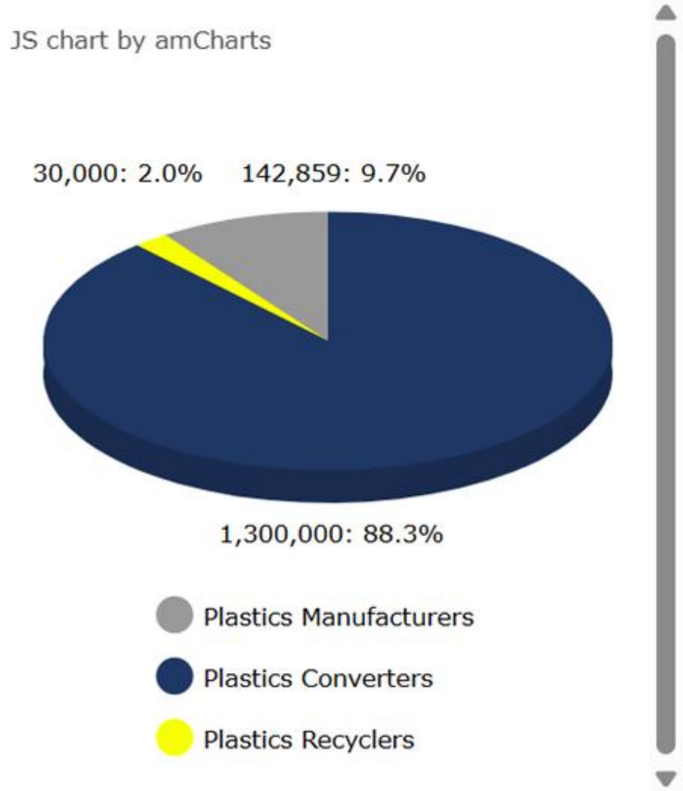
48,000
Converting companies represented

50 mn t
Products produced annually

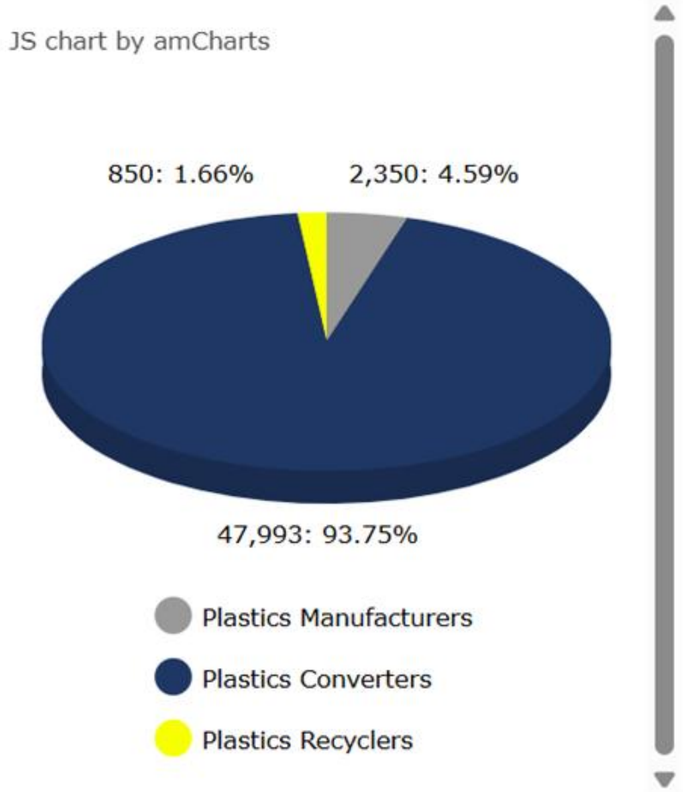
42
National & European Associations

Plastics Converters are the Heart of the Plastics Industry

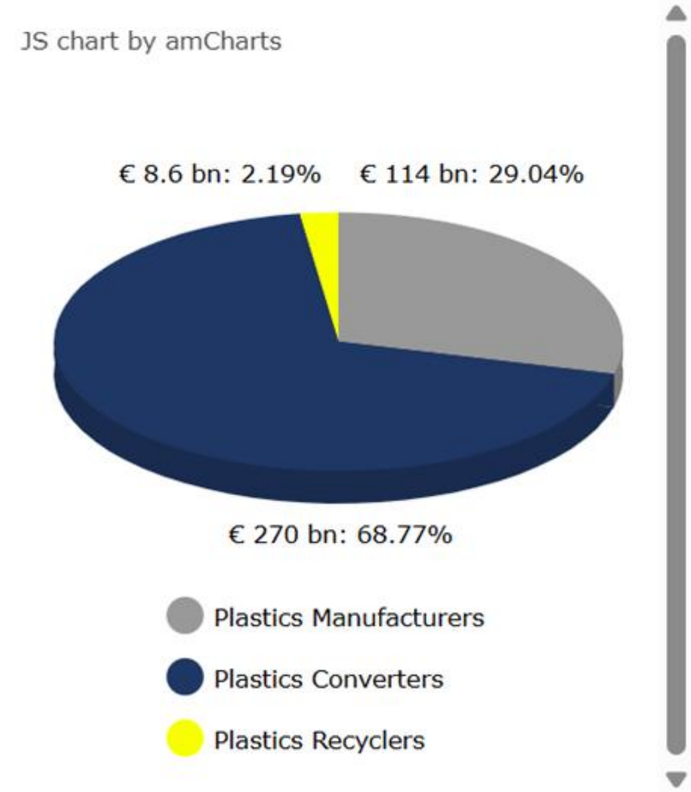
Employees in the European Plastics Industry



Companies in the European Plastics Industry



Turnover in the European Plastics Industry

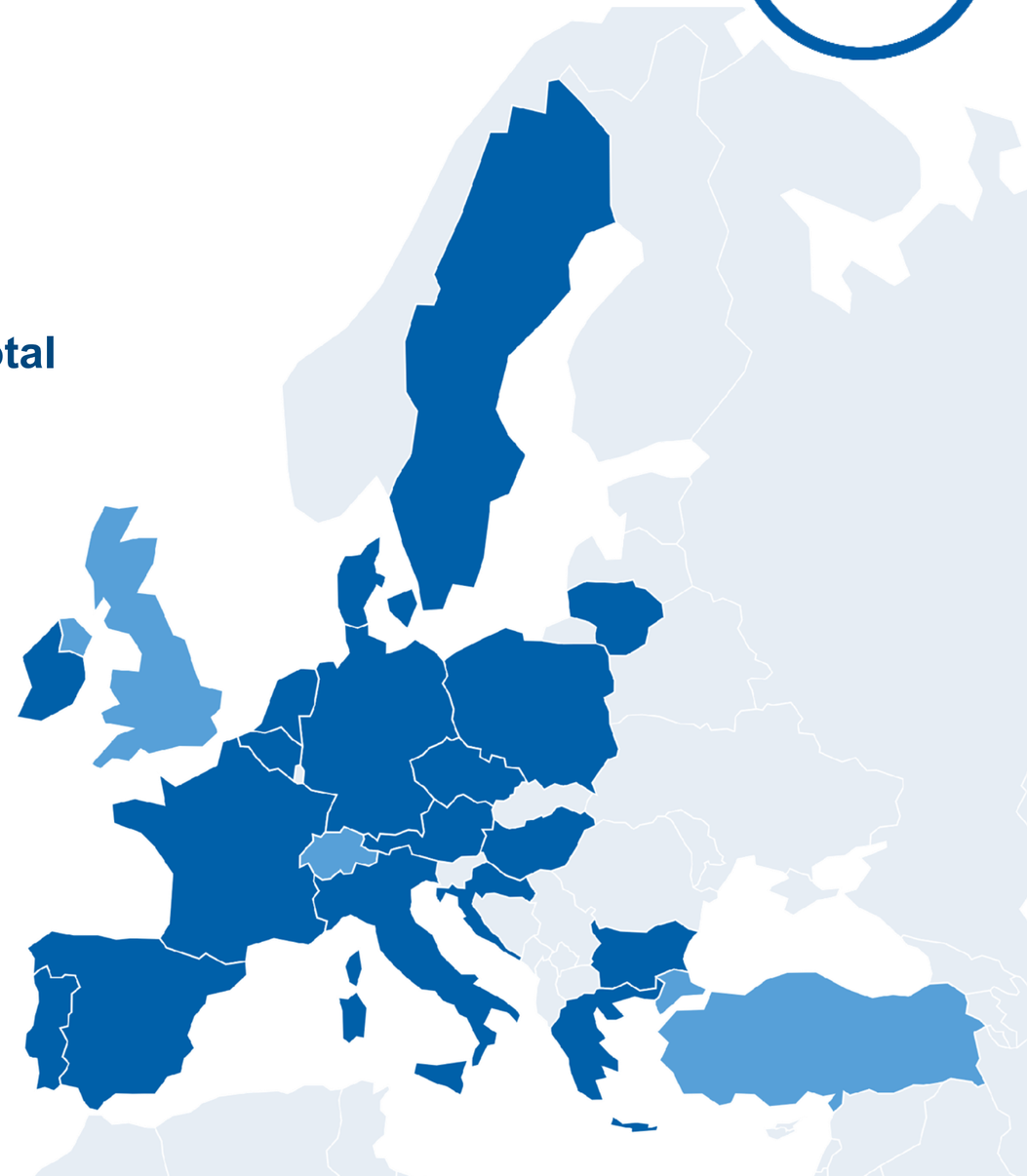


NATIONAL MEMBERSHIP

EU-wide representation

24 **National Plastics Associations represented in total**

National plastics associations across the European Union, together with the United Kingdom, Turkey and Switzerland.



EU-wide representation

United Kingdom, Turkey, Switzerland

MEMBERS

8 Sector Groups

Sensitive & Food Contact Plastics Regulatory Expert Panel

European Polycarbonate Sheet Extruders

Engineering Polymer Shapes for Machining

European Masterbatchers & Compounders

European Plastic Films

MedPharmPlast Europe

European Plastic Energy Storage Systems Association

PET Sheet Europe

MEMBERS

10 Sector Organisations

European Association of FEF and PEF Insulation Manufacturers

European Carpet and Rug Association

European Trade Association of PVC Window System Suppliers

European Resilient Flooring Manufacturers' Institute

European Single Ply Waterproofing Association

European Association of Flexible Polyurethane Foam Blocks Manufacturers

Plastic Sheets and Films Association

Plastics Recyclers Europe

European Plastic Pipes and Fittings Association

Vinyl Films & Sheets Europe

European Plastic Films (EuPF)

Who we are	The EuPC sector group for Europe’s plastic film converters
What we do	A sustainable, innovative and competitive future for Europe’s plastic film sector
How we work	With policymakers, value chain partners and researchers, backed by science
Since 2025	Five founding companies in June 2025, 17 members today

Our members



































17 member companies across stretch, shrink, agricultural, industrial and packaging film, recycling and raw materials.

Where implementing rules are shaped

PPWR in brief: *applies since 12 August 2026; 11 implementing acts, 4 delegated acts and 3 guidelines still to come.*

Commission (DG ENV)

Drafts the act

Consultants

Studies and workshops

Waste Expert Group

Member States and stakeholders

Have Your Say

Public feedback

Member States

Vote or object

Member States decide: national authorities vote, so LINPRA and Lithuanian authorities matter.

Priorities for Q4 2026

Q1 2026 | **Q2 2026** | **Q3 2026** | **12 Aug** | **Q4 2026**

Entry into application

Art. 29(18)
Delegated Act 2026/429
Adopted 25 Feb, entered into force 26 May

Commission Notice Guidance
Published 30 March

Frequently Asked Questions
Live since 30 March

Art. 5
PFAS protocol

Art. 9(6)
Standardisation request
on composting

Art. 44(14)
Implementing Act EPR

Art. 5(8)
Delegated Act
on lead-crystal glass

Art. 12(6) & Art.13(2)
Implementing Acts Labelling
- Waste sorting by consumers → JRC
- Reusable packaging, DPP, recycled & bio-based content → Ramboll

DELAYED
due 12 Aug 2026, no draft yet

Art. 7(8)
Implementing Act
on calculation and verification of recycled content

Art. 7(9)
Delegated Act
on sustainability criteria for plastic recycling

Art. 7(10)
Implementing Act
on equivalence for admitting recycled content from third countries

Priorities for 2027

Q1 2027

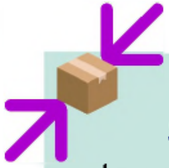
Q3+Q4 2027



Art. 25(6)
Guidelines on packaging bans



Art. 30(4)
Implementing Act
on calculation rules and methodology regarding reuse targets



Art. 10(3)
Standardisation request
to update the existing harmonised standard on the methodology for the calculation and measurement of compliance with packaging minimisation requirements for the most common packaging types and formats



Art. 6(4)
Delegated Act
on design for recycling criteria and recycling performance grades for categories of packaging listed in Table 1 of Annex II

EuPF priority files: timeline

1 Annex V grouped packaging | **2 Reuse methodology and scope** | **3 Recycled content and bio-based**

23 Oct 2026
ALL FILES
DG ENV Waste Expert Group on PPWR

4 Nov 2026
ANNEX V
Eunomia stakeholder workshop on grouped packaging

18 Nov 2026
REUSE (ART. 29/30)
Ramboll workshop on reuse targets and minimum rotations

31 Dec 2026
RECYCLED CONTENT (ART. 7)
Legal deadline: calculation, verification and import rules; drafts delayed

13 Jan 2027
BIO-BASED (ART. 8)
Deadline: public consultation closes

12 Feb 2027
ANNEX V & REUSE
Deadlines: Annex V guidelines; minimum rotations (Art. 11(2))

30 Jun 2027
REUSE (ART. 29/30)
Deadline: reuse calculation methodology

Reuse: pallet wrapping and straps (Art. 29 and 30)

Art. 29 in brief: *reuse targets for transport packaging. 100% within a company or a Member State (29(2)-(3)); 40% by 2030 for other transport within the EU (29(1)), 70% aspirational by 2040.*

Art. 29(2)-(3): settled

- **Delegated Act 2026/429** exempts pallet wrapping and straps from the 100% reuse requirements
- **In force** since 26 May 2026, based on the latest economic and scientific data

Art. 29(1): no exemption yet

- **40% target** still applies to cross-border transport
- **Commission:** "alternatives available on the market" allow operators to meet it
- **The same evidence applies,** with longer transport distances

Art. 30: calculation method

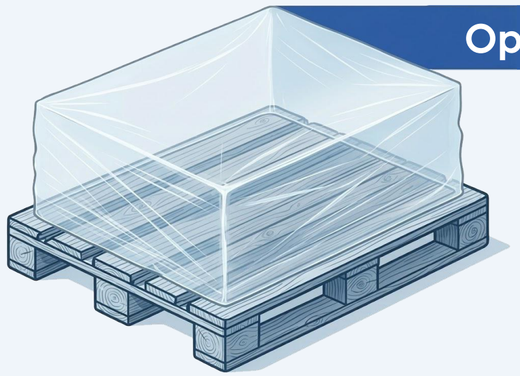
- **Defines how reuse rates** are calculated; implementing act expected in 2027
- **Consultant proposal:** one component = one unit
- **Ramboll workshop:** 18 November

Joint industry ask: define the transport unit in the implementing act and count listed formats by weight. An exemption from Art. 29(1) remains the preferred solution.

ifeu LCA: reuse options significantly increase GHG emissions

ifeu's April 2025 peer-reviewed ISO 14044 LCA covers Art. 29(1)-(3): 5 single-use vs. 3 reuse systems, 7 applications. A follow-up study tested EU-wide distribution conditions.

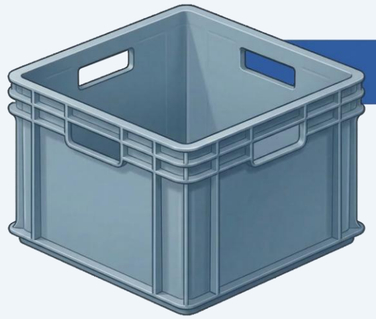
Optimized single use



Single-use plastic pallet wrapping has the lowest environmental impact.

Follow-up: no break-even at any distance (0–1,000 km) in 5 of 7 categories

Reuse options



Reuse options increase GHG emissions (+35% to +1700%)

Reusable systems require **heavier, less adaptable packaging, leading to under utilization, worsening their footprint.**

Longer Art. 29(1) distances widen the gap, due to return transport

Conclusion: **Optimized single-use provides the best environmental outcome**

RDC study: a significant economic impact of reuse obligations

The April 2025 RDC Environment study assesses the impact of Art. 29(1)-(3) on 8 sectors (agriculture, milk, water, glass, cement, construction, retail, plastics). **A follow-up annex** quantifies the investment needed.

Findings:

Additional €4.9 bn per year in costs

Follow-up annex: €4.7–5.3 bn additional CAPEX for new end-of-line equipment

~€1 bn stranded assets from premature write-off of existing machinery

Figures cover 8 sectors only; the cost for the wider EU economy would be substantially higher

EuPF reading: reuse obligations would create a system-wide economic burden

Costs driven by:

Higher logistics (increased in 29(1)) and **cleaning needs**

Reduced pallet efficiency

Need for dual systems (reuse + single-use for exports)

Export competitiveness undermined: EU exporters face higher costs than non-EU competitors

Internal market weakened: companies within the EU must manage parallel systems

The consultant's proposal: one component = one equivalent unit

> *"Economic operators that use transport packaging … shall ensure that at least 40 % of such packaging **in total** is reusable packaging" (Art. 29(1))*
> **Draft guidance (In Extenso):** every listed component counts as a separate equivalent unit (Art. 30(1)), regardless of its size, weight or function.

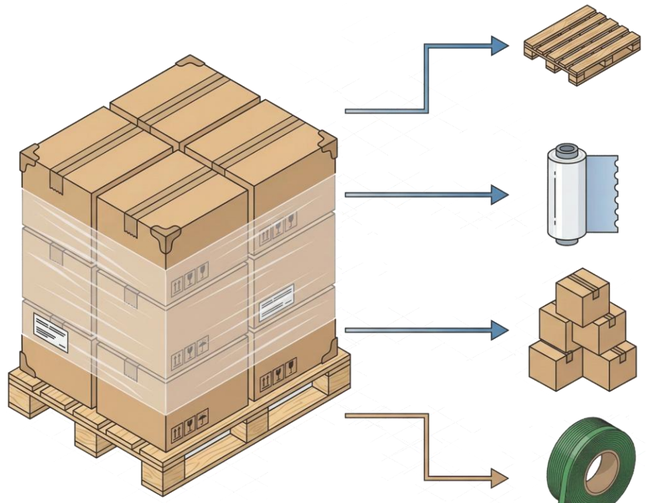
One typical palletised load

1 reusable pallet + 1 pallet wrapping + 3 straps

Cardboard boxes: not listed, out of scope

Calculated reuse rate, same reused pallet:

- Pallet + wrapping: 1 of 2 = **50%**
- + 1 strap: 1 of 3 = **33%**
- + 3 straps: 1 of 5 = **20%**



→ **reuse rate 20%**

Pallet: reusable

Wrapping: single-use

Boxes: out of scope

Straps: each one counted

The same fully reused pallet passes or fails the 40% target depending only on how the load is secured.

Grouped packaging: Annex V, row 1

Annex V in brief: *bans single-use plastic grouped packaging from 2030, unless necessary to facilitate handling.*

Joint industry proposal

- **Handling exemption** from 4 units OR 1 kg
- **Sales packaging** is not grouped packaging
- **Our evidence:** handling, stability, hygiene, food waste, environment

Eunomia's preliminary approach

- **Workshop** 4 November; feedback due 18 November
- **Criteria** stricter than the industry proposal

Next: Commission guidelines due by 12 February 2027.

Recycled content (Art. 7): Call for Evidence and the Commission's views

Art. 7 in brief: *minimum recycled content in plastic packaging from 2030, rising by 2040.*

Call for Evidence

- **Ran** until 16 September 2026, on three draft acts
- **Packaging manufacturers:** clear calculation rules, practical compliance, food-grade recyclates
- **Equal rules** for imports

The Commission's views

- **No revision** of targets or exemptions
- **Sufficient feedstock:** no shortages, no safeguard clause
- **10% contact-sensitive target** stays

Imports: six Member States are designing an equivalence mechanism, "strong but not burdensome".

Bio-based plastics (Art. 8): a new consultation

Art. 8 in brief: *the Commission may propose rules for bio-based feedstock in plastic packaging.*

What the PPWR provides

- **Art. 8(2)(b):** possible additional targets for bio-based feedstock
- **Art. 8(2)(c):** bio-based instead of recycled content where food-contact recycling is not available

Commission's view and consultation

- **Commission:** a bio-based target on top of recycled content
- **Consultation:** until 13 January 2027

Open questions (no EuPF position yet): is a bio-based target needed at all? If so, on top of recycled content, or as an alternative?

Circular Economy Act: EPR as a lever for recycling at scale

Recycled at scale (PPWR Art. 6): *from 2035, packaging must be collected, sorted and recycled in practice.*

Where we are

- **Now expected** 2 December 2026
- **Repeatedly postponed**
- **Key element:** harmonised EPR rules

EuPF expectations

- **EPR fees** fund collection and sorting of films
- **Fee revenues reinvested** in recycling capacity
- **Harmonised rules** across Member States

Our message: well-designed EPR is the main lever to reach 55% plastic packaging recycling by 2030.

Industry must not only implement decisions, but also shape them

What good rules need

- **Environmental benefit:** demonstrated, not assumed
- **Workable in practice:** realistic targets, limited administrative burden
- **Level playing field:** same scrutiny for imports
- **Competitiveness:** no costs without benefit

How to shape them

- **Adoption is only the start:** secondary acts decide
- **Engage early and throughout,** with data and practical cases
- **Work through associations:** LINPRA, EuPC, EuPF
- **Member States matter:** they vote and can object

Interesting links

ifeu & RDC studies and follow-ups

Understanding the Impacts of Switching to Reusable Pallet Packaging

European Plastic Films