
POLICY ISSUES

1. ENVIRONMENT/ CIRCULAR ECONOMY

GERMANY: INDUSTRY ALLIANCE CALLS FOR POSTPONEMENT OF PPWR AMID CONCERNS OF SYSTEM BREAKDOWN

In a joint appeal to the German Federal Environment Minister Carsten Schneider (SPD), 17 German associations from the waste management, packaging and consumer goods industries are calling for a postponement of the effective date of the new EU Packaging and Packaging Waste Regulation (PPWR). The regulation is currently scheduled to come into force on 12 August 2026. The signatories are calling for this date to be postponed to 1 January 2027 in order to avoid serious legal and structural risks for the systems and companies affected. The associations argue that starting the new regulations in the middle of the year would lead to a multitude of practical problems. For example, the date of application would fall in the middle of the financial year, which would result in two different legal regimes being applied in parallel – with implications for key terms such as ‘manufacturer’ and ‘producer’ in the context of extended producer responsibility (EPR). This could lead to those previously obliged to make payments suspending or reducing them because it is unclear who will be responsible in future. Link to full article – [here](#)

Source: EUWID pulp and paper 17 July 2025

EC LAUNCHES CONSULTATION FOR UPCOMING CIRCULAR ECONOMY ACT

The European Commission launches consultation and call for evidence for upcoming Circular Economy Act. The Commission launched today (1 Aug) a [public consultation and the Call for Evidence for the upcoming Circular Economy Act](#). This consultation will also allow the Circular Economy Act to align with key initiatives, such as the Competitiveness Compass, the Single Market Strategy, the Steel and Metals Action Plan and the implementation of recently adopted legislations, such as the Eco-design for Sustainable Products Regulation, the [Packaging and Packaging Waste Regulation](#) and the Critical Raw Materials Act. Link to [article](#)

- All stakeholders are encouraged to participate in consultation using the [Have Your Say](#) portal.

Source: European Commission 1 August 2025

EUDR: GUIDANCE DOCUMENT ON EUDR PUBLISHED IN THE OFFICIAL JOURNAL

On 12 July, a Commission notice on a Guidance Document for Regulation (EU) 2023/1115 on Deforestation-Free Products [was published](#) in the Official Journal. Destined to manufacturers, suppliers and operators, the document aims to help ensure harmonised implementation of the EU Deforestation Regulation (EUDR), ahead of its upcoming application date set to 30 December 2025. The guidance document aims to clarify definitions within the EUDR provisions, the scope of application to different products, and addresses enforcement timelines and questions of legality and certifications.

Source: OPP 13 August 2025

COMMISSION SIMPLIFICATION OF ADMINISTRATIVE BURDENS IN ENVIRONMENTAL LEGISLATION

The On 22 July, the Commission [launched](#) a call for contributions on the content of the future omnibus on the simplification of administrative burdens in environmental legislations. The consultation will be open until 10 September.

- The call for evidence will feed into an Environmental Omnibus in Q4 2025, which will take the form of a draft Regulation.
- The call for evidence does not identify which pieces of existing environmental legislation might be simplified. Instead, it merely refers to a limited number of policy areas that may be included in the forthcoming Environmental Omnibus but acknowledges that the final list could evolve once the Commission has examined the results of the call for evidence.
- After the stakeholder input has been gathered, this initiative will aim to reduce administrative burden stemming from environmental legislation in the areas of circular economy, industrial emissions and waste management.

The Commission has indicated that the aim is to reduce the administrative burden without affecting the environmental objectives under the existing environmental legislation. Link to article: [here](#)

Source: European Commission 22 July 2025

ESPR: SUMMER CONSULTATIONS ON THE FUTURE DIGITAL PRODUCT PASSPORT

On July 25, the Commission [published four questionnaires](#) to prepare the impact assessment on the implementation of this mechanism, which is provided for in the 2024 Ecodesign Regulation. One of these surveys is aimed at waste management companies (recyclers, repairers, reconditioners, etc.), which will be among the main users of these digital passports, to obtain information on the composition and design of products that have become waste. Another survey targets companies that will have to attach this passport to their products and add a series of information (environmental footprint, durability, repairability, presence of hazardous substances, etc.). The other two concern consumers and the associations that protect them, who will be able to obtain information about products via the passport, and the national authorities responsible for market surveillance. Stakeholders are thus being consulted on the technical design and operation of the passport, which will be established in a delegated act. The consultations are open until August 27.

Source: Contexte 31 July 2025

WASTE FRAMEWORK DIRECTIVE

On 16 July, MEP Sand Smith (EPP, The Netherlands) submitted a [question for written answer](#) to the Commission on the proposed Dutch waste treatment tax and its compatibility with the self-sufficient principle in the WFD.

Source: FEAD July 2025

GREEN CLAIMS DIRECTIVE

Concerned about the fate of the Green Claims Directive, around 30 organisations (companies, advertising sector organisations, certification bodies and NGOs such as Client Earth, ACT Climate Labs, ecos, EEB) [wrote](#) on 17 July to the Danish prime minister, Mette Frederiksen, and to the environment minister, Magnus Johannes Heunicke urging them to resume negotiations on the file.

2. PRODUCT SAFETY / CHEMICAL

EU PROPOSES MONITORING MEASURE FOR BPA, BPS, AND OTHER BISPHENOLS IN FOOD

The European Commission (EC) is working on a proposed Recommendation on monitoring of the presence of bisphenol A (BPA), bisphenol S (BPS), and other bisphenols in food with follow-up investigations to identify the source of their unintentional presence. The proposed recommendation specifies that monitoring should be conducted by Member States with the active involvement of food business operators, as well as food contact business operators.

The proposed EC Recommendation specifies that the investigation should only be conducted to identify the source of contamination when the level of BPA or BPS in the food is 0.01 mg/kg (10 µg/kg) or greater (although the method of analysis used for the analysis of BPA and BPS in food and in food contact materials should have a limit of quantification of 1 µg/kg). According to the proposed Recommendation, “the monitoring and outcome of the investigations will enable to establish the level of BPA that is to be considered as unavoidable presence from sources that cannot be controlled and that is not related to the intentional use of BPA.” Please note that, to our knowledge, this proposed Recommendation has not yet been finalized and may be further modified before adoption.

Source: *Packaginglaw.com* 4 August 2025

ECHA PUBLISHES GUIDANCE ON DRINKING WATER DIRECTIVE

The European Chemicals Agency (ECHA) has published [guidance documents](#) that support the implementation of the [European positive lists](#) under the [Drinking Water Directive](#) (DWD) (EU) 2020/2184. The Implementing Decisions laid down rules for the application of the DWD, namely, establishment of a Positive List of starting substances, compositions and constituents authorized for use in materials that come into contact with drinking water (Decision (EU) 2024/367), methodologies for testing and accepting substances, compositions and constituents to be included in the European Positive Lists (Decision (EU) 2024/365), and establishment of procedures and methods for testing and accepting final materials as used in products that come into contact with drinking water (Decision (EU) 2024/368).

Source: *Packaginglaw.com* July 2025

REACH SIMPLIFICATION

On 24 July, several industry associations addressed a [letter](#) to Commissioners Séjourné, Roswall and Secretary-General Juhansone. The letter states that they still have concerns regarding key aspects of the REACH simplification.

Source: *FEAD* July 2025

3. SUSTAINABILITY

GLOBAL PLASTIC TREATY TALKS ARE 'DIFFICULT', EUROPEAN COMMISSIONER SAYS

GENEVA, Aug 12 (Reuters) - Negotiations to debate the terms of a global treaty to curb plastic pollution are proving difficult, the European Union environment commissioner said on Tuesday. "I would agree the discussions so far have been difficult," said Jessika Roswall, European Commissioner for Environment, Water Resilience and Competitive Circular Economy. Link to Article [here](#)

Source: Reuters 12 August 2025

EU COMMISSION ADOPTS SUSTAINABILITY REPORTING STANDARD FOR SMALL COMPANIES

The Commission has adopted a recommendation on voluntary sustainability reporting for small and medium-sized companies (SMEs). The standard adopted in the recommendation will reduce administrative burden on SMEs by making it easier for them to respond to requests for sustainability information from large companies and financial institutions which are subject to mandatory reporting under the Corporate Sustainability Reporting Directive (CSRD) and which have such SMEs in their value chains. The voluntary standard for SMEs (VSME) was developed by EFRAG, the Commission's technical advisory body for sustainability reporting. The Commission encourages large companies and financial institutions that seek sustainability information from SMEs to base their requests on the voluntary standard as far as possible. SMEs may also wish to voluntarily report sustainability information to improve their access to sustainable finance and better understand and monitor their own sustainability performance, thereby improving their resilience and competitiveness. Link to full [article](#) .

Useful Documents [Press release](#), [Questions and answers](#), [Recommendation \(English version\)](#)

- [Annex 1 to the Recommendation \(English version\)](#)
- [Annex 2 to the Recommendation \(English version\)](#)

Source: European Commission 31 July 2025

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Source: Contexte 31 July 2025

ENERGY-INTENSIVE INDUSTRIES – COMMON DECLARATION:

France, Austria, Spain, Greece, Hungary, Italy, Luxembourg, Poland, Slovakia and the Czech Republic have published a [common declaration](#) on reinforcing European energy-intensive industries. The declaration calls for the optimization of the function of the European carbon markets to ensure the stability of the carbon price under the Emissions trading system as well as the Carbon Border Adjustment Mechanism.

Source: FEAD July 2025

RENEWABLE ENERGY DIRECTIVE (RED):

On 24 July, the European Commission [announced](#) that it had decided to open infringement procedures by sending letters of formal notice to 26 Member States (every EU Member except for Denmark) for failing to communicate to the European Commission the full transposition of the provisions of the RED III into national law, which was due for May 2025.

Source: European Commission 24 July 2025

EU PUBLIC CONSULTATION

- Simplification of administrative burdens in environmental legislation
 - o Type of act: Proposal for a regulation
 - o [Feedback period: 22 July 2025 - 10 September 2025](#)
- EU strategy to boost global climate and energy transition
 - o Type of act: Communication
 - o [Feedback period 07 August 2025 - 11 September 2025](#)
- Circular Economy Act
 - o Type of act: Proposal for a regulation
 - o [Feedback period 01 August 2025 - 06 November 2025](#)
- Product legislation – ensuring futureproof rules DDP
 - o Type of act Proposal for a regulation
 - o [Feedback period 14 July 2025 - 02 September 2025](#)

STAKEHOLDERS POSITIONS

Circular economy Act

- Ellen MacArthur Foundation, CISL, ECOS, EEB, IEEP, Reuse and RREUSE: [The Foundation signs a joint letter on the EU Circular Economy Act](#)
- [Glass for Europe - Glass for Europe: prepares input for three new public consultations over the summer](#)
- [Joint Position Paper: Ending the era of single-use: a Manifesto for change](#)
- [EUROPEN - Delivering on the Circular Economy Act: Step 1](#)

ESPR – Ecodesign for sustainable products Regulation

- DUH, ECOS and EEB, Zero Waste Europe supports strong and horizontal EU rules on recycled content in critical raw materials (CRM) as part of the Ecodesign for Sustainable Products Regulation (ESPR), as well as for other materials—i.e. ferrous metals, cobalt, other plastics streams, etc.—with high traceability requirements
 - o [Ecodesign preparatory study for product specific measures on scarce, environmentally relevant and critical raw materials and on recycled content](#)
- European Environmental Bureau (EEB) [response to public consultation on Destruction of unsold consumer products: EEB response on the derogations to the ban](#)

EUDR- Deforestation free products Regulation

- [BusinessEurope](#): Letter to Jessika Roswall on implementation of the EU Deforestation-Free Products Regulation