
PPWR

DOCUMENT: COMMISSION ISSUES GUIDELINES FOR PACKAGING RULES

The European Commission has issued a [notice](#) clarifying the new Packaging and Packaging Waste Regulation. The notice was part of the Commission's targets for "future simplification" that the executive announced today alongside its environmental omnibus that rolls back several laws. The PPWR, expected to apply from August 12, 2026, lays out rules to reduce packaging waste, increase recycling, and phase out unnecessary single-use packaging. The new document offers guidance and spells out the requirements for what is defined as "packaging" and which businesses can be considered as producers or manufacturers of packaging.

"As it takes time for economic operators and member states to adapt to these new requirements, the Commission is issuing this guidance document, which is interpreting these provisions for the purposes of providing clarity and a uniform application across the EU," reads the document.

The document clarifies the legal provisions on PFAS restrictions in food contact packaging, stating that there is no distinction in the PPWR "between unintentionally present and intentionally added PFAS," stressing that there is no transitional period for such packaging and that it must comply with PFAS limits by the application date.

The notice also lays out rules on packaging waste sorting, reusable transport packaging, reporting obligations, reuse targets, and recycled content — and clarifies how the PPWR works with the Single-Use Plastics Directive on packaging bans.

Source: Politico 10 December 2025

THE COMMISSION WITHDRAWS THE DELEGATED ACT EXEMPTING PLASTIC FILM AND PALLET STRAPPING A FEW HOURS AFTER PUBLISHING IT.

On 10 December, the Commission published the public consultation of the draft delegated act stemming from the packaging regulation. The text, which we are [publishing](#), was expected at the end of the year. It exempts pallet strapping and straps from the target of 100% reuse of packaging used for the transport of products by 2030. When the packaging regulation was adopted in 2024, the Commission undertook to study the feasibility of the target for this type of packaging, in response to pressure from German MEPs. In the draft act, the European executive states that the transition to reusable packaging would require 'significant initial investments in automated solutions that are not yet sufficiently developed'. When asked about the reasons for this withdrawal, the Commission services did not provide any further details at this stage.

Source Contexte 12/12/2025

CIRCULAR ECONOMY/ ENVIRONMENT

EU AGREES ON NEW CLIMATE TARGET FOR 2040

The European Union on 9/12/25 reached a deal on a new climate goal for 2040. Negotiators from the European Parliament, the European Commission and the Council of the EU — representing the 27 EU governments — agreed to set a target for cutting planet-warming emissions by 90 percent by 2040 compared to 1990 levels.

The final text states that at least 85 percent of these emissions cuts will need to take place in the EU, while up to another 5 percent can be outsourced to poorer countries abroad by purchasing international carbon offsets.

Negotiators spent five hours discussing the new target, disagreeing over how strict the criteria to ensure the integrity of carbon credits purchased should be and whether private companies should be allowed to use them to comply with their obligations under the EU's carbon pricing mechanism known as the Emissions Trading System (ETS).

The deal, seen by POLITICO, calls on the EU to buy high-quality carbon credits that "are subject to robust safeguards" including not infringing on human rights or contributing to environmental damage. The agreement now needs to be officially endorsed by the Parliament's plenary and EU ministers before it becomes law.

The Commission is also already working on a package of legislations to implement this new target and which should be presented through 2026, starting with the revision of the ETS before the summer break.

Source: Politico 10 December 2025

THE EU IS RACING AGAINST TIME TO SAVE ITS RECYCLED PLASTIC INDUSTRY

After years of prosperity, many recycled plastic factories are closing down in Europe. To stem the decline, the Commission is preparing to present emergency measures for the sector. But faced with aggressive international competition, the EU will have to act quickly, or risk losing part of its industry. Warnings about the health of the European recycled plastics industry have been mounting in recent months. After years of growth and investment, boosted by ambitious European circularity rules, the sector is now 'collapsing', warned Estelle Brachlianoff, CEO of Veolia, in an opinion piece published in [Les Échos](#) at the end of November. Forty-five factories have closed since 2023, according to Recycling Europe. And the trend is accelerating since the beginning of the year, around 15 facilities have already disappeared. Five of them were located in France, a country that had previously been relatively unaffected.

Source Contexte 16/12/2025

EUDR

COUNCIL AND PARLIAMENT AGREE TO DELAY AND REVIEW EU DEFORESTATION LAW

The Council of the EU and the European Parliament on 4 December agreed to simplify, review and delay the European Union's anti-deforestation law.

"The aim is to ensure simplification of the deforestation regulation so it can be implemented effectively and without unnecessary burdens, while keeping its environmental ambition," said the Danish presidency of the Council in a written statement.

The EU's anti-deforestation law (EUDR) requires that companies' police their supply chains to ensure that any commodities they use, such as palm oil, beef or coffee, have not contributed to deforestation. In a bid to appease unhappy trade partners and businesses, the Commission in October proposed to make the law effective Dec. 30 with some simplifying amendments and a six-month grace period for companies that struggle to comply.

But now, under the deal struck today, businesses will have at least one more year to comply with the rules. It will apply for large operators and traders as of Dec. 30, 2026, and for small operators as of June 30, 2027.

The agreement introduces simpler due diligence requirements. By next April the Commission must review the law's impact and its administrative burden.

The co-legislators also agreed to exclude printed products from the scope of the regulation, as requested by the Parliament. Books are “sources of content and information and should not be treated as commodities,” said Federation of European Publishers President Sonia Draga last week. “The omnibus reaps yet another victim: forests and their protections against the endless consumption of pulp and paper,” said Mateus Carvalho, a consumption reduction campaigner at the Environmental Paper Network.

Source: Politico 05 December 2025

THE PARLIAMENT’S ENVI COMMITTEE VOTES IN FAVOUR OF THE EUDR DELAY, BRINGING ABOUT FURTHER SCRUTINY AND SIMPLIFICATION TO ONE OF THE BLOC’S MUCH-AWAITED LAWS

ENVI COMMITTEE BACKS EUDR AGREEMENT: Members of the European Parliament’s environment committee on Monday voted in favour of a [deal](#) to review, simplify and apply a further one-year delay to the application of the EU’s anti-deforestation law, or EUDR. A final plenary vote on the file will be held this Wednesday. The interinstitutional agreement is expected to pass again.

Source: Politico 16 December 2025

PARLIAMENT ADOPTS AMENDMENTS TO DEFORESTATION REGULATION

By 405 votes to 242 and with 8 abstentions, MEPs have [adopted](#) the amendment to the Deforestation Regulation in Plenary. It was voted through thanks to a right leaning coalition seeing the Renew group votes split evenly between in favour and against, while the EPP, P/E and ESN all voted in favour of the deal.

The targeted amendments will postpone the application of the Regulation and simplify reporting obligations for smaller economic operators. The text will now be awaiting the Council’s approval before it can be published in the Official Journal.

Source: DeHavilland 17 December 2025

COUNCIL FORMALLY APPROVES TARGETED REVISION OF EUDR

The Council has formally [adopted](#) a targeted revision of the EU regulation on deforestation-free products (EUDR) to simplify its implementation while ensuring that operators, traders and authorities are adequately prepared.

The revision streamlines due-diligence obligations, postpones the application of the regulation for all operators until 30 December 2026, and grants an additional six-month transition period for micro and small operators.

To further reduce administrative complexity, certain printed products such as books, newspapers and printed images are excluded from the regulation’s scope, reflecting their limited deforestation risk.

In addition, the revision requires the European Commission to carry out a simplification review and present a report by 30 April 2026 assessing the regulation’s impact and administrative burden, particularly on smaller operators, and to accompany it with legislative proposals where appropriate.

Following formal adoption, the revised regulation will be published in the Official Journal and will enter into force three days after publication.

Source: DeHavilland 19 December 2025

COUNCIL APPROVES CONCLUSIONS ON EU' ENVIRONMENT 2030 TARGETS

The Council has [adopted](#) conclusions on 'Europe's Environment 2030 – Building a more climate resilient and circular Europe' in the context on the 8th Environment Action Programme (EAP). Member States have acknowledged lack of progress on the objectives set out by the EAP as showcased by the 2024 mid-term evaluation report and the report of the European Environment Agency published recently.

In their [conclusions](#) Member States reiterated their support to the overarching goals of the EAP and called for continued actions towards its targets. One of their key demands for the Commission is for a new proposal to add an annex to the ongoing programme with actions for the period post-2025.

The conclusions welcome the Commission's ongoing and upcoming initiatives seeking to foster Europe's environmental protection, especially around the development of climate resilience and the circular economy. These initiatives include the upcoming Circular Economy Act and Integrated Framework for Climate Resilience as well as the recently issued Bioeconomy Strategy.

The conclusions call amongst other issues for the streamlining of climate resilience issues across the Union's legislative agenda with a view to create new economic opportunity while addressing critical risks posed to the Union's competitiveness ambitions. The Member States also invite the Commission to take stock of existing measures regarding circular economy and to address barriers and bottlenecks, which would be consistent with the ongoing simplification agenda.

Source: DeHavilland 17 December 2025

ENVIRONMENT COUNCIL

THREE'S A CROWD: In a last hurrah for its EU presidency, Denmark will have three of its ministers chair the Environment Council in Brussels on 16 December. That means Green Transition Minister Jeppe Bruus, Environment Minister Magnus Heunicke and Climate Minister Lars Aagaard. We've got the full roundup for you on [what to expect](#).

Be better, be circular: Ministers will take stock of various recent "state of the environment" reports detailing how well (or poorly) Europe's ecosystems are doing. Much like the European Environment Agency recommends, the ministers are expected to call for more to be done so the region can transition to a circular economy, focusing on the efficient use and reuse of materials in its conclusions on "Europe's Environment 2030 — Building a more climate resilient and circular Europe."

According to the Finnish environment ministry, the conclusions "underline the need to create a functioning internal market for recycled materials, strengthen the harmonization of producer responsibility and ensure that all operators, including those from outside the EU, comply with the same environmental and product safety requirements."

The time is now: Another EU diplomat stressed that "when you look at those reports, it becomes quite clear that there is a need for action in many spheres, but climate resilience and circularity definitely are amongst those areas where there is a need for real action and for real priority."

Bioeconomy strategy in review: EU countries will also debate the Commission's bioeconomy strategy — a grand plan to replace fossil fuels in products like plastics, building materials, chemicals and fibers with organic materials that regrow, such as trees and crops.

Comments so far: "The strategy is well connected to strengthening the EU's competitiveness and resilience and to transitioning away from fossil fuels," said Finnish Environment Minister Sari Multala. "Finland's systematic advocacy work is visible in the end result." The Dutch infrastructure and water management ministry [highlights](#) that while some member countries emphasize the importance of a regional approach to the bioeconomy, others have pushed for a single harmonized strategy.

Source: Politico 16 December 2025

OMNIBUS

THE EUROPEAN PEOPLE'S PARTY WELCOMES THE COMMISSION'S NEW 'SIMPLIFICATION' PACKAGE AND LOOKS FORWARD TO THE NEXT STEPS.

The new omnibus presented on 10 December and dedicated to **environmental legislation** 'is a step in the right direction', according to the group's vice-president, Dolors Montserrat. Her German colleague Peter Liese [believes](#) that this eighth omnibus package, which amends the directives on industrial emissions, waste and permit procedures for industrial projects, is 'the most comprehensive' to date. While he welcomes the Commission's announcements of further simplification initiatives to come, particularly on water, the MEP would have liked more 'clarity' on the Habitats and Birds Directives, which he considers 'obsolete'. The EPP is calling for them to be revised. The omnibus package has not been received in the same way on the other side of the chamber. The Greens group has denounced it as an act of 'deregulation' to 'satisfy polluters'.

Source: Contexte 12/12/2025

MIXED RECEPTION OF THE ENVIRONMENTAL OMNIBUS IN THE COUNCIL

In the Environment Council, Commissioner Jessika Roswall presented the Commission's Environment Omnibus, adopted on 10 December, designed to reduce complexity without diluting rules. Measures include simplifying circular-economy legislation, discontinuing the SCIP database, easing industrial emissions requirements, and limiting farmers' reporting obligations, with faster permitting through streamlined procedures.

Several Member States broadly welcomed simplification but called for caution and safeguards. Finland and Luxembourg backed reducing reporting and speeding permitting only where protection is maintained; Ireland warned that accelerating procedures can create practical and legal risks for national authorities and requires consistency and clarity across systems.

Multiple delegations questioned whether speed alone solves complexity. Slovenia and Estonia warned that shortening deadlines without easing legal requirements increases burdens and jeopardises high-quality assessments; tacit authorisations were widely rejected. The Netherlands requested missing impact assessments, and many supported the French non-paper calling for a coherent, integrated approach.

Member States also flagged next steps and scope. Italy urged greater ambition aligned with competitiveness goals and strategic projects (e.g., critical raw materials); Poland welcomed progress but asked for more. France proposed bringing packaging rules into the Omnibus, and Greece supported proposals while calling to revisit the Nature Directives under the simplification agenda.

Source: DeHavilland 17 December 2025

BOOSTING EUROPEAN COMPETITIVENESS

The Industrial Accelerator Act is one of the first concrete actions for the entire industry that the EU executive presented since it took office in December 2024. While it was first aimed at speeding up permitting for the decarbonization process, the European Commission decided to broaden it up to include a "Made in Europe" preference in public procurement and conditionalities for foreign investments in the EU.

The Commission is slated to present its proposal on Jan. 28. Cyprus will be in charge of negotiating the Council of the EU's position before it goes into interinstitutional negotiations.

Made in Europe and conditionalities for foreign investments in the EU could be tricky topics for governments. France has been a fierce advocate of local content requirements, while other countries are wary. How can the local content requirements be designed without turning them into national favouritism? How should they go about sectors that are stronger outside the EU? Questions on

whether this is in line with international trade rules will also come up. On conditionalities, the questions will be how far is the EU ready to go? Will it include mandatory technology transfers or will it be limited to make sure investments lead to job creation and creating value within the EU borders?

Everyone talks about the urgency to act and support European industry, but success will depend on how far the EU goes on local content requirements and conditionalities for foreign investments.

Source: Politico 16 December 2025

A ROAD MAP FOR THE SINGLE MARKET

Announced by European Commission President Ursula von der Leyen during her State of the Union speech in September, the single market road map will lay out clear targets for 2028 to complete the European internal market in topics ranging from capital, services, energy, telecoms, the 28th regime and the fifth freedom for knowledge and innovation.

Governments have been calling for the Commission to act on the single market, while the EU executive has been playing the ball back into the countries' court arguing that they are the ones keeping up barriers. In May, the Commission identified 10 of the most urgent barriers to tackle — dubbing them the Terrible Ten — and has been focussing its work on addressing them. Denmark has picked three — from labelling to company law — for EU countries to prioritize.

Completion of the single market will depend on the political will of EU countries to let go of their particularities, while the Commission should step up enforcement of the rules. The EU executive has been slowly distancing itself from infringement procedures, saying these take up a lot of time and are often met with raised shields from EU governments. Industrial Strategy Commissioner Stéphane Séjourné says the EU executive is trying a more consensus-driven approach, but it can only do so much without the willingness of EU countries.

The desire to complete the single market has been gaining momentum, but progress will depend on the extent to which governments are able to let go of national barriers and stop going beyond EU rules.

Source: Politico 16 December 2025

REPORTS

EUROSTAT PUBLISHED REPORT ON WASTE DATA COLLECTION

Eurostat has prepared a [report](#) issued by the Commission taking stock of the current state of waste statistics and their quality. It provides a positive outlook of the situation and notes that it provides a comprehensive and reliable source of information on waste generation and treatment in the EU.

However, the report notes that improvements could be made to better assess the role of waste in the development of Europe's circular economy. This is due to gaps in the data on pre-treatment, reclassification of waste and international trade in waste, preventing an estimation of waste as a value-generating resource.

Source: DeHavilland 17 December 2025

JRC PUBLISHES REPORT INFORMING THE IMPLEMENTATION OF ECODESIGN REGULATION

The JRC has published a scientific [report](#) looking at the methods for defining classes of performance and the content of the future ESPR label. In doing so, it aims to provide guidance on the development of the Ecodesign Regulation and its implementation.

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It proposes a multi-step approach to select relevant product aspects and parameters appropriate for classes of performance, propose a method to develop classes of environmental performance based on the Product Environmental Footprint (PEF) single score and the single impact category, and develop classes of performance for circularity aspects/parameters.

Source: DeHavilland 17 December 2025
