
POLICY ISSUES

EUROPEAN COMMISSION PREPARES A NOTICE DOCUMENT TO CLARIFY PPWR

Paulina Dejmek Hack, Head of the Environment Commissioner's Cabinet, spoke at the "Circular future summit" organized by fast-food lobby 360° Foodservice on May 21. "We are aware that this is an exhaustive and complex piece of legislation", she acknowledged, before highlighting the volume of secondary legislation still to come.

- To help the sector find its way around, the Commission is working on guidelines and frequently asked questions. The timetable for publication has not been specified.
- On the subject of the packaging regulation, Commissioner [Jessika Roswall](#) indicated in a written reply [to several MEPs](#) dated May 22, that the study on possible exemptions from re-use quotas for certain types of transport packaging (plastic films for pallets and straps) will be finalized by next July. On this basis, the executive could propose a delegated act with exemptions.
- Finally, Paulina Dejmek Hack announced that the public consultation on the future circular economy legislation, expected by the end of 2026, will open in June

Source: Contexte 360° Foodservice conference 21 May 2025

COMMISSION LAUNCHES SINGLE MARKET STRATEGY

On 21 May the European Commission presented a strategy to reboot the Single Market. This new strategy contains more than 50 proposals with the aim to make it easier for businesses to trade in the Single Market, with an emphasis on dismantling barriers, creating jobs and stimulating growth. The new Single Market Strategy identifies fragmented rules on packaging, labelling and waste as one of the ten most harmful barriers to the free movement of goods and services in the EU.

With a GDP of €18 trillion, it is the world's second-largest economy and provides the scale, strength and legal certainty businesses need to grow.

- Link [Single market strategy](#) , [Factsheet](#) ,
- [Press release: a simpler Single Market to make companies choose Europe](#)
- Link [Politico Article](#)

Source: European Commission 21/05/2025

COMMISSION CONFIRMS PREPARATION OF AN "ENVIRONMENTAL OMNIBUS" ON EXTENDED PRODUCER RESPONSIBILITY FOR THE END OF 2025

According to Contexte, the single market strategy presented on May 21 by Stéphane Séjourné provides for a proposal for a so-called 'omnibus' text in the last quarter of 2025 to "reduce reporting obligations" under EPR schemes and limit their frequency. The executive also wants to remove the "unjustified" obligation for a company to designate an agent in each country where it operates.

- The Commission presents it as an "environmental omnibus to facilitate compliance" by companies with EPR obligations.
- In all likelihood, this will involve amending the Waste Framework Directive, which sets the framework for EPR. This amendment will be followed, a year later, by the promised circular economy legislation, which is intended to be broader to address the "fragmentation created by heterogeneous national EPR regimes" and "reform the criteria for removal from waste and by-product status".

Source: Contexte 22 May 2025

CIRCULAR ECONOMY - FRENCH PLASTIC PACKAGING MANUFACTURERS CLAIM FRENCH TEXTS ARE INCOMPATIBLE WITH PPWR.

On April 30, they sent a series of legal notes, consulted by Contexte, to the Directorate General for Risk Prevention of the French Ministry of Ecological Transition to alert the State to “major incompatibilities” with the PPWR, which will apply from August 12, 2026. In their focus several decrees implementing the Agec law, notably [the QCE decree](#) on consumer information on the environmental characteristics of packaging, and the [re-use decree](#).

- In particular, manufacturers believe that the end of single-use packaging by 2040, the ban on plastic packaging for fresh fruit and vegetables, and the ban on lightweight bags are incompatible with European regulations.
- They are asking the government to ensure that, “in the meantime, incompatible French provisions [are] applied flexibly, as they will ultimately become obsolete”. According to our information, Bercy is currently working on transposing the regulation into French law, but the vehicle has not yet been decided.

Source: Contexte 28 May 2025

EUDR - COMMISSION PUBLISHES FIRST COUNTRY BENCHMARKING LIST

The [European Commission has published the first official countries benchmarking](#) list according to their level of risk under the EUDR. The aim of this classification is to adapt due diligence obligations to the risks of deforestation.

- All 27 EU countries have dodged the “high risk” label under the bloc's own anti-deforestation regulation, in a long-awaited classification unveiled by the European Commission today.
- The [benchmarking](#) is part of the implementation of the EU Deforestation Regulation (EUDR), which ranks countries as high, standard, or low risk.
- The low-risk category includes countries such as the United States, China, Australia and Canada. Those that will be labelled “high risk” are Belarus, Myanmar, North Korea and Russia, as first reported by Euractiv. The rest are in the standard category.

Link to [Euractiv article](#)

Source: European Commission and Euractiv 22 May 2025

EUDR - A MAJORITY OF AGRICULTURE MINISTERS IN FAVOR OF A NEW REVISION OF THE DEFORESTATION REGULATION

At the Agriculture Council meeting on May 26. Eighteen countries supported a “simplification” of the regulation. The subject had been put on the table by Luxembourg and Austria, who are [calling](#) for the creation of a new category of countries where the risk of deforestation would be “zero risk”, and whose products would be exempt from many of the obligations set out in the text.

In addition, a few days before the Agriculture Council, [Sweden had also circulated a note](#) to member states calling for a further revision of the text, accompanied by proposed amendments, which Contexte publishes. During the debate, only France, through its Deputy Permanent Representative, opposed a new reopening of the text, which had already been amended at the end of 2024 to postpone its entry into force. “The text must now enter into force without delay”, he argued. However, he too recognized “major concerns” in the sectors concerned, and called for “all margins for simplification and reduction” to be mobilized. For its part, [WWF “condemned”](#) the Luxembourg and Austrian proposal, pointing out that only a few months ago, the Member States refused to modify the content of the text.

Source: Contexte 27 May 2025

EUDR: ATTACKS ON THE DEFORESTATION REGULATION RESUME IN THE EUROPEAN PARLIAMENT TOO

The full implementation of the deforestation regulation must be “postponed until the most pressing technical and legal problems have been resolved”. The request comes from some forty MEPs, mainly from the right and extreme right (EPP, ECR, PEF, ESN), who sent a letter to this effect to the European Commission on May 14. A handful of centrists and a socialist also signed the letter. Believing that the regulation risks “imposing disproportionate burdens on small and medium-sized businesses”, they are calling for a further postponement of the text’s entry into force, as well as a simplification of the formalities to be carried out for small operators. The elected representatives also take up the idea of creating a new category of countries with “zero risk” of deforestation, which would be exempt from the obligations set out in the legislation.

Source: Contexte 27 March 2025

REACH REVISION PLANS UNDER CRITICISM

The Competent Authorities for REACH and CLP (CARACAL) presented their plans for a revision of the REACH regulation; receives heavy criticism from industry and civil society; still under development and expected to be adopted by the *European Commission* in Q4 2025.

The [documents shared](#) during the meeting reflect ongoing internal discussions and are considered a work in progress.

- The proposed revision aims to streamline bureaucratic processes for both companies and authorities, modernize the regulatory framework, and strengthen enforcement.
- Industry representatives have expressed concern that the changes could lead to increased bureaucracy. In contrast, some civil society organizations view the plan as a step toward deregulation and argue that it is not in line with the objectives of the European Chemicals Strategy for Sustainability.

The legislative proposal for the REACH revision remains under development and is expected to be adopted by the European Commission in October or November 2025. Following its adoption, an eight-week public feedback period will allow stakeholders to submit their input.

Source: Food Packaging Forum 13 May 2025

THE EU’S WATER CRISIS BY THE NUMBERS

The European Commission’s long-awaited Water Resilience Strategy, set to come out in June, aims to “[make Europe water-resilient](#)” by improving the quality and management of the bloc’s waters and protecting it against the consequences of climate change.

But solving Europe’s water crisis is no easy feat. More than 40 percent of the EU’s population is already experiencing water scarcity — and data shows that without swift action, more and more people will lose unfettered access to this essential resource.

- European Parliament press release - <https://www.europarl.europa.eu/news/en/press-room/20250502IPR28214/meps-call-for-bolder-eu-action-on-water-resilience>

Source: European Parliament and Politico 27 May 2025

REPORTS

FACTUAL SUMMARY REPORT OF TARGETED STAKEHOLDER CONSULTATION ON EU HARMONISED WASTE SORTING LABELS AS PART OF THE PACKAGING AND PACKAGING WASTE REGULATION

As the European Union (EU) continues to deal with the increasing quantities of packaging waste and its environmental impact, one area of focus is the harmonisation of waste sorting labels across EU Member States. This effort aims to for easier and more accurate packaging waste sorting in the EU. In this context, between 2 September and 30 September 2024, the European Commission Joint Research Centre (JRC) invited stakeholders to a targeted consultation to gather insights on key aspects of the waste sorting labels currently being developed. The consultation concerned the design and implementation of material-based waste sorting labels as part of the Packaging and Packaging Waste Regulation (PPWR).

<https://publications.jrc.ec.europa.eu/repository/handle/JRC141019>

Source: JRC, European Commission March 2025

STAKEHOLDERS POSITIONS

PPWR

- [New FEFCO & Commission Guidance on PPWR](#) – available on demand
- [EUROPEN launches an interactive PPWR Guidebook](#) to help businesses navigate the PPWR!
- [The European construction products industry calls for realistic targets on the re-use of transport packaging under the new PPWR](#) By *Construction Products Europe*
- [Analysis – EU Packaging and Packaging Waste Regulation \(PPWR\)](#) - By ECOS

SINGLE MARKET STRATEGY

- [BEUC](#): EU simplification plans should keep GDPR and on-product labelling strong
- [BusinessEurope](#): Single Market Strategy: a promising start, but long-term impact must be secured
- [Europen](#): Europe's Single Market Strategy: from vision to action

WASTE FRAMEWORK DIRECTIVE

- [Joint Industry Statement Calls for Ban on State-Run PROs in Upcoming New Circular Economy Act](#) By *Europen, FEFCO, CITPA, Cosmetics Europe, A.I.S.E and others*

GREEN CLAIMS

- [Industry call for clarity and quality in Green Claims Directive negotiations](#) By *Europen, Cepi, FESI and others*

BIOECONOMY

- [European Bioeconomy driving industrial competitiveness: Cepi Policy asks for the European Bioeconomy Strategy](#) By *Cepi*
- [The European Circular Economy Stakeholder Platform: Finding a sustainable future](#) For the EU, 2025 will be a circular economy year. We expect a Clean Industrial Deal, a Bioeconomy Strategy and a Circular Economy Act. And yet, one of the most significant obstacles to circularity is fragmentation.

MEETINGS

EU GREEN WEEK

- When/where: 03 - 05 June // European Commission
- Focus: Policy debates on " Circular Solutions for a Competitive EU" theme and expert workshops
- Organised by the European Commission, Directorate-General for Environment, with invited speakers from the world of politics, business, NGOs, and academia.
- [Brussels conference \(europa.eu\)](https://europa.eu)

SUSTINABLE PACKAGING SUMMIT

- When/where: 10-12 November 2025, Utrecht
- Focus: debates and expert workshops
- [Link to event](#)