

NON-PAPER of the Czech Republic, [...]

on the implementation of Annex V of the Packaging and Packaging Waste Regulation

Context

The undersigned Member States would like to draw attention to an important implementation aspect of the Packaging and Packaging Waste Regulation (PPWR), related to the restriction of certain plastic grouped packaging formats under Annex V and **the exemption for packaging that is “necessary to facilitate handling”**.

While the PPWR foresees the publication of Commission guidelines by February 2027, regulatory, operational and investment decisions with long-term implications are already being taken by economic operators across the Union. Timely clarification is therefore crucial for ensuring predictability and effective implementation. This objective aligns closely with the European Commission’s competitiveness and simplification agenda, which seeks to streamline regulatory frameworks to bolster the long-term productivity of EU industry.

Implementation challenge

The interpretation of the concept “packaging necessary to facilitate handling” is central to the practical application of Annex V. In the absence of timely and sufficiently clear and operational guidance, there is a risk of legal uncertainty, diverging national approaches and inconsistent treatment of comparable logistics operations across the internal market.

In professional logistics and distribution systems, certain forms of plastic grouped packaging are necessary to facilitate handling throughout the supply chain, including wrapping solutions (e.g. shrink wrap), in particular where goods are repeatedly stabilised, moved, stored and redistributed in the course of transport, distribution and retail logistics up to the final sale. This underlines the importance of assessing handling requirements in a coherent manner across the broader logistics value chain.

Relevance for policy objectives and competitiveness

This issue has a wide-ranging horizontal relevance, affecting multiple sectors of the European economy and thousands of packaging and processing lines. Complex operational ambiguities faced by economic operators entail significant investment needs across the Union and may force unnecessary large-scale capital expenditure decisions, which in aggregate amount to several billions of euros, often with long depreciation periods.

Timely and proportionate clarity is therefore essential not only for environmental effectiveness, but also for maintaining the competitiveness of European industry and the smooth functioning and efficiency of supply chains.

Way forward

In light of the above, the undersigned Member States consider that **further practical guidance from the European Commission on the interpretation of “packaging necessary to facilitate handling”** ahead of the guidelines due in February 2027 would significantly support a harmonised and proportionate application of the PPWR.

Such guidance should help narrow down the interpretation of this concept and provide a clear framework in a manner that acknowledges the existence of plastic grouped packaging solutions

that are genuinely necessary for logistics and handling purposes and that assesses handling requirements in the context of the entire value chain.

We therefore **invite the Commission to prioritise this implementation issue** and to engage with Member States in a timely manner, ahead of the publication of the guidelines, in order to ensure legal certainty, safeguard competitiveness, and fully support the environmental ambitions of the Packaging and Packaging Waste Regulation.