

PPWR: why a “stop the clock” makes sense

A request that can work

For ProFood, the most credible path is not to ask for a general stop of the entire PPWR. It is more defensible to request a targeted “stop the clock”: suspend/postpone the Article 25 and Annex V bans until the Commission has (i) completed a comparative, performance-based impact assessment covering end-of-life, food protection and food waste, alternatives and costs, including (a) what the market would switch to and whether this would mean more imports, and (b) whether the rules can be checked and enforced equally for EU and imported packaging and (ii) published implementable Article 25(6) Guidelines (due by 12 February 2027 which should be though also based on the above assessment).

Core principle

The PPWR is fundamentally designed to accelerate the transition towards a circular economy, by promoting recycling, use of secondary raw materials and reducing lifecycle impacts. Any implementation measure should therefore be assessed against its contribution to circularity, not only material substitution.

Backup option: suspend application of the bans until 2035.

Key evidence

- **Risk of undermining circularity through bans without dedicated evidence:** the Commission’s impact assessment estimates the overall benefit for the TOTAL PPWR at less than 1% of annual EU CO2 emissions (which count for about 6% of the worldwide CO2 emission) and it does not count the food waste the bans may trigger. Moreover, within this analysis, there is NO specific impact assessment for Article 25/Annex V bans.
- **Limited scope, high disruption:** plastic packaging for pre-packed fresh fruit and vegetables represents about 1.5% of all plastic food packaging in Europe raising questions on whether banning highly performing formats delivers meaningful circular economy improvements.
- **Existing circular performance already aligned with PPWR objectives:** main formats of fruit and vegetable packaging already contain on average 70% post-consumer recycled content (above PPWR thresholds in 2040) without a mandate. This industry is already delivering circularity in practice (high recycled content, recyclability, established collection streams) sustainable based on PPWR criteria but should be banned
- **Material-based asymmetry contradicting circularity principles:** a paper-based tray with a thin plastic coating can remain on the market, while a tray made largely from recycled plastic would not. The dividing line becomes material type, not circularity or food-protection performance.

Pro Food

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- **Food waste reality:** the EU generates around 59 million tons of food waste each year (estimated value EUR 130 billion). Life-cycle assessments show that replacing effective packaging with lower-performing alternatives increases overall environmental impact.
- **Risk of single market fragmentation:** without harmonized criteria, Member States may define different fruit and vegetable exemption lists and implement divergent regimes which can disrupt the current seamless operational and logistic supply chain operations from the field to the consumer hindering scalable circular solutions already available across the EU
- **Risk of cost increase:** the above disruptions will trigger cost increases. Just for Italy, an estimated sector-wide impact exceeds EUR 1.5 billion; for stone fruit, alternative solutions add around EUR 0.20/kg (a 60-70% increase in packaging costs) hitting an already declining consumption of fresh produce potentially diverting investment away from circular innovation and infrastructure
- **5% plastic-by-mass threshold:** the same expectations on circularity and food protection should apply to formats below the 5% threshold as to any other format - it should not become a shortcut for composite solutions which would weaken overall recyclability and circular material flows.
- **Real example of effective bans - SUPD experience:** the here under statistics show the evolution of import for products banned by SUPD in 2019. The categories that replace plastic single-use items: paper cups, paper/pulps trays/plates/bowls, and wooden cutlery, based on CN codes 48236990, 48236910 and 441990 often means switching to other disposable formats sourced outside the EU, not reducing single-use overall. The data show an increase of 150% of imports for an additional amount of more than 400 m€ per year. This confirms that material substitution alone does not guarantee better circular economy outcomes, but may simply shift environmental burdens across materials and geographies. This is why any Annex V restrictions must be backed by enforceable rules and equal checks for imports (traceability, recycled-content verification, food-contact and REACH compliance).

EU27 imports of single-use substitutes – yearly values and total (2018–2025)

Import origin to EU27	Import value 2018 (€m)	Import value 2025 (€m)	Increase 25 vs (18%)	Total import value 2018–2025 (€m)
China	252,8	614,2	143%	4.15
Turkey	22,5	73,8	228%	49
India	15,0	41,6	177%	26
EU27 total	290,3	729,6	151%	4,90

Sources: ProFood Position Paper (April 2026).

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Area	Why it is sensitive	Possible ask
Article 25 / Annex V (bans)	Bans affecting fresh fruit & vegetables and HORECA without a dedicated comparative assessment (food waste, LCA, alternatives, costs). Risk of removing already circular solutions without demonstrating a net circular economy benefit	Suspend/postpone the bans until Article 25(6) Guidelines are published and a comparative, performance-based impact assessment is completed. Backup: suspend until 2035.
2027 Guidelines: scope and criteria	Without objective criteria and practical examples, the risk of divergent interpretation increases and investment is delayed.	Guidelines with clear in-scope/out-of-scope examples and objective criteria based on recycling performance, recycled content, food protection and impact on waste (not only material type).
Single Market coherence (fruit & veg derogations)	Point 2 of Annex V allows exemptions; without EU-wide guidance, Member States could create 27 different regimes.	One EU-wide fruit & vegetable derogation list and harmonized, verifiable EU criteria valid across all Member States. As alternative, any packaging authorized in 1 country must be accepted in all EU.
Substitution and imports	Material-based restrictions can shift demand to other disposable materials, often imported, without proof of a better footprint.	Before banning/discouraging a format, require proof of genuine environmental gain across the full system: recyclability, recycled content, food protection/shelf life, food waste, imports and enforcement.
Enforcement and level playing field (incl. imports)	If checks are weaker for imports, compliant EU operators are undercut and environmental goals are undermined.	Apply the same PPWR verification, food-contact compliance and REACH scrutiny to imported food packaging as to EU-made products, with verifiable traceability of recycled content.

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