Dear Ms [Redacted],

Thank you for your question to which I’m replying on behalf of [Redacted]. The general provision of Article 61 would come into force and apply in the same way as the other provisions of the Regulation (see Article 65 of the proposed Regulation), when not otherwise provided. However, it is clear that certain elements of this definition will only apply from the specific date as defined in the Regulation. In this way, packaging will have to be designed according to the Commission’s design for recycling rules as of 1/1/2030, and it will have to demonstrate that it is recyclable at scale according to the Commission’s methodology as of 1/1/2035. It is our understanding that before this date, the technical documentation accompanying packaging, when it is placed on the market, will still have to demonstrate compliance with all elements of the definition, but as regards points (a) and (e), this could be done in a more general manner. As regards the design for recycling, in particular, it would be desirable if this assessment was based on the existing industry standards and guidelines, when they are available.

Best regards,

[Contact Information]

From: [Redacted]@fooddrinkeurope.eu>
Sent: Thursday, February 2, 2023 11:58 AM
To: [Redacted]@ec.europa.eu; [Redacted]@ec.europa.eu; [Redacted]@fooddrinkeurope.eu>
Cc: [Redacted]@ec.europa.eu; [Redacted]@ec.europa.eu; [Redacted]@ec.europa.eu; [Redacted]@ec.europa.eu>
Subject: FoodDrinkeurope - question on PPWR for preparation of AMs

Dear [Redacted] and team,

Thank you for the occasions in the previous months to hear your clarifications on the Packaging and Packaging Waste Regulation.
I’m writing to you for a confirmation on the text, as we are working on developing AMs for the food and drink sector in Europe. As the Article 6.1 does not specify by when companies should make sure packaging is recyclable, we would be glad if you could clarify what the timeline would be and also how compliance is envisioned to be proved in the absence of DfR guidelines.

We thank you in advance for your kind collaboration and the support in these critical weeks.

Wish you a good day,

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If you prefer not to receive further communications from us or have any questions concerning our privacy policy, please send an email to gdpr@fooddrinkeurope.eu