

**Statement and proposed amendment on the draft delegated act to establish exemptions from the PPWR’s reuse obligations for wrappings and straps.**

CITPA supports the 100% exemption from the PPWR’s reuse obligations for wrappings and straps for all materials, and proposes the following amendment:

Commission proposal	CITPA amendment
<p>Article 1 Economic operators that use pallet wrappings or straps for stabilisation and protection of products put on pallets during transport are exempted from the 100% reuse requirements of these packaging formats established in Article 29(2) and (3) of Regulation (EU) 2025/40.</p>	<p>Article 1 <i>“Exemption concerning pallet wrappings and straps Economic operators that use pallet wrappings or straps for stabilisation and protection of products, put on pallets during transport are exempted from the <b>100%</b> reuse requirements of these packaging formats established in Article 29<b>(1)</b>, (2) and (3) of Regulation (EU) 2025/40”.</i></p>

Justification :

***Reuse targets on wrappings and straps are economically and technically unfeasible.***

No adequate reusable systems currently exist, as confirmed by the Deloitte study and return logistics and infrastructure for reusable packaging are absent. In addition, automated solutions for reusable packaging are not sufficiently developed yet. Granting a full exemption for pallet wrappings and straps is the most sensible and practical solution. This measure ensures the protection of products, upholds hygiene standards, and supports worker safety, all while preserving the cost efficiency of supply chains throughout Europe. Such an exemption is consistent with the main objectives of the PPWR and avoids placing unnecessary burdens on economic operators.

CITPA members, use wrapping and straps to ship their products and the reuse targets on those would create unnecessary costs and ergonomic risks. Within the food supply chain, maintaining hygiene standards makes the reuse of wrappings and straps even more challenging considering that the process of cleaning demands significant resources and expense, and the materials often degrade quickly, leading to disposal and increased waste generation.

Furthermore, limiting exemptions to intra-Member State transport disadvantage export-driven industries in countries that are export intensive. For many EU countries, export is essential to their commercial activities. By limiting the exemptions for transport only within the same Member State penalises those countries, in a disproportionate way. They will face inability to comply with the provisions thus undermining competitiveness and proportionality.

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About CITPA: CITPA is the International Organisation representing paper and board converting manufacturers. Our Industry produces Paper and Board products in the EU member states with an annual value of 60 billion €.