

Mr Peter Burke
Minister for Enterprise, Tourism and Employment
Chair of the EU Competitiveness Council

By email only: peter.burke@oir.ie

Prague, 17 September 2026

Subject: Packaging and Packaging Waste Regulation and its negative impact on the single market: request for Competitiveness Council intervention

Dear Minister,

I would like to draw your attention to an issue that is causing considerable concern across the European chamber network and request that you raise this under 'any other business' during next week's Competitiveness Council.

The Packaging and Packaging Waste Regulation (PPWR) is not a dossier on which the Competitiveness Council took the lead prior to its adoption and entry into force. Nonetheless, given the detrimental impact it is having on the single market and on SMEs, I trust that you agree that it merits the attention of you and your counterparts when you meet on 24 September.

Eurochambres raised several misgivings relating to the PPWR proposal during negotiations and in July wrote to European Commission Executive Vice President, Teresa Ribera, expressing serious concerns regarding the implementation. We called for postponement of the entry into application of the PPWR by at least two years to a. finalise secondary legislation, b. allow for a targeted simplification of the regulation and c. give businesses and public authorities the necessary time to adapt. Regrettably, this request was disregarded and the PPWR entered into application on 12 August.

While committed to the objectives of the regulation, most businesses simply cannot absorb the negative impact of compliance requirements and lack key information and guidance. Beyond this, the overarching issue that I believe merits consideration in the Competitiveness Council is that **the PPWR undermines the single market, fragmenting the compliance landscape and imposing disproportionate cross-border trade barriers, particularly on SMEs**. At a time when the EU is pursuing the 'One Europe, One Market' roadmap with a hard deadline of the end of 2027, this is strategically counterintuitive, politically contradictory and economically damaging.

Without going into details, the PPWR imposes additional costs and administrative barriers on sellers; these burdens have already led many to conclude that they can no longer afford to trade across borders. It also creates considerable legal uncertainty, not least due to the absence of key delegated and implementing acts and the delayed publication of compliance guidelines.

The single market is a priceless asset for Europe's competitiveness and a vital lever in reviving our economic growth. Regardless of their primary policy objective, EU initiatives across different areas should and must consistently strengthen this asset, not weaken it.

We regret that the Environmental Omnibus seemingly will not deliver significant improvements to the PPWR. By discontinuing negotiations on the proposed suspension of the authorised representative requirement for Extended Producer Responsibility (EPR), the Council has denied businesses even limited relief. While we understand that the Circular Economy Act may include measures to mitigate some of the damage, such as an EU-wide digital one-stop shop for EPR, our businesses cannot wait for two years or more until this comes into effect.

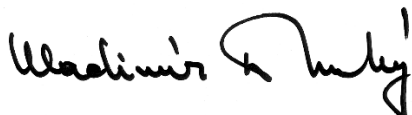
The 'One Europe, One Market' roadmap includes quarterly reviews of progress and regular stocktaking for full transparency. I urge the Competitiveness Council to ensure that the issues raised by chambers on PPWR are factored into these mechanisms. But I repeat that businesses cannot wait, hence my request that you raise this topic during next week's ministerial meeting.

In particular, chambers call on member states to press for:

- An immediate 'stop-the-clock' for the PPWR
- The swift adoption of missing delegated and implementing acts
- Targeted simplification to make the rules workable for businesses
- Renewed Council negotiations on suspending the authorised representative requirement

Thank you in advance on behalf of the European chamber network and business community for taking this request into consideration. Some damage has already been done, but it is not too late to redress the situation if ministers intervene now.

Yours sincerely,



Vladimír Dlouhý
Eurochambres President