

Packaging Industry Recommendations on the 28th Legal Regime: Advancing Competitiveness and Simplification in the Single Market

The undersigned organisations, representing the entire packaging value chain, strongly support the European Commission's initiative to establish a 28th legal regime framework as a key instrument to advance the Union's priorities on competitiveness, simplification, and strengthening of the Single Market.

The creation of a 28th legal regime, aimed at advancing harmonisation of procedures and requirements under different Union acts, represents a unique opportunity to reduce administrative burden and enhance the business environment across the EU. While we acknowledge the regime's potential to support innovative enterprises, including start-ups and SMEs, particularly in areas related to corporate law or taxation, we would like to stress that its benefits should extend far beyond to deliver on the EU's competitiveness and circularity agenda. By addressing existing fragmentation and duplications in regulatory procedures, such as for instance in relation to reporting obligations under environmental legislation or regarding the intra-EU movement of waste, the regime can strengthen the competitiveness and efficiency of all businesses operating within the Union market, regardless of their size or sector.

To realise this potential, we call on the Commission to design the regime as a truly harmonised, digital-by-default, and business-friendly framework that facilitates the free movement of goods and secondary raw materials throughout the Single Market. We therefore recommend that the regime:

- **Advances harmonisation** of procedures and requirements under different Union acts, particularly regarding registration, authorisation, and reporting obligations in environmental legislation.
- **Is leveraged to fully operationalise the principle of mutual recognition**, simplifying and accelerating cross-border administrative procedures, including those related to waste shipments and circular economy operations.
- **Implements a digital-by-default approach**, ensuring interoperability and the gradual replacement of paper-based procedures with streamlined digital solutions. Existing data infrastructures should be used to avoid duplication and reduce costs. Particularly in relation to Extended Producer Responsibility (EPR), a digital one-stop-shop should be established to simplify compliance and reduce administrative fragmentation.
- **Upholds the “once-only” principle**, requiring businesses to provide data only once to authorities, which should then securely share it across Member States. This principle should apply consistently across EU legislation, including the recently adopted Packaging and Packaging Waste Regulation (PPWR).

If carefully conceived, the 28th legal regime can serve as a cornerstone to remove remaining administrative and procedural barriers that continue hindering the free movement of goods and secondary raw materials in Europe, aligning directly with the Commission's strategic goals of harmonisation and industrial competitiveness, genuine simplification, and circularity across Europe.

Signatories:



AGMPM - Association of Greek Manufacturers of Packaging & Materials



CEC - European Footwear Confederation



CICPEN - Czech Industrial Coalition for Packaging and the Environment



EKO-PAK - Packaging Industry Union of Employers



ELIPSO - Les entreprises de l'emballage plastique et souple



EPLF - European Producers of Laminate Flooring Association



EPPA - European Paper Packaging Alliance



EUMEPS - European Manufacturers of Expanded Polystyrene



EUROPEN - The European Organisation for Packaging and the Environment



FEICA - Association of the European Adhesive & Sealant Industry



FEPA - Federation of European Producers of Abrasives



FESI - Federation of the European Sporting Goods Industry



FINAT - The Association for the European Label Industry



IK - Industrievereinigung Kunststoffverpackungen



Istituto Italiano Imballaggio



Konfederacja Lewiatan



Miljöpack



MMFA - Multilayer Modular Flooring Association



NMWE - Natural Mineral Waters Europe



PAKKAUS - The Finnish Packaging Association



Plastics Europe



SZZV - Slovak Association for Branded Products