

**To:** Commissioner Jessica Roswall

25.02.26

**Cc:** Executive Vice-President Ribera

## **Ensuring environmental and climate-positive packaging regulation in the Nordics**

On behalf of the Nordic retail sector, represented by The Danish Chamber of Commerce (Dansk Erhverv), Swedish Commerce (Svensk Handel), The Finnish Commerce Federation (Kaupan Liitto) and The Federation of Norwegian Enterprise (Virke), we wish to initiate a constructive dialogue on the implementation of the Packaging and Packaging Waste Regulation (PPWR).

### **Reuse must be implemented where it makes environmental and economic sense**

The Nordic deposit return systems (DRS) are among the highest-performing in Europe, consistently achieving return rates above 90% and delivering high-quality closed-loop recycling. These systems are trusted by consumers and already contribute substantially to EU packaging and climate targets.

We recognise that reuse can be an important tool in reducing environmental impact. However, reuse is not an objective in itself – it is a means to achieve environmental benefit. Peer-reviewed life cycle assessments from the Nordic region demonstrate that under realistic operating conditions, particularly in geographically dispersed markets with long transport distances, a mandatory shift to reuse-based systems may result in a higher overall climate footprint compared to well-functioning, high-return recycling systems.

Reuse within deposit systems should therefore be implemented where it delivers clear net environmental benefit and where it makes economic sense. Imposing reuse targets in contexts where the environmental and economic case is weak risks diverting resources from solutions that already deliver strong climate performance.

### **Applying Article 29(18) to ensure proportionate implementation**

The exemption mechanisms in Article 29(18) acknowledge that implementation must reflect real-world environmental outcomes. These provisions should be applied where robust evidence shows that mandatory reuse targets would undermine environmental performance compared to high-performing DRS recycling systems.

This is not a rejection of reuse. It is a call for proportional and evidence-based implementation. Circular economy policy must remain focused on measurable results rather than system design in isolation.

A transparent and predictable application of Article 29(18) will help ensure environmental and climate-positive outcomes, avoid unnecessary economic disruption and maintain confidence in the EU's circular economy framework.

Replacing high-performing systems without clear evidence of additional climate benefit would be difficult to justify to consumers, businesses and policymakers alike.

### **Refill requirements must reflect environmental and economic realities**

In addition to the reuse targets for beverage packaging, we would also like to draw attention to Article 28 and the requirement for certain retailers to allocate 10% of their sales area to refill stations.

While we support efforts to reduce packaging waste, the current formulation raises concerns regarding clarity and proportionality. The obligation to "endeavour" to dedicate 10% of sales area lacks clear compliance criteria, creating legal uncertainty and risking inconsistent implementation across Member States.

Retail formats and market conditions vary significantly, and a uniform area-based obligation may impose substantial costs without clear evidence of net climate gains. Refill solutions should therefore only be considered for implementation where they demonstrably deliver environmental and economic benefit, ensuring that policy remains outcome-driven rather than prescriptive in store design.

A fixed space requirement does not in itself guarantee measurable environmental benefits, and regulation should focus on measurable environmental outcomes. We therefore encourage the Commission to reconsider this regulatory approach to ensure that it remains proportionate, effective and aligned with the objective of delivering real packaging and emission reductions.

We appreciate your attention and stand ready to contribute constructively to guidance that strengthens Europe's circular economy while delivering measurable environmental gains.

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