

Brussels, 22nd February 2024

Dear Council Representatives, MEPs and European Commission,

Dear PPWR Negotiating Team,

We, the undersigned European manufacturers, are writing to express our deep concern regarding the proposed ban on shrink and collation films in the Annex V (row 1) of the Packaging and Packaging Waste Regulation (PPWR), particularly with regard to its extension to bottles. As leaders representing European small and medium companies producing or recycling shrink and collation films, we fear that such a ban will have severe consequences for our industry and lead to a disastrous loss of jobs, hindering economic growth and jeopardising the competitiveness of European manufacturers vis-a-vis other countries.

Thanks to significant investments in R&D to increase packaging sustainability and circularity, we produce **shrink and collation films that are highly recyclable and that already incorporate high percentages of recycled plastics**. These films play a vital role in packaging and protecting a wide range of products, including food, beverages, cosmetics, and household and consumer goods. They help prevent damage during transportation, extend the shelf life of perishable items, and maintain product integrity.

The proposed ban on shrink and collation films for packaging bottles presents challenges, particularly in Business-to-Business (B2B) distribution. Shrink films bind bottles together, creating a single unit that prevents shifting, thus facilitating easier management and stacking on pallets. The ban on shrink films could compromise the stability and security of packaged bottles, disrupting B2B distribution channels for beverages.

Considering the role of collation and shrink films in facilitating bottles palletisation, extending the ban to bottles appears disproportionate and unjustified. This aspect was also addressed in the Commission Impact Assessment accompanying the PPWR proposal, where it is stated very clearly in page 375 that the ban would not include items that are necessary for distribution handling reasons, e.g., to facilitate palletisation.

Of the total production of shrink films, 45%¹ is specifically allocated for use in packaging beverages, which means that a significant portion of our market would be affected.

The proposed ban, if implemented, would create a domino effect throughout the entire supply chain. Our SMEs will be hit hardest by this ban as we are already struggling with limited resources, high energy prices and fierce competition from other countries like China and US, making it impossible to adapt or reconvert our production lines. As a result, our businesses will be forced to shut, resulting in significant job losses.

We are already witnessing the unintended environmental consequence of the proposed ban on shrink films, as it is **already leading to the substitution with thicker and heavier single use cardboard packaging for six-pack bottles**. This substitution is driven by distribution needs and consumer demand for packaging that facilitates transportation of these products, however its environmental impact has not been assessed, and it will likely increase overall packaging waste.

We urge policymakers to reconsider the proposed ban and, instead of imposing arbitrary restrictions, to support a framework that enhances the sustainability of packaging and improves recycling infrastructure. We suggest removing the reference to "bottles" from the scope of the ban in Annex V (row 1) or foresee an exemption if the packaging complies with the sustainability requirements as set out in the EU Taxonomy.

¹ AMI, Market Report Collation Shrink Films, Europe, 2022

List of Signatories (79):



Achaika Plastics S.A



ALPLA Group



Ambiente S.A.



ARTEK Opakowania sp. z o.o.



Artfol Sp.J. Janusz Lubera i wspólnicy



Ate Plast LTD



BAGSTAR.pl Sp. z o.o. Sp. k.



Barbier



Berry



Bittner Packaging Sp. j.



Bourbon Packaging



C2C sp. z o.o.



CASFIL



Chrystal Plastic



Circular Packaging Design Sp. z o.o.



Crocco S.p.A.



Danipack



DAP - Flexible packaging



Deriblok



Drava International d.o.o



Elplast



EVERSIA



EWAN-FOL Sp. z o.o.



Famaplast



Fameks Sp. z o.o.



FOL-PLAST Zawadka Sp. z o.o. Sp.k



Fost Novi



Gasplast



GEC d.o.o



GUMA I PLASTIK RECYCLING Sp. z o.o.

GPR Guma i Plastik Recycling Sp. z o.o.



Granpol Sp. z o.o.



Grijótubos



GRUPA ERGIS



Grupe Ropre



Grupo Armando Alvarez



HIPAC Group



I.R.P. - Industria Recicladora de Plásticos



Inovio packaging



ITP – Innovative packaging solutions



J.M. Trade Jerzy Mróz



JOE PLAST S.p.A



Jolly Plastic



KAJ Sp. z o. o.



KGL S.A.



Kompol Sp. z o. o.



Linpac Packaging Production Sp. z o.o.
(Klößner Pentaplast)

MAKOTER d.o.o.

MAKOTER d.o.o.



MANTZARIS



MG - Lavorazione materie plastiche



Micronipol



MULTIPACK EUROPE Sp. z o.o. Sp. k.



Muraplast



PLASGAL



Plasoeste



PLASTIGAUR



Plastik



Plastotecnica



PM – Paper Mettler



POHiD - Polska Izba Handlu i Dystrybucji

POLI it's easy

Poli Sp. z o.o.

polivouga
indústria de plásticos, s.a.

Polivouga

POLYPLAST

POLYPLAST

ŠANTEK
PRERADA PLASTIKE

PRERADA PLASTIKE ŠANTEK

OPAKOWANIA FOLIOWE
L&Z RAFPOL
25 LAT DOŚWIADCZEŃ

Rafpol Opakowania Foliowe Lucyna Rafińska

reborn

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REPLAS Recycling Plastics Sp. z o.o.

rkw

RKW Group

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Samaplast S.r.l.

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Selene

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SILVEX

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FOLIE PRZEMYSŁOWE

Sławpol Sp. z o.o.



STRATUM



Termoplastica Sghedoni S.p.A



Ternawa Sp. z o.o.



Thrace Group



Topack S.A.



Trioworld