Grouped packaging restriction of Annex V row 1, specifying Art. 25 Packaging and Packaging Waste Regulation

A position of Natural Mineral Waters Europe

Context

Article 25 of Packaging and Packaging Waste Regulation (PPWR) restricts use of certain packaging formats from 1 January 2030, with these formats being specified via Annex V of PPWR. To explain Annex V in more detail and provide examples, the European Commission shall publish dedicated guidelines by 12 February 2027.

Row 1 of Annex V stipulates single-use plastic grouped packaging (collation films, shrink wraps) as one of such restricted formats:

> *"Single-use plastic packaging used at the point of sale to group goods sold in bottles, cans, tins, pots, tubs, and packets **designed** as convenience packaging **to enable or encourage** consumers to purchase more than one product. This **excludes** grouped packaging **necessary to facilitate handling**."*

In this context, Recital 85 of PPWR stipulates that *"unnecessary or avoidable packaging should not be placed on the market"*.

Applying plastic films to group beverages is a solution universally applied across product groups and Member States, accepted and preferred for its functional properties by the supply chain and consumers alike.

Natural Mineral Waters Europe (NMWE) interprets this grouped packaging as qualifying for an exemption under the provisions of Annex V. However, despite some limited positive assurances, there is no unequivocal confirmation that current grouping of natural mineral and spring waters will not be affected, leading to significant sector's concerns, as potential negative impact would be catastrophic.

Interpretation

The text of Annex V as well as Recital 85 provide sufficient grounds to conclude that plastic shrink films currently applied across Europe to group bottles or cans do not fall under the restriction imposed by Art. 25.1.

1. This grouped packaging is not *"designed as convenience packaging to enable or encourage consumers to purchase more than one product"*:
    i. A consumer is not *enabled* to purchase more than one product, as this is perfectly possible even without such grouping, although the grouping will facilitate the consumer to handle the purchase.

ii. A consumer is not *encouraged* to purchase more than one product, as it is always possible to purchase an individual item, either individually displayed or by extraction from the multipack.

iii. The design choices behind this packaging extend well beyond convenience, rendering this packaging hard to substitute: the shrink films have crucial role in product protection from external contamination, dust and humidity, ensuring pallet stability[1] and economic efficiency and safety of handling in transport, logistics, retail and for the consumer. Even if they were to be removed before the consumer purchase, they would remain necessary in all the previous stages.

2. The packaging is indeed *"necessary to facilitate handling".* The term "handling" should be understood in its broad, ordinary sense, including handling by consumers. This is decisively supported by the legislators' amendment during the legislative process: the original wording, "facilitate handling in logistics", was replaced by the final, unqualified wording, "facilitate handling". The grouped packaging facilitates handling
   - in the supply chain, see the bullet point iii in point 1 above,
   - in retail, making stacking products safe and economically feasible,
   - for the consumer, given the typical purchase volumes[2].

   Meanwhile, the current solution remains a necessity, since alternatives, although existing on a limited scale, are not truly scalable and commercially viable, and often functionally inferior[3]. Moreover, the current text aims at packaging reduction, therefore substitution by another material or removal of the packaging at the point of sale is not the intention of this law[4]. Finally, other provisions of PPWR will increase the necessity of single-use plastic grouped packaging[5].

Assessment of impacts

Due to obstructed handling, the restriction would entail significant health and safety risks for enterprise staff and would significantly inconvenience consumers.

The economic impact of restricting the current model of grouped packaging would be immense as this would lead to companies looking for alternatives with considerable investments to be made. Financial expenditures to companies would be in the order of billions €[6], notwithstanding the inability of the machinery sector to deliver such an amount of machines in limited time, or

[1] Examples are being provided to the consultants supporting European Commission in drafting the guidelines and can be made available upon request.
[2] In case of natural mineral and spring waters, regular purchasing multiple litres of the product is a standard consumer behaviour, in line with the guidelines of EFSA on a recommended daily water intake. NMWE conducted brief research of consumer behaviour concluding that consumers, while given choice to purchase water in individual bottles or in multipacks, purchase 75-100% (depending on the country) of the product in multipacks.
[3] NMWE prepared an overview of such alternatives available on request.
[4] A position verbally confirmed by both the European Commission and the consultants supporting the development of the guidelines.
[5] The following measures are expected to have negative impact on stacked products stability: Art. 7 requiring a high level of recycled content in inter alia stretch film stabilizing the pallet, Art. 10 requiring minimisation of packaging weight, or Art. 29 requiring a high share of reusable transport packaging.
[6] A standard packaging machine costs approximately € 0.5–0.6 million. With implementation, companies purchase them at € 1–1.5 million. One packaging machine can serve one bottling line and there are thousands of bottling lines in the EU.

the cost of redundant machinery handling and liquidation. These impacts would be particularly difficult to absorb in the time of economic stagnation and would disproportionally affect SMEs.

Conclusion

Single-use plastic grouped packaging, currently universally applied and accepted, fulfils indispensable functions throughout the supply chain and for consumers. Its restriction would lead to significant safety and economic impediments to European businesses and consumers alike, with disproportional impact on SMEs and more vulnerable populations.

NMWE urges the European Commission to exclude single-use plastic grouped packaging currently applied on beverage products in Europe clearly and unequivocally in its guidelines that are to be published by 12 February 2027. The aim of restricting unnecessary and avoidable packaging specified by row 1 of Annex V should be limited to

- packaging clearly designed for promotional purposes (encouraging the purchase of more than one product), or
- packaging applied on the point of sale that does not facilitate handling.

Natural Mineral Waters Europe has been the voice of natural mineral water and spring water since 1953. Today, we represent 550 producers who provide European consumers with unique, healthy and high-quality products. Pioneers in environmental custodianship, our members have a long tradition of working in partnership with local communities to safeguard the ecosystem around water resources. Our sustainability mission extends to achieving full circularity for all packaging.