Call for Evidence Waste – early warning report 2027

Utrecht, 23/10/2026

Fair Resource Foundation welcomes this Call for Evidence on the Early Warning Report 2027.
The Waste Framework Directive and new Packaging and Packaging Waste regulation sets the course towards improvement of municipal waste generation, and packaging and packaging waste management. While doing so, it is essential that the progress of Member States in that direction is monitored in a timely manner to ensure targets are being met. This is essential to foster a level-playing field within the Union in which all Member States move towards better packaging systems, without disparities and specific Member States failing to comply with the targets and objectives of the regulation. Given our specific expertise, we will focus specifically on packaging and packaging waste management.

Overall, we see a considerable risk that the packaging waste prevention targets for 2030, 2035 and 2040 will not be met. Packaging volumes are under continued upward pressure, notably due to the rapid growth of e-commerce, while the PPWR as adopted presents an insufficient set of binding measures to reduce the overall amount of packaging waste.

Key levers have been left out or weakened along the way: cardboard packaging, among the largest and fastest-growing packaging streams, is excluded from the reuse targets, and the reuse provisions are considerably less ambitious than those initially proposed by the European Parliament. Remaining uncertainties in the secondary legislation on packaging minimisation and reuse further limit their expected impact. As a result, the means available at EU level appear insufficient to deliver the targets on their own.

The initial impact assessment already recognised this risk, assuming that Member States would need to adopt national measures going beyond the Regulation (Measure 2b). However, this need does not yet seem to be widely acknowledged by Member States, which in our view represents one of the most significant risks to achieving the prevention targets.

Implementation challenges present in the Member States
The aforementioned elements are causing clear implementation challenges to arise in the Netherlands and Belgium, the two Member States in which Fair Resource Foundation's work is prominent, specifically:

In the Netherlands:

- **Prevention targets**: packaging waste generated increased by 2,10% between 2018 and 2023 (Eurostat);
- **Reuse targets:** although we observe a growing number of market initiatives offering reusable packaging solutions, there is no legislative framework that supports these innovations and enables them to scale. Single-use packaging remains the default, and in supermarkets we see regression rather than progress: reusable packaging is disappearing from the shelves (e.g. soft drinks in refillable glass bottles such as Fritz-Kola), and after pilots with refillable packaging, retailers often revert to single-use. Changing how consumers handle packaging takes time, which short-term pilots do not provide. Moving from temporary pilots to structural change requires clear steering and guidelines from the government, which is currently lacking.

- **Enforcement of e-commerce parcels:** With the introduction of a new import duty per parcel, Dutch Customs observes that non-EU webshops are shifting to bulk imports and EU-based warehouses, from which products are still shipped to consumers as individual parcels. This shift makes product controls at the border easier, but it does not reduce the volume of e-commerce packaging. It also moves the compliance challenge into the internal market, where packaging requirements must be enforced on sellers established outside the EU. Meanwhile, non-compliance with EU product legislation in this flow is very high. If even product safety requirements cannot be adequately enforced, it is unlikely that PPWR requirements will be. These include packaging minimisation, the empty space ratio for e-commerce packaging and EPR obligations for producers outside the EU. This creates an uneven playing field for compliant businesses and further undermines the achievement of the prevention targets[1]

In Belgium:

- **Prevention target**: packaging waste generated increased by 5,85% between 2018 and 2023 (Eurostat);
- **Reuse targets remain stagnating**: despite the effort put in place by Packaging PRO Fost Plus and Valipac, the share of reusable packaging has been stagnating, thereby not contributing to a reduction of packaging waste generated, necessary to achieve the prevention targets;
- **Separate collection of plastic bottles and cans is stagnating** (see EPRiBEL activity report 2025, 4.4), while the responsible governments are not taking the necessary actions to meet the targets set out in the PPWR. Belgium is not progressing towards the introduction of a deposit on plastic bottles and cans. Policymakers are pushing back a decision on DRS, hopeful that Belgium could still be exempted from having to introduce that system under PPWR (link). The latest official figures (2024) indicate that Belgium will clearly fall short of the intermediate 80% target for cans in 2026 and may only just reach it for plastic bottles. However, with separate collection rates stagnating, reaching the 90% target in 2029 will still be a major challenge. To meet the PPWR targets in time, Belgium will need a swift decision in favour of DRS. While the required action is clear, delayed reporting figures and the uncertainty on the European measurement methodology for cans are being used by policymakers as excuses to postpone decisions (PPWR Article 56(1)(c)). To reach the 80% separate collection rate for cans in 2026 - threshold that would give Belgium the possibility to ask for an exemption from introducing a deposit return system - the Flemish Government has instructed its Minister of Environment to ask the European Commission for a calculation method that takes “all potential collection streams” into account (see here), which would in practice allow metals recovered from incinerator bottom ash (IBA) to be included. This could allow Belgium to meet the threshold on paper, but would run counter to the very purpose of an ambitious separate collection target for plastic bottles and cans.

[1] The Netherlands is one of the main entry points into the EU for e-commerce parcels, which are individually addressed consignments below €150 shipped directly from non-EU suppliers to European consumers. Since the abolition of the de minimis customs duty exemption on 1 July 2026, a fixed import duty of €3 per product group applies. As of November 2026, an additional EU handling fee of €2 applies, intended to cover the costs of customs controls. Since the introduction of the import duty, the number of small parcels from China entering the Netherlands in July and August 2026 was 46% lower than the average of the preceding six months, according to figures from Dutch Customs presented by the State Secretary for Finance to Parliament (Taxlive / Ministry of Finance). Nevertheless, according to the State Secretary, the number of incoming parcels remains so large that further measures are needed (NOS).

Measures that Member States could put in place to improve their waste management performance: Use of the leeway given by PPWR as identified in recital 121 and 149:

- Stronger EPR incentives (eco-modulation) in favor of reusable packaging, also for cardboard packaging;
- Economic incentives to create a level-playing field for prevention and reuse such as:
    - The federal packaging tax in Belgium that is 7 times lower on reusable packaging - and considered one of the reasons why the reuse targets in Belgium are still relatively high over the years;
    - Financial contribution of producers via EPR for non-achievement of the prevention targets would also ensure that economic operators are financially responsible for the achievement of those targets, as opposed to the responsibility remaining on Member States as is currently the case in article 43. In case of non-achievement of the targets, this would also help financing the transition towards packaging minimization, reuse and refill systems;
- Setting up deposit and return systems covering reusable packaging formats;
- Requirements for final distributors to make a certain percentage of other products, besides those covered by re-use targets and refill obligations, available in reusable or refillable packaging;
- E-commerce packaging waste reduction targets at Member State level;
- Measures taken at the local level such as bans or additional taxes on disposable to-go packaging.

Additionally, the Commission should:

- Come back to its initial interpretation of the bans (art. 25) in which plastic cups with less than 5% are concerned by the ban;
- Ensure a timely establishment of the secondary legislation pursuant to: the method of measurement of separate collection of plastic bottles and cans (art. 56(7)(a); method for calculating the minimum number of rotations for reusable packaging (art. 11); the guidelines for the bans (art. 25);

We hope the Commission will recognize the importance of urging Member States to take measures to meet the prevention, reuse and separate collection targets. This through a timely implementation of the measures planned for in the PPWR and to identify national measures that could complement those measures to bridge the gap present in their national context.

About Fair Resource Foundation

Fair Resource Foundation is a non-profit organisation dedicated to advancing circular economy principles and ensuring equitable access to resources across the EU, with a specific focus on the Netherlands and Belgium. We advocate for systemic change in resource management, focusing on reducing waste, promoting reuse, and fostering sustainable production and consumption patterns.