



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

Maritime Policy and Blue Economy
The Director-General

Brussels
MARE.A.4/GH

Subject: Market Advisory Council advice concerning the Packaging and Packaging Waste Regulation (EU) 2025/40

Dear Ms Bermúdez,

Thank you for the advice of 18 March 2025 concerning Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR), and the potential impact of the reuse targets on transport packaging for the EU fisheries, aquaculture and fish processing industries. We appreciate the time and effort that the Market Advisory Council (MAC) has taken to examine the matter and provide recommendations.

We acknowledge the MAC's concerns regarding the feasibility and the potential environmental and economic implications of the reuse targets on transport packaging for economic operators who transport aquatic products. We also note the MAC's emphasis on the need for a level playing field with non-EU actors, given the high percentage of fresh aquatic products imported into the EU.

We are working closely with the relevant Commission services, DG ENV and DG SANTE, to understand the implications of the legislation for the fisheries and aquaculture supply chain. Colleagues from both DGs have contributed to this response as part of our collaborative effort.

Let me reassure you that, in the context of the implementation of the PPWR, the Commission will strive for maximisation of the integrity of the internal market, by achieving proportionate, feasible, precise and harmonised rules for all economic operators, whether located within or outside the Union.

Moreover, the Commission will thoroughly examine alternative reusable packaging solutions suitable to use for the transport of aquatic products against single use packaging. All relevant stakeholders, such as Member States and the respective industry, will be properly consulted, notably via the Expert Group on waste. Finally, let me stress that the Commission will use the empowerments in the PPWR to ensure a smooth transition to the new rules and to avoid unintended consequences.

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We have also taken note of the individual recommendations in the MAC advice and will consider them as we move forward, taking due account of the environmental and economic aspects that the PPWR entails.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Julia Rubeck, our Advisory Councils coordinator, via the functional mailbox MARE-AC@ec.europa.eu.

Yours sincerely,

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