

7 January 2026

The European ceramic industry calls for realistic targets on the re-use of transport packaging under the new Packaging and Packaging Waste Regulation

Cerame-Unie welcomes the draft Delegated Act on the exemption of plastic wrapping and straps from the 100% reuse obligations under the new Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR). While we appreciate the efforts made, we urge the European Commission to ensure that the Regulation is implemented through economically and technically achievable targets, without undermining the competitiveness and productivity of the industries concerned, particularly with regard to pallet wrappings, straps, and pallets.

Reusability obligation for pallets wrappings and straps

Through the proposed delegated act, the Commission introduces a targeted exemption for plastic wrapping and straps from the 100% reuse obligations set out in Article 29(2) and (3), while preserving the horizontal reuse targets established under Article 29(1). In this context, the delegated act confirms that, as of 1 January 2030, economic operators using transport packaging or sales packaging for transport purposes (including pallet wrappings and straps), are required to ensure that at least 40% of such packaging is reusable within a reuse system. In addition, from 1 January 2040, operators are expected to make efforts to reach a reuse share of at least 70% for the same categories of packaging within a reuse system.

Pallet wrappings and straps are essential tools in securing the stabilisation and protection of products during transportation, preventing possible breakages or damages and ensuring the safe handling of the load. They are often stretched or shrunk while being secured to the load, and they can suffer damages during packaging, storage, transport and handling. In most of the cases, operators are also required to cut open wrappings and straps when unloading pallets, thus preventing any further reutilisation. For their inherent characteristics, they cannot be fully recovered after being detached from the packed material, neither they can be re-used while providing the same performance in terms of efficiency, safety and conservation of the load.

Due to their specific function and attributes, **pallet wrappings and straps cannot be considered reusable packaging**, as defined by Article 11 of the PPWR. Therefore, **Cerame-Unie asks the European Commission to exempt plastic wrappings and straps from the requirements of article 29 (1).**

Reusability obligation for pallets

While the ceramic industry reaffirms its support to the exemption of pallet wrappings and straps from the above-mentioned targets, Cerame-Unie highlights that **a 100% reusability obligation is similarly not achievable for pallets. We therefore urge the European Commission to consider the challenges and limitations currently experienced by the industry** while ensuring a realistic and reasonable implementation of the PPWR.

CERAME-UNIE aisbl

Rue Belliard 12 – 1040 Brussels

Tel. +32.2.808.38.80 - E-Mail : sec@cerameunie.eu

www.cerameunie.eu

In the ceramic bricks and tiles industry, pallets are subject to rough handling due to the weight and bulk of the products. This leads to significant wear and tear, causing damage that renders many pallets unfit for reuse after a few cycles. Reusable pallets have a narrow lifetime (six to seven uses) and the use of standard formats is often hampered by technical requirements related to production or transportation needs, further limiting their efficiency and environmental advantages. Pallets are often stored outdoor and face extreme weather conditions, and long transport distances, which accelerate their deterioration. These factors reduce the number of times they can be reused, undermining their sustainability benefits. High quality of pallets and avoidance of material damage to the pallets is crucial for the safe handling (transport) of ceramic building materials. Reusable pallets require regular maintenance and repair to remain in usable condition. Consequently, **a transition to 100% reusable pallets employed in business-to-business transportation seems completely unrealistic for many companies in the next few years.**

In many regions, there is no established infrastructure to efficiently return reusable pallets to their origin for reprocessing. The high costs and complexity of pallet returns, especially in cross-border operations, make it difficult to maintain a circular system. In addition to those logistic barriers, regional discrepancies across Member States should be considered: some countries in the EU focus on single-use pallets due to the absence of return logistics, making reuse impractical. Thus, the ceramic sector is confronted with significant regional differences in pallet handling.

Different plants in the EU often rely on a mix of single-use and reusable pallets depending on their specific needs. Certain production lines and handling systems are designed to work only with single-use pallets, and retrofitting these systems would require significant investments. In some countries, the conveyor belt must be converted so that the production line can accommodate reusable EUR-pallets which in turn entails immense investment costs. On the other hand, due to the wide variety of formats in some countries, transforming the unloading and packaging lines to a layer-by-layer de-hacking system and implementing a stacker system with robots must be used which in turn entails investments. In addition, some of the products manufactured by the ceramic industry require pallets with specific dimensions and load capacities: these specific requirements cannot be met by using standardised pallet formats, further limiting their implementation.

While reaffirming its commitment to implementing realistic solutions for the promotion of circularity and environmental sustainability throughout all the supply chain, Cerame-Unie requests the European Commission to exempt pallet wrappings and straps from the scope of Article 29 (1) as well as pallets from the scope of Article 29 (2) and (3).