



To the attention of PPWR trilogue negotiators at:
The European Parliament
The Council of the European Union
The European Commission

10 January 2024

Dear Sir/Madam,

**EU PACKAGING AND PACKAGING WASTE REGULATION (PPWR):
AN OPEN LETTER FROM THE BREWERS OF EUROPE TO THE INTERINSTITUTIONAL NEGOTIATORS**

I am writing to you, on behalf of the European beer sector, about the inter-institutional trilogue negotiations on the EU Packaging and Packaging Waste Regulation (PPWR) that begin this week.

Before you begin your discussions, we wish you to be aware of some of the discriminatory measures that are still on the table and which undermine both the fairness and the sustainability of the PPWR's aims.

In particular, the brewing sector is concerned about a future EU Regulation that could place mandatory reuse targets and recycling obligations upon beer whilst exempting other, competing alcoholic beverages from these requirements.

Europe's beer sector is proud of its record on sustainability and supports the overall aims of the PPWR. We lead the way in reducing, reusing and recycling, but we cannot be the only ones.

Our position is clear: If targets and mandatory requirements in the PPWR apply to beer then there is a legal obligation that they apply to all alcoholic beverage categories. Similarly, if exemptions are provided to *any* alcoholic beverage sector (see Art. 26 and Art. 44), then they must apply to *all* alcoholic beverage sectors, including beer, to avoid discriminatory treatment.

I also take this opportunity to stress the need to build on best practise and ensure that misguided rules or governance not discourage best practise packaging such as kegs or provoke the dismantling of well-functioning existing collection systems, be they well-established reuse systems set up and supported by the brewers in many countries or efficient recycling collection systems already in place in others.

During the trilogues, there is still an opportunity to ensure a final piece of legislation that sets a level playing field when it comes to alcoholic drinks packaging, whilst protecting the existing best practice packaging systems that are already in place.

We stand at your disposal, including to share an analysis of the well-established case law on the substitutability amongst alcoholic beverages and the relevance of this in the context of proposals on packaging legislation.

Yours sincerely

Simon Spillane
Head of Operations



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