

Joint Industry Statement on the Status of Communication Items under Regulation (EU) 2025/40 (PPWR)

This Joint Industry Statement has been initiated and coordinated by the **Federation of European Producers of Envelopes and Light Packaging (FEPE)**.

The undersigned organisations represent stakeholders from across the paper, envelope, printing, postal, mailing, direct marketing, publishing and related value chains and support the common position set out below.

Purpose

We wish to express our shared concern regarding the lack of legal certainty surrounding the status of correspondence envelopes and other communication items under Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR), particularly as the first obligations under the Regulation become applicable on 12 August 2026.

Across our sectors, manufacturers, distributors, printers, publishers, postal operators, mailing houses, direct marketers and users are increasingly seeking guidance regarding their obligations under the PPWR, including requirements relating to Declarations of Conformity, technical documentation and other compliance measures. Despite the imminent application of the Regulation, significant uncertainty remains regarding the treatment of communication items and the responsibilities of different actors throughout the value chain.

Long-Established Distinction Between Communications and Goods

European and international regulatory frameworks have consistently recognised a distinction between communications and goods.

Directive 97/67/EC on postal services distinguishes correspondence from items containing goods. Regulation (EU) 2018/644 on cross-border parcel delivery services differentiates between letter mail and parcels containing goods. The Universal Postal Union (UPU) framework similarly distinguishes documents and correspondence from goods and merchandise.

More recently, the European Commission itself reaffirmed this distinction in the context of Regulation (EU) 2023/1115 on Deforestation-Free Products (EUDR). Recital (18) of Commission Delegated Regulation C(2026)4920 states:

"Items of correspondence, within the meaning of Article 1, point (26), of Commission Delegated Regulation (EU) 2015/2446, serve a communication purpose and thus are not placed or made available on the market. Therefore, it is necessary to clarify that items of correspondence do not fall within the scope of Regulation (EU) 2023/1115."

This clarification confirms the long-established regulatory understanding that correspondence serves a communication purpose and should be distinguished from goods and merchandise.

Communication Items

Correspondence envelopes and similar products are primarily designed, manufactured and marketed for the transmission of communications and information, including letters, invoices, statements, administrative documents, notices, direct mail, brochures and other informational materials.

Their primary purpose is to facilitate communication between sender and recipient. They are placed on the market to enable the transmission of information rather than contain, protect or present products.

The undersigned organisations therefore consider that communication items used for the transmission of correspondence, documents and information should not be regarded as packaging within the meaning of Regulation (EU) 2025/40.

Producers of envelopes cannot reasonably determine the eventual use of every item placed on the market. Legal certainty therefore requires that products shall be assessed according to their intended and primary purpose when designed, manufactured, marketed and supplied.

Call for Clarification

We respectfully call upon the European Commission to provide clear and unambiguous written guidance confirming that **envelopes as items of correspondence used for the transmission of correspondence, documents and information are not packaging** within the meaning of Regulation (EU) 2025/40 when placed on the market for that purpose.

Such clarification would provide legal certainty for businesses, support consistent implementation across the European Union, avoid unnecessary administrative burdens and ensure a harmonised application of the PPWR across Member States.

The undersigned organisations remain available to support the European Commission with practical examples and industry expertise in order to facilitate a clear, workable and legally certain interpretation for all stakeholders.

Signatories

Initiating Organisation



FEPE - Federation of European Producers of Envelopes and Light Packaging

Supporting Organisations



PostEurop – The European postal operators' association



CEPI - The European association representing the paper industry



Intergraf – The European graphic industry association



CITPA - The International Confederation of Paper and Board Converters in Europe



Keep Me Posted EU initiative - right to receive essential communications in preferred format—digital or print