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INFORMATION

From: General Secretariat of the Council
To: Working Party on the Environment

Subject: Packaging and packaging waste: Updated financial statement

Delegations will find attached, for information, an updated legislative financial statement regarding the proposal for a regulation on packaging and packaging waste, as transmitted by the Commission.

LEGISLATIVE FINANCIAL STATEMENT



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LEGISLATIVE FINANCIAL STATEMENT

1. FRAMEWORK OF THE PROPOSAL/INITIATIVE

1.1. Title of the proposal/initiative

Proposal for a Regulation of the European Parliament and of the Council on packaging and packaging waste replacing and repealing Directive 1994/62/EC of the European Parliament and of the Council.

1.2. Policy area(s) concerned

Policy area: 09 Environment & Climate Change

1.3. The proposal/initiative relates to:

- a new action
- a new action following a pilot project/preparatory action¹
- the extension of an existing action
- a merger or redirection of one or more actions towards another/a new action

1.4. Objective(s)

1.4.1. General objective(s)

The general objective of the legislative proposal is to reduce negative environmental impacts of packaging and packaging waste and improve the functioning of the internal market, thus boosting efficiency gains in the sector. The aim is to create a resilient value chain, starting from the design of the packaging till its re-use or -integration in high quality products, thus creating innovative, “green” jobs in a low carbon packaging industry.

1.4.2. Specific objective(s)

The specific objectives to meet this general objective are to:

- Reduce the generation of packaging waste
- Promote a circular economy for packaging in a cost-efficient way
- Promote the uptake of recycled content in packaging

1.4.3. Expected result(s) and impact

Specify the effects which the proposal/initiative should have on the beneficiaries/groups targeted.

The modelling of the preferred option (Option 2+) suggests for 2030 a reduction of waste generation by 18 million t compared to the baseline, and 3.1 million t compared to the 2018. The reduction in GHG is around 26 million tonnes CO₂e in 2030 (almost half of the total annual emissions of Hungary), and monetised environmental externalities avoided more than EUR 7 billion per year.

Reduced waste management costs of EUR 4.3 billion, additional costs of reuse schemes and DRS of EUR 5.3 billion and reduced sales and consumption of packaging

¹ As referred to in Article 58(2)(a) or (b) of the Financial Regulation.

of EUR 47.2 billion result in overall economic savings of EUR 46.2 billion. In reverse, this option results in additional annual administrative costs of EUR 1.3 billion, mainly for certification of the packaging recyclability and of the recycled content in plastic packaging. The complex impacts on employment are estimated to result in a slight net increase of about 29.000 “green” jobs.

Only the measures on recycled content fostering resource efficiency reduce fossil fuel requirements of the EU by 4.24 million t per year (about 1/3 of the fossil fuel needed currently for plastic packaging production). The total decrease in fossil fuel needs of Option 2+ is difficult to quantify but the fact that the GHG savings of the recycled content measure represent 31% of the total GHG savings indicates an order of magnitude of 13 million t fossil fuel savings. Further, the measures to improve recyclability increase the overall packaging recycling rate from 66.5% in 2018 to 73% in 2030, whereas landfill is decreased from 18.7% to 9.6%. This push for circularity results in significantly reduced needs of virgin raw materials such as wood, glass and aluminium.

The preferred option package foresees specific treatment of SME’s to ensure that the impacts on them are proportionate. Requirements would apply in a non-discriminatory manner to EU and non-EU companies. The measures are not more trade restrictive than necessary to fulfil their environmental objectives.

Overall, moving towards a more circular economy within packaging would deliver benefits such as empowering consumers, reducing negative impacts on the environment and human health, reducing the EU’s import dependency for raw materials and fossil fuel, stimulating innovation and boosting economic growth, and finally reducing unnecessary household expenditures.

1.4.4. *Indicators of performance*

Specify the indicators for monitoring progress and achievements.

The indicators of progress and achievement of the objectives will be:

- Increased quality of recyclates (secondary raw materials)
- Improved recycling efficiencies and higher material recovery for packaging materials (e.g. plastic, metal, glass, paper/cardboard, textile, wood, ceramics...)
- All packaging will be fully recyclable by 2030
- Extended Responsibility Schemes fees are properly modulated
- Mandatory targets for recycled content for plastic packaging
- Reuse and refill targets for certain sectors

1.5. **Grounds for the proposal/initiative**

1.5.1. *Requirement(s) to be met in the short or long term including a detailed timeline for roll-out of the implementation of the initiative*

The detailed requirements would need to be adopted through implementing/delegated acts in a time horizon of 3-8 years. A series of actions in terms of mandates, delegated or implementing decisions and impact assessment reports will stem from this proposed regulation. These will cover verification of compliance with sustainability

requirements, conformity checking system, sustainability requirements, as well as information and labelling.

A detailed list of these envisaged actions, to be implemented between 2025 and 2035, is provided below (21 secondary legislation instead of 12 and 14 additional reports and evaluations – in yellow are depicted the new ones):

1. Implementing Act on EPR registration and reporting format
2. Implementing Act on harmonised labels for consumer sorting, including information through digital means
- 3 Implementing Act setting digital labelling (for sorting), including information on hazardous substances
- 4 Implementing Act establishing harmonised labelling for waste receptacles
- 5 Delegated Act setting minimum number of rotations for reusable packaging
- 6 Implementing Act establishing correction factor for tourism related to packaging waste prevention targets
- 7 Implementing Act establishing reporting rules to the Commission
- 8 Implementing Act establishing the methodology for the calculation and verification of recycled content and format for technical documentation
- 9 Delegated Act on establishing sustainability criteria for plastic recycling technologies
- 10 Implementing Act establishing methodology for assessing equivalence
- 11 Implementing Act establishing calculation rules on reuse targets
- 12 Implementing Act on setting a methodology for the calculation of the empty space
- 13 Delegated Act establishing design for recycling criteria
- 14 Delegated Act on detailed condition and reporting requirements to apply reuse pooling arrangements
- 15 Implementing Act establishing the recycled at scale methodology
- 16 Implementing Act specifying minimum mandatory Green Public Procurement requirements for public contracts
- 17 Develop interconnection to automate the communication between market surveillance authorities to enhance controls on packaging entering the Union market (legal format to be decided at a later stage)
- 18 Implementing Acts specifying procedural rules for controls on packaging entering the Union market
- 19 Delegated Acts setting concentration levels of lead, cadmium, mercury, and hexavalent chromium in packaging
- 20 COM empowerment to adopt Delegated Act for additional packaging categories, after 2035
- 21 Delegated Act establishing exemptions from reuse targets for economic operators, or for specific packaging formats

The following reports and evaluations have to be performed by the Commission:

1 Evaluation of the need for derogations from recycled content

2 Review of PFAS restrictions

3 Review the empty space ratio and the related exemptions and possibility to establish empty space ration for sales packaging

4 Review of the packaging restrictions and possibility to establish new restrictions

5 Evaluation of hazardous substances (i.e. if Art. 5 and 6 of the packaging regulation) have sufficiently contributed to minimizing substances in packaging

6 General evaluation of the packaging regulation on assessing contribution to the functioning of the internal market, improvement of the environmental sustainability, impact on the agri-food system and food waste.

7 Review of the recycled at scale threshold

8 Evaluation of exemptions from recyclability

9 Standardisation request for compostability standard updating the current standard on industrial composting and for a new standard on home-composting

10 Standardisation request on packaging minimisation

11 Establishing guidelines for assisting implementation of Annex V

12 Establishing guidelines on beverages covered by the obligation to meet reuse targets

13 Establishing European Observatory on Re-use for monitoring the implementation measures, collecting data, contributing to development of best practices

14 Establishing guidelines on misleading labels

15 Report on the presence of substances of concern

16 Report on bio-based plastic packaging, on sustainability criteria, targets

17 Report on recycled content minimum percentages

18 Report on possibility to set recycled content targets for other materials than plastic

19 Report on packaging materials other than plastic, which may have a more detrimental impact on the environment

20 Review of packaging waste prevention targets

21 Review of the recycling targets

22 Report on reviewing the implementation of the 2030 reuse targets and evaluating the feasibility of 2040 targets, the relevance of maintaining exemptions and pertinence of setting new targets

1.5.2. *Added value of Union involvement (it may result from different factors, e.g. coordination gains, legal certainty, greater effectiveness or complementarities). For the purposes of this point 'added value of Union involvement' is the value resulting from Union intervention which is additional to the value that would have been otherwise created by Member States alone.*

Reasons for action at European level (ex-ante)

Recent internal market notifications from the Member States show that the implementation of some not-fully-harmonised provisions of the Directive, such as labelling requirements, or vague requirements, such as essential requirements on packaging minimisation or recyclability, are causing additional cost to the economic operators. These are strongly calling for further harmonisation not only to be able to work more cost efficient, but also to overcome regulatory uncertainty about the environmental requirements for packaging, so that appropriate infrastructure investments can be made.

Expected generated Union added value (ex-post)

The problems cannot be sufficiently addressed by the Member States alone. The EU packaging market is in many respects one large market, rather than 27 individual markets. The packaging market is characterised by high-levels of cross-border trade between Member States, with many producers placing packaging on the market in multiple Member States. National initiatives could perhaps bring certain benefits but would inevitably contribute to further fragmentation of the internal market. Similarly, the packaging-related environmental concerns are widespread, with key underlying causes being common across all Member States.

There is clear added value in setting common requirements at EU level, as this will ensure a harmonised and well-functioning internal market across all Member States and, therefore, a level playing field for packaging producers. With requirements and targets set at EU level, the move towards packaging being reusable or recyclable in an economically viable manner will take place in a coherent way in all Member States, creating a larger and more efficient market. Harnessing its strength to support the move towards a circular economy for packaging will support the achievement of targets in a more cost-effective way.

Economies of scale will be achieved through consistent approaches to, for example, influencing packaging design in such a way that packaging can be more cost-efficiently collected, sorted and recycled everywhere in the EU. This approach will be reinforced by harmonised criteria for modulation of EPR fees, which will provide an additional economic impetus for compliance and increased clarity as to the roadmap for investments in circular packaging design and innovative sorting and recycling technologies. Member State action alone could not achieve such harmonisation and thus economies of scale. The proposed measures will not go beyond what is necessary to provide regulatory certainty while ensuring a high level of protection of health and of the environment. EU action is therefore justified and necessary.

The new Regulation will make it explicit that, in the future, the adoption of restriction measures for substances in packaging will be taken following assessments that will be carried out by European Chemicals Agency (ECHA), and no longer as individual activities part of DG ENV working programme. ECHA has by large the needed experience for this task and these assessments constitute additional work area for this Agency.

The new Regulation comes with additional reporting obligations to ensure that its objectives are well met. This reporting will be carried out by Eurostat (ESTAT), which has by large the required experience and expertise for this task.

1.5.3. Lessons learned from similar experiences in the past

A number of related initiatives are very important for packaging: The Waste Framework Directive (WFD) establishes horizontally applicable concepts related to waste

generation and waste management, including waste treatment, recycling and recovery. It creates the waste hierarchy, giving priority to waste prevention over reuse and/or recycling, subsequently recycling over other recovery options and final disposal via landfilling. Further, it obliges Member States to have in place functioning Extended Producer's Responsibility (EPR) schemes, which ensure that producers of products bear responsibility for the management of the waste stage of their products. In the Circular Economy Action plan (CEAP), the Commission committed to assess feasibility of harmonising the separate waste collection systems in the Member States.

The Single-Use Plastic Directive (SUPD) focusses -amongst other plastic products- also on certain plastic packaging (e.g. carrier bags, beverages cups, food and beverage containers including bottles) with the main purpose to prevent littering and its environmental impact. It contains product bans, the obligation for Member States to ensure the separate collection for recycling and to reduce the volume of certain groups of single use plastics. Finally, it established minimum recycled content targets for single use plastic beverage bottles.

Another legal act with respect to plastic packaging is the 2020 Own Resource Decision (ORD), which established an own resource based on plastic packaging waste not recycled in a specific Member States, irrespective whether this Member States meets the target or not. The ORD creates an incentive for Member States to put in place measures in the pursuit of high recycling rates for plastic packaging. It gives flexibility to the Member States in deciding on their efforts to have high plastic recycling rates in line with the WFD.

However, the Packaging and Packaging Waste Directive (PPWD) is the main EU-level instrument dealing with placing on the market of packaging and requirements for its end-of life. There are also provisions on packaging or relevant to it in other EU legislation. Therefore, the revision of the PPWD is rather comprehensive dealing with packaging waste prevention, packaging recyclability, bio-based, compostable and bio-degradable packaging, use of recycled content and hazardous substances in packaging, as well as enabling measures, such as labelling for separate collection, packaging related green public procurement requirements and EPR requirements.

1.5.4. *Compatibility with the Multiannual Financial Framework and possible synergies with other appropriate instruments*

The actions to be financed are fully in line with the overall objectives of the Multiannual Financial Framework and of the Next Generation EU instrument, which promote the green transformation in line with the European Green Deal. In particular, the action aims at strengthening circular economy, increasing material recovery and improving quality of secondary raw materials.

The support and commitment of the European Commission in the research in the field of circular economy and in particular of better design of packaging and improving material recovery is expressed by the number of projects funded under the Horizon Europe and the financial contribution to their implementation. The overall budget spent for the period 2021-2022 was EUR 102.5 million and EUR 170.5 million in 2023-2024. Indicatively, the planned budget for the whole period 2021-2027 is approx. EUR 477 million. The results of these projects will support and promote circularity and recyclability of packaging formats.

1.5.5. *Assessment of the different available financing options, including scope for redeployment*

In theory, national legislations in Member States could have been established. However, there would have been to guarantee of consistent application across the EU and would inevitably contribute to further fragmentation of the internal market. Tasks related to development of legislation at the EU level cannot be externalised.

1.6. Duration and financial impact of the proposal/initiative

limited duration

- in effect from [DD/MM]YYYY to [DD/MM]YYYY
- Financial impact from YYYY to YYYY for commitment appropriations and from YYYY to YYYY for payment appropriations.

✓ unlimited duration

Implementation with a start-up period from 2023 to 2027, followed by full-scale operation.

1.7. Management mode(s) planned²

✓ Direct management by the Commission

- by its departments, including by its staff in the Union delegations;
- by the executive agencies

Shared management with the Member States

Indirect management by entrusting budget implementation tasks to:

- third countries or the bodies they have designated;
- international organisations and their agencies (to be specified);
- the EIB and the European Investment Fund;
- bodies referred to in Articles 70 and 71 of the Financial Regulation;
- public law bodies;
- bodies governed by private law with a public service mission to the extent that they provide adequate financial guarantees;
- bodies governed by the private law of a Member State that are entrusted with the implementation of a public-private partnership and that provide adequate financial guarantees;
- persons entrusted with the implementation of specific actions in the CFSP pursuant to Title V of the TEU, and identified in the relevant basic act.

² Details of management modes and references to the Financial Regulation may be found on the BudgWeb site:

<https://myintracomm.ec.europa.eu/budgweb/EN/man/budgmanag/Pages/budgmanag.aspx>

2. MANAGEMENT MEASURES

2.1. Monitoring and reporting rules

Specify frequency and conditions.

Standard monitoring and reporting rules for EU subsidies for this type of expenditure will apply.

2.2. Management and control system(s)

2.2.1. *Justification of the management mode(s), the funding implementation mechanism(s), the payment modalities and the control strategy proposed*

N/A

2.2.2. *Information concerning the risks identified and the internal control system(s) set up to mitigate them*

N/A

2.2.3. *Estimation and justification of the cost-effectiveness of the controls (ratio of "control costs ÷ value of the related funds managed"), and assessment of the expected levels of risk of error (at payment & at closure)*

N/A

2.3. Measures to prevent fraud and irregularities

Specify existing or envisaged prevention and protection measures, e.g. from the Anti-Fraud Strategy.

N/A

3. ESTIMATED FINANCIAL IMPACT OF THE PROPOSAL/INITIATIVE

3.1. Heading(s) of the multiannual financial framework and expenditure budget line(s) affected

- Existing budget lines

In order of multiannual financial framework headings and budget lines.

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Heading of multiannual financial framework	Budget line	Type of expenditure	Contribution			
	Number	Diff./Non-diff. ³	from EFTA countries ⁴	from candidate countries ⁵	from third countries	within the meaning of Article 21(2)(b) of the Financial Regulation
1	03 02 05 Single Market Programme – Producing and disseminating high quality statistics on Europe	Diff.	NO	NO	NO	NO
3	09 02 02 Circular Economy and quality of life	Diff.	YES	NO	/NO	NO
7	20 01 02 01 – Remuneration and allowances	Non-diff.	NO	NO	NO	NO
7	20 02 01 01 Contract staff	Non-diff.	NO	NO	NO	NO
7	20 02 01 03 – National civil servants temporarily assigned to the institution	Non-diff.	NO	NO	NO	NO
7	20 02 06 01 - Mission and representation expenses	Non-diff.	NO	NO	NO	NO
7	20 02 06 02 – Meetings, expert groups	Non-diff.	NO	NO	NO	NO
7	20 02 06 03 – Meetings of committees	Non-diff.	NO	NO	NO	NO

- New budget lines requested: not applicable

³ Diff. = Differentiated appropriations / Non-diff. = Non-differentiated appropriations.

⁴ EFTA: European Free Trade Association.

⁵ Candidate countries and, where applicable, potential candidates from the Western Balkans.

3.2. Estimated financial impact of the proposal on appropriations

3.2.1. Summary of estimated impact on operational appropriations

- The proposal/initiative does not require the use of operational appropriations
- ✓ The proposal/initiative requires the use of operational appropriations, as explained below:

Heading of multiannual financial framework	1	Single market, innovation and digital
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DG: ESTAT			2024	2025	2026	2027	TOTAL
○ Operational appropriations							
03 02 05 Single Market Programme — Producing and disseminating high quality statistics on Europe	Commitments	(1)	0.090	0.090	0.125	0.140	0.445
	Payments	(2)	0.090	0.090	0.125	0.140	0.445
TOTAL appropriations for DG ESTAT	Commitments	=(1)	0.090	0.090	0.125	0.140	0.445
	Payments	=(2)	0.090	0.090	0.125	0.140	0.445

In order to support the data collection in the area of packaging and packaging waste, service contracts for methodology and validation are needed, increasing in volume in 2026 and 2027 because of the new reporting obligation. The expected result of these actions is an increase in data quality which will not only benefit packaging and packaging waste and plastic carrier bags, but also the plastic own resource.

ESTAT costs stem from working on the following tasks: Validation and methodological guidance of packaging and packaging waste and lightweight carrier plastic bags.

Heading of multiannual financial framework	3	Natural resources and environment
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DG: ENV			2024	2025	2026	2027	TOTAL

○ Operational appropriations							
09 02 02 LIFE - Circular Economy and quality of life	Commitments	(1b)	1.400	2.200	1.800	1.300	6.700
	Payments	(2b)	1.400	2.200	1.800	1.300	6.700
TOTAL appropriations for DG ENV	Commitments	=1a+1b	1.400	2.200	1.800	1.300	6.700
	Payments	=2a+2b	1.400	2.200	1.800	1.300	6.700

DG ENV costs deal with the general implementation and follow-up to the Regulation and the necessary negotiations of the Regulation, as outlined section 1.5.1. In addition, DG ENV costs stem from: i. the needs to organise stakeholder meetings and workshops in the course of the work for various topics, such as drawing up the design for recycling criteria for the identified packaging categories, establishing the methodology to calculate and verify recycled content in plastic packaging etc., and ii. procurement needs for studies and ICT costs. Total costs for the above mentioned needs are estimated EUR 6.700 million for the period 2024-2027. The table below lists the proposed studies and service contracts to be procured.

List of proposed procurement studies and services contracts (subjects may need further finetuning)

List of proposed Procurement studies and services contracts (subjects may need further finetuning)	2024	2025	2026	2027 ⁶	Period 2024-2027
Preparatory study for establishing design for recycling guidelines and recycled at scale methodology	0.200	0.200	0.200	0.200	0.800
Preparatory study for establishing a methodology on calculating the recycled content for plastic packaging and analysing the bio based plastic packaging by possibly laying down sustainability criteria, targets for inclusion of biobased content.	0.200	0.250	0.100		0.550
Preparatory study to identify a methodology to calculate the reuse targets outlined in Article 26 of the Regulation, review the exemptions set in Article 26 of the Regulation and establishing the pooling arrangements for reuse.	0.300	0.200	0.200		0.700
Preparatory study to set guidelines to help MS to implement the provisions on bans of certain use of packaging formats		0.100	0.100	0.100	0.300

⁶ It is expected that some studies foreseen in 2027, will be continued for the period starting in 2028.

Preparatory study to assess the waste prevention targets and possibly introduce new, review the recycling targets with the view to increase them or setting further targets	0.200	0.100			0.300
Preparatory study, in collaboration with ECHA to prepare a report on the presence of substances of concern in packaging to determine the extent which they negatively affect reuse and recycling or impact chemical safety.		0.100	0.100	0.100	0.300
Preparatory study to specify minimum mandatory requirements for public contracts (Green Public Procurement)	0.500	0.500	0.400	0.200	1.600
Preparatory study to establish sustainability criteria for plastic recycling technologies and assessment of the possibility to introduce targets for biobased plastic packaging		0.250	0.200	0.200	0.650
Preparatory study for carrying out the reports and review clauses		0.500	0.500	0.500	1.500
Total procurement costs	1.400	2.200	1.800	1.300	6.700

			2024	2025	2026	2027	TOTAL
○ TOTAL operational appropriations	Commitments	(4)	1,490	2,290	1,925	1,440	7,145
	Payments	(5)	1,490	2,290	1,925	1,440	7,145
TOTAL appropriations under HEADING 1 to 3 of the multiannual financial framework	Commitments	=4	1,490	2,290	1,925	1,440	7,145
	Payments	=5	1,490	2,290	1,925	1,440	7,145

Heading of multiannual financial framework	7	‘Administrative expenditure’
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This section should be filled in using the 'budget data of an administrative nature' to be firstly introduced in the [Annex to the Legislative Financial Statement](#) (Annex V to the internal rules), which is uploaded to DECIDE for interservice consultation purposes.

EUR million (to three decimal places)

		2024	2025	2026	2027	TOTAL
DG: <ESTAT>						
○ Human resources		0.178	0.178	0.273	0.273	0.902
○ Other administrative expenditure						
TOTAL DG <ESTAT>	Appropriations	0.178	0.178	0.273	0.273	0.902

		2024	2025	2026	2027	TOTAL
DG: <ENV >						
○ Human resources		1.001	1.096	1.096	1.096	4.289
○ Other administrative expenditure		0.484	0.484	0.484	0.484	1.936
TOTAL DG <ENV>	Appropriations	1.485	1.580	1.580	1.580	6.225

		2024	2025	2026	2027	TOTAL
TOTAL appropriations under HEADING 7 of the multiannual financial framework	(Total commitments = Total payments)	1.663	1.758	1.853	1.853	7.127

EUR million (to three decimal places)

3.2.2. Estimated output funded with operational appropriations

Commitment appropriations in EUR million (to three decimal places)

Indicate objectives and outputs ↓	Type ⁷	Average cost	Year N		Year N+1		Year N+2		Year N+3		Enter as many years as necessary to show the duration of the impact (see point 1.6)						TOTAL		
			No	Cost	No	Cost	No	Cost	No	Cost	No	Cost	No	Cost	No	Cost	Total No	Total cost	
SPECIFIC OBJECTIVE No 1 ⁸ ...																			
- Output																			
- Output																			

⁷ Outputs are products and services to be supplied (e.g.: number of student exchanges financed, number of km of roads built, etc.).

⁸ As described in point 1.4.2. 'Specific objective(s)...'

- Output																		
Subtotal for specific objective No 1																		
SPECIFIC OBJECTIVE No 2 ...																		
- Output																		
Subtotal for specific objective No 2																		
TOTALS																		

PUBLIC

3.2.3. Estimated impact on Commission's human resources and administrative appropriations

(a) Summary of estimated impact on administrative appropriations

The proposal/initiative does not require the use of appropriations of an administrative nature

The proposal/initiative requires the use of appropriations of an administrative nature, as explained below:

EUR million (to three decimal places)

	2024	2025	2026	2027	TOTAL
--	------	------	------	------	-------

HEADING 7 of the multiannual financial framework					
Human resources	1,179	1,274	1,369	1,369	5,191
Other administrative expenditure	0,484	0,484	0,484	0,484	1,936
Subtotal HEADING 7 of the multiannual financial framework	1,663	1,758	1,853	1,853	7,127

Outside HEADING 7 ⁹ of the multiannual financial framework	N/A	N/A	N/A	N/A	N/A
Human resources					
Other expenditure of an administrative nature					
Subtotal outside HEADING 7 of the multiannual financial framework	N/A	N/A	N/A	N/A	N/A

TOTAL	1,663	1,758	1,853	1,853	7,127
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The appropriations required for human resources and other expenditure of an administrative nature will be met by appropriations from the DG that are already assigned to management of the action and/or have been redeployed within the DG, together if necessary with any additional allocation which may be granted to the managing DG under the annual allocation procedure and in the light of budgetary constraints.

⁹ Technical and/or administrative assistance and expenditure in support of the implementation of EU programmes and/or actions (former 'BA' lines), indirect research, direct research.

(b) Estimated requirements of human resources

- The proposal/initiative does not require the use of human resources.
- The proposal/initiative requires the use of human resources, as explained below:

Estimate to be expressed in full time equivalent units

	2024	2025	2026	2027
20 01 02 01 (Headquarters and Commission's Representation Offices)	5	5	5	5
20 01 02 03 (Delegations)				
01 01 01 01 (Indirect research)				
01 01 01 11 (Direct research)				
Other budget lines (specify)				
20 02 01 (AC, SNE, INT from the 'global envelope')	3.0	4.0	5.0	5.0
20 02 03 (AC, AL, SNE, INT and JPD in the delegations)				
XX 01 xx yy zz ¹⁰	- at Headquarters			
	- in Delegations			
01 01 01 02 (AC, END, INT - Indirect research)				
01 01 01 12 (AC, END, INT - Direct research)				
Other budget lines (specify)				
TOTAL	8.0	9.0	10.0	10.0

XX is the policy area or budget title concerned.

The human resources required will be met by staff from the DG who are already assigned to management of the action and/or have been redeployed within the DG, together if necessary with any additional allocation which may be granted to the managing DG under the annual allocation procedure and in the light of budgetary constraints.

Description of tasks to be carried out:

Officials and temporary staff	<p>DG ENV: 4 AD (3 existing and 1 new one) posts are needed for the implementation of the regulation and the different preparatory work and drafting of secondary legislation according to the deadlines proposed in the Packaging and Packaging Waste Regulation.</p> <p>DG ESTAT: Staff will measure reusable packaging in open loop systems which poses several technical challenges. To develop better methodological guidance, technical support and follow-up with Member States, an additional AD is needed. IT support is ensured by horizontal services in the unit ESTAT.E.2, which are estimated to be 1/20 of an AST post for the packaging and packaging waste and lightweight carrier plastic bags data collections (and thus not considered in the present note).</p>
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¹⁰ Sub-ceiling for external staff covered by operational appropriations (former 'BA' lines).

External staff	<p>The SNE post and the CA are needed to perform the technical work, as it was detailed in Section 1.5.1.</p> <p>The execution of these tasks requires 3 additional contractual staff in 2024, increased to 4 in 2025 and to 5 from 2026 on). This contractual staff consists of:</p> <ul style="list-style-type: none">- in DG ENV: 1 SNE (from 2024 to 2027) and 2 CAs in 2024, increased to 3 CAs from 2025.- IN ESTAT: 1 CA from 2026 on.
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3.2.4. Compatibility with the current multiannual financial framework

The proposal/initiative:

- ✓ can be fully financed through redeployment within the relevant heading of the Multiannual Financial Framework (MFF).

The costs foreseen under the SMP and LIFE will be covered within the existing envelopes of these programmes. The human resources required shall be preferably met by an additional allocation under the annual allocation procedure of human resources.

- requires use of the unallocated margin under the relevant heading of the MFF and/or use of the special instruments as defined in the MFF Regulation.
- requires a revision of the MFF.

3.2.5. Third-party contributions

The proposal/initiative:

- ✓ does not provide for co-financing by third parties
- provides for the co-financing by third parties estimated below:

Appropriations in EUR million (to three decimal places)

	Year N ¹¹	Year N+1	Year N+2	Year N+3	Enter as many years as necessary to show the duration of the impact (see point 1.6)			Total
Specify the co-financing body								
TOTAL appropriations co-financed								

¹¹ Year N is the year in which implementation of the proposal/initiative starts. Please replace "N" by the expected first year of implementation (for instance: 2021). The same for the following years.

3.3. Estimated impact on revenue

- ✓ The proposal/initiative has no financial impact on revenue.

