

Joint Industry Statement on Slovakia's Proposed Amendment to the Environmental Fund Act

The undersigned organisations strongly oppose the proposed Amendment to Slovakia's Environmental Fund (EF) Act aiming to enable the Environmental Fund (EF) to act as a Producer Responsibility Organisation (PRO) within the Extended Producer Responsibility (EPR) system.

The proposed Amendment would reduce the effectiveness of the Slovak EPR system for packaging, risking to jeopardize the achievement of packaging recycling targets.

The purpose of Extended Producer Responsibility

Extended Producer Responsibility is mandatory for all packaging since 31st December 2024. It is the financial and organisational mechanism that closes the gap between the costs of separate collection, sorting and recycling and the market value of secondary materials.

Article 8a of the Waste Framework Directive (WFD), which sets out the general minimum requirements for EPR schemes, as well as the Packaging and Packaging Waste Regulation's (PPWR), are very clear that the role of EU Member States in EPR systems is to authorise and supervise PROs. By taking on the role of a PRO, the State would be put in the conflicted and inappropriate position of having to police itself. Such an approach undermines the very concept of producer responsibility, is contrary to international best practice, and is cause for concern given the apparent trend towards the rise of State-run EPR schemes in Europe.

Risks to recyclability and packaging market access

The PPWR's recycling and recycled-at-scale targets¹ are set at a level of ambition that requires practically all used consumer and commercial / industrial packaging to be separately collected, sorted and recycled.

By assigning EPR responsibilities to a state-run body, the proposed Amendment risks to jeopardise progress towards recyclability at scale mandated under the PPWR. This could lead to the loss of market access for numerous packaging applications from 2035, even if they meet the PPWR's Design for Recycling requirements, thus negatively impacting businesses and consumers alike.

In its 2023 Waste Early Warning Report², the European Commission concluded that Slovakia was at risk of failing to meet the 2025 PPWR recycling targets (which have now been incorporated into the new PPWR). It recommended Slovakia to implement pay-as-you-throw systems and to improve the system for managing quality of recycling data. There were no concerns identified that would justify the intervention of the state in taking on the role of a producer. Nevertheless, on 1st October 2025, the Slovak government tabled in an expedited procedure an amendment to the national Waste Law that would enable the state Environment Fund to take on the role of a PRO.

Our call for action

The undersigned organisations urge members of the National Council to reject the government's proposal to amend the Environmental Fund Act, and to ensure Slovakia's EPR system remains aligned with the general minimum requirements of the Waste Framework Directive and supportive of the recyclability at scale objectives of the PPWR.

¹ Article 6 of the PPWR requires that from 1st January 2035, all packaging waste is effectively recycled at scale, achieving at Union level, an annual quantity of recycled material under each packaging category listed in Table 2 of Annex II equal to or greater than 30 % for wood and 55 % for all other materials.

² [Waste Early Warning Reports 2023](#), European Commission

Signatories:



AGMPM - Association of Greek Manufacturers of Packaging & Materials



AIM - European Brands Association



A.I.S.E - International Association for Soaps, Detergents and Maintenance Products



Aluminium Closures Group



APPLiA - Home Appliance Europe



ARAM - The Association for Packaging and the Environment in Romania



CEC - European Footwear Confederation



CEFLEX - A Circular Economy for Flexible Packaging



CEPE - European Council of the Paint, Printing Ink and Artists' Colours Industry



CICPEN - Czech Industrial Coalition for Packaging and the Environment



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



Cosmetics Europe



Der Grüne Punkt



EAFA - European Aluminium Foil Association



EDRA - European DIY Retail Association



EKO-PAK - Packaging Industry Union of Employers



ELIPSO - Les entreprises de l'emballage plastique et souple



EPPA - European Paper Packaging Alliance



EPRO - European Association of Plastics Recycling and Recovery Organisations



EucoLight - European Association of lighting WEEE compliance schemes



European Aluminium



EUROPEN - The European Organisation for Packaging and the Environment



EXPRA - Extended Producer Responsibility Alliance



FBCA - The Food & Beverage Carton Alliance



FDE - FoodDrinkEurope



FEFCO - The European Federation of Corrugated Board Manufacturers



FEPA - Federation of European Producers of Abrasives



FEPE - Federation of European Producers of Envelopes and Light Packaging



FESI - Federation of the European Sporting Goods Industry



FEVE - The European Container Glass Federation



FINAT - The Association for the European Label Industry



FPE - Flexible Packaging Europe



IK - Industrievereinigung Kunststoffverpackungen



Istituto Italiano Imballaggio



MPE - Metal Packaging Europe



NMWE - Natural Mineral Waters Europe



PAKKAUS - The Finnish Packaging Association



PETCORE EUROPE



PET EUROPE - Producers' Association



PROSPA - Producer Responsibility Organisations Packaging Alliance



RUCODEM - Romanian Union of Cosmetics and Detergents Manufacturers



SfPE - Steel for Packaging Europe



SZZV - Slovak Association for Branded Products



The Brewers of Europe



TIE - Toy Industries of Europe



UNESDA - Soft Drinks Europe



WEEE Forum - International Association of Electronic
Waste Producer Responsibility Organisations