CIRCULAR ANALYTICS PACKAGING NEWSLETTER



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LEADING THE WAY: PPWR FIRST MOVERS SET THE NEW STANDARD IN RETAIL

The Packaging and Packaging Waste Regulation (PPWR) is about to reshape the packaging landscape in Europe. It brings new and far-reaching obligations on recyclability, reuse quotas, compositional design, labelling, and reporting, that will affect every company placing packaged products on the European market.

For many businesses, this is more than just a regulatory shift: it's a systemic challenge requiring cross-functional coordination, solid data structures, and strategic foresight.

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Many companies are currently facing challenges, but they are approaching them with a forwardlooking mindset and a clear commitment to future-ready solutions. Just recently, **BILLA and BIPA** (REWE Group) announced they are digitally standardizing and consolidating their private label packaging data via the **Packaging Cockpit** to meet PPWR requirements - specifically targeting reduced packaging, improved recyclability, increased recycled content, harmonised labelling, and enhanced reusability.

This move confirms that leading retailers are already investing in packaging data infrastructure to stay ahead of regulation.

Learn how **BILLA and BIPA** are taking a first-mover role in approaching PPWR requirements by digitalizing and standardizing their packaging data: <u>Read the full article here (DE)</u>.

NAVIGATING THE NEW PACKAGING RULES: HOW OUR MODULAR CONSULTING SERVICE HELPS YOU MASTER THE PPWR

At **Circular Analytics**, we transform this strategic necessity into a streamlined, actionable process. Our **modular PPWR consulting service** offers tailored support at every level of readiness whether your focus is on data availability, legal compliance, or packaging optimization. **From compact analyses to comprehensive support in the implementation of PPWR requirements, our approach is flexibly scalable according to your specific needs**. Backed by deep expertise in sustainability, packaging technology, data systems, and regulatory frameworks, we help companies navigate complexity with clarity and precision.



Module 0 – PPWR Quick Check

Start with clarity. Our Quick Check evaluates your packaging assortment, specification systems, data availability, and organizational readiness. Through a concise workshop, we identify compliance gaps and chart your next steps, so you can launch the process with confidence.

Module 1 – Company Positioning & Requirements Profile

Every PPWR obligation depends on your role as producer, importer, retailer, or online trader. In this module, we define your status, segment your packaging with an ABC-analysis, assess legal impacts, and benchmark your position. Then we co-develop a prioritized action plan with clear milestones tied directly to your business context.



Module 2 – Packaging Data and System Readiness

As seen with BILLA and BIPA, robust packaging data systems are non-negotiable. Using the **Packaging Cockpit**, we inventory your packaging, locate data gaps, and improve cross-functional and supply-chain data integration. You will walk away with a data model and roadmap that support both compliance and commercial strategy.

Module 3 – Conformity Assessment

While full legal conformity under the PPWR is not yet technically possible, pending the finalization of key secondary legislation - companies must already begin aligning their packaging systems with the expected criteria. This module focuses on assessing your packaging portfolio's current "fitness for conformity" based on existing requirements. We evaluate recyclability, reuse potential, and likely certification needs, helping you anticipate future obligations. Using the Packaging Cockpit, we support proactive alignment and documentation, ensuring you are well prepared as regulations evolve.

Module 4 – Packaging Optimization

Compliance is a launching pad for improvement. We offer targeted redesign and material innovation proposals based on assessment insights. You'll gain quick wins and long-term optimization paths, improving recyclability, reducing material use, and lowering sustainability-related costs using a holistic evaluation methodology.

Module 5 – Implementation & Continuous Support

Compliance is ongoing. In this module, we help operationalize your strategy, integrating processes, training teams, and deploying sustainability dashboards. We facilitate continuous improvement cycles through the Packaging Cockpit and tailored reporting, embedding adaptability and control into your day-to-day packaging management.

Let's connect and turn your PPWR journey into a clear, manageable path:

Charlotte Neumair | charlotte.neumair@circularanalytics.com

COUNTRY SPECIFIC NEWS



ECODESIGN FOR SUSTAINABLE PRODUCTS AND ENERGY LABELLING WORKING PLAN 2025-2030

EU- The European Commission has adopted its 2025–2030 Working Plan for Ecodesign for Sustainable Products, outlining priority products for new ecodesign and energy labelling requirements. Packaging is not within the scope of this plan. The focus is on textiles (especially apparel), furniture, tyres, and mattresses, with a mid-term review set for 2028.



GREEN CLAIMS DIRECTIVE WITHDRAWAL ANNOUNCED



EPR FOR PACKAGING

EU- On 20 June, a spokesperson for the European Commission announced that the Commission plans to withdraw the Green Claims Directive proposal, even though the legislation is nearing final approval.

Further Information

EPR OBLIGATIONS FOR

COMMERCIAL PACKAGING IN

FRANCE - Starting January 2025, France

(EPR) to all industrial and commercial

packaging. This includes both single-use

and reusable packaging—such as crates,

barrels, and transport containers-used by

Further Information

will extend extended producer responsibility

INDUSTRIAL AND

FRANCE

USA: Hawaii - Hawaii has passed HB750, requiring the Department of Health to assess recycling needs. The goal is to reduce waste, improve recycling collection and reuse, and expand local processing through an EPR program for packaging and paper.

Further Information



RECYCLING REFORM ACT

USA: Washington - Washington has enacted SB 5284, also known as the Recycling Reform Act, which establishes an EPR system for packaging and paper products placed on the market, with certain limited exemptions.

Further Information



MARYLAND ADOPTS EPR FOR PACKAGING AND PAPER

BAN ON POLYSTYRENE PACKAGING

companies across sectors.

FRANCE - France have made a strategic decision to extend the timeframe for phasing out styrenic packaging. Originally marked for elimination by 2025, the transition period has been lengthened until 2030.

Further Information

USA: Maryland - Maryland has enacted Senate Bill 901, an EPR law covering packaging (including bottles and paper products). The law requires producers to join a PRO by July 1, 2026, and to begin covering the costs of local recycling programs by July 2028.

Further information

CIRCULAR ANALYTICS NEWS

NEW PEER-REVIEWED PUBLICATION

TECHNICAL RECYCLABILITY AND CARBON FOOTPRINT OF PACKAGING FOR BUTTER, YOGURT, AND SPREADS

The aim of this work was to assess the technical recyclability of packaging available on the market in the DACH region for the product categories of butter, yogurt, and spreads, as well as to determine the global warming potential exhibited by the packaging using a streamlined LCA.



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Γ	10% 0%	Glass	Shrink Foil	Trav	Tray (+CS)	Wra

Butter Packaging

27 butter packaging samples were assessed. Market research showed that in the DACH region, 47% of butter is sold in wraps, 43% in trays, and 4% each in glass jars and shrink foils.

Wraps: Recyclability ranges from 24–31% in Austria, 0–31% in Germany, and averages just 2% in Switzerland (max 26%).

Glass: Recyclability is 97% in all three countries.

Shrink foil: Only the steel clip is recyclable, accounting for 23% of the packaging weight.

Trays: PP trays are 94–100% recyclable in Austria and Germany; in Switzerland, most are non-recyclable (best case: 7%).





Yogurt Packaging

The yogurt packaging sample included glass and ceramic jars, LDPE/HDPE pouches with PET screw caps, PP and PS cups, and PP buckets. Cups represent 75% of the market, glass jars 14%, and buckets 5%.

- Yogurt cups:
- 1. With cardboard Sleeve: For recyclability, it's assumed that consumers in Austria and Switzerland separate the cardboard sleeve if clearly labeled, though this is not backed by data. In Germany, according to the German Mindeststandard, consumer separation cannot be considered. Without separation, recyclability is 0% in all countries.
 - **PET**: 96% recyclable in Austria, 36% in Switzerland, 0% in Germany.
 - **PP/PS**: Recyclability ranges from 17–99% in Austria (avg. 75%), 0–94% in Germany (avg. 66%), and 6–71% in Switzerland (avg. 16%).
- **2.** Cups without sleeve: Average recyclability is 78% in Austria, 48% in Germany, and 4% in Switzerland.
- Pouch: Not recyclable in any of the three countries.
- Jars: 99% recyclable in all countries.



Spread Packaging

46 samples of spreads, cream cheese, and curd cheese were assessed. Only one was a glass jar, the remaining 45 were cups or trays, which also make up 98% of the market.

Due to similar packaging, recyclability trends align with those for yogurt. The highest recyclability was found for glass jars and for PP and PS cups without cardboard sleeves in Germany and Austria.





CARBON FOOTPRINT

The results show clear differences both between and within product groups, especially for yogurt. Country-level differences are minor and mainly stem from transport emissions and energy mix in waste management. A glass jar used for spreads and butter appears as an outlier due to its higher carbon footprint. Yogurt shows the widest range, driven by varying filling volumes and packaging sizes. For example, a 250 g PP yogurt cup emits 0.035 kg CO_2 eq, while a 500 g version emits 0.692 kg CO_2 eq.

This assessment reveals significant variability in packaging recyclability due to design and material differences, highlighting the urgent need to improve packaging systems to meet upcoming regulations focused on recyclability and carbon footprint reduction. To succeed, businesses must remove recycling barriers like incompatible materials, adopt mono-material packaging, and support tailored waste management aligned with local regulations. Understanding consumer behavior and harmonizing infrastructure across countries are also key to boosting recycling efficiency.

At Circular Analytics, we specialize in guiding companies through these challenges - helping optimize packaging design, improve recyclability, and reduce environmental impact to meet evolving sustainability standards.

Read the whole article here: https://www.mdpi.com/2313-4321/10/2/31#app1-recycling-10-00031



METHODOLOGICAL DIVERSITY IN CARBON FOOTPRINT ASSESSMENT

With the Corporate Sustainability Reporting Directive (CSRD), the EU Commission obliges companies to systematically document their environmental impact, in particular greenhouse gas emissions. The European Sustainability Reporting Standards (ESRS) serve as the methodological backbone. These require, among other things, reporting in accordance with the **Greenhouse Gas Protocol**, the Product Environmental Footprint (PEF) or the EN ISO 14064 standard, as well as the use of emission factors from the **IPCC** (Intergovernmental Panel on Climate Change). It should be noted that the recently adopted Omnibus Package narrows the scope of CSRD, temporarily exempting a significant number of companies from these requirements.

What appears to be a clear roadmap at first glance reveals a great deal of room for interpretation on closer look: the frameworks mentioned differ in terms of content, scope and depth of application. For example, end-of-life recycling can be handled in different ways – either by giving credit for recycling (Circular Footprint Formula) or not (cut-off approach). There is also plenty of room for further methodological decisions like various options when selecting the underlying calculation models of the Life Cycle Impact Assessment (LCIA) method, such as EF3.1 or ReCiPe.

This article takes a closer look at this diversity of methods: we are analysing how different methodological decisions affect the impact category of climate change in the packaging sector. The materials examined are plastic, aluminium, paperboard, steel and glass in the context of beverage and food containers. In particular, we analyse the following parameters:

- Life Cycle Impact Assessment method
- Data basis
- End-of-life allocation
- System boundaries (focus on regionalisation)

Omnibus I-Package: https://www.wko.at/nachhaltigkeit/omnibus-paket-berichts-sorgfaltspflichtennachhaltigkeit#auswirkungen_csrd





Figure 1: Range in Methodological Differences | 0.5 L Packaging for food or beverage containers in comparison | **[PET]** = PET bottle; **[Aluminium]** = Aluminium can; **[Paperboard]** = Beverage carton; **[Steel]** = Steel bottle; **[Glass]** = Glass bottle | **[*]** = Components made of other materials included; **[**]** = Multi-layer material (Liquid packaging board) | **Purple bars:** range in which the result per material is located; **Overlapping bars:** Method dependent conclusions possible | Post-consumerrecycled content, recyclability assessment and recycling rates depend on the packaging in focus. Single use packaging (n=1)

Figure 1 shows the range of possible different results per packaging (purple bars) when changing only one of the parameters above. In the case of the aluminium can and the plastic bottle, depending on the model decisions made, an opposite statement can be made as to whether one or the other packaging causes more greenhouse gases. The European baseline scenario, calculated with ecoinvent 3.10 and EF3.1 and uses the Circular Footprint Formula as described in the PEF method is labelled with a blue dot.

The choice of **database** influences results by up to **34%** (*Ecoinvent 3.8 instead of 3.10*)

• The choice of **LCIA method** shows rather small differences (**3%**) for climate change (*ReCiPe instead of EF3.1*)

• End-of-life allocation can make a difference of up to 45% (*Cut-off instead of Circular Footprint Formula*)

• **Regional assumptions** lead to deviations of up to **58%** (*Austria instead of Europe*)

Differences are to be expected. Nevertheless, the result of "regionalised calculations" depends on which parameters are regionalised. In practice, this is often done at different levels of granularity.

Especially the choices of end-of-life allocation and system boundaries lead to significant variations in the results. In some cases, the database used also has a major impact on the greenhouse gas balance. If results are presented without context but calculated using different methods, this gives the impression of comparability, although the results can be misinterpreted or played off against each other without context.

It should also be noted that only one parameter was changed in the example shown - several changes could cause larger deviations. In addition, climate change is a robust category, in other categories differences are expected to be significantly greater. As a consequence, it is becoming more difficult for companies and decision-makers to draw reliable conclusions. **Summarised:** Results should only be compared when based on consistent methodology and assumptions - otherwise, findings may reflect the model rather than the packaging itself.

In order to achieve the actual goal of CSRD - comparability and transparency - further standardisation and harmonisation of assessment methods is required. To ensure true comparability, the Product Environmental Footprint method is therefore probably the most suitable framework of the three frameworks mentioned: It defines more methodological details, reduces room for interpretation and comprises 16 impact categories - not just climate change.

Only with consistent harmonisation of the methods can sustainability reporting really serve as reliable for decision-making - in terms of climate protection, credibility and fair assessment. That's why we at Circular Analytics are orientate our work on the Product Environmental Footprint (PEF) method and incorporate it directly into our software, the Packaging Cockpit. In this way, we ensure that our assessments are not only scientifically sound, but also in line with the most comprehensive and harmonised framework currently available - supporting credible, transparent and truly comparable sustainability reporting.

CALL FOR EXPERT INPUT ON MATERIAL LOSS RATES

Call for Expert Input: Reducing Material Losses in the Supply Chain

Circular Analytics, together with the World Packaging Organization, is conducting a research project focused on material loss rates linked to different packaging types, with the goal of improving efficiency and sustainability across the supply chain.

We're currently seeking insights from experts in the packaging, retail, logistics, and manufacturing sectors across Europe. If you or someone on your team has relevant experience, we'd be glad to hear from you!

Interviews are short and flexible

Questions can be shared in advance, and all input will be treated confidentially and anonymously.

Participants will receive a summary of key findings, including practical insights to reduce material loss, CO₂ emissions, and related costs.

Interested or want to connect us with the right person in your organization? Just reply to this newsletter or reach out to nathalia.antoniazzi@circularanalytics.com.

Let's work together for smarter packaging and more sustainable supply chains!



PROZERO – PROSPECTIVE LIFE CYCLE ASSESSMENT FOR FUTURE-PROOF PACKAGING SOLUTIONS

REGISTRATION FOR INFORMATION SESSION ON PROZERO

The future of the packaging industry starts today with 'ProZero', our pioneering research project to develop a prospective Life Cycle Assessment (pLCA) tool for packaging, looking ahead to the year 2050.

Why Prospective LCA?

The requirements of the European Green Deal, the PPWR (Packaging and Packaging Waste Regula-tion) and the EU Circular Economy Package clearly show that packaging must become more climate-neutral, resource-efficient and recyclable in the near future. Traditional life cycle assessments pro-vide valuable insights but are primarily based on past data.

A sustainable packaging strategy requires forward-looking assessments of environmental impacts that take future regulatory, technological and social developments into account. This is precisely where 'ProZero' comes in.

Goal Of The Project:

In this project, a practical tool for the forward-looking packaging assessment will be developed, based on three scientifically grounded future scenarios extending to 2050. This approach incorporates, among other things, industry roadmaps, current research, and integrated assessment models. The focus will be on packaging made of plastic, paper, glass, aluminium, and steel. To enable companies to calculate the results independently in the future, the methodology will be integrated into the Packaging Cockpit – our tool for the environmental assessment of packaging – after the project is completed.

Your benefits as a project partner:

- Future readiness & competitive advantage: You will gain early, well-founded insights into how future CO₂ emissions, circularity requirements, and production factors will affect your packaging, enabling you to make informed decisions and leverage this knowledge for a sustainable market advantage.
- Exclusive analyses: Depending on the size of your company, you may submit up to four or eight packaging solutions (your own or competitors') as case studies within the project. For each submitted packaging, we will calculate:
 - \rightarrow the current environmental impacts (status quo)
 - → the projected CO₂ emissions for 2030, 2040, and 2050, under three distinct future scenarios, based on societal, political, and economic developments
- Strategic insights: You will receive well-founded insights into the future strengths and weaknesses of your packaging materials or solutions (SWOT analysis).



Who should participate? The project is aimed at:

- Packaging manufacturers
- Brand owners and product manufacturers
- Retail companies
- Industry associations representing relevant packaging materials (paper, plastic, glass, aluminium, steel)

Scientific partners:

Circular Analytics (project lead), Paul Scherrer Institute (CH), Leiden University (NL), World Packaging Organization

If you would like to join our information session on **11 September 2025, 16:00-17:00 CEST** or have us reach out to schedule an individual meeting, please fill in the form:

Registration for information session on ProZero || September 11th – Circular Analytics

PACKAGING COCKPIT NEWS

COLLABORATING FOR CLARITY: THE GREEN DEAL PACKAGING FRAMEWORK

The **Initiative Digital Packaging Transformation** was launched early 2025 by **PreZero, Lidl, Kaufland, BILLA, REWE International, SPAR Austria, ARA** and **Packaging Cockpit**. Its primary objective is to establish a unified project methodology for the digitalisation of packaging data across the entire supply chain, enabling stakeholders to meet emerging regulatory requirements.

The Initiative's work is consolidated in the **Green Deal Packaging Framework** (GDPF), which serves as a practical guide and foundation for supply chain participants. This framework provides the basis for implementing an efficient, harmonised data collection processes to prepare for regulatory requirements.





BILLA AND BIPA RELY ON PACKAGING COCKPIT FOR DIGITAL PACKAGING DATA MANAGEMENT

We at **Packaging Cockpit GmbH** are proud to support **BILLA and BIPA**, two leading retail brands of **REWE International AG**, on their way to a future-ready packaging data management for private label packaging.

Together, we are implementing a centralized and standardized system for managing packaging data using our Packaging Cockpit software.

"The PPWR calls for transparency, clarity, and accountability throughout the supply chain. That's exactly what we're enabling by digitally capturing our packaging data in a structured way, with Packaging Cockpit as our reliable partner," says **Andreas W. Streit**, Head of Sustainability at REWE International.

Dr. Ernst Krottendorfer, Managing Director at Packaging Cockpit GmbH, underlines that whether companies are making strategic portfolio decisions or working on packaging design, such choices rely on complete and trustworthy data:

"The Packaging Cockpit ensures that all relevant packaging data is available, that legal requirements, both current and future, can be met, and that packaging costs can be managed efficiently," he says.

With our solution, BILLA and BIPA suppliers can enter and submit packaging data in a simple and efficient way. This supports REWE's Green Packaging Management team in building a robust data infrastructure that enhances operational efficiency and supports informed decision-making of private labels packaging.

Christian Stiefsohn, Managing Director at Packaging Cockpit GmbH, considers the decision by BILLA and BIPA a milestone for the entire industry. Building on the foundations laid by **the Initiative Digital Packaging Transformation**, the decision marks a significant step toward scaling packaging data management.

With our technology and expertise, we help our partners align their strategies with both today's requirements and tomorrow's developments.

Would you like to learn how Packaging Cockpit can support your packaging data strategy?

Get in touch with our team member Katja Dvir at kdv@packaging-cockpit.com

or book a tailored consultation directly via our webshop.

Read the full press release by REWE Group (German)



PACKAGING COCKPIT JOINS FORUM REZYKLAT

We are pleased to announce that **Packaging Cockpit GmbH** is now a member of **the Forum Rezyklat**, a platform for collaboration and innovation in packaging circularity.

Dr. Ernst Krottendorfer, Managing Director at Packaging Cockpit GmbH, emphasizes that packaging fulfils many essential functions, from ensuring product safety to enabling efficient distribution and remains a key part of modern consumer culture.

He points out that to preserve this role, it is necessary to close the product and material loops in packaging. As a member of Forum Rezyklat, Packaging Cockpit actively supports other members in driving forward innovative solutions for the transformation packaging urgently requires.

By joining Forum Rezyklat, we strengthen our commitment to collaborative, data-driven change and support the shared mission of making packaging fit for a circular future.

ARA WEBINAR: DIGITALISATION OF PACKAGING DATA

In March 2025, our experts Pia Buchmayr and Michael Parzer, together with Kathrin Tabor, hosted a dedicated webinar for **ARA**. The session focused on the digitalisation of packaging data in the context of upcoming regulatory changes.

Participants gained practical insights into how companies can use Packaging Cockpit to ensure high data quality, prepare for the EU Packaging and Packaging Waste Regulation (PPWR), and implement effective, future-proof packaging strategies

PACKAGING COCKPIT EVENTS



SAVE THE DATE: 23. - 25. September 2025: EUROPEAN TRADE FAIR FOR PACKAGING, TECHNOLOGY AND PROCESSING

Location: PM Messezentrum || Messezentrum, 90471 Nuremberg

As mentioned in our last newsletter, we'd like to highlight once again that Packaging Cockpit will be participating in **FACHPACK 2025!** We're thrilled to be part of this event and will be joining our trusted partner, PreZero, at their booth to present our tool - <u>PreZero SPOT in cooperation with Packaging Cockpit.</u> Our team members Kathrin Tabor, Katja Dvir and Mathias Egger look forward to engaging with you in person and sharing the exciting developments we've been working on.

For further information





SAVE THE DATE: 21. - 23. October 2025: SUSTAINABILITY IN PACKAGING EUROPE

Location: Hyatt Regency Barcelona Tower || 08907 Hospitalet de Llobregat, Barcelona, Spain

Together with our partner **PreZero** you will be able to meet our team members Katja Dvir and Michael Parzer at the **Sustainability in Packaging Europe** event in Barcelona, which is the Europe's largest sustainable packaging event. It is a great opportunity to connect and discuss with other packaging and sustainability experts from brand owners, retailers, packaging manufacturers and many other actors in the industry.

For further information



SAVE THE DATE: 10. - 12. November 2025: SUSTAINABLE PACKAGING SUMMIT Utrecht || Netherlands

You will also have the opportunity to meet Packaging Cockpit's Katja Dvir and Michael Parzer, alongside our partner PreZero, at the **Sustainable Packaging Summit** in Utrecht. This event brings together leading voices from across the global packaging value chain, including brands, NGOs, recyclers, and regulators, all united by the goal of accelerating the sustainable transformation of packaged goods. It's a valuable opportunity to connect, exchange insights, and collaborate with experts in packaging and sustainability.

For further Information





Prochure.ch- Foreign Trade Summit | September 16, 2025 - Olten bei Zürich Presentation: tba by Charlotte Neumair



FACHPACK - European Trade Fair for Packaging, Technology and Processing | September 23-25, 2025 - Nuremberg Presentation: tba by Lina Wimmer



ProZero – Information Session | September 16, 2025 - online (for further information on the project please see pages 11-12) Details and registration





16. qualityaustria Lebensmittelforum | September 30, 2025 - Vienna Presentation: tba by Charlotte Neumair



SAVE THE DATE: The Packaging Updates by Packforce Austria – Update Nr. 5 | October 16, 2025 – Vienna

Location: Haus der Ingenieure, Eschenbachgasse 9, 1010 Vienna

Join us for this quick and informative event covering the latest and most pressing topics in packaging. As with previous editions, you can look forward to highly professional presentations on the current state of the packaging sector, inspiring insights, and, of course, valuable opportunities to exchange ideas and network with industry peers.

More details and registration (German only)

Strategies for a Transition to Circular Economy

We specialize in assessing and comprehensively optimizing the sustainability of packaging – our goal is to develop circular and sustainable solutions for our clients.

We are internationally oriented and offer the following range of services: <u>PPWR Compliance Consulting</u> <u>Regulatory Monitoring</u> <u>Circularity Assessment</u> <u>Life Cycle Assessment</u> <u>Trainings</u>

IMPRINT

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