



CIRCULAR ANALYTICS

PACKAGING NEWSLETTER

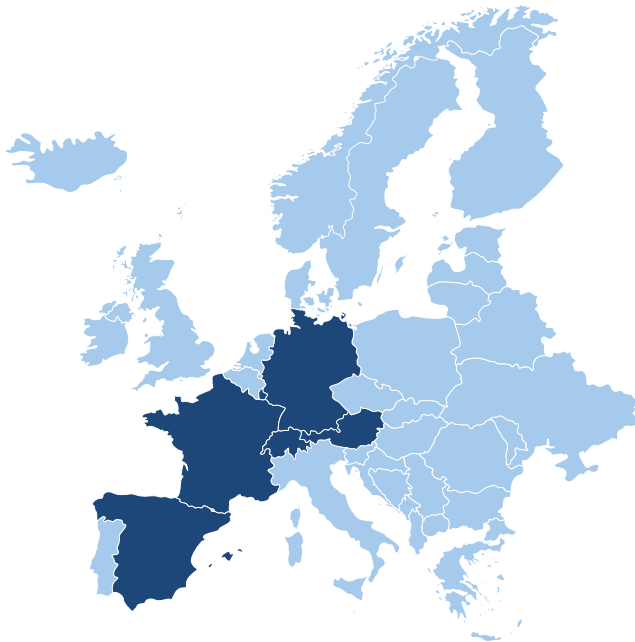


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EDITORIAL

This edition highlights key developments shaping the European packaging landscape.

We also cover increasing scrutiny of PFAS in food packaging, displaying our PFAS risk-matrix methodology (Wack et al.) is referenced in the EU Commission's draft on harmonised PFAS testing under the PPWR. Furthermore, the scientific methodology of Wack et al. is now being published as an industry whitepaper in cooperation with ECR Austria.

Moreover, this issue contains updates from the Packaging Cockpit, including the provision of new functionalities for creating the PPWR Declaration of Conformity (DoC) and the corresponding Technical Documentation (TD).

Thank you for your continued interest and engagement as we navigate these regulatory challenges together.

Best regards,

Your Circular Analytics Team

COUNTRY SPECIFIC NEWS



COMMISSION ADOPTS RULES FOR REPORTING RECYCLED CONTENT IN PLASTIC BEVERAGE BOTTLES

EU - The European Commission adopted an Implementing Decision on 30 June 2026 establishing harmonised methods for calculating, verifying and reporting recycled plastic content in single-use plastic beverage bottles, providing producers with clear and uniform compliance rules across all Member States.

[Further Information](#)



COMMISSION ADOPTS VOLUNTARY SUSTAINABILITY REPORTING STANDARD FOR SMES

EU - The European Commission formally adopted the Voluntary Sustainability Reporting Standard (VSME) on 3 July 2026, providing smaller value-chain companies with fewer than 1,000 employees a simplified, standardised framework for voluntary sustainability reporting.

[Further Information](#)



COMMISSION PUBLISHES FAQ ON EMPCO DIRECTIVE APPLICATION

EU - With the EmpCo Directive (2024/825) applying from 27 September 2026, the European Commission published a detailed FAQ on 18 May 2026 clarifying compliance requirements for environmental claims and sustainability labels on packaging, including the use of visual elements and the prohibition of unsubstantiated carbon neutrality claims.

[Further Information](#)



AUSTRIA PUBLISHES GUIDANCE ON PPWR TRANSITIONAL PROVISIONS FROM AUGUST 2026

AUSTRIA - Austria's Federal Ministry issued a fact sheet clarifying which PPWR obligations apply from 12 August 2026, including PFAS limits for food contact packaging, conformity assessment requirements, and reuse system standards. Existing national rules remain in force where compatible with the PPWR, pending planned legislative amendments.

[Further Information](#)



COMMISSION ADOPTS SIMPLIFIED EUROPEAN SUSTAINABILITY REPORTING STANDARDS

EU - The European Commission formally adopted the revised ESRS on 3 July 2026, amending Delegated Regulation (EU) 2023/2772 to reduce mandatory datapoints by 61%, simplify the materiality assessment process and cut reporting costs for businesses, while preserving core sustainability policy objectives. The revised standards apply from financial year 2027, with optional early adoption for 2026.

[Further Information](#)



PARLIAMENT AND COUNCIL REACH DEAL ON CHEMICALS "OMNIBUS IV" PACKAGE

EU - Parliament and Council reached a political agreement on 17 June 2026 on the Chemicals "Omnibus IV" package, simplifying chemical labelling requirements including flexible digital labelling options for chemical products, simplified cosmetics packaging rules, and a mandatory 15-month deadline for updating hazard labels following reclassification.

[Further Information](#)



EU PROPOSES TO ALLOW MIXED MUNICIPAL WASTE EXPORTS TO SWITZERLAND

EU - The Commission proposes to exempt Switzerland from the upcoming ban on exporting mixed municipal waste for recovery under the Waste Shipment Regulation, citing disproportionate economic and environmental costs for border regions of Austria, France, Germany, and Italy.

[Further Information](#)



AUSTRIA DROPS PLANS FOR NATIONAL PLASTIC PACKAGING TAX

AUSTRIA - The Austrian Federal Government confirmed on 22 April 2026 that the planned national tax on single-use plastic packaging will not be introduced, following significant opposition from industry and trade associations across the value chain.

[Further Information](#)



FRANCE CLARIFIES BONUS SCHEME FOR RECYCLED PLASTIC CONTENT UNDER EPR

FRANCE – France's Ministry of Ecological Transition published an updated FAQ in April 2026 clarifying the recycled plastic incorporation bonus (IMPR) under the EPR framework, specifying bonus amounts of €450–€1,000 per tonne, proximity requirements, and confirming that ISCC mass balance certifications are not accepted.

[Further Information](#)



EU COMMISSION TAKES FRANCE TO COURT OVER MANDATORY TRIMAN LOGO

FRANCE - The European Commission brought an action against France before the Court of Justice (Case C-249/26), alleging that the mandatory display of the national "Triman" sorting logo on EPR-regulated household packaging fails to fulfil obligations under Article 34 TFEU and infringes the notification obligation under Article 5 of the TRIS Directive.

[Further Information](#)



BUNDESTAG PASSES PACKAGING LAW IMPLEMENTING EU REGULATION 2025/40

GERMANY - Following Germany's clarification of 27 May 2026, the Commission withdrew its detailed opinion on the draft VerpackDG, accepting Germany's explanations on definitions and EPR provisions. The Bundestag passed the law on 11 June 2026, replacing the existing Packaging Act ahead of the PPWR's 12 August 2026 application date.

[Further Information](#)



DRAFT AMENDMENT TO GERMAN CIRCULAR ECONOMY ACT PUBLISHED FOR CONSULTATION

GERMANY - Germany's Federal Environment Ministry published a draft amendment to the Circular Economy Act (KrWG) on 26 June 2026, transposing EU Waste Framework Directive amendments into national law, including strengthened waste avoidance measures and updated rules on separate collection and chemical recycling.

[Further Information](#)



SPAIN CLARIFIES INTERACTION BETWEEN EU PACKAGING REGULATION AND NATIONAL LAW

SPAIN - Spain's Ministry for Ecological Transition issued a clarification note in May 2026 confirming that EU Regulation 2025/40 takes precedence over the national RD 1055/2022 from 12 August 2026, and that a new national packaging decree is under development to align Spanish law with the EU framework.

[Further Information](#)



SWITZERLAND ADOPTS COMPREHENSIVE NEW PACKAGING ORDINANCE

SWITZERLAND - Switzerland's Federal Council adopted the new Packaging Ordinance (VerpV), introducing for the first time a comprehensive regulatory framework covering all packaging types, including take-back obligations, recycling quotas, and deposit rules for reusable beverage containers. The Ordinance enters into force on 1 January 2027.

[Further Information](#)



SENATE LAUNCHES INQUIRY INTO NATIONAL PACKAGING EPR BILL

AUSTRALIA - Australia's Senate launched an inquiry into the Extended Producer Responsibility Scheme for Packaging Bill 2026, which would introduce a mandatory national EPR framework, marking a potential shift away from the country's current co-regulatory packaging stewardship system.

[Further Information](#)



FEDERAL BILL PROPOSES BAN ON PFAS, PHTHALATES AND BPA IN FOOD PACKAGING

USA - Congressional Democrats introduced the No Toxics in Food Packaging Act on 11 June 2026, seeking to prohibit a range of chemicals from food packaging and food processing materials, including PFAS, ortho-phthalates, BPA and styrene polymers, while ensuring they are not replaced by similarly harmful alternatives.

[Further Information](#)



CALIFORNIA FINALIZES EPR REGULATIONS UNDER SB 54

USA, California - California's Office of Administrative Law approved the final SB 54 regulations on 1 May 2026, introducing phased compliance obligations. Producers must register with the approved Producer Responsibility Organization and report packaging supply data, with the first operational phase scheduled to commence in 2027.

[Further Information](#)



CIRCULAR ANALYTICS NEWS

PFAS MEETS PPWR:

WACK ET AL. BECOMES THE BLUEPRINT FOR THE EU COMMISSION

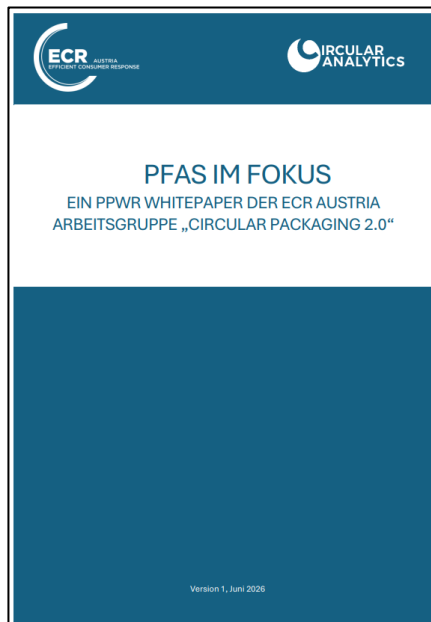
The regulation of PFAS (per- and polyfluoroalkyl substances) in food-contact packaging continues to gather pace — and Circular Analytics is right at the heart of it. What began as a scientific study has evolved into both a practical industry resource and a reference point in the European Commission's own regulatory thinking.

Why PFAS in Packaging Matters

PFAS are a large family of synthetic chemicals valued for their grease-, water- and heat-resistant properties — qualities that once made them attractive for food packaging applications such as coated papers, boards and moulded fibre. The same properties that made them useful, however, also make them extraordinarily persistent in the environment and in the human body, earning them the label "forever chemicals." Mounting evidence of their health and environmental impact has pushed regulators across the EU to move decisively toward restriction. For packaging producers, this shift is no longer a distant prospect but an immediate compliance reality.

From Study to Industry Whitepaper

Our scientific work on the assessment of PFAS in food packaging (Wack et al.) has been transformed into a practice-oriented industry whitepaper in cooperation with ECR Austria. This makes the approach we developed — in particular the risk matrix for the structured assessment of PFAS risks along the value chain — directly applicable for companies. The whitepaper translates the scientific methodology into concrete, actionable guidance for manufacturers and those placing packaging on the market.



The strength of the risk-matrix approach lies in its structure: rather than treating every material as an undifferentiated testing burden, it helps companies prioritise where PFAS risk genuinely lies. By combining an assessment of intentional use, realistic contamination pathways and the intrinsic likelihood of PFAS occurrence in a given material, the matrix allows resources to be focused where they matter most — a decisive advantage when analytical testing is costly and time is of an essence.

The full “PFAS im Fokus” Whitepaper can be downloaded here:

<https://circularanalytics.com/downloads/>

(currently only available in DE/ EN will follow shortly)

The EU Commission Adopts Our Approach

Particularly encouraging: as part of its PFAS Task Force, the European Commission (Directorate B, Unit B.1 – Bioeconomy and Sustainable Materials) has issued a draft on harmonised sampling and testing of PFAS in food-contact packaging — and it explicitly references our approach.

In its recommendations for manufacturers, the Commission draws on the methodology developed by Wack et al. and sets out three pillars of conformity assessment: first, verification of intentional use via supplier declarations; second, assessment of the specific risks of unintentional presence (cross-contamination, legacy PFAS in recycled inputs, carry-over between production runs); and third, assessment of the material-intrinsic likelihood of PFAS occurrence. The draft cites our publication "Development of a Risk Matrix for Assessing PFAS in Food Packaging" (Wack et al.) directly.

The methodological section of the draft (the PARC stepwise approach) likewise reflects the logic we advocate — from information collection through total fluorine quantification to targeted PFAS analysis. This stepwise design mirrors a core principle of our work: begin with the information already available in the supply chain, then escalate to increasingly specific analytical techniques only where the evidence warrants it. Total fluorine screening acts as a first filter; where elevated fluorine is found, qualitative techniques such as pyrolysis-GC/MS help establish whether that fluorine is genuinely attributable to PFAS; and targeted analysis then confirms compliance against the specific limit values. It is a pragmatic architecture that balances scientific rigour with the operational realities of manufacturers and laboratories alike.

The Regulatory Framework: PPWR

The backdrop is the new EU Packaging and Packaging Waste Regulation (PPWR, Regulation (EU) 2025/40), which sets PFAS restrictions for food-contact packaging under Article 5. The Commission draft specifies the three relevant limit values: 25 ppb for any individual PFAS (excluding polymeric PFAS), 250 ppb for the sum of PFAS, and 50 ppm total fluorine. Market surveillance is governed by Regulation (EU) 2019/1020, under which national authorities are empowered to carry out documentary, physical and laboratory checks on the products placed on their markets.

Crucially, the draft also underscores where the burden of proof sits. Manufacturers are expected to prepare technical documentation as part of their Declaration of Conformity (DoC) and to make it available to market surveillance authorities on request. That documentation should include a description of the conformity assessment procedure, a hazard analysis of critical points in the production chain, supplier documentation, and analytical reports from accredited laboratories — complete with method descriptions, limits of detection and quantification, sample sizes and sampling points. In other words, robust documentation is not an optional extra; it is the very foundation on which compliance rests.

What This Means in Practice

The fact that a methodology developed by Circular Analytics and its partners is now feeding into the Commission's thinking underscores the practical relevance of our approach. For manufacturers, the message is clear: a risk-based, three-tier assessment procedure backed by robust technical documentation is becoming a central building block of PPWR compliance.

Companies that begin preparing now — mapping their supply chains, gathering supplier declarations, and establishing a defensible testing and documentation strategy — will be far better placed than those who wait for enforcement to arrive. PFAS compliance under the PPWR is not simply a hurdle to clear once; it is an ongoing discipline of evidence, traceability and risk management. The organisations that treat it as such will turn a regulatory obligation into a mark of quality and trust.



The approach and methodology for assessing PFAS in food packaging are described in detail in a recent study by Wack, Apprich, Bergmair, and Tacker, **“Development of a Risk Matrix for Assessing PFAS in Food Packaging”** (Foods, 2026).

The full article can be found here:
<https://doi.org/10.3390/foods15071183>

We are happy to support you on your PPWR journey.
For further information please contact lina.wimmer@circularanalytics.com

VIENNA PACKAGING DATA FORUM 2026 – EVENT RECAP: PACKAGING DATA IS BECOMING A STRATEGIC ASSET

On 10 June, experts from across the packaging value chain gathered at FH Campus Wien for the Vienna Packaging Data Forum to discuss one of the most pressing questions facing the industry today: How can companies meet the requirements of the Packaging and Packaging Waste Regulation (PPWR) and prepare for a new data-driven packaging landscape?

A clear message emerged throughout the day: compliance with future packaging legislation will increasingly depend on the availability, quality, and traceability of packaging data.

The forum provided participants with valuable insights into the current state of PPWR implementation, upcoming legal obligations, and the practical steps companies need to take to prepare for future requirements. Discussions covered the growing need for structured packaging data along the entire supply chain—from material composition and recyclability to compliance documentation and declarations of conformity.

Another key topic was PFAS compliance. Experts shared updates on current regulatory developments, strategies for managing PFAS-related risks, and the implications for packaging manufacturers, brand owners, and retailers. Legal experts also highlighted the roles and responsibilities defined under the PPWR and discussed future compliance requirements from a legal perspective.

The afternoon focused on the evolving European framework for Design for Recycling. Participants received an update on the latest developments in CEN standardisation and discussed how future recyclability assessments could influence packaging design decisions and compliance strategies in the years ahead.

The strong participation and lively discussions throughout the event demonstrated that the packaging industry is actively preparing for a future in which data management, regulatory compliance, and circularity are increasingly interconnected.

A sincere thank you to all speakers, participants, partners, and sponsors for making this event a success. We would especially like to thank our event partners and sponsors Packforce Austria, FH Campus Wien, Circular Analytics, ARA - Altstoff Recycling Austria, PreZero and Mav - Austrian Brand Association.

A summary of the event, the presentation slides, photos, and a recording of the livestream are available on the [Packaging Data Forum post-event page](#).



Impressions from the Vienna Packaging Data Forum 2026

PPWR COMPLIANCE IN PACKAGING COCKPIT: DECLARATION OF CONFORMITY AND TECHNICAL DOCUMENTATION NOW AVAILABLE

With the gradual application of the EU Packaging and Packaging Waste Regulation (PPWR) from August 2026 onwards, packaging data and compliance requirements are becoming increasingly important. To support companies in preparing for these new obligations, Packaging Cockpit now provides new functionalities for creating Declaration of Conformity (DoC) and the corresponding Technical Documentation (TD).

Users can now create and manage DoCs and TDs directly within the tool.

New functions include:

- ✓ Creation of Declaration of Conformity in accordance with PPWR requirements
- ✓ Automatic generation of Technical Documentation based on existing data and supporting documents
- ✓ Upload and centralized management of all relevant evidence, supplier declarations, and test reports
- ✓ Documentation of Article 5 requirements, including PFAS-related information
- ✓ Centralized data and document exchange across the supply chain

All required information is brought together in one central location and can be structured, managed, supplemented, reviewed, and shared throughout the supply chain. Through the integrated data exchange request functionality, missing data and documents can be requested directly within Packaging Cockpit. This significantly reduces inefficient email exchanges with suppliers while ensuring that all relevant information remains transparent, traceable, and centrally accessible.

The new features, templates and content structures for the Declaration of Conformity and Technical Documentation were developed in close collaboration with regulatory and industry experts as part of the Digital Packaging Transformation Initiative. The methodology is based on the PPWR and relevant guidance and explanatory documents published by the European Commission.

With these new capabilities, Packaging Cockpit further expands its support for PPWR compliance and provides companies with a future-proof foundation for creating and managing their compliance documentation.

COMING SOON: A NEW PPWR-ORIENTED RECYCLABILITY ASSESSMENT IN PACKAGING COCKPIT

As the Packaging and Packaging Waste Regulation (PPWR) continues to reshape the packaging landscape across Europe, harmonised recyclability assessments are becoming increasingly important for packaging developers, manufacturers, and brand owners. While a harmonised European assessment methodology has not yet been published, companies are already preparing for future PPWR requirements.

To support this transition, Packaging Cockpit is currently integrating a new **PPWR-oriented recyclability assessment methodology**. As an interim solution, the approach is based on the principles and criteria of the new **German Minimum Standard** for the Assessment of Recyclability of Packaging, which is currently considered one of the most advanced and PPWR-aligned assessment frameworks available. At the same time, users will continue to be able to perform country-specific recyclability assessments.

By integrating this new assessment method into Packaging Cockpit, we aim to provide a practical and future-oriented tool that helps companies evaluate packaging design choices, improve recyclability, and prepare for evolving regulatory requirements.

Further details on the methodology, scope, and implementation timeline will be shared in the coming months.



SAVE THE DATE: July 14th – 16th 2026:
CONVERGE Packaging Sustainability Forum, Vienna

Join us at CONVERGE 2026 – Packaging Sustainability Forum, taking place at the United Nations Headquarters in Vienna. The event, organised by UNIDO and GreenBlue, brings together international experts to discuss sustainable packaging, circularity, and the implementation of global packaging regulations.

We are pleased to announce that Dr. Manfred Tacker (Packforce) will join the panel discussion "Aligning Global Voices on PPWR Implementation" on Wednesday, 15 July (2:30–3:00 PM CET). Together with international experts, he will discuss the global implications of the PPWR, practical implementation challenges, and the importance of international collaboration for a harmonised transition to sustainable packaging.

[For further information](#)



SAVE THE DATE: October 1st, 2026: Austrian Packaging Day

Location: Hochschule Campus Wien, Favoritenstrasse 232, 1100 Vienna

On 1 October 2026, Hochschule Campus Wien (HCW) will host the Austrian Packaging Day together with its cooperation partners. Representatives from the entire packaging industry will take part in the event.

You can look forward to the following topics:

- Packaging market - potentials and risks
- Packaging from the consumer's perspective
- PPWR: next steps & challenges
- Impulses from industry and trade
- Practical examples: Paper packaging - insights from the field & HCW project highlights

[For further information](#)



SAVE THE DATE: October 6th – 8th 2026: Sustainability in Packaging Europe 2026, Barcelona

From 6–8 October 2026, the European packaging industry will gather in Barcelona for Sustainability in Packaging Europe 2026. The conference brings together leading experts from industry, policy, retail, recycling and technology to discuss the latest developments in packaging sustainability, circularity and the implementation of the PPWR.

With dedicated sessions and interactive workshops on packaging sustainability, the event provides a unique platform for exchanging practical insights and shaping the future of packaging in Europe.

Packaging Cockpit will be exhibiting at the event with its own stand. Meet our team to discuss how packaging data can support PPWR compliance, recyclability assessments, technical documentation and data-driven packaging decisions.

We look forward to meeting you in Barcelona!

[For further information](#)



SAVE THE DATE: October 19th – 21st, 2026: SETAC Europe 27th LCA Symposium

Location: Bruges, Belgium

This symposium brings together experts and practitioners working on Life Cycle Assessment (LCA) to explore how life cycle approaches can support European sustainability initiatives. Under the theme “Designing Tomorrow: Advancing Life Cycle Approaches for European Sustainability Initiatives,” participants will discuss methodological advances, policy integration, and practical applications of LCA across industries and decision-making contexts.

Circular Analytics will be present at the symposium, presenting two LCA projects:

1. Quantifying Packaging-Induced Product Losses in Life Cycle Assessment: A Risk-Based Modelling Framework
2. Plastic packaging substitution can increase emissions and resource use impacts: evidence from European and US life cycle assessments

To find out more about the event, please visit [SETAC Europe 27th LCA Symposium](#).



*In cooperation with our partner
Packaging Cockpit GmbH*



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:

PPWR Consulting
Regulatory Monitoring
Circularity Assessment
Life Cycle Assessment
Trainings

IMPRINT

Circular Analytics TK GmbH

Canovagasse 7/1/14

A-1010 Vienna

+43 1 997 4332 – 20

office@circularanalytics.com