CIRCULAR ANALYTICS

PACKAGING NEWSLETTER



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EDITORIAL

This edition covers regulatory developments and their implications for the European packaging industry.

We report on updates to the PPWR, including delayed harmonised labelling requirements and changes to national packaging regulations. We also introduce our PPWR Handbook, developed with ECR Austria and ARA, and present findings from our latest life cycle assessment comparing polyethylene packaging with alternative materials.

Furthermore, this issue presents new Packaging Cockpit functionalities for compliance documentation and data management, as well as new partnerships. We also provide summaries of recent industry events.

Thank you for your continued interest in our work.

Best regards,

Your Circular Analytics Team

PPWR labelling requirements delayed

The introduction of the harmonised EU packaging labels under Article 12 of the PPWR has been delayed. The European Commission was required to adopt the implementing acts establishing the harmonised labels and the corresponding technical specifications by 12 August 2026. These implementing acts have not yet been adopted.

This also affects the date from which the new harmonised material and sorting labels become mandatory. Under Article 12(1), packaging must carry the harmonised material composition label from 12 August 2028 or 24 months after the relevant implementing acts enter into force, whichever date is later. As the implementing acts were not adopted by the original deadline, the mandatory application of the harmonised labelling requirements will move beyond 12 August 2028.

A separate requirement applies to symbols used to indicate compliance with Extended Producer Responsibility (EPR) obligations. From 12 February 2027, EPR information may no longer be displayed by means of a physical EPR symbol directly on the packaging. Where an EPR scheme is identified on the packaging, the corresponding symbol must be provided through a QR code or another standardised, open digital marking technology. This includes symbols such as the Green Dot where they are used to indicate fulfilment of EPR obligations. The 12 February 2027 requirement is independent of the delayed implementing acts for the harmonised packaging labels. Companies using physical EPR symbols on their packaging therefore still need to review and adapt their packaging artwork for this deadline, while the timetable for the new harmonised sorting labels will depend on the entry into force of the outstanding implementing acts.

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

COUNTRY SPECIFIC NEWS

COMMISSION LAUNCHES DIGITAL PRODUCT PASSPORT REGISTRY

EU - The Commission launched the Digital Product Passport Registry and a testing environment under the Ecodesign Regulation (EU) 2024/1781 on 20 July 2026. Economic operators must register each passport's unique product identifiers and metadata there; a helpdesk and implementation guides support businesses.

Further Information

COMMISSION LAUNCHES INFRINGEMENT ACTION OVER MISSED RECYCLING TARGETS

EU - On 8 July 2026, the Commission announced infringement action against 12 Member States for missing waste recycling targets. Seven missed packaging targets for 2020–2023: Croatia, Cyprus, Greece, Hungary, Malta, Portugal and Romania. Countries have two months to respond before possible further action.

Further Information

DRAFT IMPLEMENTING REGULATION ON PPWR PRODUCER REGISTRATION AND REPORTING FORMAT

EU - On 6 August 2026, the Commission published a draft Implementing Regulation on the format for registration in and reporting to PPWR producer registers, with a simplified format below 10 tonnes per year and reporting by predominant material and the weight of all components..

Further Information

COMMISSION CONFIRMS PPWR EXEMPTION FOR PHARMACEUTICAL PACKAGING

EU - In an answer of 21 August 2026 to a parliamentary question, the Commission confirmed that packaging of medicinal products is exempt from the PPWR recyclability and recycled-content obligations, and said it will review by 2035 whether the recyclability exemptions, including this one, should be revised.

Further Information

COMMISSION OPENS CALL FOR EVIDENCE ON 2027 WASTE EARLY WARNING REPORT

EU - The Commission will assess Member States' progress towards the 2030 targets for packaging waste reduction, municipal waste recycling, packaging waste recycling by material and food waste reduction, and the 2035 landfill target. It will identify Member States at risk of missing the targets.

Further Information

DENMARK ADOPTS NEW PACKAGING AND DEPOSIT ORDERS SUPPLEMENTING THE PPWR

DENMARK – On 28 September 2026, Denmark adopted two new orders supplementing the PPWR. The packaging order covers producer registration, reporting, fees and municipal waste allocation; the deposit order covers deposit, return obligations, labelling and fees for beverage packaging. Both replace the earlier orders and apply from 15 October 2026.

Further Information1
Further Information2

COMMISSION CLARIFIES TREATMENT OF EXISTING PACKAGING STOCK UNDER THE PPWR

EU - On 21 August 2026, the Commission clarified that packaging held by distributors before 12 August 2026 counts as placed on the market, with no sell-off deadline. Stock not yet placed need not be relabelled; identification and manufacturer details may be given in an accompanying document.

Further Information

COMMISSION UPDATES GUIDELINES ON SINGLE-USE PLASTIC PRODUCTS

EU - On 8 September 2026, the Commission published an updated notice on its single-use plastics guidelines. The only update concerns examples of different types of caps, lids and covers of single-use plastic beverage containers and single-use plastic cups for beverages.

Further Information

BULGARIA PROPOSES DRS FOR BEVERAGE PACKAGING

BULGARIA - On 29 September 2026, Bulgaria notified a draft act providing for a single national deposit-return system for beverage packaging. The deposit is independent of the beverage price and refunded in full on return to a take-back point, wherever bought and without a new purchase.

Further Information

FRANCE POSTPONES START OF EPR SCHEME FOR B2B PACKAGING TO 1 JANUARY 2027

FRANCE - On 28 July 2026, France's Minister Delegate for Ecological Transition postponed the operational start of the EPR scheme for commercial and industrial packaging from 1 July 2026 to 1 January 2027. Producers concerned must join an approved eco-organisation by the end of 2026.

Further Information

FRENCH CONSEIL D'ÉTAT PARTIALLY ANNULS ORDER ON EPR BONUSES FOR RECYCLED PLASTIC

FRANCE - On 25 September 2026, France's Conseil d'État annulled two paragraphs of Annex II of the 5 September 2025 order on EPR bonuses for recycled plastic, for lack of new public consultation on a provision added afterwards. It rejected the other challenges, including on State aid.

Further Information

GERMANY PLANS NATIONAL PLASTIC TAX IN 2027 FEDERAL BUDGET DRAFT

GERMANY - On 6 July 2026, the Federal Cabinet approved the draft 2027 federal budget and financial plan to 2030, which provides for a plastic tax to help offset Germany's annual EU payment on non-recycled plastic packaging. Details of the tax have yet to be specified.

Further Information

ITALY PUBLISHES PPWR SELF-ASSESSMENT TOOL FOR PACKAGING OPERATORS

ITALY - On 12 August 2026, the Italian Ministry of Environment and Energy Security (MASE) published a PPWR self-assessment tool guiding operators to identify their role in the packaging chain, the packaging type and material, and the related compliance and EPR obligations.

Further Information

DRAFT ROYAL DECREE ON EPR FOR WET WIPES AND BALLOONS

SPAIN - Spain notified a draft Royal Decree applying extended producer responsibility to waste from single-use wet wipes and single-use balloons containing plastic. It goes beyond Directive 2019/904 by also covering wet wipes made of unmodified natural polymers that do not meet standard UNE 149002:2022.

Further Information

NEW REGISTRATION REQUIREMENTS FOR PACKAGING OUTSIDE THE RECYCLING SCHEME

GERMANY - From 12 August 2026, manufacturers fulfilling take-back obligations for packaging outside the recycling scheme themselves, and other producer responsibility organisations, must be authorised by the ZSVR under the VerpackDG, with transition periods until 31 December 2027 and 31 October 2027 respectively.

Further Information

GERMANY PROPOSES PPWR RELIEF FOR SMALL BUSINESSES

GERMANY - On 7 September 2026, Germany presented a proposal in Brussels to amend the PPWR: retailers placing under ten tonnes of packaging a year would not need an authorised representative, and registration would be suspended until mid-2028, pending a central European registration system.

Further Information

INTERPRETATIVE NOTE ON PPWR DEFINITIONS

SPAIN - On 27 July 2026, Spain's Ministry for the Ecological Transition and the Demographic Challenge published an interpretative note on applying the PPWR definition of "producer" to registration in the producer register, annual reporting and extended producer responsibility, including decision trees and practical examples.

Further Information

FEDERAL COURT BLOCKS ENFORCEMENT OF CALIFORNIA'S SB 343 RECYCLABILITY LABELING LAW

USA, California - On 14 July 2026, a federal court issued a preliminary injunction blocking enforcement of SB 343, which restricts recyclability claims such as the chasing arrows symbol. The law has not been struck down and litigation continues; the 4 October 2026 compliance date may be affected.

Further Information

The PPWR Handbook: practical guidance on the Packaging Regulation



Since 12 August 2026, the EU Packaging and Packaging Waste Regulation (PPWR) has been in force, and for many companies the hard part is just beginning. Which role do you play in the supply chain? What data do you need? And what does a robust conformity assessment actually look like? The **PPWR Handbook**, developed by Circular Analytics and **ECR Austria** with **ARA** as project partner, gives practical answers to exactly these questions.

What the handbook offers

The handbook explains the core PPWR requirements in plain terms. It gives an overview of roles, obligations and conformity assessment, along with practical tools for putting them into practice in your company. These parts are already published:

- **General volume**: introduction and overview of the key requirements
- **PFAS**: limit values, evidence and supplier declarations
- **Packaging Design for Recycling**: requirements for recyclability
- **Packaging Minimisation**: cutting volume and weight to what is necessary
- **Glossary & Abbreviations**: shared terminology across the whole series



Ready-to-use templates

The handbook also comes with templates you can use right away. There is an EU Declaration of Conformity template, plus PFAS supplier declarations for two cases: material suppliers to packaging manufacturers, and packaging manufacturers to contract fillers.

A living document

The handbook grows with the regulation and will be expanded and updated continuously until 2030. Planned volumes cover, among others, recyclability, minimum recycled content, labelling, reusable packaging and data requirements, plus a collection of templates.

👉 Go to the PPWR Handbook (available only in German). You can reach it directly from the ECR Austria homepage.

Want to know what the PPWR means for your portfolio? Get in touch. We can help with role allocation, conformity assessment and documentation.

A new life cycle assessment of polyethylene packaging and alternatives in the United States and Europe takes a broader view of packaging systems.

Substituting plastic packaging with alternative materials is increasingly promoted as a strategy to help reduce environmental impacts and conserve resources, yet broader trade-offs remain poorly understood. We are pleased to share a new peer-reviewed publication, developed in collaboration with Michigan State University, Trayak, Inc., and ExxonMobil, that examines packaging systems rather than materials alone.

The study is a comparative cradle-to-end-of-life life cycle assessment (LCA) of five major polyethylene (PE) packaging applications in the United States and Europe. It uses region-specific data and indicators for global warming potential, acidification, freshwater eutrophication, water use, land use, and fossil resource use. It is organized around three questions. 1) How does PE packaging compare with paper, glass, and metal alternatives? 2) How do reuse, post-consumer recycled content, and end-of-life recycling affect the potential environmental impacts assessed? 3) What happens when package-level differences are scaled to align with projected annual packaging demand through 2030 and beyond?

1. PE-based packaging often had lower potential environmental impacts

For most packaging applications and environmental indicators assessed, single-use PE packaging showed lower potential environmental impacts than functionally equivalent alternatives. For global warming potential, PE-based packaging had lower impacts in 84% of the comparisons in the US and 68% in Europe.

"Packaging environmental impact depends on more than whether it is made of plastic, paper, glass, or metal. The amount of material used, how it is produced and transported, and what happens at the end of its life all influence the environmental outcome."

- Manfred Tacker, Chief Science Officer of Circular Analytics

2. Life cycle choices matter

Using more post-consumer recycled content generally reduced environmental impacts, but higher recycling rates did not improve every environmental indicator. In Europe, for example, raising the recycling rate of PE pallet stretch wrap from 41% to 70% reduced the global warming potential by up to 15% but increased eutrophication by up to 21%. Packaging reuse presents similar trade-offs although factors like transport distance, number of rotations, washing, and return logistics can significantly influence whether reusable systems are advantageous.

"Reuse and recycling are not single numbers that can be separated from the system around them, the results depend on how often a package is actually reused, how far it travels, cleaning cycles, and what virgin and recycled production is truly displaced by reuse."

- Elizabeth Avery, Sustainability Consulting Manager of Trayak, Inc

3. Scaled annual environmental impacts showed that from 2020 to 2030 and beyond, market growth amplified the consequences of material substitution

US demand for the assessed packaging applications is forecast to grow by around 30% from 2020 to 2030, and European demand by around 3%. Against this background, replacing PE-based packaging with alternatives could increase packaging weight five- to sixfold and raise global warming potential by roughly 190–280% in the US and 50–95% in Europe within the studied timeframe.

"The 2030 and beyond projection shows why scale matters. A substitution that seems modest at the individual-package level can require substantially more material when applied across the supply chain and a growing market. That is why future packaging decisions need to consider both material efficiency and expected demand."

- Rafael Auras, professor at the Michigan State University School of Packaging

What this means:

Packaging material substitution by itself is not necessarily resource-efficient nor environmentally preferable; potential trade-offs should be considered. Packaging-related decisions and policies should rely on functionally equivalent, regionally specific life cycle data that covers several environmental indicators and accounts for burden shifting. This study does not claim that PE packaging is universally superior, results can depend on the application and are limited to the scope of the study and the environmental impacts assessed. Two panels of independent experts reviewed the underlying studies in accordance with ISO standards for life cycle assessment.

→ Read the full paper and get in touch if you would like to discuss what the findings mean for your packaging portfolio.

PACKAGING COCKPIT NEWS

PPWR COMPLIANCE IN PACKAGING COCKPIT: NEW FEATURES AND IMPROVEMENTS

In our last newsletter, we introduced the creation of Declarations of Conformity (DoC) and Technical Documentation (TD) in Packaging Cockpit. Since then, we have continued to develop these features and improved many other areas of the tool. The result: more flexibility, greater visibility and even more efficient compliance processes.

Declarations of Conformity and Technical Documentation

- ✓ Individual profiles: Define exactly which information appears in your documentation, including your own custom fields
- ✓ Electronic signatures: Sign your DoCs direcctly within Packaging Cockpit
- ✓ Deleting DoCs and TDs: Remove outdated or incorrect documents from your records
- ✓ Version warnings: Get notified when a change to a packaging record affects other records, and see which affected records contain DoCs or TDs
- ✓ PPWR documents in reports: Include your DoCs and TDs in your reports

Data exchange

- ✓ Deadlines: Set a date by which recipients need to respond to your data requests
- ✓ Reopening requests: Reopen closed requests if information needs to be added or corrected
- ✓ Own folders: Recipients can save requested records in their own folder structure

User administration

- ✓ User management: Administrators can now create and delete users and manage passwords directly in Packaging Cockpit
- ✓ User groups: Set up groups and control access with folder permissions

General

- ✓ PPWR view in data management: Keep track of all PPWR-relevant information in one dedicated view, with columns you can select and arrange to suit your needs
- ✓ New languages: Packaging Cockpit is now also available in French and Spanish
- ✓ Performance improvements: Faster workflows, especially for importing, exporting and updating data

With profiles, every organisation can tailor its documentation to its own requirements. Profiles can be created for packaging systems, units, components and materials and combined with one another. If you prefer a quick start, you can simply select the minimum requirements recommended by Packaging Cockpit. If no profile is selected, all standard fields are included as usual.

The new warnings help you always stay on top of your documentation: as soon as a change to a packaging record affects other records, Packaging Cockpit shows you which ones are affected and whether they contain DoCs or TDs. This way, you can decide right away whether new documents need to be created.

The improved data exchange makes working with suppliers and partners even easier: with deadlines and the option to reopen requests, you can keep track of outstanding information and get the data you need on time.

More performance improvements will follow in upcoming releases, so you can work even faster and more smoothly.

With these updates, Packaging Cockpit makes PPWR compliance easier and more efficient and provides a reliable foundation for your documentation.

NEW PARTNERSHIPS: QUARTERPACK, GS1 HUNGARY AND PACKTECH

Packaging data is becoming a key success factor, and strong partnerships help companies make the most of it. We are delighted to welcome three new partners.

QuarterPack: one reliable data foundation for packaging compliance

QuarterPack is a service company for packaging prepress, supply chain management and digital asset management. It supports brand owners across the entire packaging process, from packaging development and procurement to print approval and substrate definition.

Through our new strategic partnership, QuarterPack connects its central packaging data management with Packaging Cockpit's compliance solution. A standardised interface synchronises packaging, sustainability and regulatory data automatically. This reduces coordination effort, avoids duplicate data maintenance and ensures consistent information across markets and channels. At the same time, it prepares companies for upcoming requirements such as the PPWR and the Digital Product Passport.

👉 Read more in Packaging Journal.

GS1 Hungary: supporting Hungarian businesses on the road to the PPWR

GS1 is the neutral, not-for-profit organisation behind the barcode, scanned billions of times every day worldwide. GS1 Hungary brings more than 40 years of experience in applying these global standards locally.

Together, Packaging Cockpit and GS1 Hungary want to help Hungarian companies prepare for the PPWR. The partnership combines GS1 Hungary's expertise in global standards and structured data management with Packaging Cockpit's digital solution for packaging data and compliance. It is supported by CSAOSZ, the National Association of Packaging and Materials Handling. The partners aim to provide practical guidance and digital support, helping companies increase transparency and make compliance processes more efficient.

👉 Read more in the official announcement by GS1 Hungary

> *GS1 Hungary plays a vital role in supporting businesses through globally recognised standards and deep industry expertise. We are excited to combine these strengths with Packaging Cockpit's technology to provide companies with practical solutions for managing packaging compliance and preparing for the regulatory challenges ahead."*
>
> – Ernst Krottendorfer, Managing Director, Packaging Cockpit GmbH

PACKTECH: our partner in Israel

PACKTECH is an Israeli consultancy specialising in packaging development, innovation, sustainability, regulatory compliance and cost optimisation. It was founded by Shira Rosen, a packaging expert with more than 30 years of experience, Chairperson of the Israeli Packaging Institute and Board Member of the World Packaging Organisation.

As our partner in Israel, PACKTECH combines its technical and regulatory expertise with Packaging Cockpit's digital tools to help companies prepare for the PPWR. Support ranges from packaging portfolio assessments and recyclability evaluation to data management and technical documentation.

Welcome on board, QuarterPack, GS1 Hungary and PACKTECH! We look forward to working together.

PRO50 – PROFESSIONAL PACKAGING MANAGEMENT AT AN SME PRICE

Same regulatory requirements, but fewer resources? Pro50 makes professional packaging management affordable for small and medium-sized enterprises too. Packaging Cockpit has designed Pro50 specifically for companies with an annual turnover of up to €50 million. The package combines the key features of Packaging Cockpit – starting at just €1,500 per year.

What does Pro50 offer?

♻️ Assess recyclability across the EU

🌱 Calculate your carbon footprint

📋 Create Declarations of Conformity (DoC) and Technical Documentation (TD)

✅ Stay on top of PPWR requirements: Prepare for upcoming regulatory requirements and benefit from PPWR features that will be integrated in the future.

💻 Work simply and efficiently: Manage up to 60,000 data records with five users and easily import existing packaging data via Excel.

AUSTRIAN PACKAGING DAY 2026 – EVENT RECAP: THE SUPPLY CHAIN IS BECOMING A DATA CHAIN

What will the packaging of tomorrow look like? On 1 October 2026, the packaging industry met at Hochschule Campus Wien for the Austrian Packaging Day to explore exactly that. Under the theme "Next Generation Packaging – Sustainability, Regulation and Innovation", manufacturers, fillers, suppliers, authorities and researchers came together for expert talks and practical insights.

Packaging Cockpit was proud to support the event, alongside ARA, BILLA, Circular Analytics, Getränkekarton Austria, NürnbergMesse, Fachverband Propak and Propak Austria.

A highlight from our perspective: Manfred Tacker, Chief Science Officer at Circular Analytics and Packaging Cockpit, spoke about a packaging industry at a turning point.

He showed how the PPWR is turning the supply chain into a data chain, and why this chain must work smoothly to achieve compliance. These data requirements are changing the rules of the game and redefining the roles of packaging manufacturers, fillers and retailers.





Impressions from the Austrian Packaging Day 2026 | Photos: © Hochschule Campus Wien/Sailer

Many thanks to Hochschule Campus Wien and all partners for a successful day. We look forward to next year!

SUSTAINABILITY IN PACKAGING EUROPE 2026 – EVENT RECAP: PFAS AND PACKAGING DATA IN FOCUS

From 6 to 8 October 2026, Barcelona became the meeting point of the European packaging industry. Sustainability in Packaging Europe 2026 focused on current developments in sustainable packaging solutions, the circular economy and the requirements of the Packaging and Packaging Waste Regulation (PPWR).

Packaging Cockpit and Circular Analytics were on site to discuss current challenges, regulatory requirements and practical solutions with industry experts.

A particular highlight was our roundtable on “PPWR Article 5: Managing PFAS requirements along the supply chain”. Manfred Tacker and Pia Buchmayr from Circular Analytics explored how companies can collect and assess PFAS-relevant information along the supply chain and use it to meet regulatory requirements.

Digital packaging data management was another key topic. Together with our customer SPAR Austria, we presented “One system for the entire supply chain: achieving unified management of packaging data and PPWR compliance”. Drawing on practical experience, Mathias Egger from Packaging Cockpit and Julia Lettner from SPAR Austria showed how a central data foundation supports companies in implementing the PPWR.

Alongside the conference programme, the event offered many opportunities for valuable exchange, new perspectives and inspiring conversations with representatives from across the entire packaging value chain.

A big thank you to everyone who visited us and shared their thoughts with us! We look forward to bringing these insights into our ongoing work and shaping the future of sustainable packaging together.

GS1 IN EUROPE REGIONAL FORUM 2026 – EVENT RECAP: FROM REGULATION TO ACTION

From 12 to 15 October 2026, the GS1 in Europe Regional Forum took place in Istanbul. Hosted by GS1 Türkiye, the flagship event brought together representatives from 49 GS1 Member Organisations for four days of collaboration, strategy and inspiration, under the theme “Accelerating as One GS1”.

Packaging Cockpit was proud to sponsor the forum, alongside Systrion, Trade Connectors and UseSafe.

Our Managing Director Ernst Krottendorfer spoke in the plenary session “From regulation to action – GS1 and the sustainability agenda”. The session explored what EU regulations such as the PPWR mean for companies, and how GS1 standards and solutions can help them meet these requirements. In this context, perspectives from brand owner Emmi and GS1 Hungary showed how Packaging Cockpit makes a key contribution to meeting the challenges of the PPWR and to the packaging data management of the future.

Our participation also reflects a long-standing collaboration: For years, Circular Analytics and Packaging Cockpit have been working with GS1 as a key content partner in various initiatives, including:

- the ECR Austria Circular Packaging Initiative (GS1 Austria)
- the DoC Working Group of the Forum Rezyklat (GS1 Germany)
- the Global Design for Recycling Guide (ECR Community and World Packaging Organisation)

Many thanks to GS1 Türkiye and GS1 in Europe for a well-organised and inspiring forum!

CIRCULAR ANALYTICS EVENTS

November 30th, 2026, Vienna: The Packaging Updates by Packforce Austria – Update No. 6

Location: Hochschule Campus Wien, Favoritenstraße 232, 1100 Vienna.

Join us for this compact event on the most pressing topics in the packaging industry. Expert presentations will cover the current state of the sector, and inspiring insights and valuable networking opportunities with industry peers round out the programme. We will also celebrate the presentation of the Green Packaging Star Awards.

More details and registration (German only)

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

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