
POLICY ISSUES

1. ENVIRONMENT/ CIRCULAR ECONOMY

CALL FOR EVIDENCE LAUNCHED BY ECHA TO IMPLEMENT SUBSTANCES OF CONCERN ACROSS EU PACKAGING LAW

The European Chemicals Agency (ECHA) has launched a [Call for Evidence](#) to support the preparation of a study report under the Packaging and Packaging Waste Regulation (PPWR, Regulation (EU) 2025/40). The study, as mandated in Article 5(2) PPWR, aims to map substances of concern (SoC) that are present in packaging and packaging components that negatively affect the re-use and recycling of materials or impact their safety. The notion of SoC is based on the definition set out in Article 2(27) of the Ecodesign for Sustainable Products Regulation (ESPR, Regulation 2024/1781). The PPWR foresees that the presence of such SoC in packaging shall be minimized, including regarding their presence in emissions and any outcomes of waste management [Link to article here](#)

Source: ECHA 17 September 2025

EUDR: EU PLANS TO DELAY ANTI-DEFORESTATION RULES, AGAIN

On 23 September 2025, European Commissioner for the Environment, Jessika Roswall, announced that the European Commission is considering **a one-year delay** to the entry into application of the [EU Deforestation Regulation \(EUDR\) 2023/1115](#) (EUDR), currently scheduled for 30 December 2025 for large and medium companies, and 30 June 2026 for small and micro-operators. A formal proposal, if submitted by the Commission, would reopen the legislative process on a burning topic and would trigger, again, great amount of uncertainty for economic operators currently actively working on their compliance with obligations supposed to start at the end of this year. The proposed new delay is being considered due, officially, to concerns about the IT system's capacity and readiness ([letter](#) sent to the EU's environment chief, Jessika Roswall). The [announcement](#) was made during the Agriculture and Fisheries Council in Brussels at which Commissioner Roswall confirmed she would be discussing the EUDR with EU Agriculture and Fisheries Ministers.

Source: Euractiv and Council of the EU 23 September 2025

EUDR: INDUSTRY PLAYERS OPPOSE A SECOND DELAY

Nestlé, Mars Wrigley, Ferrero, and Tony's Chocolonely have signed an [open letter](#) urging the European Commission not to postpone the EU Deforestation Regulation (EUDR) for a second time, warning that further delays will have environmental consequences. The regulation will require businesses to provide evidence that products sold on the EU market were not sourced from recently deforested land and have not contributed to the degradation of forests. Last month, the Commission announced that the EUDR – previously set to apply for large businesses by the end of the year, and by June 2026 for SMEs – would be delayed for a second time due to 'IT issues'. Environment Commissioner Jessika Roswall explained that the twelve-month postponement would give the EU the "necessary time to get the IT system capacity that we need".

Source: Euractiv and Packaging Europe 14 October 2025

EUROPEAN COMMISSION'S 2026 WORK PROGRAMME LEAKED

The Commission is set to present its detailed work programme for 2026 next week in Strasbourg and Euractiv has obtained the [document](#). The 30-page paper outlines the coming legislation, pending proposals, and planned repeals. The final version is due to be adopted by the Commission and presented to MEPs by President Ursula von der Leyen next week, meaning the draft could be subject to change.

WHAT TO EXPECT FROM BRUSSELS IN 2026: The European Commission could present its landmark circular economy law earlier than previously expected, according to its 2026 work program. The Circular Economy Act, [promised by the Commission at the start of the new mandate](#), aims to boost the collection, recycling and reuse of materials in the EU economy. It is expected to include provisions on collecting the critical raw materials lost in electronic waste, update the rules under which recycled materials can be sold and traded within EU borders (known as the [end-of-waste criteria](#)), and boost producer responsibility schemes to encourage best practice in waste management. Link [here](#)

Source: Euractiv 15 October 2025

EU ETS REFORMS: INDUSTRY CONCERNS OVER COSTS, COMPETITIVENESS & CARBON LEAKAGE

The EU Emissions Trading System (EU ETS) aims to reduce member countries' joint CO2 emissions by 55% by 2030 through the "polluter pays" principle and reach climate neutrality by 2050. A joint position paper by industries, dubbed by the European Commission (EC) as "energy-intensive", has outlined how the new rules would disadvantage EU businesses, including packaging manufacturers, and favor markets with less stringent environmental legislations. Some of the EII EU trade organizations behind the EII paper include the European Chemical Industry Council (Cefic), Cepi (the European association representing the paper industry), Eurofer (a steel association), and the Glass Alliance Europe.

"Packaging producers rely on a wide range of products from the chemical industry as well as other products from EIIs in their business operations," a spokesperson for Cefic tells Packaging Insights. The EU ETS places caps on companies' CO2 emissions, expressed as emission allowances, which may be traded and sold. EIIs suppliers of chemicals and materials are required to monitor and report their emissions annually. According to the EC, it imposes "heavy fines" if its requirements are not met. "If the decline in ETS allowances happens too rapidly, without having the enabling conditions in place to invest in low-carbon production processes, companies will face additional constraints."

They argue that this challenge will be amplified in a scenario of increasing EU carbon prices and energy costs that are higher than in competing economies. "This results in a more expensive intermediate or finished product on the market, which is then used in the packaging production process." Link to article [here](#)

Source: Packaging insights 16 October 2025

UPCOMING MEETINGS UNDER CYPRUS' UPCOMING EU COUNCIL PRESIDENCY

[Cyprus will take over the Presidency of the Council](#) from Denmark on 1 January next year, for a six-month term. As is customary each semester, three meetings are planned for environment ministers, according to a draft calendar dated 3 October: an informal meeting (with no text to be adopted) in Cyprus in early February, followed by two formal meetings, one in mid-March and the second at the end of June.

Source: Contexte 13 October 2025

REVISED WASTE FRAMEWORK DIRECTIVE ENTERS INTO FORCE TO BOOST CIRCULARITY OF TEXTILE SECTOR AND SLASH FOOD WASTE

The [targeted revision of the Waste Framework Directive](#) enters into force today (16 Oct), introducing common rules for extended producer responsibility (EPR) for textiles and setting binding food waste reduction targets for Member States. It will help reduce waste, mitigate environmental damage, and enhance the EU's economic security and resilience by driving innovation in sustainable practices and reducing dependency on raw materials, in line with the EU's [Competitiveness Compass](#) and Strategic Agenda for 2024-29. The revised Waste Framework Directive introduces two main sets of measures to tackle these impacts, while boosting the competitiveness and circularity of the sector:

- Mandatory EPR schemes for textile and footwear products
- New rules for the management of used textiles and textile waste

Source: European Commission October 2025

EUROPEAN PARLIAMENT PLENARY SESSION (20 - 23 OCTOBER 2025)

final draft agenda of next parliament plenary session Click [here](#) for the final draft agenda.

Source: Contexte 17 October 2025

BRUSSELS REACTS ON BIOECONOMY LEAK

The EU is turning down the heat on biomass burning. According to a [leaked draft](#) of its new bioeconomy strategy, the European Commission plans to disincentivize “inefficient combustion” of biomass and substitute it with other types of renewable energy. The EU executive will also look to speed up the authorization processes for bio-based chemicals and to accelerate approvals for other “high-impact products.” European Parliament Plenary Session (20 - 23 October 2025)

The undated leaked draft of the strategy, floats several measures to build a “thriving bioeconomy” with innovations capable of substituting fossil-based materials, by scaling investments in bio-based materials. Its official publication is slated for Nov. 12. The leaked document asserts that food security comes first: biomass should be used for food, then feed, then higher-value materials, with energy as a last resort.

Source: Politico 14 October 2025

ZERO WASTE EUROPE PROPOSES AN EMISSIONS TRADING SYSTEM TO REDUCE RESIDUAL WASTE

In a report published on 9 October, the NGO calls on the European Commission to explore this approach as part of the upcoming European Circular Economy Act, expected by the end of 2026. According to Zero Waste Europe, the EU should not merely aim to limit landfilling of residual waste - “at the risk of simply promoting incineration” - but should instead encourage Member States to reduce such waste by allocating them emissions quotas.

While the organisation anticipates that Member States may resist such “revenue transfers,” it argues that this measure would nevertheless incentivise greater compliance with recycling obligations. Zero Waste Europe has also recently called for a moratorium on the construction of new incinerators.

Source: Contexte 12 October 2025

EU MUST RESIST PRESSURE TO WATER DOWN ANTI-DEFORESTATION LAW

The EU is facing unrelenting pressure from the US to reverse policies designed to protect the natural world and fight climate change. This must be resisted. An egregious example is Washington's use of ongoing EU-US trade talks to try to force the EU to gut its anti-deforestation law (EUDR). This landmark legislation bans the import of goods including soy, timber and cocoa, if companies cannot prove that they are deforestation-free. It was passed with an overwhelming democratic mandate in 2023. The European Commission appears willing to acquiesce to Washington's demands for special treatment under the EUDR, on the basis of US claims that it poses a negligible risk of deforestation and forest degradation.

'Rather than appeasing an administration determined to dismantle environmental protections, it is more important than ever for the EU to maintain its global leadership and vision' Rick Jacobsen Senior Manager Commodities Policy, Environmental Investigation Agency (EIA) US, Washington, DC, US

Link to [Article](#)

Source: Financial Times 15 October 2025

2. PRODUCT SAFETY / CHEMICAL

ECHA PUBLISHES UPDATED PFAS RESTRICTION PROPOSAL

In a draft of the conclusions, the Twenty-Seven urge the Commission to review REACH and to present the promised omnibus packages. This is what appears in the first version of the conclusions prepared by the President of the European Council, António Costa, for the 23 October meeting of heads of state and government. The Commission is invited to "rapidly present new and ambitious simplification packages, notably in the areas of automotive, military mobility, digital, environment and food safety, as well as a review of the REACH Regulation." This message is being sent to the Commission at a time when the REACH revision- originally expected by the end of 2025- is likely to face yet another delay, this time until 2026. The timeline should be clarified in the Commission's work programme to be adopted on 21 October.

Member State capitals are also asking the Commission to "explore new proposals to streamline and accelerate planning and permitting procedures" and to continue its "simplification efforts" concerning secondary legislation.

Source: Contexte 14 October 2025

SWEDEN REQUESTS MORE INFORMATION ON UPCOMING REACH REVISION

Ahead of the 21 October Environment Council, Sweden called on the Commission to provide more details on the forthcoming REACH revision and its accompanying work plan.

Sweden reiterated that a comprehensive modernisation and simplification of the legislation is urgently needed to improve protection for citizens and the environment and to strengthen Europe's competitiveness.

Source: Contexte 17 October 2025

3. SUSTAINABILITY

SUSTAINABILITY REPORTING AND DUE DILIGENCE: SIMPLER RULES FOR FEWER COMPANIES

The new draft rules would reduce the required amount of sustainability reporting and simplify due diligence requirements for companies. The Commission presented its Omnibus I simplification package on 26 February. Besides rules simplifying due diligence requirements and sustainability reporting, it also contained file delaying application of these rules for some companies, which was approved by the European Parliament via urgent procedure in April 2025. **Next steps:** Should the Parliament approve the committee mandate at the next plenary session, MEPs and EU governments should start negotiations on the final text of the legislation on 24 October.

- Fewer companies required to report on sustainability and comply with due diligence obligations
- Commission to establish a digital one-stop-shop with free access to templates, guidelines and information for companies
- No civil liability at the EU level but victims to receive full compensation from companies breaching due diligence obligations

Link to article [here](#)

Source: European Parliament Press 13 October 2025

A LETTER FROM SIEMENS, TOTALENERGIES AND 44 MORE CEO'S URGES THE EU TO SCRAP CS3D, AS IT MOVES TO SIMPLIFY SUSTAINABILITY RULES & DELAY COMPANY OBLIGATIONS

The European Commission is reassessing the EU's Omnibus package, aiming to reduce compliance complexities for all companies, focusing the rules on the largest companies that have a "bigger impact on the environment and climate." To date, 46 German and French CEO's have urged the abolition of the CS3D, writing to Emmanuel Macron, President of France and Friedrich Merz, Chancellor of Germany, to call for the full abolishment of CS3D. The letter dated 6 October 2025 after the Franco-German business leaders' meeting in Évian and signed on behalf of all 46 by Patrick Pouyanné, CEO and Chairman of TotalEnergies and Roland Busch, President and CEO of Siemens.

The letter sets out a wider deregulatory agenda beyond repeal: a reframing of competition policy to enable strategic mergers, a moratorium with substantial revision of digital rules such as the Data Act and the AI Act and a freeze on new EU directives with simplification by 1 January 2027.

Source: Various media 13 October 2025

CORPORATE SUSTAINABILITY DUE DILIGENCE: AFTER THE COMMITTEE VOTE, THE AGREEMENT BETWEEN THE EPP, RENEW AND S&D NOW HANGS ON THE PLENARY

The compromises negotiated between the three groups were all adopted during the vote in the Legal Affairs Committee on 13 October - by just one vote in the case of the provision on climate transition plans. The report by Jörgen Warborn (EPP) was approved with 17 votes in favour, six against and two abstentions. Members also endorsed the proposal to skip the plenary vote and move directly to trilogue negotiations. However, this decision can still be challenged by a sufficient number of MEPs (72) at the opening of the plenary session on 20 October. According to our information, the Greens and The Left (99 seats) plan to object, which would trigger a vote on 23 October. If a majority in the chamber supports

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the mandate, trilogues could begin as early as 24 October. If the majority opposes it, the mandate will have to be submitted to a new vote — with the possibility of amendments — during the next plenary session in November. Although the committee vote confirmed the political agreement in principle between the three groups of the so-called “von der Leyen majority,” the plenary vote remains more uncertain, particularly within the Social Democrats, who were divided during the negotiations (see our brief). Added to this are the far-right groups’ attempts to further amend the text, which did not succeed in committee.

Source: Contexte 15 October 2025

STUDIES AND REPORT

Factsheet on recyclability Corrugated cardboard packaging [View](#)

Source: OPP, FEFCO

EU PUBLIC CONSULTATION

- Public consultation: Green-listing certain waste for the purposes of shipments to recovery between Member States
 - o Type of act Delegated regulation
 - o [Feedback period: 02 July 2025 - 31 October 2025](#)
- Circular Economy Act
 - o Type of act: Proposal for a regulation
 - o [Feedback period 01 August 2025 - 06 November 2025](#)