

SPICE YEAR 7 COMMITTEE 4 MEETING MINUTES MARCH 12TH, 2026



Minutes written by: Quantis

Participants (online, unless stated):

- Albea, Gilles Swyngedauw (on site)
- Albea, Léna Massaro
- Aptar, Benedicte Luisi
- Aptar, Christophe Marie
- Amcor, Anna Oliveras Torra
- Axilone, Augustin Maire Duposet
- Axilone, Reynal Trochet
- Chanel, Helene Villecroze (on site)
- Estée Lauder, Michael Christe
- Hermes Parfums, David Petit
- KAO corporation, Shu Genhaku
- KAO corporation, Shinya Oogane
- L'Oréal, Philippe Bonningue (on site)
- LVMH, Régine Frétard (on site)
- LVMH, Elsée Ekambi Eyoum (on site)
- Meiyume, Jan Porter
- Puig, Joachim Cons Garcia
- Shiseido, Yuria Miyabayashi
- Shiseido, Kenji Ito
- Sisley, Jérôme Morel (on site)
- Toly, Olaf Zahra
- Unilever, Frédéric Dreux
- Canopy Planet, Eugenia Kwok
- FEBEA, Elodie Fiscaro (on site)
- FEVE, Fabrice Rivet
- MWE, Caroline Noyrez (on site)
- Quantis, Jean-Marc Fontaine (on site)

- Quantis, Jules Faucher (on site)
- Quantis, Liliana Jalpa Pineda
- Quantis, Nassim Bami
- Quantis, Joris Deschamps
- Quantis, Amandine Baylet

Excused SPICE Members:

- COTY
- N°7 Beauty Company
- CITEO
- Detic
- Elipso
- PCPC
- Recyclclass

Description: The Members of the SPICE initiative - the Sustainable Packaging Initiative for Cosmetics - gather for the fourth committee of the seventh year of the initiative.

Opening of the meeting

Introduction

Jean-Marc Fontaine (Quantis) welcomes all participants to the fourth committee of SPICE Year 7, presents the meeting’s rules to ensure efficient discussions, and calls each member by company and name.

Meeting agenda

Jean-Marc Fontaine (Quantis) presents the meeting’s agenda:

- 0. Antitrust Statement**
- 1. Year 7 overall review timeline & budget, and Year 7 survey results for year 8 priorities**
- 2. Year 8 SPICE database license to EBS 2026 agreement**
- 3. SPICE tool migration into eQopack status and next steps**
- 4. SHARP taskforce (continued) + year 8 plan**
- 5. Recyclability taskforce (continued) + year 8 plan**
- 6. SPICE database update and development**
- 7. SPICE database sharing**
- 8. SPICE Claims guidelines**
- 9. SPICE Year 8 budget proposal**
- 10. SPICE year 8 steering committee candidates**

0. Antitrust statement

Caroline Noyrez (MWE) introduces the antitrust statement (antitrust and confidentiality undertakings) that was duly signed by all participants:

While some initiatives among companies may be both legal and beneficial to their industry, group initiatives between competitors are often suspected to be anticompetitive and therefore illegal by National Competition Authorities.

In this respect, being a member of such an initiative, as being part of any formal or informal meetings, where other competitors are present, may involve risks, especially regarding the type of information likely to be shared around the table.

As a general rule, participants shall not exchange any sensitive information in relation to their business or company nor reach any understanding, expressed or implied, with the object or effect of restricting competition. Participants may only discuss the issues at hand in the agenda of the meeting. Therefore, it is the responsibility of each participant to avoid raising improper topics for discussion.

Participants to the meeting must not discuss topics such as:

- Prices, including any subject relating to prices or its components such as discounts, rebates, surcharges, price changes, price differentiation, profit margins, price increases, credit, or any other sales condition;
- Costs, including any component relating to costs such as production or distribution expenses, formulas for cost accounting, methods for cost calculation;
- Information relating to sales and company's production, especially production volumes, sales profits, operating capabilities, level of stocks or supplies;
- On-going non-public litigations;
- Any of a company's upcoming and confidential projects, including those relating to sales and to marketing strategy, along with production and technology, wage policy, R&D programs;
- Information relating to the relationship with customers/suppliers (including terms and conditions).

This applies not only to discussions in formal meetings but also to informal discussions before, during and after meetings.

Participants shall observe the below procedure for each meeting:

- The agenda of the meeting, including the name and position of each participant, must be submitted to legal review prior to the meeting.
- The meeting shall be conducted on the basis of the agreed agenda only.
- The antitrust statement may be read by each participant at the beginning of each meeting.
- If the discussions turn to improper subjects during a meeting, the concerned participants will be required to put an end to the discussion and to leave the meeting immediately.
- A comprehensive summary of all meetings shall be taken and shall be submitted to legal review prior to circulation.
- The summary shall be circulated to all members as soon as possible after the meeting.
- Any comment or request for amendment shall be notified as soon as possible following receipt of the summary.

She specifies that his role is to ensure that participants will not exchange commercial sensitive information as regards competition rules and that SPICE is not used as a cover for an anticompetitive agreement. It is the responsibility of each participant to avoid raising any improper subjects during the meeting. She develops the list of topics that are considered commercially sensitive from a competition law perspective (prices, costs, customer, general strategy, etc.).

1. Year 7 overall timeline & budget, and Year 7 survey results for year 8 priorities

Jean-Marc Fontaine (Quantis) presents a synthesis of the SPICE Year 7 member survey results.

Overall, the SPICE initiative and SPICE Tool receive strong ratings and demonstrate a positive dynamic. However, members expect greater acceleration and clearer prioritization for the year ahead.

For the SPICE Tool, members confirm strong support for the migration to eQopack and emphasize the need for an enhanced and continuously updated database. Key requested features include PDF reporting, material-specific emission factors, reuse modules, and recyclability assessment capabilities.

Members also highlight the need to further operationalize methodologies through more practical deliverables, including standardized supplier data templates, implementation guidelines, and dedicated training sessions or webinars.

For Year 8 priorities, the Recyclability Task Force will focus on EU PPWR developments and key US regulations, while the SHARP task force will continue developing actionable methodologies. In parallel, there is strong interest in expanding the SPICE database with new and innovative material datasets, although supplier data collection remains a key challenge.

2. Year 8 proposed roadmap

Jean-Marc FONTAINE (Quantis) the proposed Year 8 roadmap, aligned with the survey results and previous committee discussions. The main priorities include the SPICE migration to eQopack, continued work of the Recyclability Task Force with streams on EU PPWR and US EPR legislation, and the continuation of the SHARP Task Force. Additional summaries and webinars are planned to share outcomes beyond SPICE members. A webinar will also be organized to promote the Claims Guidelines report that was previously published.

3. Year 8 SPICE database license to EBS 2026 agreement

Jean-Marc presented the proposed 2026 licensing agreement between SPICE and EBS for the SPICE database, following several months of negotiation. EBS launched its scoring platform in 2025 and currently has around 200 users, with plans to grow and add eco-design features in 2026. These features would use the SPICE database to enable product comparison and visualization of life-cycle impacts, including packaging. Because the number of users and feature rollout remain uncertain, we decided not to adopt a variable pricing model. Instead, we propose a fixed license fee of €45,000 for 2026, covering scoring calculations, publication, and the new comparison/visualization functionality. (Slide 19)

Helene VILLECROZE (Chanel): What was the 2025 license price?

Jean-Marc FONTAINE (Quantis): €40,000 per year but there was no mention of the number of users or possibility to use other functionality because those additional features were not even considered.

Jean-Marc then explained why the proposed agreement is considered the best option at this stage. It enables EBS to continue using the SPICE database. He also clarified that EBS focuses on product-level scoring for B2C communication, while SPICE tools and the SPICE database remain dedicated to detailed packaging eco-design and B2B environmental impact assessment (Slide 19).

Christophe MARIE (Aptar): What will be the term for the contract? how many years?

Jean-Marc FONTAINE (Quantis): It is an annual contract. It's only until 2026 and will be revisited before the end of the year. By October we'll agree on next year agreement.

Christophe MARIE (Aptar): So, if one day we don't agree anymore on the contract they have no tool and no data the day after? If we don't find an agreement, they won't have access to data and won't be able to use the tool anymore.

Jean-Marc FONTAINE (Quantis): For now, a one-year agreement is proposed, with the possibility to consider a multi-year arrangement in the future. The plan is to review the agreement in September 2026, once there is more clarity on the number of users and the scope of eco-design features. This approach reflects the fact that EBS is still scaling its platform and currently lacks visibility on future growth and feature deployment.

Elsée EKAMBI EYOUM (LVMH): What is the format of data we provide? Do they have access to the details of the datasets?

Jean-Marc FONTAINE (Quantis): EBS users don't have access to this extract, EBS tool is using SPICE database as background for packaging environmental impact calculation following EBS methodology.

Spice Year 7 Vote: SPICE Database License to EBS for 2026

Company	Vote
Albea	Yes
Aptar	Yes
Axilone	Yes
Berry Global	Yes
Chanel	Yes
Estee Lauder	Yes
Hermes Parfums	Yes
KAO	Yes
L'Oréal	Yes
LVMH	Yes
Meiyume	Yes
Puig	Yes
Shiseido	Yes
Sisley	Yes
Toly	Yes
Unilever Prestige	Yes

Coty and N°7 Beauty Company were not present during the committee.

No further questions or comments from SPICE members.

3. SPICE TOOL into eQopack platform

Jules FAUCHER (Quantis) shared the timeline and mentioned the advancement done since Q4 2025. Jules confirmed that the team is on track with the plan and did not encounter any unpredictable issues.

Jules FAUCHER (Quantis) shared that the team has successfully migrated almost 260 projects done by quantisiens in the new tool. Which is great news and makes the team confident that there will be no issues during the migration and if there happen to be any the team is confident that they will handle it easily. With this news, Jules confirmed that the configuration part is over.

Jules FAUCHER (Quantis) mentioned that the SPICE tool and eQopack are now aligned, modifications to fully align with the SPICE methodology were performed and interfaces are now nearly identical.

Regarding the migration, the team has started the communication with batches. Members of who have not yet received any communication should receive it shortly.

The next step is the onboarding sessions phase, this will include learning materials, diffusions, and training sessions in which the goal is to invite as many people as possible. Training sessions are open to participants that are not in batch 1. The objective in the migration is to have identical results after the migration and if ever results are not identical to make sure that gaps are explainable and coherent.

Jean-Marc Fontaine (Quantis) explains that a dedicated Q&A session on the eQopack contractual framework was held on February 13th, 2026, with the eQopack legal team and SPICE legal counsel (Caroline). This session provided detailed explanations of the migration implications, including terms and conditions, contractual structure, and impacts on SPICE initiative and participation agreements, and addressed all questions collected from members.

Following this session, the following documents were shared with all SPICE members:
SPICE Tool Transition to eQopack - Consolidated Questions & Answers, summarizing the main topics discussed and clarifications provided.
eQopack Order Form for SPICE Members, including the associated terms and conditions (reshared for convenience).

Jean-Marc indicates that the SPICE Year 8 Participation Agreement will be shared in the coming weeks.

The team will then circulate the participation agreements to all members for review, ensuring alignment and a smooth transition.

Jean-Marc FONTAINE (Quantis) remind that questions were answered but that if any questions remained, they could ask them now, or later.

Helene VILLECROZE (Chanel): I have just a question about the migration batches. Did you already communicate with companies in which batch or not yet?

Jules FAUCHER (Quantis) presented the timeline as initially thought. This was for us to make it easier to have group of companies in order to test and to do the migrations, and to gather feedback at the same time. Everyone can go at its own paces and activities can be frozen whenever companies are ready.

Jules FAUCHER (Quantis): The only thing that is global for all batches are the training sessions. Even if we are not yet at batch 2 or 3, companies in this batches should join the training sessions.

Jean-Marc FONTAINE (Quantis) We will need to start the migration for batch 1 with at least 1 company to start preparing the training sessions. And after it's batch 2 and 3 is more rolling out in separate batches.

Jules FAUCHER (Quantis) shared that companies in the first migration batch should not be worried if they face a few minor issues as the team will support them throughout the process. Jules reassured participants that the migration should go smoothly and that being part of batch 1 should not be a concern.

Jules FAUCHER (Quantis) confirmed that the team already tested the migration on nearly 260 projects, and that it went smoothly. This successful test makes the team confident that the upcoming migrations will not face major issues and that any small issues can be handled easily.

Christophe MARIE (APTAR): The two volunteers have already been identified?

Jean-Marc FONTAINE (Quantis): Yes, they have been identified.

Jean-Marc FONTAINE (Quantis) explained that the team will be present to manage the transition, including trainings and the migration of projects, and to help users adapt to the eQopack platform.

Jules FAUCHER (Quantis) presented the roadmap and explained that the roadmap is aligned with SPICE priorities and that work on SPICE does not stop after the migration. Jules highlighted that one priority is to ensure the reference scenario is displayed consistently with SPICE and that the PDF report export will be improved beyond the current version to make it more robust and solid and visually stronger.

Jules FAUCHER (Quantis) mentioned that recyclability assessment is also among the priorities, and that the team is currently discussing with several players in the market to make sure they can cover the different solutions available. **Jules FAUCHER (Quantis)** shared that a reuse module (including recharge and refill possibilities) will be a priority after the migration.

Jules FAUCHER (Quantis) explained that API development is already ongoing with at least one client on the eQopack side, and that API implementation can take time and effort, especially

when the number of SKUs is low, 150 or lower for instance, so they invite interested companies to reach out if they want to explore API development.

Luisi BÉNÉDICTE (Aptar): I have question regarding the recyclability assessment, and whether it is anticipated that the team will use an external tool at some point (and whether this would relate to SPICE and/or PPWR rules).

Jean-Marc FONTAINE (Quantis): It's a complex topic, as you are highlighting. Here we are talking about a digital solution, and we are not going to develop within eQopack. For these features we are looking at existing tools to connect with them. Jean-Marc added that for Europe it will likely be aligned with PPWR, while for other countries it may depend on local rule sets and the tool chosen. He clarified that their focus is on building the digital capability to connect to external tools rather than defining the rules themselves.

Luisi BÉNÉDICTE (Aptar): Okay, very clear. Thank you.

Jules FAUCHER (Quantis) emphasized that new material modules (e.g., glass, paper, plastic, metal) are coming, and that the team will collaborate with the SHARP task force, where work is already ongoing on these topics.

Elsée EKAMBI EYOUM (LVMH) asked about the integration of eQopack with eQosphere and requested more details on what is planned.

Jean-Marc FONTAINE (Quantis) explained that eQosphere is a tool that allows users to access, customize and manage their own emission factors using databases (e.g., ecoinvent, WALDB, WFLDB). He noted that today eQosphere is not linked with eQopack. What Jules has presented is the long term eQopack roadmap, with a potential connection between eQopack and eQosphere in 2027, it is not a priority for 2026.

Elsée EKAMBI EYOUM (LVMH) asked whether access to the different databases would depend on having eQopack and/or eQosphere licenses.

Jules FAUCHER (Quantis) confirmed that integrating the two tools makes sense, but that access will depend on licenses and is still under discussion.

Jean-Marc FONTAINE (Quantis) clarified that the SPICE database is not available in eQosphere today. The core idea is that users would be able to create custom emission factors and datasets and then use them in eQopack.

Amandine BAYLET (Quantis) introduced her role and explained that she is responsible for ensuring methodological consistency between the SPICE tool and the migration to eQopack, and for making sure improvements remain aligned with the SPICE methodology.

Amandine explained that the current end-of-life database approach relies on different data sources depending on geography, and that the limitations include restricted country coverage, limited granularity, and inconsistent data quality. She explained that the plan is to switch to a

dedicated database for plastics only, while keeping the existing database approach for other materials.

Amandine presented the plastic database Plasteax, explaining that it is led by several companies to address gaps and inconsistencies in end-of-life treatment and to expand country coverage (up to around 80 countries, with more to come). She explained that Plasteax provides more detailed data by packaging type, polymer type, and country, including differentiation between single-use and reusable plastics. She also explained that the database relies on three levels of data (high-coverage data complemented by country-specific data; primary data complemented by literature; and model-based consolidation using a mass-balance approach).

Amandine added that Plasteax is updated annually and that the data is generally more recent and granular than other sources.

Philippe BONNINGUE (L'Oréal) raised a question about the SPICE footprint methodology and whether the database change and/or the recyclability assessment, soon available, could lead to changes in the footprint methodology.

Philippe also questioned whether SPICE should anticipate methodological changes if recyclability assessments become more robust and lead to reduced recycling rates because the assessment would be more precise (thinner granulometry).

Jean-Marc FONTAINE (Quantis) clarified that the discussion was related to end-of-life scenarios and recyclability rate values, not on the recyclability assessment. **Jean-Marc** explained that in eQopack users will have default values but will also be able to customize end-of-life splits.

Amandine BAYLET (Quantis) confirmed that for now they will implement shares for recycling, landfill, and incineration, while mismanaged waste is not covered yet but could be a topic for later.

Philippe BONNINGUE (L'Oréal) questioned whether, ideally, recycling should be assumed for packaging placed on the market, and whether eQopack will include a more explicit recyclability assessment in the future.

Amandine BAYLET (Quantis) clarified that the current system is similar to SPICE tool, eQopack has a button the user must select to indicate recyclability (on/off); if it is not selected, recycling will not be taken into account at end-of-life. She also noted that the recyclability assessment itself remains the responsibility of the user unless and until an external assessment tool is connected.

Philippe BONNINGUE (L'Oréal) suggested that if an external recyclability tool exists and is robust enough, they should consider whether footprint methodology should be revisited to remain up to date (and still leading the packaging methodology footprint), acknowledging that the topic is complex. Plasteax and EqoSphere should be discussed during the next steering committee.

Jean-Marc FONTAINE (Quantis) acknowledged **Philippe BONNINGUE (L'Oréal)**'s point.

Gilles SWYNGEDAUF (Albéa) highlighted that “recyclable” does not mean “recycled,” and that recyclability is often only a percentage and can be very specific to the product and polymer. He also mentioned that if recyclability cannot be proven, the recommendation is not to take it into account.

Jean-Marc FONTAINE (Quantis) responded that the intent of improving databases is to provide more accurate and updated default scenarios, while still allowing users to override values if they have better data.

Helene VILLECROZE (Chanel) asked for a future deep dive and requested concrete examples of the type of data Plasteax can provide (by polymer, country, and treatment routes). **Helene** expressed surprise that such precision could exist and asked whether the data might sometimes be “0 everywhere,” and requested examples to better understand the reliability and granularity.

Jean-Marc FONTAINE (Quantis) confirmed they will prepare examples for a deep dive in a future committee.

4. SHARP Taskforce (continued) + year 8 plan

Liliana Jalpa Pineda (Quantis) presents the SHARP task force update, showing the progress on creating exchangeable environmental footprint methodologies for packaging materials. Liliana explains they have completed steps zero and one of their four-step framework, which involved scoping validation and methodology creation with help from multiple brands, manufacturers, and federations. The team has developed three levels of methodology complexity (detailed methodology 1 detailed Product Carbon Footprint, methodology 2 focus on hotspot, and methodology 3 backup calculations) and completed a comprehensive document with a detailed use case for glass, while prioritizing plastics as the next material to address. She also reminds that the SHARP task force aims to develop a harmonized and practical methodology for PCF data exchange across the cosmetics value chain, by establishing best-practice recommendations for collecting and allocating product-level carbon footprint data.

Liliana Jalpa Pineda (Quantis) discusses the validation process for a glass use case methodology document developed by a task force, which has been shared with all SPICE members for review before a planned Q&A session.

Fabrice Rivet (FEVE) highlights that FEVE has not been consulted on the SHARP document despite previous discussions and requests that this point be formally acknowledged. He asks for an antitrust compliance analysis of the task force work if not done already. He wonders whether the methodology could lead to disclosure of confidential business information from glass manufacturers, such as recipes or detailed energy consumption data, and suggests instead that suppliers should calculate their own emission factors within a common

framework. He also expresses concerns regarding the technical feasibility of some recommendations included in the glass use case, particularly within SHARP methodology 1.

Jean-Marc Fontaine (Quantis) takes note of the request and clarifies that the current document is a work-in-progress draft, which was discussed during the two previous SPICE committees (September 18th, 2025 and December 11th, 2025) and shared with all SPICE members on February 11th to collect feedback and questions in preparation for the upcoming Q&A sessions. He reiterates that feedback is still being collected and will be considered to revise the SHARP methodology recommendations ahead of the April Q&A session.

Considering Fabrice's request and in preparation for the Q&A session, Jean-Marc proposes organizing a dedicated call with FEVE representatives and selected SHARP task force members, ahead of the April QA session with all members, to address their concerns. Jean-Marc and Liliana encourage Fabrice to share detailed feedback on the methodology document and offer to organize a pre-Q&A exchange to discuss it.

Caroline Noyrez (MWE) takes note of the request for an antitrust compliance analysis of the task force work. It seems that the concern lies not in the recommendations themselves but in their operational implementation. A careful, in-depth review is needed to ensure no confidential information is shared on this basis.

After discussion about sharing restrictions, the group agrees that Liliana will extract and share the glass-related sections of the document with Fabrice's FEVE members for review and comments.

Jean Marc Fontaine (Quantis) based on the SPICE Year 7 end-of-year survey and recent SHARP task force discussions, presents two proposed options for Year 8 priorities:

Option 1: Focus on finalizing the general methodologies.

Option 2: Focus on detailing the plastic use case, including the development of detailed methodologies for Method 1 (Product Carbon Footprint) and Method 2 (Hotspot analysis), as well as the associated plastic use cases for both methods.

Jean-Marc also outlines the implications of each option for Year 8 and Year 9 in terms of deliverables and expected timelines. He highlights that the SHARP task force requires significant effort, which is why the work has been structured into smaller, manageable components (by methodology and use case). Each component will be developed progressively, following defined priorities across SPICE Years 8 and 9.

Giles Swyngedauw (Albea) asks clarification about method 2 - hotspot. Liliana clarify that method 2 (hostpot) refers to a simplified approach so the focus is on the parameters that have the biggest contribution to the environmental impact of a specific packaging material (for example, energy consumption for glass, or raw material extraction for plastic).

Lena Massaro (Albea) asks clarification on plastic use case, only focusing on virgin fossil based PP, converted via injection molding, and decorated with offset printing.

Liliana Jalpa Pineda (Quantis) confirms that this scenario will be the main focus, as the use case decided via a previous survey, but if there are convergence with other plastic, it will be

specified, for method 1 and 2. Jean Marc is adding that, as plastic is a big family the goal of the use case is not to be a reference rule, but rather an illustration of the application of the general methodologies to the a plastic case study.

The members are invited address their preference in an online survey between the two options.

The results are 31% (5) of members wishing to cover option 1, and 69% (11) of members would rather be covering the option 2.

5. Recyclability taskforce (continued) + year 8 plan

Joris DESCHAMPS (Quantis): Today I'll run you through the agreed upon roadmap for the recyclability task force in the upcoming year 8. But first, I'd like to give you a reminder of the members of the recyclability tasks force. That is mix of different stakeholders throughout the value chain of cosmetic packaging life cycle.

- Manufacturer represented (Albea, Aptar, Amcor)
- Recyclers and Producer Responsibility Organization

Seeking of year 7 workstream here is an overview of what was delivered during the year 7. For an allocated budget of 60kEuros.

Year 7 taskforce was articulated around 4 main pillars

1. Follow up of the work between CETIE and CEN for the development of Glass DfR guidelines
 - In addition to the regular follow-up, we also produced a PPWR insight document that aim to clarify PPWR actors and timeline. That was shared to all SPICE members.
2. A partnership with Recyclclass
 - Sharing of different testing campaign results of various parameters on recyclability
 - Direct printing on rigid pack
 - Metallized decoration
 - Rigid rolling pack
3. SPICE Insights Publication, shared in Jan 2026
 - Addressing gaps beyond design for recycling. Calls for collective action between cosmetics packaging producers, sorting centers operators and authorities responsible for collection systems, to all share responsibility when it comes to complex-to-sort waste (such as cosmetic packs).
4. Engagement of PRO stakeholders
 - Produced a outside EU overview of existing PRO initiative in the world, shared to all members.

SPICE taskforce members have revisited what was previously discussed in the previous SPICE committee, giving the overall objective for 2026: Focus on interpreting and implications of the Design for Recycling standards that will be published in 2026.

The proposed approach focuses on:

- Interpreting the Design for Recycling (DfR) standard and its implications for cosmetics packaging.
- Mapping gaps between DfR requirements and existing national recycling guidance.
- Identifying practical solutions to close these gaps, while highlighting technical, functional, cost, or timing limitations.
- Clarifying key US regulations (SB54 and SB343) and their implications for packaging and labeling.

This approach has been discussed within the recyclability task force and reviewed by the Steering Committee. In the fast-evolving 2026 context, SPICE aims to provide clear, actionable guidance to help members translate regulatory and technical developments into practical implementation for cosmetics packaging.

In Year 8, the Recyclability Task Force will focus on two priorities distinct workstream on regions leading the way on recyclability. The PPWR in the EU and the US Californian regulation.

Regarding the EU regulation, the objectives are threefold:

- Interpret: translate plastic DfR requirements into cosmetics-specific design choices.
- Gap analysis: map divergences between the new EU direction and existing guidance and practices in priority markets, grounded in selected cosmetic packaging use cases.
- Technical & industry assessment: translate SPICE technical findings into structured implementation insights, to be shared with relevant industry platforms (e.g., Cosmetics Europe) and support informed regulatory dialogue.

In terms of deliverable this includes a DfR interpretation and gap analysis with clause-to-pack mapping, an ambiguity log, and comparisons with key national guidance in countries, supported by cosmetic case studies. The idea is to produce a structured PPWR implementation assessment for cosmetics packaging, documenting technical challenges, feasibility considerations, and practical implications. Finally, we will ensure ongoing technical exchange with industry associations such as Cosmetics Europe, FEBEA, and RecyClass to support alignment and constructive dialogue on PPWR implementation.

In parallel, the US Legislation workstream, will focus on understanding and clarifying implications of major California regulations for cosmetics packaging. This includes the Plastic Pollution Prevention and EPR Act, as well as the "Truth in Labeling" requirements under SB343. We will analyze how recyclability claims and labeling must evolve and clarify how the Circular Action Alliance's EPR plan is being structured.

The key deliverables here will include clear do's and don'ts for applying SB343 to cosmetic packaging, and a step-by-step explanation of how the California EPR plan is expected to be implemented, with publication in mid 2026 and entry into force in January 2027.

The budget will be distributed as 45k for the PPWR workstream and 15k on the US regulation workstream.

Overall, Year 8 is about moving from monitoring regulatory developments to structured interpretation and practical guidance, ensuring that members are equipped to anticipate and respond to both EU and US regulatory changes.

Gilles SWYNGEDAUF (Albea): For European members, comparing national guidance may not add much value. Countries like Germany, for example, adopted a new law two weeks ago that will align fully with PPWR. More broadly, national standards are gradually moving toward PPWR alignment. In practice, there are still gaps because the rules are not fully in place yet, but the direction is clear. Where it could be more interesting is to look at countries outside the EU, such as the UK, where the regulatory framework may differ.

Jean Marc FONTAINE (Quantis): Our proposition is based on survey results and last taskforce meeting, now it can be adjusted, as it is true that countries like Germany, France and Italy fall within the PPWR scope. The added value might therefore come from looking at a country such as the UK, which is not directly covered by PPWR and follows a different regulatory approach.

Phillipe BONNINGUE (L'Oréal): I see two possible objectives here. First, helping future packaging design in countries that are not under PPWR by assessing how close or far they are from the PPWR requirements. Second, analyzing the situation today (e.g. cosmetics packaging case study) to potentially enrich the future CEN standards, making them more tolerant of the typical constraints of cosmetic packaging. Therefore, I don't see the benefits of the gap analysis between PPWR and existing Germany, France,... regulations as bottom line, the catalog will have to comply with PPWR. To move forward, we need to be clear about the objective. Originally, the goal of this task force was to assess how difficult it would be for cosmetic packaging to comply with PPWR requirements, and—with some distance—to identify where the PPWR guidance itself might need adjustment.

Gilles SWYNGEDAUF (Albea): The UK is introducing a new circularity system, but it is not aligned with what is currently being implemented in Europe. We need to consider this as well, as it could help our teams operating in the UK.

Joris DESCHAMPS (Quantis): One option would be to reframe the gap analysis directly around the differences between PPWR requirements and specific cosmetic packaging use cases.

Michael Christe (Estée Lauder) : Is there any issue with doing both? In other words, analyzing the gap between PPWR and cosmetic packaging realities, while also comparing PPWR with other frameworks such as the UK system or SB54 in California.

Phillipe BONNINGUE (L'Oréal): That would make sense, provided we have a clear understanding of what SB54 requires in terms of recyclability, and whether we have sufficient

information on that topic. SB54 is different from PPWR as it is not just D4R but at-scale 2032 and with a REM Responsible End Market for the produced-PCR.

Helene VILLECROZE (Chanel): Comparing PPWR in Europe with the future regulatory framework in the US under SB54 is indeed important. I expect that the two systems will not operate in the same way, and for companies like ours it is critical to understand whether they can work together or whether they will diverge significantly.

Frederic DREUX (Unilever): I agree with Philippe regarding the current state of SB54. The principle behind the regulation is relatively clear, but there is still significant discussion around how recyclability will be measured in practice. The concept of “recyclable at scale” is defined in principle, but authorities are still working on the methodology to assess and verify whether those conditions are met.

Jean Marc FONTAINE (Quantis): summarizes that the proposed action plan and deliverables for the EU PPWR workstream can be adapted as suggested. This would involve first assessing the gaps between PPWR Design for Recycling standards and their applicability to cosmetics packaging, then comparing these with SB54 recyclability assessment requirements, and subsequently with the UK Recyclability Assessment Methodology (RAM).

Joris Deschamps (Quantis) presents the Year 8 planning (Q2 2026 - Q1 2027), structured around key external milestones, notably the publication of CEN Design for Recycling (DfR) guidelines. Six task force meetings are planned, mainly concentrated at the beginning of the year.

The EU PPWR workstream is organized into three progressive phases:

- Interpretation: translate CEN DfR standards into cosmetics-specific implications (starting with plastics).
- Gap analysis: compare EU requirements with existing national practices using concrete packaging use cases.
- Technical & industry assessment: consolidate findings and share insights with industry and regulatory stakeholders.

The key deliverable is to establish an open technical dialogue with European federations (e.g., Cosmetics Europe, FEBEA, RecyClass) to share SPICE insights and expertise, support PPWR implementation discussions, and ensure cosmetics packaging industry representation.

The US workstream will run in parallel, aligned with key milestones (CAA plan mid-2026, labeling compliance in October 2026), and dependent on collaboration with US-based stakeholders. CAA and PCPC should do a presentation to SPICE (about SB54)

Fabrice RIVET (FEVE): The CEN standards will not be the end of the process. A delegated act from the European Commission will follow, and we still don't know exactly how much of the CEN standards will be incorporated. The Commission may also add additional requirements to define the final ABC performance categories. For example, substances of concern will likely

need to be considered. So, the question is whether it makes sense to base the analysis solely on the CEN standards, or whether the focus should instead be on the future delegated act.

Joris DESCHAMPS (Quantis): The dedicated act will be published way after and would rather be able to work as soon as possible on the document that can be published, being mindful of the fact that they are certain uncertainty around it, because we don't know, for sure it's going to be included at the end. I think all the members were confident that at least the same guidelines that would be published is a good start. As it's already, you know, being done in collaboration with the JRC.

Gilles SWYNGEDAUF (Albea): In practice, it is very likely that the Commission will use the CEN standards as the baseline. On top of that, they will probably add the additional elements related to substances of concern that may hinder recyclability or reusability. This list is the main aspect we still do not know, as it should only be published later in the year. Normally, a first draft should be released around July, with finalization expected by the end of the year. In the end, the framework will probably combine these two elements. Even without the delegated act, we should already have a good idea of what to work on. In practice, if a packaging component contains a “red” element, recyclability will essentially be compromised. So, the priority is already clear: focus on addressing those red elements. For some materials, this alone already represents a significant amount of work.

Christophe MARIE (APTAR): What exactly are we aiming for? Is the objective to enrich the CEN guidelines on assessing cosmetic packaging? Or are we analyzing specific derogations or transitional provisions to implement these requirements for cosmetic packaging?

Jean-Marc FONTAINE (Quantis): It is probably too early to define that. The role of SPICE is mainly to generate technical insights and evidence. These insights can then feed into discussions at the level of industry federations such as Cosmetics Europe, FEBEA or others. SPICE itself does not advocate for regulatory changes. Its aim is to carry out the technical assessment and document the findings; the conclusions can then be communicated and potentially used by the relevant federations in the regulatory dialogue.

No further questions or comments from SPICE members.

5. SPICE database update and development

Nassim BAMI (Quantis): As every year, we carried out the database update during the summer, mainly by integrating the latestecoinvent updates. This update process will continue a yearly basis.

All members received a document summarizing the changes introduced and the resulting impacts on the results.

We also took the opportunity to reiterate that Quantis is currently looking for data to develop new datasets. The development of these datasets depends on members' ability to share

relevant data and supporting documentation on their data collection processes, which are necessary to ensure robust and accurate modelling.

Now, PET without antimony has been identified as a high-priority dataset. We are therefore looking for supplier contacts or data related to this material, as well as any other materials or processes of interest. Members are encouraged to contact the SPICE team or reach out to me directly. Full confidentiality of shared data is guaranteed.

Finally, we also reminded members of the major development of the Glass datasets, released in October, which include both mass-market and luxury-market glass datasets.

SPICE DATABASE SHARING

Jean-Marc Fontaine (Quantis) presents a proposal to license the SPICE database extract (Excel format) to SPICE tool licensees, in response to increasing demand from both licensees and external stakeholders. The proposal includes a defined financial contribution, a formal communication framework to ensure alignment with SPICE principles, and specific conditions related to the ecoinvent license. The objective is to reinforce the SPICE database as an industry reference while covering the cost of maintenance and updates. As we have already presented this proposal to the Steering Committee, the next steps include review of the process, definition of pricing for future vote during next committee.

Regine FRETARD (LVMH): What about the update ?

Jean-Marc FONTAINE (Quantis): The database extract is provided as an Excel file. As the SPICE database is updated annually, this extract will become outdated. Therefore, SPICE tool licensees will need to access updated versions of the database, as the extract itself is not dynamic.

No further questions or comments from SPICE members.

8. SPICE CLAIMS GUIDELINES

Jean-Marc FONTAINE (Quantis): Presents the contributors and thanks members for their support in developing the guidance. Recalls the work carried out during Year 7, including three iterations and the integration of 191 comments. Confirms that the final version of the guidance has now been published.

Jean-Marc FONTAINE (Quantis): explains that based on the survey results, SPICE members want to organize a dedicated Webinar to present and explain the updated SPICE Claims Guidelines in 2025. We will include this in SPICE year 8 budget.

No further questions or comments from SPICE members.

9. SPICE Year 8 estimated revenues and budget allocation

Jean-Marc FONTAINE (Quantis) presented the estimated Year 8 revenue and budget allocation, based on 17 corporate members, 12 SPICE Tool licenses, and the €45,000 EBS database license. The budget will mainly support the Recyclability and Short Task Forces, annual SPICE database updates, and development of new datasets, as well as the migration of the SPICE Tool to the eQopack platform and related support. Two SPICE Insights webinars are planned, including one on claims, and the initiative will also be promoted at selected conferences. The budget will be updated according to the final number of members and submitted for vote at the next committee (Slide 73).

10. SPICE year 8 steering committee candidates

Jean-Marc reminded participants about the renewal of the Steering Committee, which includes four seats: two for brand owners and two for suppliers/manufacturers. Members were encouraged through the survey to express interest in joining, as the committee helps set SPICE priorities, review key positions, and promote the initiative internally and externally. The current candidates are Beiersdorf and Puig for brand owners, and Albéa, Aptar, Amcor, and Axilone for suppliers. An electronic vote will be organized at the end of March or early April to confirm the committee members (Slide 74).

He then asked the steering committee members to share their feedback on their experience as being of the Spice Steering committee.

Christophe MARIE (Aptar): Aptar joined SPICE from the beginning and later increased its involvement by joining the Steering Committee. Current challenges—such as regulation, methodology, and reporting—concerns the entire industry. Our objective is to continue contributing through a science-based and pragmatic approach, supported by our product sustainability and sustainability teams. We want to continue supporting and engaging in the SPICE initiative and are very happy to be here and continue this journey.

Joaquim CONS GARCIA (Puig): I have a short comment related to brand owners. Not about the workload but about commitment. Important to have this focus and this approach. Yeah, in fact, we are really happy to be part of this steering committee because we have some specific insights and we can contribute to developing this transition and addressing the challenges for the future.

But I am quite surprised because I am strongly convinced that diversity is very important to be part of this steering committee. Last year we had the same players, and I think it would be a good opportunity for other brand owners to join, bring additional value and contribute with fresh ideas.

Jean-Marc FONTAINE (Quantis): And do you think that being part of this chain committee is a huge amount of additional work for you, or it's reasonable compared to the committees?

Joaquim CONS GARCIA (Puig): No, it's reasonable. It's not about the workload. I think it's about commitment. And for me diversity essential because the approach can be different from one brand to another and it's important to represent this diversity.

Jean-Marc FONTAINE (Quantis): Gilles would you like to share your point of view?

Gilles SWYNGEDAUF (Albea): Very similar to Aptar. From beginning we believed we could contribute as a whole. Diversity is very critical also. That's why we welcomed suppliers voice in this steering committee, and we would like to continue to contribute inside and outside Spice. In fact, increase the voice of Spice is what I think we should do to continue to go on the right way.

Jean-Marc FONTAINE (Quantis): Thank you Gilles. Does anyone from Axilone want to share their thoughts?

Reynald TROCHEL (Axilone): Aligned with what was said. We have to work all together and be available to help this community for better packaging.

Anna OLIVERAS TORRA (Amcor): I agree with all the comments made so far. We are happy to be in this Steering Committee. We joined at the very beginning also, when it was very global. We encourage others to join and are happy with this initiative.

Jean-Marc FONTAINE (Quantis): And Michael, you've been part of this steering committee with Estée Lauder for the last years, and you are still candidate. What is your point of view about this role?

Michael CHRISTEL (Estée Lauder): We've been part of it for several years. We definitely like to have all the conversation taking into consideration all the members and external voices. Let's make sure everything gets to a vote and that all the voices are heard. We're happy to help and continue to help in that.

Jean-Marc FONTAINE (Quantis): Thank you for sharing that. I will double-check with all of you, some seats are still available. Don't hesitate to reach out to me.

2026 next steps: Timeline towards Year 8

Jean-Marc Fontaine (Quantis) presents the timeline towards SPICE Year 8, outlining key milestones and required member actions. Members are expected to confirm their commitment by March 20th, 2026, followed by a Steering Committee electronic vote early april. In parallel, SPICE participation amendments and eQopack order forms will be shared for signature ahead of migration. The transition to eQopack will be organized in batches. The new SPICE year 8 cycle will start with the steering committee end of may and then SPICE Year 8 Committee meeting on June 4th, 2026.

Closing of the meeting
