

SPICE YEAR 6 COMMITTEE 3 MEETING MINUTES DECEMBER 19TH, 2024



Minutes written by: Quantis

Participants (online, unless stated):

- Albea, Gilles Swyngedauw (on site)
- Aptar, Christophe Marie (on site)
- Aptar, Benedicte Luisi
- Berry Global, Ellen Seyda
- Chanel, Helene Villecroze (on site)
- Chanel, Virginie Recoura
- Coty, Vincent Delavenne (on site)
- Estée Lauder, Michael Christel
- Hermes Parfums, David Petit
- JPMS, Sean Ansett
- KAO corporation, Shu Genhaku
- KAO corporation, Shinya Oogane
- L'Oréal, Philippe Bonningue (on site)
- LVMH, Régine Frétard
- LVMH, Elsée Ekambi Eyoun
- Mary Kay, Kristin Dasaro
- N°7 Beauty Company, Steve Owen
- Puig, Joachim Cons Garcia
- Shiseido, Yuria Miyabayashi
- Shiseido, Kenji Ohashi
- Sisley, Jérôme Morel
- Texen, Christophe Cardi
- Toly, Cheryl Bezzina
- Toly, Olaf Kahra
- Unilever, Frédéric Dreux
- Canopee, Eugenia Kwok
- FEBEA, Elodie Fisicaró

- FEVE, Fabrice Rivet
- Recyclas, Fabrizio Di Gregorio
- MWE, Caroline Noyrez (on site)
- Quantis, Elsa Saouabi
- Quantis, Gabrielle Perier (on site)
- Quantis, Jean-Marc Fontaine (on site)
- Quantis, Victor Frontère
- Quantis, Nassim Bami
- Quantis, Margaux Biharé

Excused SPICE Members:

- Axilone
- Clarins
- Natura & Co
- Meiyume
- Canopy Planet
- CITEO
- Cosmetics Valley
- Detic
- Elipso
- PCPC

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

Opening of the meeting

Introduction

Jean-Marc Fontaine (Quantis) welcomes all participants to the third committee of SPICE Year 6, 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 6 timeline & budget updates**
- 2. SPICE Year 6 new publications**
- 3. Review of Year 6 workstreams**
- 4. Update on SPICE Tool IT development**

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 6 overall update

Year 6 timeline & budget updates

Jean-Marc Fontaine (Quantis) reminds members of the SPICE Year 6 roadmap as well as the budget allocation update.

No question or comment from SPICE members.

2. SPICE Year 6 new publications

SPICE insight: Ecodesign & Circularity

Victor Frontere (Quantis) reminds members of the SPICE insight timeline, status and next steps, and reminds that members' comments have been integrated in the last version, and that the vote this SPICE insight publication is happening during the Committee.

SPICE YEAR 6 VOTE | Ecodesign & Circularity SPICE Insights

DO YOU APPROVE THE ECODESIGN & CIRCULARITY SPICE INSIGHT FOR PUBLICATION?

Company	Vote
Albea	Yes
Aptar	Yes
Axilone	-
Berry Global	Yes

Chanel	Yes
Clarins	Yes
Coty	Yes
Estee Lauder	Yes
Hermes Parfums	Yes
JPMS	Yes
KAO	Yes
L'Oréal	Yes
LVMH	Yes
Mary Kay	Yes
Meiyume	Yes
Natura & Co	Yes
N°7 Beauty Company	Yes
Puig	Yes
Shiseido	Yes
Sisley	Yes
Texen	-
Toly	Yes
Unilever Prestige	Yes

Vote results – 21 voting members

YES 100 % - NO 0% of voting corporate members, Ecodesign & Circularity SPICE Insights is approved for publication.

Jean-Marc Fontaine (Quantis) adds that from now on in SPICE all comments will be recorded and saved to keep trace of the changes between versions.

No additional question or comment from SPICE members.

Reuse case studies & guidance

Margaux BIHARE (Quantis) reminds the work done during the last months and timeline. She reminds the context that it is to build a reuse guideline on reusable packaging in cosmetics. She reminds the work of the taskforce that helped to build this guidance (agreed on case studies to work on, data sharing, etc.)

Following the Q&A session and email received since last committee, all comments have been considered and an excel file was created to track the comments of the members.

The idea is to promote the document, do a webinar and write a SPICE insight.

Margaux BIHARE (Quantis) reminds the structure of the document that follows slide 13 agenda. The sections on context and definitions of case studies have been reviewed by EMF. Margaux highlights the point that a new section was created thanks to last committee comments, the key insights and takeaway to help the understanding and the reading of the document, because it is a long document. Following this Margaux presents the achievements to date with the taskforce creation, 7 reuse scenarios studied, 3 iterations of the guidance, Q&A session and final guidance writing.

For the next step, the vote of the document is during this committee and if it is voted, the document will be published, and a SPICE insight will be created.

Jean-Marc FONTAINE (Quantis) reminds that the time was taken to consider all the comments of the members during all the project and with the Q&A sessions.

SPICE YEAR 6 VOTE | Reuse case studies assessment

DO YOU APPROVE THE REUSE CASE STUDIES ASSESSMENT FOR PUBLICATION?

Company	Vote
Albea	Yes
Aptar	Yes
Axilone	-
Berry Global	Yes
Chanel	Yes
Clarins	YES
Coty	Yes
Estee Lauder	Yes
Hermes Parfums	Yes
JPMS	Yes
KAO	Yes
L'Oréal	Yes
LVMH	Yes
Mary Kay	Yes
Meiyume	Yes
Natura & Co	Yes

N°7 Beauty Company	Yes
Puig	Yes
Shiseido	Yes
Sisley	Yes
Texen	-
Toly	Yes
Unilever Prestige	Yes

Vote results– 21 voting members

YES 100% - NO 0 % of voting corporate members, Reuse case studies assessment is approved for publication.

Margaux BIHARE (Quantis) thanks all the members and says that all the work on the next step will begin in 2025.

No additional question or comment from SPICE members.

Product emissions data exchange protocol:

Margaux BIHARE (Quantis) reminds the work done during the last months and timeline. She also presented what was inside the document to members so they can see if they are ready to vote for this workstream today or if next steps need to be added before voting.

Margaux BIHARE (Quantis) reminds the strategic importance of the product emissions data exchange for the cosmetics industry: data exchange is what will enable companies to “talk” to one another. That is specifically what is summarized in the document you will vote for: technical explanations, applicable framework and high-level recommendations.

Margaux BIHARE (Quantis) highlights that the document is not a position paper, target to technical audiences or operational teams, focuses only on climate change indicator, and its methodology is aligned with the PACT framework. She also reminds the document agenda.

Margaux BIHARE (Quantis) reminds the achievements to date, foreseen next steps for SPICE Year 6: either the publication is voted today, and a webinar is planned Q1 2025, or extra time is needed to clarify some points, and the vote will be submitted during the Year 6 Committee 4 and a webinar is planned later. For Year 7, members will be asked to think about specific modules and deep dives.

Q. Gilles Swyngedauw (Albéa) - Why do we focus only on one category (scope 3) and not the others ?

A. Margaux BIHARE (Quantis) – The difference is that for scope 1 and 2 is primary data from company, so no need to exchange with value chain partners, for scope 3 there is more need to exchange with the suppliers. Also, scope 3 is important to target as the emissions are much more important than scope 1 & 2.

A. Jean-Marc Fontaine (Quantis) - When we say scope 3 here it is from the brand's point of view. It already includes scope 1-2-3 for each upstream level. We also focused on one indicator, climate change, because it was the easiest one.

Q. Gilles Swyngedauw (Albéa) - Different way to allocate my scope 1&2 emissions (some are economic data, other unit data). If between two brand owners, we do not have the same rules of allocation, we will compare apples and pears.

A. Jean-Marc Fontaine (Quantis) - This is the exploration phase, it was a new topic for this year, some members are more mature on this topic while some have not grasped the topic fully. Plus, today there is no Product Environmental Footprint Category Rules Guidance (PCR) specific to packaging in cosmetic. The question now is do we want SPICE to work further on this topic with a taskforce and work on allocation recommendations specific to cosmetic packaging?

A. Gilles Swyngedauw (Albéa) – It is not mentioned in the document. If we do not have clear protocols, we will not be able to compare equal things.

Q. Stephanie Lumbers (FEBEA) - This is something very important to be done. Just a question, is this specific to the cosmetics industry? Have you integrated some plastics / metal / materials providers in the process?

A. Margaux BIHARE (Quantis) – It is not specific to the cosmetics industry. Benchmark of what was existing not specific to cosmetics. Recommendation found in the benchmark can be applied for all industry. Specificities: in the document 1 section at the end with high level recommendation if you want to create specific data for glass, paper, ... it is high level and with no many details but it is the next step.

Q. Steven Owen (N°7 Beauty Company) – Is the document focusing only on specific packaging materials, or does it cover all packaging materials? Are we able to provide a timeframe regarding when we will be able to claim and externally communicate on impact reduction thanks to data exchange?

A. Margaux BIHARE (Quantis) – It's not specific to any kind of packaging material, which is why you have examples with glass, paper, plastic and metal. To your second question, I think so far, the topic of data exchange is still something that is new and not all companies are used to it yet, so I think it's something really for the future, but I would not bet on any timeline, but data is key which is why the idea was 'let's start somewhere'.

A. Victor Frontere (Quantis) – One comment, this technical review is a first step and probably needs more deep-dive for suppliers and brands to be at ease to share data. See page 30 (start of allocating approaches recommendation): it could be refined and deep dived for next steps.

A. Jean-Marc Fontaine (Quantis) – The taskforce will answer these questions, and this requires a common effort as a group to define and standardise product emissions data allocation method for cosmetics packaging.

Q. Vincent Delavenne (Coty) – No need to postpone the vote. Could we have a target for 1 year?

A. Jean-Marc Fontaine (Quantis) – We can do it step by step. First publish this report as a first deliverable as exploration phase, and in parallel open a taskforce during SPICE year 7 to work

on defining standardized product emissions data allocation method specific for cosmetics packaging.

A. Margaux BIHARE (Quantis) – We can plan to have something before the end of Year 7.

A. Victor Frontere (Quantis) – if you find it a priority topic, we can find a way to accelerate. But we will need iterations.

Q. Christophe Marie (Aptar) - if we go with this document now and we vote today, do we plan to include the next steps in it?

A. Margaux BIHARE (Quantis) – We can add a slide to show the next steps.

A. Jean-Marc Fontaine (Quantis) – Indeed, we can.

A. Victor Frontere (Quantis) – There are no more glass suppliers in the members except FEVE, Fabrice would you be open to support this for glass?

Q. Fabrice RIVET (FEVE) – Can discuss with his member to confirm.

A. Jean-Marc Fontaine (Quantis) – Is there anyone that thinks we should not vote for this technical review?

A. Victor Frontere (Quantis) – I think we can go for vote, and we'll see the answers.

SPICE YEAR 6 VOTE | Product emissions data exchange protocol technical review
DO YOU APPROVE THE SPICE PRODUCT EMISSIONS DATA EXCHANGE PROTOCOL TECHNICAL REVIEW FOR PUBLICATION?

Company	Vote
Albea	No
Aptar	Yes
Axilone	-
Berry Global	Yes
Chanel	No
Clarins	Yes
Coty	Yes
Estee Lauder	Yes
Hermes Parfums	Yes
JPMS	No
KAO	No
L'Oréal	Yes
LVMH	Yes
Mary Kay	Yes

Meiyume	Yes
Natura & Co	Yes
N°7 Beauty Company	Yes
Puig	Yes
Shiseido	Yes
Sisley	Yes
Texen	-
Toly	No
Unilever Prestige	No

Vote results– 21 voting members

YES 71 % - NO 29 % of voting corporate members, Product emissions data exchange protocol technical review is not approved for publication as it is.

Jean-Marc Fontaine (Quantis) adds that we are below 75% so the document is not approved for publication as it is.

Following that Margaux BIHARE (Quantis) introduced the survey to collect members feedback on the next steps for this topic: Product emissions data exchange protocol technical review.

- **Question 1:** WOULD YOU BE INTERESTED IN THE ABILITY TO CUSTOMIZE CERTAIN PARAMETERS OF THE SPICE EMISSION FACTORS DIRECTLY WITHIN THE SPICE TOOL?
- **Questions 2:** WOULD YOU BE INTERESTED IN CREATING A TASKFORCE IN SPICE Y7 TO BUILD MORE SPECIFIC RECOMMENDATIONS FOR KEY PACKAGING MATERIALS ON HOW TO CREATE SPECIFIC EF?

Company	Question 1	Question 2
Albea	Yes	Yes
Aptar	Yes	Yes
Axilone	-	-
Berry Global	Yes	Yes
Chanel	Yes	Yes
Clarins	Yes	Yes
Coty	Yes	Yes
Estee Lauder	Yes	Yes
Hermes Parfums	Yes	Yes

JPMS	Yes	Yes
KAO	Yes	No
L'Oréal	No	No
LVMH	No	No
Mary Kay	Yes	No
Meiyume	No	Yes
Natura & Co	Yes	Yes
N°7 Beauty Company	Yes	Yes
Puig	Yes	Yes
Shiseido	Yes	Yes
Sisley	Yes	Yes
Texen	Yes	Yes
Toly	Yes	Yes
Unilever Prestige	Yes	Yes

Survey results – 22 members replied

SPICE members answered the survey:

Question 1: 86% Yes, 14% No

Question 2: 82% Yes, 18% No

Jean-Marc Fontaine (Quantis) adds that we cannot conclude yet on opening a taskforce early next year as we are pending some votes, but we can wait for the workshop early 2025 to discuss with members on potential next steps for Year 7.

No additional question or comment from SPICE members.

Plastic chemical recycling life cycle allocation rules:

Margaux BIHARE (Quantis) reminds the work done during the last months and timeline. She also presented what was inside the document to members so they can see if they are ready to vote for this workstream today or if next steps need to be added before voting. (as for the data exchange)

Margaux BIHARE (Quantis) reminds the goal was to provide an introduction on chemical recycling life cycle allocation rules. The topic raised a lot of questions and lot of iteration of the document and a Q&A session.

If the document is not yet ready for publication, additional time will be taken to review and refine its content.

Chemical recycling, as a relatively new technique, serves as a complementary method to mechanical recycling for processing plastics. It has garnered interest due to its potential and increasing regulatory pushes to raise the percentage of recycled plastic content in packaging.

The primary purpose of the document is to explain how to measure the environmental benefits of chemical recycling. Rather than serving as a position paper, it provides an overview of existing methodologies and shares knowledge in this rapidly evolving field.

Margaux BIHARE (Quantis) reminds the overview of the agenda of the guideline and gives a summary slide to have in mind the key insights. Chemical recycling is the focus of the review, but it is not the only recycling technic for plastic e.g. mechanical recycling. They complement one another. Mechanical recycling lower energy and cost but chemical recycling can recycle some part that mechanical cannot do.

Margaux explains how to account for chemical recycling in LCA, presenting the several methodologies existing to study the impact of chemical recycling: cut-off, CFF (recognized by PEF and used in SPICE), Upstream System Expansion.

Several allocation methodologies are studied in the document.

Margaux reminds the purpose of the technical review that provides an overview, the target audience that is not technical and the key insights have been presented already.

Two option next step:

- document ready for publication and vote take place
- if not ready: no vote but schedule an extra meeting in 2025

Extra budget will anyway be needed

Q. Gilles Swyngedauw (Albéa) – Thanks for the work. I have two topics: still confusion in term of mass balance methodology and the allocation of the mass balance that are two different things. It seems there is still a confusion between proportional and chain of custody mass balance so I don't feel we should vote today.

Second, how it will impact my CO2 emission (the allocation). Depending on the allocation, the CO2 emission is not the same.

A. Margaux Bihare (Quantis) - We can take the point, this is not something we have studied for the moment, and if we continue to work on the topic, we can eventually consider this.

A. Jean-Marc Fontaine (Quantis) – recommendation on option 2 is not to vote today and continue discussion with expert to go into technical details. **If the members want to join they can.**

Q. Philippe BONNINGUE (L'Oréal): – On the principle, when we evaluate a SPICE project to work on it is not very fair to say it cost X, and the year after to say we need additional cost to finish what we wanted to achieve. We should be clear on the beginning what we want to achieve to decide if yes or no we want to vote. The project is very well done -, but I don't think it answers what people thought about it, so I think it is a waste of SPICE budget.

We need to be careful with the projects we want to achieve in SPICE: Agree on the outcome, fully understand the outcome and what is not included, and stick to the budget.

A. Jean-Marc Fontaine (Quantis) – The topic was coming from the Year 6 survey, pushed by members. Then, we have proposed a scope with an initial budget of, that was first reduced to 25k. I agree with you this topic has evolved, and we see that we have more questions, very

technical, and what happened is technical experts within companies came to us with questions, but because the topic is evolving, we don't have clear answers. What we see now is that there are still a lot of members that are interested in this topic. The question is do we want to continue, to go further, etc.

A. Philippe BONNINGUE (L'Oréal): 4th question to add to survey: are we planning to use it? Question for the members.

A. Vincent Delavenne (Coty) - It's true this document is very interesting and answers some questions, but if we continue like this it will be a never-ending story, and we should maybe publish it. It's above us if I may, we are going too far away from the principle of SPICE. It was complex to read this, we must go back to the principle of helping SPICE members, not scrutinizing the law.

A. Frederic Dreux (Unilever) – Topic suite deep into that. Agree on what has been said. We went to much in detail at the end maybe, and for me it was not to be published but more internal. It is not the right topic for publishing something externally. Scoping: when do we start when do we stop?

A. Christophe Marie (Aptar) - Agree on that is it not a position paper. It is a state of knowledge, good way to educate because complex topic, well done to be able to do that. Not sure we can do more than this, except some clarification. Yes for a publication at this stage.

A. Frederic Dreux (Unilever) – I am not sure there is a lot of value to publish it. I don't think we bring anything more than what is already known.

A. Michael Christe (Estee Lauder) – I am kind of torn on this all topic, I think this is important as a group to say something on the topic as SPICE. I believe many of our members use this technology, I think not saying anything is perhaps a missed opportunity and if we stay silent, we are saying the regulators we don't care. I think we need to consider that as a group and do agree with other comments and we need to come to a consensus.

A. Frederic Dreux (Unilever) – Michael has a good point: what is the message? Interesting for SPICE members. We are expecting regulation to set the rules of the game. But to say, "this is our recommendation", we need to take position for one or another at the end, and I am not sure we are in position to do that, and not even sure it is our role to do that. Agree with the point of Michael, if the purpose is to show our interest and need for regulation, maybe the communication should be different than this document.

A. Jean-Marc Fontaine (Quantis) – I suggest we don't vote now and discuss this further, and then if there is no will go further, we stop for Year 7, but we build on it for internal use at least. We will contact the main players that already contributed a lot.

No additional question or comment from SPICE members.

3. Review of Year 6 workstreams

Regulatory hub

Jean-Marc Fontaine (Quantis) reminds members of the Regulatory Hub and its process. He explains that during SPICE committee #2, members were asked if they wanted to continue this work. The answer was yes, with a request to study next ESPR & Recycled Content regulations.

Jean-Marc Fontaine (Quantis) presented the inventory of regulations and asked members if any other regulations should be tracked but is not on the list. No feedback from members

Jean-Marc Fontaine (Quantis) then asked members if there is a specific regulation on which SPICE should work with members to build some common work.

Q. Philippe Bonningue (L'Oréal) - To me, we have 2 major threats that will come for the cosmetics industry. The first one will be California 2032, because nothing will be recyclable at scale. The second one is the PPWR, because according to the guidelines very rare products will be deemed not recyclable. The first question is: do we want to do something together on that? And if not answered today, do we want to work on that?

Q. Vincent Delavenne (Coty) – Is it the role of SPICE to do this? Or more the role of another organization, like FEBEA?

Q. Philippe Bonningue (L'Oréal) - It can't be FEBEA because FEBEA is only for France. FEBEA can for sure help, but the point is much broader than France. Also, this is the value of SPICE, because it is the only organization in packaging for cosmetics specifically.

Q. Frédéric Dreux (Unilever) – I am quite aligned on that. It is interesting to have a voice, because we have a unique position: we have brands, producers, materials manufacturers... This gives us a voice. I think the best question is: how do we want to work on that? Which audience do we want target? What is our reach, and where can we influence?

A. Fabrice Rivet (FEVE) – I just have a comment on ESPR. On Nov 15th, JRC published a final report. We are not yet speaking of a Delegated Act, but a report with priority products, which includes cosmetics. It is very likely the commission will take that over when they will write their Delegated Acts.

Q. Jean-Marc Fontaine (Quantis) – Philippe, you proposed to work on PPWR & California 2032. What would be the approach?

A. Philippe Bonningue (L'Oréal) - We don't know what we would be able to do, but in California, the regulation is challenging because if products are not recyclable at scale, brands can't sell. California is the only region to ban sales, it is not the case of any regulation or upcoming regulation in Europe so far. We could work on what technically is needed to be recyclable at scale in cosmetics, i.e. be at scale in collection step, recycling step, sorting step... As per this regulation, packaging collection should not be for burning, but for recycling only, and recycling activities should be good for the planet, it is not just about showing we do something with the waste. It is for 2032, we still have time, but only 7 years. The key question

for the first SPICE meeting in 2025 is: do we want to do something together? If no, too bad. If yes, we could advocate towards the authorities, but in this case, it would not be through SPICE. Or, we could discuss doing something about packaging collection together in California, and liaise with local authorities to confirm our approach will be recognized as recyclable at scale

A. Frédéric Dreux (Unilever) – This approach would be the same as the dairy industry initiative in Europe following the AGECE ban on styrenic. They demonstrated styrenics could be recycled at scale, and this demonstration allowed them to step out of the ban on styrenics. We should consider it, but also, we should be careful not to create a precedent: each state will have the same mandate, and we may need to adapt in each state, to set up the infrastructure while they are getting the money from the extended producer responsibility. Apart from this, I agree that finding the right medium is key.

Q. Vincent Delavenne (Coty) - If we think this is so important & risky, do we need to wait for March to decide? Can't we decide before, via for example a survey in January? And just agree on the content in March?

A. Jean-Marc Fontaine (Quantis) – Yes, we can ask about this in a survey, preparing for next year and making sure we have a clear approach to comment in the March committee (how to do that, who could contribute, what would be the budget...).

A. Hélène Villecroze (Chanel) - Before this, we may need to have another discussion on how SPICE can act and work together to address the topic. We can do a survey to have the opinion of every member, but we will need to discuss all together to think about how to work on this. It is not so easy to address. Personally, I don't know how we can work on this.

A. Victor Frontere (Quantis) - What we could do, as usual, to accelerate, is to have exploratory discussions with the SPICE Steering Committee on where SPICE could be relevant, without being in advocacy, but preparing the industry to be in position to answer those regulations. Because it is a structural topic, we could have a general discussion with all members invited to identify the possible ways forward.

A. Philippe Bonningue (L'Oréal) - The way you read the regulation is very company-oriented, maybe we are reading it wrong. Each member should first deal with their own Public Affairs/Scientific Direction to see if the regulation could be an issue or not. This could be a good first insight.

A. Frédéric Dreux (Unilever) - If we don't voice anything, as cosmetics is not seen as a large volume, we can be left aside and not taken into consideration. Having some voice can highlight the specifics of cosmetics.

A. Philippe Bonningue (L'Oréal) - To your point, with the size of the cosmetics industry, which is small, the economic viability of our actions is often challenged. One option could be to ask for a delay in the implementation of the regulation for the cosmetics, because we are small. This doesn't mean we shouldn't do anything, we should not push for an exemption, but we could ask to postpone. And to do this, we would be much stronger all together, while complying with anti-trust laws

A. Frédéric Dreux (Unilever) - I agree to avoid being collateral damage

A. Victor Frontere (Quantis) - I think there are two things to clarify. The first one is how SPICE can help the industry set-up to answer to the regulations (e.g. how can we put in place collection schemes, as mentioned by Philippe). The second one is how can SPICE advocate for postponing or not being on the frontline of the law. We can re-address this, but currently, we have put this last point on the side for legal reasons. On top, the professional federations are making regulation monitoring & advocacy their specialty. Thus, if we want to move forward on the second one, this is a very strong step, a different purpose for SPICE. On this, we would need to collectively agree.

A. Stéphanie Lumbers (FEBEA): Thank you Victor. I am just thinking that SPICE has a strong part to play in bringing insights and technical support on those questions. But I wanted to warn members and be careful on advocacy, in order not to crossfire with what FEBEA or PCPC can do.

A. Jean-Marc Fontaine (Quantis): Thank you for this interesting debate. We will prepare this topic for the next committee. Before that, we will send a survey which will be reviewed during the next committee.

Jean-Marc Fontaine (Quantis) reminds that the cards are screenshots of regulations and are not meant to be exhaustive.

Q. Gilles Swyngedauw (Albéa) - On the ESPR card, we are talking about eco-design as defined by the European Commission. I think there is 16 boxes to tick, it would be very interesting to add them on the slide, they are split by end-of-life management, type of materials... It is useful to help members better understand how Europe sees eco-design.

A. Jean-Marc Fontaine (Quantis) - I will see if we can add this, but we cannot go too deep into the topic

Questions in the chat:

Q. Ellen Seyda (Berry Global) - Might the new president change the view on recyclability in US?

A. Michael Christel (Estée Lauder) - It is my understanding that we should also get more definition from California early next year, so March may be a good time to reconvene, if that information/detail does indeed come through.

No question or comment from SPICE members.

SPICE datasets developments:

Gabrielle PERIER (Quantis) reminds all the datasets development since the beginning of year 6. A lot of data was collected at the end of the year and lots of models were developed. 7 material datasets are ready to be added to the SPICE tool, as well as 5 processes. 2 processes are waiting for final supplier approval. Finishing datasets refining is in development with the support of suppliers and Members for Year 6.

Gabrielle PERIER (Quantis) reminds that 3 datasets for year 5 are still pending support of Members for data collection. If members can share data and help do not hesitate to reach out.

Gabrielle PERIER (Quantis) also announces that she will share a survey before the end of Year 6 to ask members what new materials or processes they would like to see added to the SPICE Database.

Gabrielle PERIER (Quantis) focuses on the aluminium datasets, that will be constructed considering several energy sourcing mixes. 4 different sourcing mixes were chosen by the survey shared with the members.

Gabrielle PERIER (Quantis) shows what members will see in the tool comparing different aluminium types and explaining the differences in impacts.

Q. Vincent Delavenne (Coty) – Is it already available in the tool or soon?

A. Gabrielle Perier (Quantis) – It's probably going to be available by the end of January 2025.

Q. Vincent Delavenne (Coty) – So, the aluminium that is for the moment used in my projects is going to be replaced by another one?

A. Gabrielle Perier (Quantis) – Yes, that's the idea, as for the moment the aluminium currently in SPICE is around 9-10 kg CO₂eq/ kg of aluminium, and it will be switched to 8.7, the best scenario, because it is the one considering the same energy sourcing mix as the aluminium already available in SPICE.

Q. Vincent Delavenne (Coty) – If we have calculated something, if we go to the best scenario but because we are more precise in term of emission factor, we could have a big change because we will select the better one.

A. Jean-Marc Fontaine (Quantis) – Not related to design but related to primary source of aluminium.

Q. Vincent Delavenne (Coty) – The point is on reporting. If we change cap today, it is the same but only the artwork change, but more of that the aluminium emission factor is updated, we can have a discrepancy between two project and we will have to justify that that the change is not linked to the artwork.

A. Jean-Marc Fontaine (Quantis) – This dataset the one currently in SPICE: we keep it but the EQUIVALENT is the one on the below : no change in your project.

The one on the bottom in the table corresponds to the one currently in SPICE and the three others will be added in the tool. Based on the value chain.

A. Gabrielle Perier (Quantis) – The current one will be replaced by the fourth one but it is very close in term of result.

Q. Vincent Delavenne (Coty) – And the fourth will replace and the aluminium currently in SPICE, that will disappear? We will have to justify the fact it will be updated. The data will change, and the results will change when comparing projects.

A. Gabrielle Perier (Quantis) – There is always a communication when there is an update.

A. Gilles Swyngedauw (Albéa) – Struggling to understand what the original data was and on what it will differ from the new data.

A. Gabrielle Perier (Quantis) – The current is average European market, and will be replaced by number 4, which includes the European market dataset and explains why it is really close to the current one in terms of results. We will make sure to be really precise and explain what will change and how it will affect results in the communication before the update.

A. Gilles Swyngedauw (Albéa) – By the way, in the regulatory hub, we need SIBAM.

A. Victore Frontère (Quantis) – We can add this regulation with a card in the regulatory hub.

No additional question or comment from SPICE members.

SPICE Glass dataset development:

Gabrielle PERIER (Quantis) says we managed to receive more data and shows the table with all the types of glass and suppliers.

Gabrielle PERIER (Quantis) explains how these datasets will be integrated in the SPICE database, with 3 datasets for virgin glass, with the FEVE glass kept, and cosmetics mass-market and luxury market glass added. These 3 datasets for recycled glass will also be added in the background database to allow CFF calculations with PCR.

We just managed to get all the data, but it will need to be added later in 2025 as we still need to validate the results with suppliers, the objective is Q2 2025.

Q. Fabrice RIVET (FEVE) – What do you call virgin and recycled, and would it be possible to discuss on gate-to-gate data between Quantis and FEVE to see if it makes sense?

A. Gabrielle PERIER (Quantis) – Virgin means no cullet, internal or external, and recycled means maximal rate of PCR, thus external cullet. For the data, we must check what we can share with the FEVE.

Q. Fabrice RIVET (FEVE) – No individual data but the averages.

A. Gabrielle PERIER (Quantis) – Yes, for sure we will discuss the results with FEVE, we will see what we can discuss about the data, we'll come back to you.

Q. Philippe Bonningue (L'Oréal) – I am concerned about the 40% recycled maximum. What if I have to put 20%?

A. Gabrielle PERIER (Quantis) – Still must see how to block the maximum 40% to put in the tool. In the background dataset it will be a theoretical 100%. If you have 20% you can put 20% in the tool, like for the rest of the materials.

Q. Philippe Bonningue (L'Oréal) – If we put 20%, the calculation will be half of 40% + 60% of the virgin?

A. Gabrielle PERIER (Quantis) – It will be 20% of the theoretical 100% PCR, to work with the calculations linked to the CFF in the tool, like other materials. Like it is done for the moment for the FEVE glass in the tool.

Q. Philippe Bonningue (L'Oréal) – So, we have only standard gas furnace, no electric furnace?

A. Jean-Marc Fontaine (Quantis) – Yes we have only standard gas furnace, as we did not get data for electric furnace from glass makers. I don't know if Fabrice can help on that topic, if FEVE has some data?

A. Fabrice RIVET (FEVE) – I don't have the data.

A. Jean-Marc Fontaine (Quantis) – Is the FEVE working on new dataset using electric glass furnace?

Fabrice RIVET (FEVE) – For us, the flaconnage in cosmetics is too different from one product to another, it does not make sense to plan specific cosmetic dataset for the FEVE, we will stay with bottles or jars.

No additional question or comment from SPICE members.

Glass recyclability taskforce:

Elsa SAOUABI (Quantis) explains that we have seen an acceleration in the taskforce meetings on this topic, due to pressure from the European Commission. The idea is to have something ready by next summer.

Elsa SAOUABI (Quantis) then summarizes the work done so far by the taskforce. With the three working groups until February, the aim will be to provide to CEN the recommended table from CETIE, so that hopefully the European Commission will take it into account. The idea is to have an ambition approach, but not too much so that it would prevent packaging being put on the market.

Elsa SAOUABI (Quantis) then explains the foreseen structure for the document to be provided to CEN. It should include the traffic light classification, but this will be further discussed with taskforce members.

Elsa SAOUABI (Quantis) concluded by saying we are entering a new year in CETIE, so we will need to consider this in the budget.

Q. Fabrice RIVET (FEVE) – Are we clear for SPICE committee that there is no overlap between discussions with CETIE and with FEVE, i.e. between the two workstreams? Are we duplicating the work or not?

A. Jean-Marc Fontaine (Quantis) – We had this conversation 6 months ago. We decided to participate to this group to avoid duplicating the work.

Q. Fabrice RIVET (FEVE) – Thank you Elsa for the overview. We are now discussing a paper, in which we haven't yet addressed the issue of opacity, which is addressed in a sub-group. What is missing is the timing: we need to provide the commission with a first document by summer 2025. As there is probably additional testing needed for opacity, the timing is very challenging and is the main issue. There are many intermediate steps between CETIE, CEN and the European Commission, and at the end, we cannot be sure the European Commission will take our recommendations.

A. Elsa SAOUABI (Quantis) – This is very important indeed; it is key to be on time so the European Commission can listen to our voice. That is why many people are around the table.

A. Gilles Swyngedauw (Albéa) - First, the EC is obliged to consider what CEN is going to deliver if the work is done by 2025. It can be done a little bit after July, but we need to have in mind there is a very long process ahead, as consensus within CEN is needed. If we stick to this timing, the EC will take in the document account for the Delegated Acts, planned for 2028. This is valid for all packaging categories, metal, glass, paper, plastic, textile, wood....

A. Fabrice RIVET (FEVE) – Thank you Gilles. I would be a little bit less optimistic. The EC needs to take into consideration the work of CEN, but we know from experience this is not always the case, they may not translate it word by word. There was a very big workshop this week on PPWR, attended by more than 5,000 people. There, the EC stated they would ask the JRC to develop the horizontal methodology. It means the CEN working group, which was supposed to work on this horizontal methodology for all materials, may be replaced by JRC. All of this needs to be confirmed

A. Gilles Swyngedauw (Albéa) – I can tell you it will be done by CEN, with the JRC. It is written in the mandate we received from the EC. We really hope we will be able to work together, so the work will reflect the industry's work.

No additional question or comment from SPICE members.

Plastic recyclability taskforce:

Elsa SAOUABI (Quantis) starts by reminding the background of the topic, and the timeline. As the Recyclability Appendix still needs some updates and validation of the taskforce, she mentions the guidance vote will be postponed to SPICE Y6 committee #4, to validate the appendix in the next taskforce meeting in January.

Elsa SAOUABI (Quantis) explains more in details the content of the document and highlights the members who provided inputs to help build the document.

C. Stéphanie Lumbers (FEBEA): The guideline mentioned on the slide was done between FEBEA & Elipso, it was sent to members yesterday and will be made available for everyone in January. There will also be webinars opened to everyone.

Q. Gilles Swyngedauw (Albéa) – We said earlier we want to look further into the California law on recyclability. Do we want to do the same here with some of the organisms?

A. Jean-Marc Fontaine (Quantis) – Do you mean Recyclclass?

Q. Gilles Swyngedauw (Albéa) – Yes, for example

A. Jean-Marc Fontaine (Quantis) – There is a link with the discussion we had on the Regulatory Hub and indeed, this could be added in the taskforce work, i.e. how to address recyclability in the face of upcoming regulations. It would be important to work with key actors and stakeholders of each country.

A. Elsa SAOUABI (Quantis) – Yes, it would be important to have stakeholders' engagement on such topics, particularly from recycling associations. Their engagement is not so big yet, but it would be paramount.

Q. Gilles Swyngedauw (Albéa) – On this recyclability taskforce, there is one topic today that we don't discuss, and yet, it is the biggest issue: the sorting of small and heavy packaging, that are mainly cosmetics products. If you do a Recyclclass assessment today, you often fail because we are not successful at the sorting phase. Sorting facilities are designed to sort big PET bottles, but not tiny and heavy packaging. If we want those to be sorted at scale, we need to work on this topic. Cosmetics is the only industry facing this issue, maybe food industry a little bit too. It is a key topic to crack before we think about colored PET, metallization and so on.

A. Elsa SAOUABI (Quantis) - Handling small packaging is a topic for the taskforce and is part of the tests. It may not be sufficient; I would be very happy to talk about this during the next taskforce meeting.

Q. Gilles Swyngedauw (Albéa) – This issue is not small packaging; it is small and heavy packaging. The main issue is the ejection. When you are identified as a PET small packaging, you are not ejected properly because the sorting facilities are not built for this.

Q. Elsa SAOUABI (Quantis) -

Any comment from Recyclclass who could give some update on what is planned by Recyclclass, Fabrizio?

A. Fabrizio Di Gregorio (Recyclclass): In Recyclclass, usually, the size is not taken into consideration because all packaging should be designed for recyclability by 2030. Recyclability at scale will come in 2035, we will probably have a methodology by 2030 and Recyclclass will adapt to it to guarantee compliance. Gilles was probably referring to another problem in Recyclclass, i.e. rolling cylindrical packaging which are hard to compact and for which there is no way to eject the packaging. We will run tests, we will go further and discuss with the sorting lines to see if we can find a compromise on how the lines should be developed tomorrow to enhance recyclability.

Q. Philippe Bonningue (L'Oréal) – I have a question because I am lost. If we comply with conditions for recyclability based on the assessment, are we sure we will be A, B or C as per PPWR?

A. Gilles Swyngedauw (Albéa) – Yes, except for the issue of size and weight. If you are sortable and comply with Recyclclass guidelines, you will be able to claim you are compliant.

Q. Philippe Bonningue (L'Oréal) – Clear. Why do we challenge the recyclability of plastic recyclability for cosmetics with so many guidelines, if in the end, we only look at the Recyclclass guideline?

A. Elsa SAOUABI (Quantis) - We do not only focus on Recyclclass guidelines, we also look at what is done in other countries. The goal is to show where there might be challenges for cosmetics packaging in different countries

Q. Philippe Bonningue (L'Oréal) – Yes, but the recommendation will be on what you need to do to be recyclable, correct?

A. Gilles Swyngedauw (Albéa) – Yes and no. For now, there are many ways of defining recyclability. The PPWR Standard for Plastic (Design for Recyclability) will come by August 2025. It will be a mix of the different approaches we are studying in the taskforce

Q. Philippe Bonningue (L'Oréal) - Then, the value of the taskforce is huge if it feeds the PPWR discussion to have a sort of weighted average of the approach. If we don't do this, aren't we wasting our time?

A. Elsa SAOUABI (Quantis) - The difference is that this taskforce evaluates key packaging & challenges vs the guidelines on the screen. In the guidance, there are also recommendations that should be aligned with PPWR, and suggestions of alternatives/options if you have difficulties to be compliant. It thus also provides solutions. The global idea is to collaborate with the different associations like CITEO and Recyclclass, so as to feed the tests and help adapt their tests to provide more insights to the cosmetics industry. The tests are usually defined for food packaging, so it is worth investing some SPICE budget to have more tailored insights to cosmetics.

Q. Christophe Marie (Aptar) - Do we have a margin of appreciation on PPWR? If not, we need to wait to have the PPWR guidance to guide members appropriately. Is it too early or do we have the means to do something? Or do we have to wait in order to better know what to do?

A. Fabrizio Di Gregorio (Recyclclass) - If we wait for PPWR, we need to wait for 2028. We won't have time to adjust between 2028 and 2030. Therefore, there is a lot of sense in having this taskforce, it will help to create awareness within companies and to avoid false expectations. In particular, next year, when the standard will be in place, be conscious that it was already written by someone before me. The standard will be the standard, but the Implementing Act could be completely different. No one knows today, but in any case, it is good to continue to share data to create awareness and educate companies, and to get closer to what will be the upcoming implementing act. This is the value I see for this taskforce

Q. Philippe Bonningue (L'Oréal) – I understood the mandate was given to CEN to feed the delegated act, is this correct?

A. Gilles Swyngedauw (Albéa) – Yes

Q. Philippe Bonningue (L'Oréal) – Then, to Fabrizio's point, creating awareness is wonderful. But we should not ask companies to change their design to be compliant with those guidelines if we think or know the legal standard will be different. It is a waste of time and resources, because thinking or hoping to be recyclable, they would redesign and discover they are not. We have to be careful with this taskforce, which has been created 2-3 years ago when nothing was planned. It was a proactive taskforce, but a long one. The deliverables are too late, and as we will not feed the CEN discussions, we should think about whether to carry on

A. Jean-Marc Fontaine (Quantis) – We already published a guidance, this is only an update. I think here, we are again trying to bring to the EPRs the problematics of the cosmetics packaging industry by saying "Ok, currently my packaging is not recyclable or cannot be sorted. I can improve the packaging design to a certain extent to make it recyclable, but I cannot change fully". For example, a lipstick will remain a lipstick and not grow in size. Thus, it is also a question to the recyclers or sorting facilities, to understand which efforts they could do to integrate those problematics. On top, at the end, we should make sure that there is compliance with legislation. It is thus a common effort, i.e. representing the cosmetics packaging problematics, and trying to move forward on both ends.

Q. Christophe Marie (Aptar) - So, should SPICE feed CEN? This is where everything will happen. We are saying all these guidelines will disappear in Europe once PPWR will be there, or will need to align with PPWR. Thus, we should focus our efforts on what could be prohibited on the market. And today, the CEN work could prohibit it. Thus, should we focus the taskforce on providing information for the CEN? In the end, on design for recycling, we can do a perfect lipstick (monomaterial, monograde), but it will not pass existing guidelines because it is too small, too heavy and not compactable.

A. Jean-Marc Fontaine (Quantis) – There is a taskforce meeting in one month, this question should be addressed at that point. After this, we will be able to bring recommendations on what to do next year.

C. Gilles Swyngedauw (Albéa) – To clarify, there are people in SPICE who are in the CEN working group (myself, Elodie from FEBEA, Elen from Berry, CITEO, Alice from L'Oréal ...)

Q. Christophe Marie (Aptar) – Are we aligned with the CEN working group?

A. Gilles Swyngedauw (Albéa) – I believe we are, but it might be good to have a special meeting to confirm.

A. Victor Frontere (Quantis) - Most of those members are part of the Plastic Recyclability Taskforce, so it seems like a good group to work on alignment.

A. Gilles Swyngedauw (Albéa) – It is more about how to transform the group, i.e. how can the taskforce convey the voice of cosmetics to the people representing cosmetic packaging in the CEN.

A. Victor Frontere (Quantis) – Indeed. As a reminder, the historical way of SPICE to have a say is to collaborate with CITEO and Recyclclass to guide and complement the testing that should be carried out for cosmetics packaging. We could thus add another layer to the mission of the taskforce. For that, we need to make sure the people mentioned before are involved

A. Elsa SAOUABI (Quantis) – Please contact me if you want to be added to this discussion.

Elsa SAOUABI (Quantis) concludes that Quantis will also send a survey to understand what members want to do for next year, including in terms of tests.

4. Update on SPICE Tool IT Development

SPICE Tool Calculation Engine

Jean-Marc FONTAINE (Quantis) presented SPICE tool calculation engine license principal. We have worked to connect this engine to the IT system. The data is presetting at the company with the BOM management. In parallel data mapping with SPICE database. The API is connecting the BOM for a request to SPICE calculation engine. The results will return with the same API and return the result in single score and 16 PEF indicator, with automatic visualization.

In SPICE actually we only have the calculation. But not data presetting.

Jean-Marc Fontaine shows what is included in SPICE calculation engine license.

We haven't reached the scale up of the pilot tool and still waiting to give a clear pricing view.

This slide is a clarification and answers to last committee questions.

Q. Vincent Delavenne (Coty) - Do we have to vote? Do we have to say something? I have to digest this.

A. Jean-Marc Fontaine (Quantis) – This is a presentation of the status of a pilot project with a SPICE tool licensee, sharing with SPICE members the principal of licensing the SPICE tool calculation engine to perform LCA automatically on the product portfolio. It is not a vote.

Q. Vincent Delavenne (Coty) - Where will the data be stored?

A. Jean-Marc Fontaine (Quantis) – The data input and output are managed by the company IT system, SPICE tool is not storing any data.

Q. Vincent Delavenne (Coty) - May I say you continue to work on this point, and to have a specific topic on security of data storage.

A. Jean-Marc Fontaine (Quantis) - The company stores the data, this is the company's work to save it, we just return the results.

Q. Gilles Swyngedauw (Albéa) – JM can you share the type of licensee? Brand owner or packaging supplier?

A. Jean-Marc Fontaine (Quantis) - It's a brand owner. They have to clean the data on their own and to organize it.

No additional question or comment from SPICE members.

SPICE Tool IT development

Jean-Marc FONTAINE (Quantis) presents the future of SPICE tool. SPICE is becoming more mature as it was initially created to provide a harmonized packaging environmental impact assessment tool for the cosmetic industry. To keep it relevant, it is now important to clarify its positioning and complementarity.

Jean-Marc Fontaine presented the timeline for early 2025. Clear roadmap for SPICE tool IT development in 2025.

No additional question or comment from SPICE members.

Closing of the meeting