Managing risk. Enabling growth.

19–25 OCTOBER 2026

Define Resilience Brief

This week brings three immediate priorities for Greek businesses: address critical PHP vulnerabilities, confirm scope and file Article 19 emissions reports by 31 October, and substantiate environmental claims on packaging.

01

PHP SECURITY • NIS2 • INCIDENT RESPONSE

PHP vulnerabilities: patch the CMS and underlying system

Two critical PHP vulnerabilities may enable remote code execution. Updating the CMS alone may leave the underlying PHP installation exposed.

FACT:

On 23 October 2026, the Hellenic National Cyber Security Authority (NCSA), through EL-CSIRT, reported two critical PHP vulnerabilities: CVE-2026-109618 and CVE-2026-109619. Both have a CVSS v4.0 score of 9.2. Successful exploitation may allow an unauthenticated remote attacker to execute code on vulnerable systems.

WHY IT MATTERS:

Updating WordPress, Joomla or Drupal does not necessarily patch the underlying PHP. Inventory affected systems, apply available patches and review logs for signs of exploitation. If patching is not immediately possible, temporarily restrict or isolate the service. Patching does not rule out prior compromise.

WHO IS AFFECTED

Websites and services using PHP, CMS platforms (WordPress, Joomla, Drupal), internal applications and third-party devices that include PHP.

SOURCE: NCSA / EL-CSIRT, 23 Oct 2026 ↗

ACTION — IMMEDIATE PHP VULNERABILITY CHECKS:

- Inventory PHP services and devices, versions, and the responsible provider or developer.
- Apply available official patches to both PHP and the CMS.
- If immediate patching is not possible, temporarily restrict or isolate the exposed service.
- Review and preserve logs for signs of exploitation before and after the update.
- Assign an owner for remediation and NCSA reporting if an incident is confirmed.

MANAGEMENT QUESTION:

- Do we know which internet-facing systems use PHP, and can we confirm they have been patched or isolated and checked for prior exploitation?

02

ENVIRONMENTAL COMPLIANCE • CLIMATE LAW • CARBON REPORTING

Article 19: 31 October deadline for emissions reports

Installations within Article 19 scope must submit their annual 2025 emissions report by 31 October 2026.

FACT:

Article 19 of Greek Law 4936/2022 requires covered projects and activities to submit an annual emissions report by 31 October for the previous year. The first filing is due on 31 October 2026. Reports are submitted to NECCA's public database using company Taxisnet credentials and verified where required.

WHY IT MATTERS:

The requirement applies to installations and activities covered by Article 19(1), based on their scope and environmental permits. It is distinct from Article 20, which concerns certain legal entities and corporate carbon footprints. Check scope separately for each installation, activity and environmental permit; do not assume other reporting, including EU ETS, covers it.

WHO IS AFFECTED

Projects and activities covered by Article 19(1) of Greek Law 4936/2022. Applicability depends on each installation's activity and environmental permit.

SOURCE: NECCA | Ministry of Environment and Energy, Article 19 ↗

ACTION — ARTICLE 19 READINESS CHECKS:

- Check each installation's activity, environmental permit and Article 19(1) scope; distinguish this from Article 20 and EU ETS.
- Compile source data and records for calculating 2025 emissions, using the Ministry's guidance and tool.
- Confirm whether verification is required and schedule it with an accredited verifier in time.
- Check company Taxisnet access, submit the report to NECCA by 31 October, and retain proof of submission.

MANAGEMENT QUESTION:

- Have we confirmed which installations fall within Article 19, and is each 2025 report ready for submission and verification where required?

03

ESG • GREEN CLAIMS • CONSUMER COMPLIANCE

“100% recycled”: clearer claims on packaging

Danone’s commitment followed those of Coca-Cola and Nestlé Waters on clearer recycled-plastic claims for bottles.

FACT:

On 22 October 2026, the European Commission announced Danone’s commitment, following earlier commitments by Coca-Cola and Nestlé Waters. Among other measures, the companies committed to clarify next to a “100% recycled” claim whether caps and labels are excluded, avoid wording or imagery suggesting a closed recycling loop, and ensure the overall packaging and marketing presentation is not misleading. The Commission says national authorities will monitor implementation and consider the practices of other major bottlers.

WHY IT MATTERS:

These commitments apply to the named companies and do not, by themselves, create a new blanket obligation for every business. They signal that authorities assess the overall impression created by packaging and advertising, not just whether an individual phrase is literally accurate. Businesses should substantiate environmental claims and align packaging, website and social media messaging.

WHO IS AFFECTED

Food and beverage, cosmetics and consumer-goods businesses, as well as any organisation making environmental claims on packaging, websites or in advertising.

SOURCE: European Commission | BEUC, 22 Oct 2026 ↗

ACTION — REVIEW YOUR ENVIRONMENTAL CLAIMS:

- Inventory environmental claims across labels, packaging, websites, social media and advertising.
- Keep evidence for every quantified claim, including the recycled-content percentage and which packaging components it covers.
- Make qualifications clear next to the claim; check that images or wording do not imply benefits beyond the evidence.
- Align approved wording across labels, websites and campaigns, with review before publication.

MANAGEMENT QUESTION:

- Can we substantiate every environmental claim and show that our packaging, website and advertising do not create a misleading overall impression?

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