

EEB response to the public consultation on the New Circular Economy Action Plan Roadmap

The EEB welcomes the development of a new Circular Action Plan. We call for unprecedented ambition, urging the Commission to finally set a transformative agenda. In line with the challenges of our time, this should unleash the potential for a toxic free, sustainable and inclusive circular economy. The systemic changes needed are incompatible with preserving the interest of a few acquisitive players at the expenses of citizens and environment. It goes without saying that we need to protect vulnerable populations and territories as well as those affected most by the required changes, but we must challenge without shyness the economic actors which have until now benefited from linear, wasteful and polluting production and consumption. We cannot simply expect these actors to remedy the problems they have created and continue to profit from, trusting they will make a transition happen. A strong regulatory framework, clear market incentives, reliable information schemes are required to guide production and consumption decisions as well as support to truly circular R&D. The next circular economy action plan must deliver on the following priorities:

- **Set a headline target to halve Europe's resources use** and associated environmental impact by 2030. Initially this target could be based on Material Footprint (or DMC where MF is not available), completed by a more comprehensive set of indicators.
- **Establish taxes on virgin material use**, starting with but not limited to plastics, with the aim to reduce the embodied GHG emissions in our products and materials.
- **Develop a sustainable product policy framework** with stringent standards that not only remove worst performing and most toxic products from the market but set the conditions so that all products placed on the EU market are sustainable, kick-starting circular supply chains, and promoting Ecolabel as an inspiring benchmark.
- **Implement a robust and digitally enabled product information system** to disclose the material and chemical properties of products, including their circular performance (repairability and durability) and environmental footprint (including carbon but eventually also toxicity and biodiversity). Providing the basis to assess green claims or to make product information available to citizens.
- **Address biotic resources use** and apply circularity principles to all bio-based products to avoid growing pressure on forestry and biomass at the detriment of climate and biodiversity objectives.
- **Set commercial, municipal and hazardous waste prevention targets.** Reducing waste generation is a precondition for a well-functioning circular economy as well as establishing the same standards for virgin as recycled materials to prevent hazardous chemicals from being reinjected into the economy

- **Reject growth as the ultimate narrative for developing Europe's economy**, and associate alternative indicators to GDP when assessing CE measures. Link explicitly objectives in the circular economy action plan to the SDGs and document their expected contribution.
- Take immediate and iconic decisions to **demonstrate that the circular economy and the new Commission serves its citizens**, notably by using ecodesign to make smartphones durable and repairable, ensuring that all mobile devices can use a common charger, stop hazardous substances entering consumers goods through recycling, and make toxic free reusable packaging the new normal.
- **Invest private, European and public funds in sustainable circular solutions**, supported by various fiscal and economic instruments including the taxonomy, strengthened rules on financial responsibility, and mandatory public procurement rules.
- **Support a global agenda for reducing pressure on natural resources**. Mainstream the integration of the circular economy into European trade agreements. Prevent illegal, polluting or exploitative waste trades.

More details on the EEB's recommendations can be found in our priorities for the [European Green Deal and 8th EAP](#), [10 policy priorities to reduce waste](#), and position paper on the [interface between chemicals, products and waste](#).