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PUBLIC CONSULTATION QUESTIONNAIRE
Circular Economy Act

Fields marked with * are mandatory.

Introduction

As announced in the Clean Industrial Deal, the European Commission is preparing a proposal for a circular economy act for adoption in 2026. The main objective of this new legislation is to accelerate the transition to the circular economy in the EU. It will target several obstacles, such as the lack of sufficient demand and supply for secondary raw materials (including critical ones); and the fragmentation of the single market for circular products, waste and secondary raw materials.

As an integral part of the analysis, the Commission is launching this public consultation to gather views from all interested parties. The questionnaire consists of seven parts:

- Part 1 collects some key information about you;
- Part 2 covers general questions on the circular economy;
- Part 3 focuses on waste electrical and electronic equipment (WEEE);
- Part 4 contains questions related to single market barriers to circularity;
- Part 5 contains questions about the demand and supply of secondary raw materials;
- Part 6 contains questions on improving waste management and circular processes;
- Part 7 provides an opportunity to submit open comments and upload documents.

Your feedback will feed into the impact assessment. This questionnaire is launched in parallel to the call for evidence.

You can save your replies as a draft and finish later.

PART 1. ABOUT YOU

About you

* Language of my contribution

- ○ Bulgarian
- ○ Croatian
- ○ Czech
- ○ Danish
- ○ Dutch
- ◉ English
- ○ Estonian
- ○ Finnish
- ○ French
- ○ German
- ○ Greek
- ○ Hungarian
- ○ Irish
- ○ Italian
- ○ Latvian
- ○ Lithuanian
- ○ Maltese
- ○ Polish
- ○ Portuguese
- ○ Romanian
- ○ Slovak
- ○ Slovenian
- ○ Spanish
- ○ Swedish

* I am giving my contribution as

- ○ Academic/research institution
- ◉ Business association
- ○ Company/business
- ○ Consumer organisation
- ○ EU citizen
- ○ Environmental organisation

- ○ Non-EU citizen
- ○ Non-governmental organisation (NGO)
- ○ Public authority
- ○ Trade union
- ○ Other

* First name

Tudy

* Surname

Bernier

* Email (this won't be published)

tudy.bernier@co2value.eu

* Organisation name

255 character(s) maximum

CO2 Value Europe

* Organisation size

- ◉ Micro (1 to 9 employees)
- ○ Small (10 to 49 employees)
- ○ Medium (50 to 249 employees)
- ○ Large (250 or more)

If applicable, which NACE code (Nomenclature of Economic Activities) best describes your primary area of business activity?

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

977056531128-71

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan

- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands

- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer**

association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- **Anonymous**

  Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

- **Public**

  Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☑ I agree with the personal data protection provisions

PART 2. GENERAL QUESTIONS ON THE CIRCULAR ECONOMY

Question 1: To what extent do you agree with the following statements about barriers hampering the EU single market for secondary raw materials?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Prices for secondary raw materials are generally higher than prices of primary raw materials	◉	○	○	○	○	○	○
b. The quality of secondary raw materials is generally lower than the quality of primary raw materials	○	○	○	○	◉	○	○
c. A lack of standardised certification for secondary raw materials affects their marketability	◉	○	○	○	○	○	○
d. There are too many regulatory obstacles to a well-functioning single market for secondary raw materials	◉	○	○	○	○	○	○
e. There are too many other barriers (financial, information, etc.) obstructing economies of scale for the supply and demand of secondary raw materials	◉	○	○	○	○	○	○
f. There is insufficient supply of secondary raw materials	○	○	○	○	◉	○	○
g. There is insufficient demand for secondary raw materials	◉	○	○	○	○	○	○
h. EU-made secondary raw materials face competition from imported secondary raw materials that are cheaper, of lower quality and/or of uncertain origin	◉	○	○	○	○	○	○
i. There is not enough high-quality, sorted waste in the EU to produce secondary raw materials	○	○	○	○	○	○	◉

j. There is inadequate infrastructure for the collection, sorting, and transportation of secondary raw materials within the EU	○	○	○	○	○	○	◉
k. Circular economy business models are not receiving the necessary financial support	◉	○	○	○	○	○	○
l. Current public procurement practices do not sufficiently prioritise or incentivise the use of secondary raw materials	◉	○	○	○	○	○	○
m. Key actors in the products' value chains (e.g. producers and recyclers) are not sufficiently working together to improve circularity	◉	○	○	○	○	○	○
n. Consumer awareness and acceptance of products made from secondary raw materials is low	◉	○	○	○	○	○	○

Other, please specify:

500 character(s) maximum

From our standpoint, the questions appear to be focusing on secondary raw materials only as "recycled content", for example recycled plastics. Our core point in answering this consultation is the following: Carbon Capture and Utilisation (CCU) should be included in the Circular Economy Act. CCU is circular by nature, and is considered by all accounts, including IPCC reports, as one of the pathways to build a more circular economy.

Question 2: How important are the following economic incentives in boosting the EU circular economy?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Extended Producer Responsibility schemes (e.g. producers are held financially responsible for the entire lifecycle of their products, including their waste management)	○	○	○	○	○	○	◉
b. Deposit refund schemes	○	○	○	○	○	○	◉
c. Public procurement criteria supporting the circular economy	◉	○	○	○	○	○	○
d. Taxes or fees on incinerating and/or landfilling of waste	◉	○	○	○	○	○	○
e. Taxes on exports of waste	◉	○	○	○	○	○	○
f. Tax breaks and other fiscal incentives supporting circular economy practices	◉	○	○	○	○	○	○
g. EU funding for circular economy practices	◉	○	○	○	○	○	○
h. National funding for circular economy practices	◉	○	○	○	○	○	○
i. Reduction of subsidies which prevent circularity (e.g. subsidies for landfills and incineration)	○	○	○	○	○	○	◉
j. Pay-as-you-throw schemes	○	○	○	○	○	○	◉
k. Product-as-a-service models	○	○	○	○	○	○	◉

Other, please specify:

500 character(s) maximum

we understand the focus of the Commission in the last years has been to look at reducing / reusing / recycling waste – and not at where feedstocks that end up as waste come from. But we believe that keeping CCU out of the scope of circularity legislations would be leaving out an entire part of the circular economy potential in Europe. The point of CCU is by no means to replace other pathways like mechanical (or chemical) recycling, but complement them for what they cannot address.

Question 3: To what extent do you agree that the EU can take the following measures to help raise awareness and encourage a change of mindset among the broader public and economic operators towards a more circular economy?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Set up EU-wide public awareness campaigns	◉	○	○	○	○	○	○
b. Set up national or local public awareness campaigns	◉	○	○	○	○	○	○
c. Systematically introduce the circular economy into educational curricula	◉	○	○	○	○	○	○
d. Introduce standardised product labelling, product information, including toxic substances, and other consumer transparency measures and tools focusing on circularity	◉	○	○	○	○	○	○
e. Support Member States authorities' capacity building for the circular economy through training, exchanges on best practices and advisory services	◉	○	○	○	○	○	○
f. Support Member States authorities in developing a diverse trainings programme and skill set to meet emerging challenges of circularity	◉	○	○	○	○	○	○
g. Work on prevention (e.g. reducing resource use, waste generation, foster re-use)	◉	○	○	○	○	○	○

Other, please specify:

500 character(s) maximum

PART 3. WASTE ELECTRICAL AND ELECTRONIC EQUIPMENT (WEEE)

Question 4: How important are the following measures to increase the collection of waste electrical and electronic equipment (WEEE)?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Make producers legally responsible for meeting national WEEE collection targets	○	○	○	○	○	○	◉
b. Increase collection targets	○	○	○	○	○	○	◉
c. Impose financial penalties on producers that fail to meet WEEE collection targets	○	○	○	○	○	○	◉
d. Increase inspection to uncover illegal exports of WEEE from the EU	○	○	○	○	○	○	◉
e. Require all actors handling WEEE to register and report quantities through a unified national system	○	○	○	○	○	○	◉
f. Conduct recurring, product-specific awareness campaigns at national level	○	○	○	○	○	○	◉
g. Investigate consumer behaviour and barriers to WEEE return as a basis for targeted initiatives	○	○	○	○	○	○	◉

Other, please specify:

500 character(s) maximum

Question 5: How important are the following measures to incentivise waste electrical and electronic equipment (WEEE) take-back?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Mandating online sellers to offer free WEEE take-back for delivered electronics	○	○	○	○	○	○	◉
b. Making door-to-door WEEE collection mandatory for municipalities above a certain population size	○	○	○	○	○	○	◉
c. Making Commission Recommendation (EU) 2023/2585 that aims to increase the return of used and waste mobile phones, tablets and laptops mandatory	○	○	○	○	○	○	◉
d. Establishing deposit return systems for small appliances (or other products, please specify below)	○	○	○	○	○	○	◉
e. Requiring sellers of electrical and electronic equipment to accept WEEE, regardless of where the product was purchased	○	○	○	○	○	○	◉
f. Developing incentives based on consumer preference (e.g. preferences for vouchers over deposit schemes)	○	○	○	○	○	○	◉

Other, please specify:

500 character(s) maximum

Question 6: What is currently impeding the recycling of critical raw materials (CRMs) from waste electrical and electronic equipment (WEEE) in the EU?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. WEEE diverted to scrap metal yards or large shredders	○	○	○	○	○	○	◉
b. Lack of infrastructure (e.g. collection, sorting and recycling)	○	○	○	○	○	○	◉
c. Lack of scale / a fragmented market	○	○	○	○	○	○	◉
d. Insufficient technology readiness	○	○	○	○	○	○	◉
e. The concentration of CRMs in electrical and electronic equipment components is too low to qualify for recycling	○	○	○	○	○	○	◉
f. Insufficient removal of electrical and electronic equipment components	○	○	○	○	○	○	◉
g. Low price of virgin primary CRMs	○	○	○	○	○	○	◉
h. Low price of imported secondary CRMs	○	○	○	○	○	○	◉
i. The quality of secondary CRMs is lower than primary ones	○	○	○	○	○	○	◉
j. Insufficient demand for secondary CRMs	○	○	○	○	○	○	◉
k. High energy costs of recycling	○	○	○	○	○	○	◉
l. Insufficient information on CRMs in WEEE available to recyclers	○	○	○	○	○	○	◉
m. Electrical and electronic equipment not designed for recycling	○	○	○	○	○	○	◉

Other, please specify:

500 character(s) maximum

Question 7: To what extent do you agree that the current waste of electrical and electronic equipment categories should be expanded?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Setting a new category for renewable energy related equipment, including photovoltaic panels, wind turbines and others	○	○	○	○	○	○	◉
b. Setting a new category for photovoltaic panels (from current category 4 into to a new category)	○	○	○	○	○	○	◉
c. Setting a new category for wind turbines	○	○	○	○	○	○	◉
d. Setting a new category for digital and telecommunications equipment (e.g. data servers)	○	○	○	○	○	○	◉
e. Setting a new category for seabed cables, large industrial cables	○	○	○	○	○	○	◉
f. Setting a new category for non-mobile road machinery	○	○	○	○	○	○	◉
g. Setting a new category for large-scale stationary industrial tools	○	○	○	○	○	○	◉
h. Setting a new category for large scale fixed installations	○	○	○	○	○	○	◉

Other, please specify:

500 character(s) maximum

Question 8: To what extent do you agree with the following measures to improve the Extended Producer Responsibility (EPR) system for waste electric and electronic equipment (WEEE)?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. EPR financing needs to be harmonised across the EU as well as registration and reporting requirements	○	○	○	○	○	○	◉
b. EPR fees for electrical and electronic equipment should remain unchanged	○	○	○	○	○	○	◉
c. Member States should do regular compositional surveys of collected mixed municipal waste stream to determine the share of WEEE	○	○	○	○	○	○	◉
d. EPR fees should cover costs additional to the costs currently covered under the current WEEE Directive (from collection to recycling). These include awareness campaigns, compositional surveys, data gathering and reporting, and deducting any revenues obtained from preparation for re-use or preparation for repurposing or from the value of secondary raw materials recovered from recycled WEEE	○	○	○	○	○	○	◉
e. EPR business-to-business and business-to-consumer obligations should remain different (as is the case in the current WEEE Directive)	○	○	○	○	○	○	◉
f. The difference between EPR business-to-business and business-to-consumer obligations should be reduced to the minimum	○	○	○	○	○	○	◉
g. EPR fees should also be eligible for financing behavioural research and targeted consumer initiatives, because the consumer's decision to return or not return WEEE is crucial to the quantity and quality of collected material	○	○	○	○	○	○	◉

Other, please specify:

500 character(s) maximum

PART 4. SINGLE MARKET BARRIERS FOR CIRCULARITY

Question 9: How important is it to simplify (e.g. through harmonisation) the following rules in order to improve the single market for waste and secondary raw materials?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Extended Producer Responsibility	○	○	○	○	○	○	◉
b. End-of-waste criteria	◉	○	○	○	○	○	○
c. By-product criteria	◉	○	○	○	○	○	○
d. Permits (e.g. for establishing a recycling facility)	◉	○	○	○	○	○	○
e. Rules on cross-border waste shipments within the EU	◉	○	○	○	○	○	○

Other, please specify:

500 character(s) maximum

Question 10: How important are the following obstacles preventing waste from being recognised as reaching the end-of-waste or a by-product status?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Heterogeneity of end-of-waste and by-product criteria	◉	○	○	○	○	○	○
b. Existence of sub-national/local end-of-waste and by-product criteria	◉	○	○	○	○	○	○
c. Existence of national end-of-waste and by-product criteria	◉	○	○	○	○	○	○
d. Lack of mutual recognition between national end-of-waste and by-product criteria	◉	○	○	○	○	○	○
e. Lack of EU-wide end-of-waste and by-product criteria	◉	○	○	○	○	○	○

Other, please specify:

500 character(s) maximum

Question 11: How important are the following reforms to facilitate the attainment of the end-of-waste and by-product status?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Swiftly develop additional EU-wide end-of-waste and by-product criteria	◉	○	○	○	○	○	○
b. No longer allow sub-national/local end-of-waste and by-product criteria	○	◉	○	○	○	○	○
c. Enable mutual recognition of national end-of-waste and by-product criteria	◉	○	○	○	○	○	○
d. Further develop the provisions for the end-of-waste and by-product criteria in the Waste Framework Directive	◉	○	○	○	○	○	○

Other, please specify:

500 character(s) maximum

Question 12: To what extent do you agree with the following statements about Extended Producer Responsibility schemes?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Producer responsibility organisations should be regulated at Member State level	○	○	○	○	○	○	◉
b. Producer responsibility organisations should be regulated at EU level	○	○	○	○	○	○	◉
c. Various actors in the life cycle of the product should be represented in producer responsibility organisations	○	○	○	○	○	○	◉
d. Extended Producer Responsibility fees should cover the entire waste management costs (e.g. collection, transport and treatment)	○	○	○	○	○	○	◉
e. Extended Producer Responsibility fees should cover waste prevention (e.g. re-use, repair and waste prevention campaigns)	○	○	○	○	○	○	◉
f. Extended Producer Responsibility fees should be modulated (lower or higher) depending on the circularity performance of related products	○	○	○	○	○	○	◉
g. Transparency should be required on how fees are determined and how they are spent	○	○	○	○	○	○	◉
h. The issue of ‘free riders’ (producers that do not register for Extended Producer Responsibility) needs to be addressed	○	○	○	○	○	○	◉
i. Ensuring cost efficiency is a key objective of Extended Producer Responsibility	○	○	○	○	○	○	◉

j. Ensuring high recycling rates is a key objective of Extended Producer Responsibility	○	○	○	○	○	○	◉
k. Ensuring minimal landfilling of waste is a key objective of Extended Producer Responsibility	○	○	○	○	○	○	◉
l. Ensuring minimal incineration of waste is a key objective of Extended Producer Responsibility	○	○	○	○	○	○	○

Other, please specify:

500 character(s) maximum

Question 13: To what extent do you agree that EU mandatory Extended Producer Responsibility systems would benefit for the following product groups?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Agricultural plastics	○	○	○	○	○	○	◉
b. Tyres	○	○	○	○	○	○	◉
c. Mattresses	○	○	○	○	○	○	◉
d. Furniture	○	○	○	○	○	○	◉
e. Construction products	○	○	○	○	○	○	◉

Other, please specify:

500 character(s) maximum

Question 14: How important are the following digitalisation measures to simplify Extended Producer Responsibility (EPR) systems?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Setting up a national webpage for each EPR system	○	○	○	○	○	○	◉
b. Setting up an EU-level webpage for all EPR systems	○	○	○	○	○	○	◉
c. Turning an EU-level online registration of producers into an EU-level EPR register	○	○	○	○	○	○	◉
d. Turning an EU-level online registration into national EPR registers	○	○	○	○	○	○	◉
e. Setting up an EU-level online platform to register and access national EPR schemes (one-stop-shop)	○	○	○	○	○	○	○

Other, please specify:

500 character(s) maximum

PART 5. DEMAND AND SUPPLY OF SECONDARY RAW MATERIALS

Question 15: Would you be in favour of the Commission proposing minimum bio-based content targets at EU level?

- (●) Yes
- ( ) No
- ( ) Do not know

Please specify for which end product(s)?

500 character(s) maximum

Question 16: How important are the following measures in increasing the demand of secondary raw materials?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Minimum recycled content targets	◉	○	○	○	○	○	○
b. Minimum EU-made recycled content targets	◉	○	○	○	○	○	○
c. Public procurement rules favouring products/companies using secondary raw materials	◉	○	○	○	○	○	○
d. Public procurement rules favouring products/companies using EU-made secondary raw materials	◉	○	○	○	○	○	○
e. EU-wide standards on the quality and traceability of secondary raw materials	◉	○	○	○	○	○	○
f. Measures to further reduce the landfilling of waste	◉	○	○	○	○	○	○
g. Information on the quality and origin of secondary raw materials	◉	○	○	○	○	○	○
h. Price incentives for products or companies using EU-made secondary raw materials (e.g. value-added tax exemptions and tax credits)	◉	○	○	○	○	○	○
i. Price disincentives for products or companies using primary raw materials (e.g. taxes and carbon cost)	◉	○	○	○	○	○	○
j. Stronger support from extended producer responsibility schemes for the uptake of secondary raw materials (e.g. eco-modulation of Extended Producer Responsibility fees)	◉	○	○	○	○	○	○

k. Stronger market surveillance	◉	○	○	○	○	○	○
l. Support to increase waste recycling activities in the EU (e.g. financial support for new capacities)	◉	○	○	○	○	○	○

Other, please specify:

500 character(s) maximum

Question 17: To what extent do you agree with the following statements on public procurement?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Public procurement can be a significant driver of the circular economy	◉	○	○	○	○	○	○
b. Circularity criteria should complement price criteria	◉	○	○	○	○	○	○
c. Circularity criteria should be optional for contracting authorities to use	◉	○	○	○	○	○	○
d. Circularity criteria should be mandatory for contracting authorities to use	◉	○	○	○	○	○	○
e. Circularity criteria should apply to specific products' aspects (e.g. durability, reparability, recyclability and recycled content)	◉	○	○	○	○	○	○

Other, please specify:

500 character(s) maximum

Question 18: In order to support the transition to circular economy in the EU, which goods or services should be prioritised for public procurement criteria?

500 character(s) maximum

Question 19: To what extent do you consider it important to improve the scrap classifications and trade codes for steel, aluminium and other secondary raw materials?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Additional scrap classifications for recycled steel	○	○	○	○	○	○	◉
b. More granularity in trade codes for recycled steel	○	○	○	○	○	○	◉
c. Additional scrap classifications for recycled aluminium	○	○	○	○	○	○	◉
d. More granularity in trade codes for secondary aluminium	○	○	○	○	○	○	◉

Other materials: please specify

500 character(s) maximum

Question 20: How important are the following measures in reducing the export of products and waste streams containing critical raw materials and increasing recycling capacity within the EU?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Introducing export fees for certain waste streams that contain critical raw materials and reinvesting the revenues generated into domestic recycling infrastructure and technology	◉	○	○	○	○	○	○
b. Tightening controls or restrictions on the export of waste that contains critical raw materials	◉	○	○	○	○	○	○
c. Enhancing transparency and reporting requirements for exports of secondary raw materials	◉	○	○	○	○	○	○
d. Introducing further regulatory requirements (e.g. for environmental objectives) on exports of secondary raw materials	◉	○	○	○	○	○	○
e. Prioritising access to critical raw materials for strategic EU sectors before authorising exports	◉	○	○	○	○	○	○
f. Aligning with practices of non-EU countries that restrict critical raw materials exports to support domestic recovery	◉	○	○	○	○	○	○

Other, please specify:

500 character(s) maximum

PART 6. IMPROVING WASTE MANAGEMENT AND CIRCULAR PROCESSES

Question 21: How important are the following elements into improving waste management systems?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Further limit the use of derogations from the obligation on Member States to establish separate collection systems for certain waste streams (Article 10(3) of the Waste Framework Directive)	○	○	○	○	○	○	◉
b. Establish a harmonised methodology at EU level to conduct compositional analysis of the mixed waste	◉	○	○	○	○	○	○
c. Introduce a legal obligation to use advanced sorting facilities for mixed municipal waste	○	○	○	○	○	○	◉

Other, please specify:

500 character(s) maximum

Question 22: To what extent do you agree with the following measures to reduce the landfilling or incineration of waste and incentivising recycling?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Strengthening the provisions on enforcement of EU legislation concerning landfilling and uncontrolled dumping of waste	◉	○	○	○	○	○	○
b. Introducing a general ban on landfilling of waste	◉	○	○	○	○	○	○
c. Introducing (additional) bans on landfilling for specific types of waste	◉	○	○	○	○	○	○
d. Tax policy aimed at taxation of landfilling waste in the EU	◉	○	○	○	○	○	○
e. Tax policy aimed at taxation of incinerating waste in the EU	○	◉	○	○	○	○	○
f. Introducing a market-based instrument (e.g. cap-and-trade systems) for landfilling waste in the EU	◉	○	○	○	○	○	○
g. Ensuring a level playing field for circular products by eliminating value added tax (VAT) embedded in the value of recycled goods used as input	◉	○	○	○	○	○	○

Other, please specify:

500 character(s) maximum

Question 23: Which are the most important barriers hindering the use of sewage sludge and bio-waste as secondary materials?

500 character(s) maximum

Question 24: How important are the following measures for the management of extractive waste and supporting the recycling of critical raw materials (CRMs) from extractive waste?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Improved data availability on the recycling potential of CRMs in extractive waste facilities across the EU	○	○	○	○	○	○	◉
b. Ensuring a high level of environmental and human health protection	○	○	○	○	○	○	◉
c. Promoting research and innovation in new and emerging technologies	○	○	○	○	○	○	◉
d. Adopting mandatory best available techniques (BAT) conclusions for the management of extractive waste	○	○	○	○	○	○	◉

Other, please specify:

500 character(s) maximum

Question 25: Do you agree that amending the List of Waste (Commission Decision 2000/532/EC) to cover new waste streams or to revise existing entries would benefit the efficient and circular management of waste?

- ○ Yes
- ○ No
- ◉ Do not know

Question 26: To what extent do you agree with the following interventions to facilitate the establishment of trans-regional circularity hubs that promote smart specialisation and economies of scale for (separate) collection, sorting and recycling?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Legal enablers (e.g. permitting, licences and permits)	○	○	○	○	○	○	◉
b. Financial enablers (e.g. tax breaks and public and private funding)	○	○	○	○	○	○	◉
c. Information provision (e.g. digital platforms matching supply and demand)	○	○	○	○	○	○	◉
d. Capacity building in national, regional and local authorities	○	○	○	○	○	○	◉

Other, please specify:

500 character(s) maximum

Question 27: Industrial processes often not only produce the core output but also provide side streams or by-products. Those could become an input for another industrial process, which could then be valorised, creating an industrial symbiosis. Is that the case for your industry?

- (•) Yes
- ( ) No
- ( ) Do not know

How important are the following hindering factors?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. No EU harmonised definition of by-products	◉	○	○	○	○	○	○
b. Insufficient harmonisation / clarity of rules for waste classification	◉	○	○	○	○	○	○
c. Overly burdensome waste shipment	○	○	○	○	○	○	◉
d. Lack of platforms or hubs to facilitate matchmaking between companies	◉	○	○	○	○	○	○
e. Lack of facilitation	◉	○	○	○	○	○	○
f. Lack of awareness of or expertise in industrial symbiosis	◉	○	○	○	○	○	○
g. High initial investments costs	◉	○	○	○	○	○	○
h. Uncertain return on investment	◉	○	○	○	○	○	○
i. Data confidentiality	○	○	○	○	○	○	◉
j. Insufficient regulatory incentives or regulatory push	◉	○	○	○	○	○	○
k. Insufficient tax incentives	◉	○	○	○	○	○	○
l. Limited support for SMEs participation	◉	○	○	○	○	○	○
m. Proximity/transport	◉	○	○	○	○	○	○
n. Risk of unstable supply of by-products	○	○	○	○	◉	○	○

o. Doubts about quality of by-products	○	○	○	○	◉	○	○
p. Fragmented policy conditions in EU Member States	◉	○	○	○	○	○	○

Other, please specify:

500 character(s) maximum

Question 28: Do you agree with the following statements about the benefits and challenges in conducting pre-demolition and pre-renovation audits?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. The audit improves planning of selective demolition	○	○	○	○	○	○	◉
b. The audit increases reuse/recycling of materials	○	○	○	○	○	○	◉
c. The audit reduces landfilling	○	○	○	○	○	○	◉
d. The audit allows better cost estimation and project control	○	○	○	○	○	○	◉
e. The audit supports circular economy targets	○	○	○	○	○	○	◉
f. The audit leads to high administrative burden	○	○	○	○	○	○	◉
g. A harmonised database would improve pre-demolition and pre-renovation audits	○	○	○	○	○	○	◉
h. Pre-demolition and pre-renovation audits should be mandatory	○	○	○	○	○	○	◉
i. Pre-demolition and pre-renovation audits should be digital	○	○	○	○	○	○	◉
j. High costs (especially for small-scale projects)	○	○	○	○	○	○	◉
k. Lack of expertise is a challenge	○	○	○	○	○	○	◉
l. Lack of a market for recycled materials is a challenge	○	○	○	○	○	○	◉
m. Demolition contractors would duplicate the audits	○	○	○	○	○	○	◉

Other, please specify:

500 character(s) maximum

PART 7. OPEN COMMENT BOX + UPLOAD DOCUMENTS

Question 29: What impact do you expect measures supporting EU circularity (particularly measures on WEEE; improving the single market for secondary raw materials; measures on the supply and demand of secondary raw materials; and measures improving waste management systems) to have on international trade?

500 character(s) maximum

If you wish, please provide additional comments/suggestions related to this consultation

1000 character(s) maximum

If you wish, please upload a document/position paper here

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Contact

EC-CIRCULAR-ECONOMY-ACT@ec.europa.eu