

# **Minutes of the Commission's Expert Group on Circular Economy and Sustainable Production and Consumption (E00470)**

Brussels, 18.11.2025

## **1. Approval of the agenda**

Approved.

## **2. Nature of the meeting**

The meeting was chaired by Aurel Ciobanu-Dordea, DG ENV Director for a Competitive Circular Economy and Clean Industrial Policy. The objective of the meeting was to inform the Circular Economy Directors of the EU Member States about recent EU policy and legislative developments. The meeting also allowed the Commission to gather the views of the Directors on the upcoming EU Bioeconomy Strategy (BES) and forthcoming Circular Economy Act (CEA).

Representatives of stakeholders also participated in the meeting. The complete list of participants is attached to these minutes.

## **3. List of points discussed**

### **Update on the upcoming EU Bioeconomy Strategy (BES - to be adopted by the Commission on 27.11.2025)**

The Chair provided an overview of the upcoming Communication “Strategic framework for a competitive and sustainable EU bioeconomy”, insisting on the objective i.e. sustainable prosperity and the new mandate given to DG ENV i.e. by building on the 2012 BES and the reviews carried out in 2018 and 2022, to shift the focus from research & innovation towards industrial deployment, market scale-up, competitiveness, sustainability and long-term resilience. The Chair also indicated that the Communication was only the start of a new journey, and that MS were invited to actively contribute to it and be part of a co-creation work based on their national experiences.

DG ENV Head of Unit 'Bioeconomy & Sustainable Materials', outlined:

- the results of the stakeholders’ dialogue, call for evidence and OPC (number of responses, category of respondents and highlighted themes such as increasing circularity across the different bioeconomy value chains) and
- the expected pillars of the strategy, namely: 1) scaling up innovation and investments by removing barriers and using public and private funds, 2) developing lead markets through public procurement and voluntary industry alliances, 3) securing long-term prospects for bioeconomy through sustainably sourced biomass and circularity, and 4) harnessing global partnerships and opportunities for wider access to markets and a shared global agenda.

Last but not least, COM invited MS to join forces for delivery, in particular by allowing contact points for a structured dialogue with the MS.

Then, the Directors were asked to express their views on the following two questions (shared in advance):

- How can we join forces to unlock the full potential of the European bioeconomy - transforming our industries, biomass and natural resources into engines of sustainability, innovation and competitiveness?
- What collective actions can we take to ensure that the bioeconomy becomes a cornerstone of Europe's green transition and industrial resilience - fully leveraging national strengths and EU instruments?

## **Discussion**

The Danish Presidency referred to **upcoming events i.e. presentation in Council's environmental wp on 01.12; conference in Copenhagen on "Boosting and mainstreaming the bioeconomy" on 02.12; exchange of views at ENVI Council on 16.12. The BES will also be presented under AOB at AGRIFISH Council on 11.12.** The Chair shared that there was strong interest in the BES from the Competitiveness configuration as well. While other Councils' contributions are very important, the ENVI Council should remain in the lead.

15 MS took the floor plus Norway. The discussion showed strong interest in the following topics:

- Growth potential of bioeconomy sectors, in particular, bio-based chemicals, pharmaceuticals and plastics, textiles from bio-based fibres and fabrics, bio-based construction products, bio-based fertilisers (pretty much in line with expected lead markets)
- Sustainability, circularity, and cascading principle
- Reducing pressure on primary production systems
- Demand side measures (like environmental requirements in Public Procurement) in addition to supply side measures
- Biobased content targets
- Link with Multi-annual Financial Framework, investments and territorial imbalances

In details:

- IE mentioned a forthcoming 3<sup>rd</sup> edition of their national bioeconomy strategy, highlighting the multiple benefits of working with civil society and having a bottom-up approach. It shared that bioeconomy remains a difficult concept to explain, subject to different understandings among the public.
- NL strongly supported demand creation and prioritisation of material use of biomass against combustion. Implementing the cascading principle while reflecting local conditions is something challenging, but some MS can share their experience and knowledge on it. It also supported targets for biobased content beyond plastic packaging and again, stands ready to share learnings from national experience on sustainability criteria for all uses.
- HU voiced territorial imbalances in progress made and strongly advocated for a Bio East macro-regional roadmap facilitated by the Commission to reinforce Eastern Europe contribution to bioeconomy. It also supported the scale-up of industrial biotechnology for the production of bio-based solutions under the upcoming BioTech Acts.

- For PT, the objectives of bioeconomy are climate neutrality and nature conservation. This country insisted on measures to reduce the environmental and climate footprint of agriculture.
- SI mentioned the growth potential of bioeconomy; biopharmaceuticals and genetic engineering as lead market; two upcoming public calls of respectively €60 and €30 million.
- MT and CY emphasised limited biological resources, MT insisting on marine resources and valorisation of food waste to reduce reliance on virgin biomass, CY mentioning national standards for secondary raw materials under development. These countries also asked for coordination between different policies i.e. bioeconomy, circular economy, energy, climate, agriculture and fishery etc.
- AT invited to avoid delays in moving away from fossil resources (support from SE), and to concentrate efforts on securing biomass production in Europe and on holding it in Europe, to stop the decline of European farming. Circularity and resource efficiency must stay as guiding principles. Bioenergy is part of bioeconomy. The Chair observed different positions on standards on secondary raw materials: some pushing for them, others saying it will take too much time (issue for further discussion). It also confirmed strong attention on farming and harvesting.
- For FI, the link with the MFF is important (support from IT). Sustainability is a difficult issue. This country asked for data on biomass availability and uses, including high value uses. As lead markets, it mentioned bio-based chemicals and plastics, textiles from bio-based fibres and fabrics, bio-based construction products, bio-based fertilisers and biopesticides. The Chair confirmed that sustainability will continue to require strong attention.
- IT referred to its national strategies since 2017, and the need of both vertical (the supply chain) and horizontal (the territories) integration aspects in bioeconomy policies. On land degradation, it pushed for using compost as a soil improver (IT invested €450 million to improve residual and organic waste management facilities).
- DE voiced the importance of well-functioning, local and cross-border bioeconomy supply chains. As lead markets, it mentioned bio-based chemicals and plastics, asking the EU to help the sector, and forestry. It also called for knowledge sharing, setting of sustainability criteria, and prioritisation of material use of biomass in Europe.
- For SE, bioeconomy and circular economy must support each other to deliver sustainable production and consumption. We need to provide stable legislation and to strengthen the capital markets.
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- FR insisted on sufficiency and resource efficiency as guiding principles. It also asked to pay special attention to environmental and social implications of bioeconomy policies, and to data and methodologies to assess consequences (support from EE, for which data is quite fragmented). The Chair mentioned the product environmental footprint (PEF) methodology.

- NO, for which bioeconomy is a necessity, asked for cross-border cooperation and for robust sustainability criteria for using forest biomass for bioenergy. It also asked for environmental requirements in public procurement (support from EE) as did at national level (a requirement to put at least 30 % weight on environmental impacts in public procurements).
- The Chair explained that food security and safety were not addressed in the Communication (well-established policy and legislation, EU Vision for agriculture and food available). On CCU technology, it expressed cautious approach.
- The European Environmental Bureau insisted on sustainability and circularity as overarching guiding principles, expressed cautiousness on CCU, asked about trade dimension, and whether the civil society will be invited to participate in a structure dialogue as well. ECOS insisted on eco-design, sustainability criteria and nature-based agricultural practices.

At the end of the discussion, **CY announced foreseeing Council Conclusions at the March ENVI Council** (preparation in the environmental working party, with possible contributions from other Council configurations TBC).

### **Insights on the forthcoming Circular Economy Act (CEA)**

DG ENV Leader of the Task Force on the Circular Economy Act (CEA), provided insights on the forthcoming CEA, outlining the following:

- 1) the political guidelines (notably the Letta and Draghi Reports), and mission letters for both Roswall and Sejourné Commissionaires) as political mandate;
- 2) the key problems identified explaining the slow progress made;
- 3) the objectives pursued by the CEA;
- 4) the key sectors and bottlenecks as well as the need to capture, at the same time, simplification requests and complexity inherent to the challenge; and
- 5) descriptive statistics on the participation in both call for evidence and OPC (high number of inputs including from SMEs, but under-representation of Central and Eastern Europe, for which mitigation strategies were outlined).

Regarding the next steps, a targeted stakeholder consultation is running until 4 December. Adoption of the proposal is expected in September 2026. Concerning simplification, the Chair confirmed that there will be an important simplification dimension in the CEA, including through greater harmonisation by shifting from Directives to Regulations.

Then, the Directors were asked to express their views on the following two questions (shared in advance):

- What are the 2-3 most important areas of intervention that the Circular Economy Act should address to establish a single market for secondary raw materials?
- Where do you see the greatest opportunities to simplify, harmonise and modernise the EU Circular Economy legislation (e.g. permitting, reporting and procedural obligations) within the objectives of the Circular Economy Act that could be addressed to enable faster, simpler and more effective implementation of existing legislation?

### **Discussion**

16 MS took the floor plus Norway. The discussion showed strong interest in the following topics:

- Strong support for improving the Single Market for secondary raw materials
  - Overall strong support for greater harmonisation of existing rules
  - Waste prevention as a complementary priority to recycling
  - Better understanding links to existing and forthcoming initiatives, including with ETS possibly covering incineration and/or landfilling
  - Recycled content and standards
  - Public Procurement to maximise the uptake of secondary raw materials
  - Mutual recognition of end of waste criteria
  - EPR, authorized representative and digitalisation
  - Online platforms
  - Higher harmonisation and a means to contribute to simplification
- FR made a strong call for coordination and for avoiding overlaps and contradictions between different policies and instruments (support from SE). Waste prevention meaning reduce, reuse, repair and remanufacturing must remain a priority. Second priority must be the construction of competitive European value chains. For that, access to waste and secondary raw materials is key, and support to EU-made recyclates is indispensable. On EPR, the role of authorised representative must be reinforced to ensure a level playing field for online sales. End of waste is important to harmonise. Finally, online purchasing and sharp increase in small parcels arriving from abroad are an issue (support from EE and DE) requiring a future EU level mechanism. The Chair acknowledged the need to avoid overlaps and contradictions. On waste prevention, other instruments are mainly addressing this, notably ESPR. On EPR, different options will be assessed, including digitalisation (support from IT). On online platforms, a level playing field between EU and non-EU operators is of great importance.
  - NL supported recycled content targets and other supply and demand measures to boost the market for secondary raw materials (support from several MS). Ensuring a level playing field is important. On simplification, it supported shifting from Directives to Regulations and stressed that higher harmonisation (e.g. End of Waste, EPR) will contribute to simplification (support from IT).
  - HU expressed some concerns on higher harmonisation.
  - ES emphasised the potential of public procurement to maximise the use of secondary raw materials, supported mutual recognition of end of waste criteria (support by several MS) and warned against the presence of hazardous substances in secondary raw materials (support from AT, SE and NO). End of waste needs to be further harmonised. The Chair confirmed strong interest in mandatory, specific, directly implementable and cost-friendly environmental criteria in public procurement (support from PT and NO) and invited MS to share their best practices. It also confirmed that national and regional end of waste criteria had turned into barriers, that harmonisation was challenging and that the Commission would consider mutual recognition of end of waste criteria.

- IT supported mutual recognition of both end of waste criteria and criteria in public procurement. As key sectors, it mentioned e-waste, plastic packaging, construction and textiles. It also mentioned fiscal measures like reduced VAT to boost the market for secondary raw materials.
- EE referred to an incineration tax that will soon be passed in this country (€60 per tonne). The need for greater harmonisation of EPR and End of Waste was stressed. Digitalisation is key and real-time data does not need to increase the reporting obligations if done well. COM referred to different options, including bans, fees or a cap-and-trade mechanism to reduce incineration (causing CO<sub>2</sub> emissions) and landfilling (causing methane emissions).
- DE insisted on secondary raw materials quotas and, to make such quotas viable, on the need for standards. A level playing field is essential. It also referred to the crisis of the plastic recycling sector where fake imports have exacerbated the already present lack of competitiveness. On the mirror clause, DE is divided. On the latter, the Chair referred to the COM proposal for equivalence under ELV.
- For IE, the price competition between primary and secondary raw materials is the key issue. It calls for End of Waste criteria.
- AT called for the implementation of both ESPR and Digital Product Passport without further delay, and for mattresses and carpets as key sectors for expanded EPR schemes.
- PT stressed education/awareness raising and financing as key. EPR digital platforms might help as well as further harmonisation (EPR, End of Waste) to simplify.
- SE emphasised that not only focusing on recycling is important but also on re-use. Demand needs to be supported (recycled content). Landfill bans can help and phosphorus recovery of sewage sludge. Important to harmonise (EPR and End of Waste).
- MT stressed the importance of the Single Market for secondary raw materials. End of waste and by-products, green listing of waste (under WSR) and digitalisation can help.
- HU stressed the importance of recycled content for plastics. It would like to see the emphasis on Directives rather than Regulations (notably for EPR). The cross-border dimension of EPR is important. It supports End of Waste mutual recognition. Permitting is key for simplification.
- For NO, there should be new EPR schemes only for high priority waste streams and well impact assessed. Supply and demand side measures are key. Toxic free cycled are indispensable.
- FI focused on construction, sub-optimal reuse and recycling. Building a Single Market for secondary raw materials is important. End of Waste is crucial. New EPR need to be well justified.

- LT supports recycled content, public procurement, EPR and End of Waste. The Bioeconomy plays an important role as well, so do DPPs.
- SI supports harmonisation. Establishing a Single Market for secondary raw materials is important, as well as public procurement and R&I.
- CY asked for bilateral discussion with the Commission on links between insularity and circularity, which the Chair accepted as an issue for attention.

### **Update on pending files**

Under this point, DG ENV Head of Unit 'Bioeconomy & Sustainable Materials' updated Directors on the following pending files.

#### *European Circular Economy Stakeholder Platform (ECESP)*

The Platform - in place since 2017 - gathers the large circular economy community. In this context, several annual conferences and other events have taken place contributing to the promotion of the circular economy agenda, in addition to a very interactive website. Recently, the Coordination Group of the Platform has been renewed for another mandate of 2.5 years. In total, 24 ambassadors of circular economy in Europe representing public authorities, businesses and civil society, from all over Europe, plus five observers, will help accelerate the transition. Member States are invited to interact with them and take part in their events. **Next ECESP annual conference is set for 22-23.04.2026.**

#### *Circular Economy 2025 Package*

A package of short-term measures is set for adoption on 27.11 to support the plastics sector (manufacturing and recycling), as it is confronted with a crisis of competitiveness. Three the priorities: Overcoming market fragmentation for plastic recyclers and new technologies to recycle plastics such as chemical recycling • Creating a level playing field in the plastics market • Supporting investment and innovation through horizontal measures. The measures are a follow-up to the State of the Union 2025, and a dialogue initiated with the Member States in June. They are needed to stop the decline of the sector and prevent plastics from going to incineration or landfilling.

### **Discussion**

- For DE, the issues to deal with are the low demand for recyclates and also cheap imports of false recyclates exacerbating the already negative situation in which European recyclers find themselves. Transparency and traceability are even more of a concern in the case of chemical recycling.
- NL welcomed the measures as very necessary indicating it is working on the issue with other countries if view of specific suggestions for the Commission. This country is glad that chemical recycling will be part of the measures. It would like to see plastics as a priority product group under ESPR.

- FI referred to Commission’s work on chemical recycling as having negative impact on oil refineries and their ability to participate in the value chain for recycled plastic content.

COM agreed that imports of recyclates that do not meet our standards is an important issue. Work is ongoing including on custom codes to distinguish biobased and fossil-based plastics. This said, regulation alone is not enough and the market surveillance authorities must be mobilised to help address the problem through verification (each import comes with a certificate) and enforcement tools. On the claim that these are false recyclates, Directors were invited to submit written evidence

#### *Chemical recycling under the Single-Use Plastics Directive (SUPD)*

COM recalled the 2-step approach taken to set rules on calculation, verification and reporting on recycled content in SUP beverage bottles: Step 1: Methodology based on Regulation 2022/1616 focusing on mechanically recycled PET (Implementing Decision 2023/2683); Step 2: Amendment to also account for other recycling technologies (ongoing work). Under 2, following public consultation, there have been changes as to: restriction of the definitions of ‘post-consumer plastic waste’ and ‘recycled plastic’; mass balance rules with some calling for stricter rules, and others calling for (partial) free allocation; certification (only the certificate of the last economic operator that must be certified (i.e. the last chemical recycling step) has to be passed on). Additionally, simplification was considered. Finally, COM sticks to the “fuel-use excluded” principle in line with the definition of ‘recycling’ in the Waste Framework Directive.

#### **Discussion**

- DE, while acknowledging the need for a final text soon, considered the last draft submitted as a difficult one. COM reassured that the new text takes simplification into account and strikes a good balance between the different positions. It remains that what is turned ultimately into fuel cannot be considered as recycled.

The discussion will continue in the Technical Adaptation Committee (TAC).

#### *Packaging and Packaging Waste Regulation (PPWR)*

Work continues on the preparation of an Implementing Act on how to frame the equivalence rules for recycled content recovered from post-consumer plastic waste recycled or collected in a third country (to be delivered end 2026). An external contractor is supporting COM in assessing the administrative burden of these rules. This is a collective work involving different COM services and a working group under the Technical Adaptation Committee (TAC). Interested Member States can nominate experts (to be communicated by the end of the year). COM ensures coordination with JRC work on sustainability criteria for plastic recycling technologies.

#### **Discussion**

- AT expressed interest in joining the working group. Further, it suggested addressing in the announced Environmental Omnibus the following issues: the obligation for producers from 3rd countries that sell products directly to end users to appoint an authorized representative; the frequency of the reporting obligation for producer responsibility organizations (PROs).
- DE also mentioned the Environmental Omnibus as asked for a postponement of the new producer definition in view of the EPR schemes to 2027.
- COM reassured that, while these issues might to a certain extent be addressed in the Environmental Omnibus, a more substantial solution to them will only come under the Circular Economy Act.
- SE challenged the interpretation concerning the scope of the packaging ban established in Annex V.3 of the PPWR, as presented by the COM in the TAC meeting of 13/10/2025. It suggested to postpone the publication of this part of the announced guidance. COM expressed doubts on such postponement.

#### *End-of-life Vehicles*

A 2nd political trilogue is scheduled on Monday 24 November, in view of a possible political agreement by the end of 2025 (still many open issues). For COM it is important to keep the recycled content limited to post-consumer waste.

#### *Ecodesign for sustainable products Regulation (ESPR)*

The implementation of the Working Plan 2025-2030, adopted in April, continues at full speed. An Ecodesign Forum meeting is scheduled on 24.11.2025 (on the WP and the ESPR methodology). On the issue of the destruction of unsold goods, there will be soon an Implementing Act on the format to disclose information and a Delegated Act on derogations from the prohibition of destruction of unsold textiles and footwear. Regarding, ecodesign requirements for apparel textile products, a JRC preparatory study will start soon, followed by an impact assessment. Regarding, horizontal requirements on reparability, a stakeholder meeting on preparatory study was taking place.

Work continues on Digital Product Passport (first step is the launch of the DPP registry which is foreseen for July 2026). The modernisation of the EU's product framework is subject to two public consultations, one on the revision of the New Legislative Framework (NLF) and another on the Market Surveillance Regulation.

#### *International activities on Circular Economy*

Several international initiatives were mentioned. The G7 Energy and Environment Ministerial under Canada's Presidency adopted a G7 Circular Economy and Resource Efficiency Action Plan, focusing on CRMs, textiles and plastics. The G20 Resource Efficiency Dialogue, with the active support of the EU, this year organised four webinars to discuss extended producer

responsibility, waste management and minimisation, and right to repair. The G20 Environment and Climate Ministerial that took place in Cape Town on 16-17 October 2025 could not deliver a communiqué because of US opposition to mentioning climate change. The seventh session of the United Nations Environment Assembly (UNEA-7) will take place from 8 to 12 December 2025 in Nairobi. Korea has presented a resolution on ‘Establishing a Sectoral Needs-Assessment Framework for the Transition to a Circular Economy’. COM and Member States are working together to bring CE back to the Assembly.

Concerning the Global Plastics Treaty, the negotiations in Geneva last August were unsuccessful and INC-5.2 could not deliver an agreement. There are still diverging views between those wanting to look at the full life cycle of plastics, including the upstream dimension, and those wanting a treaty limited to waste management aspects. Bringing China, India and Brazil to support compromise proposals between the two camps at the next negotiation session (date and place tbc, probably in the second half of 2026) will be key. The management of the process will hopefully improve with the election of a new Chair, expected to take place on 7 February 2026.

Work by the 10YFP (10-Year Framework of Programmes on Sustainable Production and Consumption Patterns) for implementing its 2022-2030 Global Strategy on Sustainable Consumption and Production is ongoing. A recent development has been the launch of the Global Circularity Protocol at the UNFCCC COP30 in Belém on 11 November 2025. The Protocol aims to become a framework for companies to assess, measure, set science-based targets, report, and disclose progress on resource efficiency and circularity information consistently and comparably. Efforts continue in the contexts of GACERE (Global Alliance on Circular Economy and Resource Efficiency), launched by the EU, UNEP and UNIDO in 2022. The secretariat is now handled by UNEP. GACERE has produced a number of working papers and is cooperating with other regional alliances / coalitions / platforms in Africa, Latin America and South-East Asia.

Finally, the new EU Circular Economy Resource Centre (EU CERC) is now operational. It is a joint initiative of the European Commission (DG INTPA), the Finnish Ministry for Foreign Affairs, Finnish Innovation Fund Sitra and the Belgian agency for international cooperation Enabel. The EU CERC serves as a collaboration platform between the EU and partner countries to ensure that the circular economy can advance fast enough and on a large enough scale.

#### **4. List of participants**

Member states: Austria, Belgium, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Hungary, Ireland, Italy, Lithuania, Malta, Netherlands, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden

Non-EU Member States : Norway

EU institutions : EC DG ENV B1, B3, EEA

Stakeholders: CEN/CENELEC, ECOS, EEB, SMEUnited, ANEC, BEUC, Business Europe, EuroChambres, EuroCommerce, IEEP