

Centring Circular Economy in the European Single Market

Philippe Pochet, Rebecca Tauer, Eva Bille,
Janek Vähk and Friederike Möller

Policy Brief
April 2026

Expert contributions from: Ana Berdzenishvili (European Policy Centre); Constance Maillard (Veolia); Cristina Ganapini (Right to Repair Europe); Julian Lauten-Weiss (Academics for Circular Economy); Lindsey Wuisan (Friends of the Earth Europe); Marie-Jeanne Gaertner (RREUSE); Miriam Thiemann (European Environmental Bureau); Odysseas Konstantinakos (European University Institute); Pauline Deutz (University of Salford)

Introduction

Philippe Pochet is a Fellow of the Green European Foundation and Affiliate Professor at Sant'Anna College, Pisa. Previously, he was the General Director of the European Trade Union Institute and Director of the Observatoire social européen for 16 years.

Friederike Möller is a Policy Assistant at the Green European Foundation, working across several key areas related to the green transition and the nexus of tech and democracy.

The development of the single market has historically been at the core of European integration. Access to the single market – both internally and externally – is the biggest lever that the EU has to express its political will. Deeper integration of the single market is once again at the centre of the political agenda (e.g., [Draghi, 2024](#); [Letta, 2024](#); [Milne & Joiner, 2025](#)) with various political actors advocating for its reform.

In these discussions, Greens and progressives insist on revamping the single market to address current challenges of the green, digital and demographic transitions ([Akgüç et al., 2022](#); [Pochet & Van Melkebeke, 2024](#)). Social actors have long argued that the single market creates social risks without adequate protection (e.g. [Monti, 2010](#)) and that its ecological impacts must be properly accounted for ([Pochet et al., 2025](#)).

Repeated crises – the Covid-19 pandemic, the full-scale Russian invasion of Ukraine, and the now escalating conflict in the Middle East and its energy fallout – all point to Europe's failure to address supply chain and energy dependencies. Europe is left vulnerable and unable to address the root cause of the social turmoil it faces. This new geopolitical context adds urgency to the debate on the future of the single market.

To date, and especially during the von der Leyen commissions, the circular economy has been a key entry point for greening the single market. At the political level, this endeavour is structured by two successive EU action plans in 2015 and 2020 with proposals covering sectors from electronics, information and communications technology, and batteries to vehicles, packaging, plastics, textiles, construction, buildings, food and water. But even with these efforts, measures to support Europe's transition towards a circular economy have so far had limited effects.

If you take the circular material use rate, there has only been a 1.5% increase in circularity since 2010.

Secondary materials made up only 12% of total material use in 2024 ([European Environmental Agency, 2025b](#)). Analyses of the effects of the Circular Economy Action Plans have shown that, at best, they have been unevenly implemented at the national level (see, for example, [European Court of Auditors, 2023](#)). While resource productivity has risen and material consumption and GDP are increasingly uncoupled ([Eurostat, 2025](#)), it remains the case that globally, “the extraction and processing of materials, fuels and food contribute half of total global greenhouse gas emissions and over 90% of biodiversity loss and water stress” ([UN, n.d.](#)).

A third proposal is planned for 2026, the Circular Economy Act ([European Commission, 2025c](#)). It provides a timely political opportunity to advocate for a more comprehensive vision of a circular single market and address its current limitations and contradictions (presented in more detail in the three following chapters).

The EU must be more ambitious about its transition to a circular economy. Circularity is not only about making vital progress in reducing our resource consumption. Its implications in freeing Europe from dependencies address broader and pressing questions about Europe and its capacity to act.

In the current political context, a circular single market is an essential pillar of the competitiveness agenda that can deliver economic security, independence and resilience. With geopolitical and trade tensions prompting increased calls for “Made in Europe”, reforms of the single market are a crucial lever. Proposals, such as the “One Europe, One Market” agenda put forward in March 2026, address single market issues, but fail to account for green or social considerations, let alone build a political offer around them ([European Council, 2026](#)).

Building on Europe’s strengths, the circular economy is a means to provide quality through the single market – quality of life, quality of goods and quality of jobs.

This policy brief highlights the power of circularity for economic, social and environmental resilience and makes political and policy proposals that can untap this potential. We put two key questions at the centre of the discussion. First, how can Europe approach the circular economy more ambitiously? Second, how can we shape an inclusive transition towards a circular single market?

From adaptation to transformation?

Defining circular economy is inherently political. The legal definition of the circular economy is: “a system which maintains the value of products, materials and resources in the economy for as long as possible and minimises the generation of waste. This means a system where products are re-used, repaired, remanufactured or recycled” ([European Union, n.d.](#)). Beyond this definition, there are competing visions of the circular economy at the EU level that each perceive the capacity of the circular economy differently.

The contrast between a more ambitious and systemic vision of circular economy and a more limited one is evident in the two prominent reports that have shaped the debate on the EU economy since 2024: the Letta Report on the single market and the Draghi report on competitiveness. Letta considers the circular economy “as the only possibility of saving the planet and changing the paradigm of present manufacturing” ([2024, p. 8](#)), arguing that Europe needs to “embed circular economy principles within the Single Market... [by] actively incorporating sustainable practices and innovations into our economic framework” ([2024, p. 43](#)).

In turn, Draghi allows for a more modest role for the circular economy, focusing on waste and raw materials ([2024](#)). This less capacious vision for the circular economy is mirrored in the European Commission’s economic roadmap, the Competitiveness Compass¹ ([European Commission, 2025b](#)). This limited understanding can also be found in the European Semester², with recommendations to support the

¹ The Competitiveness Compass, announced in January 2025, is a strategy document that develops a roadmap for Europe’s competitiveness.

² The European Semester is a recurring exercise to coordinate the EU member states fiscal and economic policy.

transition through “increasing waste prevention, fostering resource efficiency, stepping up public and private investments and promoting solutions to improve durability, re-usability, reparability and recyclability of products” (European Commission, 2025a, p. 10).

As the difference between the Letta and Draghi reports illustrates, the stated objectives oscillate between urgently changing the economic paradigm to address planetary crises and functional approaches that incorporate waste and supply constraints on strategic raw materials into the existing mode of production. This range of conceptual approaches has been synthesised by Friant et al. (2021) into four different versions of circular economy (reformist, technocentric, transformational, fortress) along two main axes (holistic/segmented and optimist/sceptical). The authors analyse the corresponding European discourses and legal instruments related to the first Circular Economy Action Plan and found that the discourse was encompassing (reformist circular economy), but the actions are rather segmented (technocratic circular economy). This shows a contradiction between ambitious general rhetoric and essentially technical policy proposals, but their interaction is also reflected in European policy debates.

	Reformist Circular Society (optimist and holistic)	Technocentric Circular Economy (optimist and segmented)	Transformational Circular Society (sceptical and holistic)	Fortress Circular Economy (sceptical and segmented)
Perspective on technological innovation and ecological collapse	<i>Optimist:</i> Technical innovations can enable eco-economic decoupling to prevent ecological collapse.	<i>Optimist:</i> Technological innovations can enable eco-economic decoupling to prevent ecological collapse.	<i>Sceptical:</i> Technical innovations cannot bring absolute eco-economic decoupling to prevent ecological collapse.	<i>Sceptical:</i> Technical innovation cannot bring absolute eco-economic decoupling to prevent ecological collapse.
Approach to socio-political components of circularity	<i>Holistic:</i> includes social and political implications of circularity.	<i>Segmented:</i> focuses on technical, industrial and business components of circularity.	<i>Holistic:</i> includes social and political implications of circularity.	<i>Segmented:</i> focuses on technical, industrial and business components of circularity.
Goals	Prosperity and wellbeing for all within the biophysical boundaries of the earth.	Human progress and prosperity without negative environmental externalities.	A world of conviviality and frugal abundance for all, while fairly distributing the biophysical resources of the earth.	Maintain geostrategic resource security in global conditions where widespread resource scarcity and human overpopulation cannot provide for all.

Table 1: Four visions of the circular economy (Friant et al., 2021, p. 339)

As it stands, the circular economy model envisaged by the EU is much more a function of the traditional production system than a proposal for a radically new system of sustainable production ([Bækgaard et al., 2024](#)). Not only is the concept hollowed out, but without moving beyond these limitations, the transition to a European circular economy is at stake.

Making an ambitious circular economy happen

Surprisingly, there has been little political or academic consideration of the social, gender, and employment aspects of the circular economy so far. How will women be affected by the transition to a circular economy? What kind of employment will be created? These kinds of questions have only begun to be explored. In its report, the European Environment Agency ([2024](#)) noted this lack of a social dimension in most studies, with little consideration given to employment, working conditions, health and safety, or wages.

While the just transition is central to debates over climate and environmental action, circular economy policies have not yet been strongly debated from this fundamental point of view (see, e.g. [Gözet et al., 2025](#)). Sabato and Vanhille ([2024](#)) found that just transition proposals are rather weak in the circular economy area. Elsewhere, Friant et al. ([2024, p. 31](#)) added that “key social and political elements, such as the democratisation of power, the redistribution of wealth, and the nurturing of caring activities, are thus typically absent from mainstream circular economy debates”. To put it shortly, social aspects remain terra incognita.

Industry representatives such as Business Europe ([2026](#)) have been publicly calling for a reduction of administrative burdens across various pieces of legislation related to the circular economy via delays, removal of certain clauses and reductions in scope. In turn, European trade unions (in particular, IndustriAll and the European Federation of Public Service Unions) support the development of the circular economy but are not very visible in the debates yet. For example, trade union representation is rather marginal in the leadership of the European Circular Economy Stakeholder Platform ([European Circular Economy Stakeholder Platform, 2025](#)). At its annual conference in 2024, only one panel was dedicated to social actors.

A narrow conception of the circular economy, limited to turning waste into resources, neglects important levers for an ambitious circular single market. A main goal of the circular economy is to decrease resource consumption and its environmental impact. In Europe, the biggest resource pressures come from housing, mobility systems and food, together making up more than 80% of the material footprint of the European Union ([European Environmental Agency, 2025a, p. 128](#)).

These high-impact sectors are fiercely politically contested. Housing, food and mobility are also sources of consumption in which resources are distributed unevenly. In 2021, 17% of the European population lived in overcrowded housing, while 34% live in homes that are too large ([Eurostat, 2022](#)). Low to middle-income households are disproportionately impacted by high energy costs due to energy inefficient homes ([Chauhan, 2025](#); [Keliauskaite, 2025](#)).

Similarly, 58 million tons of food are wasted annually, while close to 42 million people

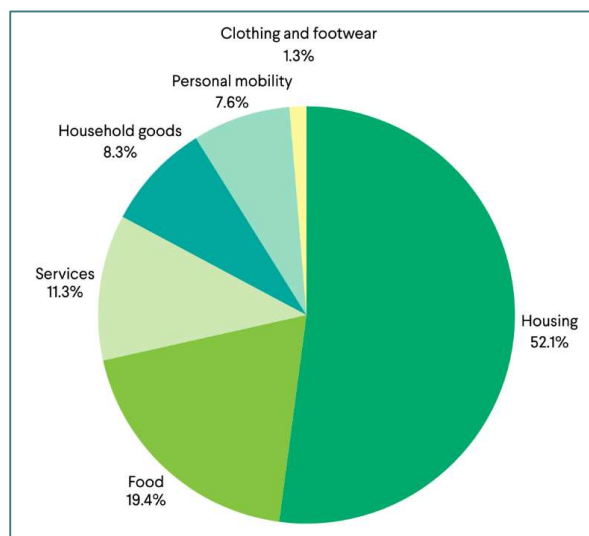


Figure 1: Shares of consumption domain in the EU's material footprint in 2021, adapted from European Environmental Agency ([2025, p. 128](#))

can only eat a quality meal every other day (Eurostat, [2023](#), [2025a](#)). Access to transport is also unevenly distributed, with a study finding that the top 10% of transport consumers use more than 50% of the energy consumed in mobility ([European Commission, 2024](#); [University of Leeds, 2020](#)).

How then can the EU pursue a more ambitious implementation of its circular economy agenda? First, to transition to a circular single market, the waste hierarchy should serve as a key entry point. Established through the Waste Framework Directive, the waste management hierarchy sets out a five-point prioritisation of waste management options, starting with prevention ([European Commission, n.d.](#)). A stronger preventative approach is essential because in the critical housing, mobility and food sectors, the effects of recycling will naturally hit a ceiling. Construction materials stay in the built environment, food waste cannot be recycled to any great extent, and fossil fuels are burned ([European Environmental Agency, 2025a](#)).

Second, while the circular economy is often considered a mere technical feat, we need to broaden the frame of reference. Because only by considering the social distribution of resource consumption can we build a politically salient offer for economic, social, and environmental resilience around the circular economy.

From this vantage point, a circular single market is an economic agenda to transition to a continent of wellbeing and quality, towards a European Union that charts its own course towards autonomy and sovereignty.

In the current political context, where efforts to amend previous legislation through Omnibus proposals are muddying the waters for people and companies, the circular economy is one area where the EU needs the confidence to shape a strong basis for prosperity and innovation. Clear direction from EU legislation can deliver for consumers, workers, and businesses alike.

This brief explores the transformative potential and diversity of possible solutions along the “9 R chain” from Refuse to Recover (see below) ([Potting et al., 2017, p. 5](#)). The hierarchy of the model is closely connected to the waste hierarchy ([European Union, n.d.](#)) as it flips the focus on recycling on its head and prioritises resource reduction.

Through this approach, the brief builds on ongoing debates on sufficiency and the circular economy (see e.g. [Urban & Nipius, 2025](#)) but does so in careful consideration of the ongoing cost of living crisis across Europe.

This brief is structured around the three categories of the 9 R strategies. Three authors contributed a brief centred around their expertise, which was then repeatedly presented for feedback and discussion to a broad range of experts from EU institutions, civil society, industry, social enterprises, trade unions and think tanks.

The following chapters examine the state of play and potential of each area, outlining the opportunities in this legislative term and developing a broader vision for a circular European single market. The content of the brief reflects the consensus but also speaks to ongoing debates within the Knowledge Community on the routes towards a circular single market.

The upcoming Circular Economy Act and the political doors that this agenda opens are crucial to address the major challenges that the European Union faces. Our imagination of the circular economy has been too limited so far. A circular single market is the way to move forward – developing sustainable economic resilience and security, championing environmental and climate goals, and untapping the potential of the social dimension of circularity.

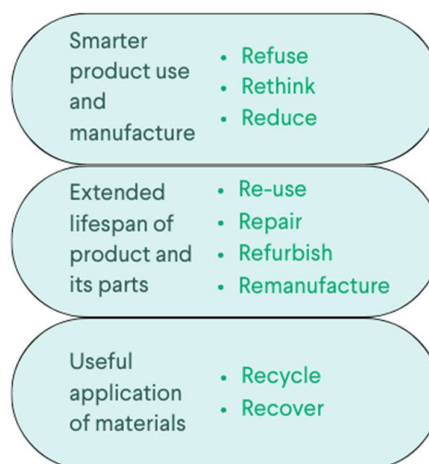


Figure 2: The 9 Rs of circular economy (based on [Potting et al., 2017, p. 5](#))

References

- **Akgüç, M., Countouris, N., Hancké, B., & Pochet, P. (2022).** Rethinking the European single market: Moving towards new frontiers for a highly competitive, socio-ecologically sustainable and resilient Europe. <https://www.etui.org/sites/default/files/2023-01/rethinking-the-european-single-market-etui-2022.pdf>
- **Bækgaard, A. S., Engberg, C., & Hasselbalch, J. A. (2024).** The technocentric consensus: a discourse network analysis of the European circular economy debate. *Journal of Environmental Policy & Planning*, 26(2), 173–187. <https://doi.org/10.1080/1523908x.2024.2317793>
- **BusinessEurope (2026).** The BusinessEurope omnibook to reduce regulatory burdens – January 2026. <https://www.businesseurope.eu/wp-content/uploads/2026/01/2026-01-22-BusinessEurope-Omnibook-to-reduce-regulatory-burden.pdf>
- **Chauhan, M. (2025).** Energy Affordability: The hidden barrier to housing stability. *Journal of Environmental and Geographical Studies*, 4(4), 25–49. <https://doi.org/10.58425/jegs.v4i4.464>
- **Draghi, M. (2024).** The future of European competitiveness. Part A: A competitiveness strategy for Europe, available at https://commission.europa.eu/document/download/97e481fd-2dc3-412d-be4cf152a8232961_en
- **European Circular Economy Stakeholder Platform (2025).** Coordination Group contacts. <https://circulareconomy.europa.eu/platform/en/dialogue/cg-names-contacts?title=&scope%5B0%5D=622&page=0>
- **European Commission (2024).** Transport poverty: Definitions, indicators, determinants, and mitigation strategies: final report. Publications Office. <https://data.europa.eu/doi/10.2767/0662480>
- **European Commission (2025a).** 2025 European Semester - Spring package. https://commission.europa.eu/document/download/5e1e7cfe-a9e0-47ad-aac9-e850e5739589_en?filename=COM_2025_200_1_EN_ACT_part1_v3.pdf
- **European Commission (2025b).** A Competitiveness Compass for the EU. https://commission.europa.eu/document/download/10017eb1-4722-4333-add2-e0ed18105a34_en?filename=Communication_1.pdf
- **European Commission (2025c).** Commission launches consultation and call for evidence for upcoming Circular Economy Act. https://environment.ec.europa.eu/news/commission-launches-consultation-upcoming-circular-economy-act-2025-08-01_en
- **European Commission (n.d.).** Waste Framework Directive. Environment. https://environment.ec.europa.eu/topics/waste-and-recycling/waste-framework-directive_en
- **European Council (2026).** Boosting EU competitiveness: the way forward. <https://www.consilium.europa.eu/en/policies/boosting-eu-competitiveness-the-way-forward/#OeOm>
- **European Court of Auditors (2023).** Special report – Circular economy: Slow transition by member states despite EU action. https://www.eca.europa.eu/ECAPublications/SR-2023-17/SR-2023-17_EN.pdf
- **European Environment Agency (2024).** Accelerating the circular economy in Europe. European Environment Agency (EEA). <https://www.eea.europa.eu/en/analysis/publications/accelerating-the-circular-economy>
- **European Environment Agency (2025a).** Europe’s environment 2025: Knowledge for resilience,

prosperity and sustainability. Publications Office. <https://data.europa.eu/doi/10.2800/3817344>

- **European Environmental Agency (2025b)**. Circular material use rate in Europe. Indicators. European Environment Agency (EEA). <https://www.eea.europa.eu/en/analysis/indicators/circular-material-use-rate-in-europe>
- **European Union (n.d.)**. Circular economy. <https://eur-lex.europa.eu/EN/legal-content/glossary/circular-economy.html>
- **Eurostat (2022)**. Housing in Europe - Quality of housing. Housing in Europe. <https://ec.europa.eu/eurostat/cache/digpub/housing/bloc-1c.html?lang=en>
- **Eurostat (2023)**. Inability to afford a meal with meat, chicken, fish (or vegetarian equivalent) every second day. https://ec.europa.eu/eurostat/databrowser/view/ilc_mdes03/default/table?lang=en
- **Eurostat (2025a)**. Food waste and food waste prevention - estimates. https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Food_waste_and_food_waste_prevention_-_estimates
- **Eurostat (2025b)**. Resource productivity statistics. https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Resource_productivity_statistics
- **Friant, M. C., Vermeulen, W. J., & Salomone, R. (2020)**. Analysing European Union circular economy policies: words versus actions. *Sustainable Production and Consumption*, 27, 337–353. <https://doi.org/10.1016/j.spc.2020.11.001>
- **Keliauskaitė, U. (2026)**. The solution to Europe’s housing affordability crisis must include building decarbonisation. *Bruegel*. <https://www.bruegel.org/analysis/solution-europes-housing-affordability-crisis-must-include-building-decarbonisation>
- **Letta, E. (2024)**. Much More Than a Market. Speed, Security, Solidarity. Empowering the Single Market to Deliver a Sustainable Future and Prosperity for All EU Citizens. European Union. <https://www.consilium.europa.eu/media/ny3j24sm/much-more-than-a-market-report-by-enrico-letta.pdf>.
- **Milner, R., & Joiner, S. (2025, December 3)**. The EU single market’s elephant in the room. *Financial Times*. <https://www.ft.com/content/35bbe00a-75c6-4c9e-9f23-94f61ce87cdb?syn-25a6b1a6=1>
- **Monti, M. (2010)**. Towards a Single Market Act: For a highly competitive social market economy 50 proposals for improving our work, business and exchanges with one another. European Commission. <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:0608:FIN:en:PDF>
- **Pochet, P., & Van Melkebeke, T. (2024)**. A European Single Market for the Future. *Green European Foundation*. <https://gef.eu/wp-content/uploads/2024/04/GEF-Political-Brief-A-European-Single-Market-for-the-Future-1704.pdf>
- **Pochet, P., Van Melkebeke, T., & Möller, F. (2025)**. A modernised European single market for a new reality of economic security. European Commission. <https://gef.eu/wp-content/uploads/2025/08/A-modernised-European-single-market.pdf>
- **Potting, J., Hekkert, M., Worrell, E., Hanemaaijer, A., & PBL Netherlands Environmental Assessment Agency. (2017)**. Circular Economy: Measuring innovation in the product chain. <https://www.pbl.nl/sites/default/files/downloads/pbl-2016-circular-economy-measuring-innovation-in-product-chains-2544.pdf>
- **Sabato, S., & Vanhille, J. (2024)**. The European Green Deal and the ‘Leave No One Behind’

principle: state of the art, gaps and ways forward [Slide show].

<https://www.justtransition.be/sites/default/files/2024-03/ECJT-Day2-presentation%20of%20the%20OSE%20study.pdf>

- **Taylor, L. (2020, March 16).** Shining a light on international energy inequality. <https://environment.leeds.ac.uk/see/news/article/5311/shining-a-light-on-international-energy-inequality>
- **United Nations. (n.d.).** Facts and Figures. United Nations. <https://www.un.org/en/actnow/facts-and-figures>
- **Urban, P., & Nipius, L. (2025).** Enough is enough – why the EU needs sufficiency to thrive. <https://www.ceps.eu/enough-is-enough-why-the-eu-needs-sufficiency-to-thrive/>

1. Refuse, Rethink, Reduce: Putting the waste hierarchy into action

Rebecca Tauer leads the circular economy team within the business & markets department at WWF Germany, where she implements projects that advance a circular and resource-efficient economy.

Europe's circular economy policies have historically focused on end-of-life solutions, namely waste management and recycling. With this emphasis, powerful leverage has been mostly disregarded, namely the upstream potential of refuse, rethink and reduce.

Implementing these upstream strategies can include efficiency, such as doing better with less through design and process innovation. Looking at upstream also means looking at business and consumption models, shifting from ownership to access and product to service where possible. Sufficiency approaches, such as phasing out short-lived products or non-essential features, can also reduce throughput overall.

These three "Rs" act before waste, emissions or raw material dependencies occur. Upstream strategies can reduce household costs by extending product lifetimes and through access to repair and sharing services. They strengthen nature protection by avoiding resource extraction and associated emissions. Lastly, they enhance corporate resilience by lowering exposure to volatile global raw-material markets while opening new value-creation models based on durability, services and secondary materials.

This chapter investigates how to create value with fewer resources across Europe.

Untapping the potential of refuse, rethink and reduce for a transformative circular economy

Public support for circular choices is clear and sustained. Data shows strong citizen backing for circular economy measures, with respondents favouring re-use/repair and viewing circularity as among the most effective environmental solutions ([Eurobarometer, 2024](#); [EEA, 2024](#)).

The three R's addressed in this chapter, however, are often less prominent in political discussions around circularity, even though an increased focus on upstream circular measures plays an important role in reducing environmental footprints since reduced resource consumption contributes to climate mitigation and biodiversity protection ([WWF Germany, 2023](#)). To fully realise the circular economy's potential for economic resilience and reduce supply chain dependency, moderating demand for critical raw materials is necessary to achieve the EU's raw material targets ([European Court of Auditors, 2026](#)).

Social co-benefits of upstream strategies include improved affordability and increased access to products through sharing, leasing and other models that act as alternatives to ownership, lowering entry barriers for all households. Harmonised and trustworthy product information can further strengthen consumer confidence and ensure fair competition for companies leading the circular transition. Participation in sharing, leasing and re-use schemes can increase citizens' sense of agency in shaping sustainability in everyday life. Strengthening economic participation, social cohesion and local communities, it can increase willingness to support and engage in environmentally responsible practices overall.

Rethinking products can also bring system-level transformation for infrastructure, consumer behaviour and product lifecycles. New product-service systems would grow a service ecosystem, boosting regional job creation. At the business level, circular models such as leasing and sharing reduce the need for asset ownership, lowering capital intensity while enabling more flexible, usage-based cost structures.

State of play: Some progress without transformation

Overall, resource consumption in Europe is considered unsustainable and has remained stable since 2010

(EEA, 2025). The EU has tried to address this through two successive Circular Economy action plans (2015, 2020), which involved measures targeting wasteful resource usage and addressing product- and use-phase levers.

Most notably, the Ecodesign for Sustainable Products Regulation (ESPR) sets a horizontal framework to mandate durability, reparability, upgradability, and recycled content. It includes a ban on the destruction of unsold textiles and footwear, as well as an obligation to look into the data on the destruction of other articles. Its provisions drive the rethinking of products and enable circular business models overall. The Packaging and Packaging Waste Regulation (PPWR), which introduces binding prevention and re-use provisions, bans certain single-use formats and requires packaging minimisation. The Right to Repair Directive strengthens the availability of spare parts, repair information and standardised repair offers. The Waste Framework Directive, the legal framework for waste prevention and management, has, in a recent review, also been amended to include textile Extended Producer Responsibility, allowing for eco-modulation based on business practices.

In addition, national initiatives have emerged. France's Anti-Waste & Circular Economy Law (AGEC) bans the destruction of unsold goods, introduces a product "repairability index" and channels Extended Producer Responsibility (EPR) fees to repair funds. The French Fast Fashion bill introduces advertising restrictions and fees for ultra-fast fashion. In Germany, the obligation to offer re-use for takeaway food and beverage packaging and a single-use plastic fund was introduced. In the Netherlands, reduction targets for primary resource consumption have been introduced.

These national measures are to be applauded from a circular economy perspective, creating innovation and important policy pilots to later drive EU-level harmonisation. However, they also result in single-market inconsistencies and increase complexity and compliance costs for businesses. For consumers, different labels and indexes lack comparability, which could reduce trust in circular products and services. In addition, national differences result in leakages, while resource-efficient business models only get established in markets with financial support and resource-intensive alternatives still exist in less regulated markets, not creating a net reduction overall.

For this reason, the EU needs an integrated framework for resource reduction.

Why upstream strategies stall

Politically, reducing material consumption remains highly sensitive, even though it has been part of EU-level discussions since the Potočník resource plan in 2014 and is addressed in various council conclusions (European Commission, 2014). Policymakers and business associations often fear that lower material throughput will translate into economic decline, employment losses or reduced competitiveness, which helps explain the reluctance to adopt binding resource-reduction targets. As a result, circular economy policy has tended to prioritise technological approaches such as recycling and incremental product design, which are perceived as more compatible with existing growth models and easier to implement than fundamentally rethinking business models and value creation. Thus, the social and systemic dimensions of upstream circularity remain underdeveloped.

Most existing policy instruments rely on incentives such as vouchers or information labels, while underestimating structural barriers related to affordability, convenience and access. Repair, re-use and return options are often more time-intensive, geographically fragmented or less financially attractive than linear alternatives. In addition, poor system design, particularly in mobility, housing, retail logistics and public procurement, continues to lock in high material throughput by privileging ownership, disposability and short lifetimes.

Currently, most of the marketing and product design that consumers face prioritises short-term novelty over longevity and quality. While it is difficult to disentangle cultural and social forces at play, consumers are faced with planned and marketing obsolescence. An example are so-called "dark patterns" on online platforms,

which pressure consumers with countdown timers or messages about low stocks ([European Environmental Bureau, 2026, p. 1](#)). In this environment, consumers face an uphill battle to make an informed choice, driving the overconsumption of products.

These challenges are reinforced by fiscal frameworks and subsidies that continue to reward extraction and imports of low-value, resource-intensive goods, often externalising environmental and social costs to producer countries outside the EU. Without addressing these systemic dimensions, upstream strategies risk remaining niche solutions rather than becoming the default option within the single market.

Ideas and proposals: from efficiency to system innovation

Upstream circular economy strategies – Refuse, Rethink and Reduce – require a shift from isolated, product-focused interventions toward a coherent policy framework that combines regulation, fiscal reform, public investment and social engagement. The following proposals translate upstream circularity into concrete policy levers for the EU single market, explicitly linking resource reduction with affordability, quality jobs, resilience and public wellbeing. Together, these measures reposition competitiveness around intelligent resource use and social cohesion rather than volume-driven production.

1. **Regulatory and governance levers: designing products and systems for lower throughput**
 - Establish and implement **resource use (material footprint) reduction targets** as called for in the Council conclusion on the 8th Environmental Action Programme in June 2024 and mirrored in the Council conclusions on climate and circular economy from December 2025 to strengthen Europe’s strategic autonomy ([Council of the European Union, 2024, 2025](#)).
 - **Introduce targeted EU-wide phase-outs of short-lived and low-value products** where alternatives exist and co-benefits are evident, such as disposable electronics, single-use vapes or ultra-fast fashion items. Combining environmental, health and consumer-protection arguments increases political feasibility.
 - **Modernise Extended Producer Responsibility (EPR) schemes** by expanding obligations to importers and distributors and linking fees to upstream prevention performance. EPR should reward design and business model choices that reduce resource consumption overall, not only enable end-of-life recycling.
 - **Harmonise liability, consumer-protection and accounting rules** for leasing, sharing and product-as-a-service models. Clear safeguards are needed to prevent subscription dependencies and ensure consumer rights if services are discontinued.
2. **Fiscal and economic levers: correcting price signals**
 - **Integrate resource-reduction incentives into EU funding frameworks.** Access to EU funds under the Clean Industrial Deal, Cohesion Policy and recovery instruments should be linked to measurable reductions in material use and primary resource dependency.
 - **Use the Multi-Annual Financial Framework (MFF) as a lever for upstream circularity.** Building on existing own resources such as the plastic levy, additional material-based contributions could finance repair infrastructure, re-use systems and circular public services (e.g. the proposed Waste Electrical and Electronic Equipment levy)
 - **Mobilise the European Investment Bank and national development banks** to support the transition from linear sales models to circular, service-oriented value creation through guarantees and low-interest loans.
3. **Budgetary and public investment levers: making circular options accessible**
 - **Transform public procurement into a driver of upstream circularity.** Public authorities should prioritise re-use, repair and service-based solutions and apply lifecycle-cost criteria. Public buildings and infrastructure should be designed for multiple use cycles and long service lives. Training on non-price criteria for local officials operationalising public procurement can help make

this goal more feasible.

- **Invest in local repair, re-use and return infrastructure.** EU regional and social funds should support easily accessible community repair hubs and return centres, reducing time and convenience barriers while creating local jobs.
 - **Expand investment in affordable, low-material mobility.** Public transport infrastructure and targeted mobility vouchers can directly reduce material demand while supporting household budgets.
 - **Support housing retrofits and shared-use facilities,** such as communal laundries or tool libraries, to reduce per-capita material consumption, particularly in dense urban areas.
4. Social, cultural and public engagement levers: building legitimacy and agency
- **Develop a European communication initiative on sufficiency** that is grounded in everyday, local realities. Rather than abstract campaigns, communication should highlight relatable examples of repair, longevity and shared use that improve quality of life.
 - **Institutionalise citizen participation** through assemblies or deliberative processes on fair resource-reduction pathways. This can increase trust, legitimacy and political feasibility.
 - **Integrate circular living and skills into education.** This would start with raising awareness of reducing resource use and informed decision-making in consumption, particularly on online platforms. Training on circular skills should also extend into vocational training, supporting high-quality local employment and inclusive business models such as cooperatives and social enterprises.

Putting these proposals into play requires a positive vision for the future European economy. The upcoming Circular Economy Act provides a key opportunity. The policy window is open to enact these opportunities and future-proof the single market. A European economy built on Refuse, Rethink, and Reduce is an economy built to last.

References

- **Council of the European Union (2024)**. The 8th Environmental Action Programme Mid-term Review - The way forward to a green and just transition for a sustainable Europe – Council conclusions. <https://data.consilium.europa.eu/doc/document/ST-11326-2024-INIT/en/pdf>
- **Council of the European Union (2025)**. Europe’s Environment 2030 – Building a more climate resilient and circular Europe - Council conclusions. https://www.consilium.europa.eu/media/3cxfwwlj/final_councilc-ccls-europe-s-environment.pdf
- **Eurobarometer (2024)**. Attitudes of Europeans towards the environment. European Commission. <https://europa.eu/eurobarometer/surveys/detail/3173>
- **European Commission (2014)**. Environment: Higher recycling targets to drive transition to a Circular Economy with new jobs and sustainable growth. https://ec.europa.eu/commission/presscorner/detail/en/ip_14_763
- **European Commission (2015)**. Closing the loop: Commission adopts ambitious new Circular Economy Package to boost competitiveness, create jobs and generate sustainable growth. https://ec.europa.eu/commission/presscorner/detail/en/ip_15_6203
- **European Commission (2020)**. A new Circular Economy Action Plan. <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1583933814386&uri=COM:2020:98:FIN>
- **European Court of Auditors (2026)**. Special report 04/2026: Critical raw materials for the energy transition – Not a rock-solid policy. <https://www.eca.europa.eu/en/publications?ref=SR-2026-04>
- **European Environmental Agency (2024)**. Public Views on the Circular Economy. <https://www.eea.europa.eu/en/circularity/thematic-metrics/consumer/public-views-on-the-circular-economy#references-and-footnotes>
- **European Environmental Agency (2025)**. Europe’s material footprint. <https://www.eea.europa.eu/en/analysis/indicators/europes-material-footprint?activeAccordion=>
- **European Environmental Bureau (2026)**. Civil society calls for a strong Digital Fairness Act to protect people online. <https://eeb.org/en/library/civil-society-calls-for-a-strong-digital-fairness-act-to-protect-people-online/>
- **WWF Germany (2023)**. Circular Economy Model Germany. A comprehensive circular economy for Germany in 2045. <https://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/Unternehmen/WWF-model-germany-circular-economy.pdf>

2. Re-use, Repair, Refurbish, Remanufacture, Repurpose: Extended lifespans for economic, social and environmental benefits

Eva Bille is in charge of the European Environmental Bureau's activities on circular economy policy, leading the team and co-chairing the working group across rethink, refuse, re-use, recycling, all the way to waste. This work includes both technical and political involvement in performance and information criteria across different policy areas related to circularity.

Extended lifespans are at the heart of a truly circular economy and key to the acceleration of the green transition. Moving away from a linear model means evolving from products that are used only once or sparingly and then thrown away, towards a model that privileges re-use, repurpose, repair, refurbishment and remanufacture before considering more energy-intensive or polluting options like recycling or landfill/incineration. A circular model alleviates environmental, social and economic risks as value is decoupled from resource extraction, and more people have access to more affordable and lasting products. This section will discuss policy options that favour extending product lifespans.

The various lifespan-extending levers have numerous advantages for the EU single market. They offer a diversity of business models with a wide variety of jobs, including innovative product design jobs, technical and specialised expert roles in repair, remanufacturing and digital sectors, as well as quality employment in the social economy.³ In terms of economic benefits, according to a recent study ([Circle Economy, 2025, p. 11](#)), 46% of the up to 142 million global circular economy jobs are in repair. From an EU economy perspective, these repair sector jobs account for between 1.6 and 1.9% of EU turnover ([EEA, 2025a](#)).

There is ample opportunity to increase both the economic value generated and the range of skilled, quality jobs and self-employment in a circular economy. By focusing on keeping products in the loop for longer, extended lifespans also successfully disconnect economic value from resource extraction, decoupling prosperity from resource use. In turn, this dynamic strengthens European resilience and reduces dependence on resource and product imports, while also strengthening European communities. The positive impact on sustainability (emissions/pollution/resource use reduction) remains clear ([EEA, 2025b](#)).

Incentives for circular business models need to be designed with care for social, environmental and economic aspects alike. Positive examples abound. Re-use/repair initiatives create economic opportunities to open shops in (smaller) cities and have the potential to re-dynamise “dead” city centres. Repair shops and in-home repair services are easier and more socially stimulating than being on hold with an AI-generated voice or chatbot owned by the manufacturer. Conversely, there are greenwashing examples of companies using “try and buy” schemes and labelling them as circular, when, in effect, they are driving overconsumption.

State of play: To what extent is re-use-to-repurpose currently facilitated in the EU?

Since the very first actions on resource efficiency during the Barroso II Commission (2009-2014), re-use to repurpose has increasingly been accepted as a competitive advantage of the EU. Designing for durability, re-

³ Examples from Belgium: [Evaluation of sheltered employment - HIVA](#)

[Collectief maatwerk levert nieuwe, duurzame jobs op - Hilde Crevits](#) (Site of the Christian Democrat party, which has the minister for social economy right now)

[Onderzoek naar de leefbaarheid van collectief maatwerkbedrijven, hun structurele financiering en de doeltreffendheid van de maatregel collectief maatwerk | Vlaanderen.be](#)

use and repair have made it to the EU's priorities through the Circular Economy Action Plans and Consumer Agendas. In the 2024-2029 Commission agenda, circularity remains politically attractive, however the concept is so far mostly connected in practice to secondary raw materials, recycling and waste. A small minority of policy officers, Members of the European Parliament and Permanent Representations continue to champion further improvements, but many actors consider extended lifespans as already covered by existing legislation and therefore "job done" – focusing instead on how the adopted rules can be simplified.

Indeed, the first von der Leyen Commission (2019-2024) saw several notable legislative proposals that pave the way for better facilitation of extended lifespans, but the work is far from complete.

Ecodesign for Sustainable Products Regulation

The Ecodesign for Sustainable Products Regulation (ESPR) stands out, as it sets the ambition to define what is sustainable by design across a wide range of product parameters, moving beyond its legislative predecessors (Ecodesign and Energy Efficiency Directives), which have a limited focus on energy consumption. While the ESPR is the framework legislation setting down ecodesign principles, the actual ecodesign criteria will have to be defined for each product group in the coming years. In the initial phase up until 2030, the roll-out of ESPR is limited to four new product groups, two new intermediary products and horizontal requirements on reparability, recyclability and recycled content ([European Commission, 2025a](#)).

Ecodesign requirements have the potential to significantly prolong products' lifespan by setting minimum criteria – for example, on durability, re-usability and reparability – thereby reducing the environmental impact of products sold on the European market. But even with demanding ecodesign criteria in place for many product groups, it remains important to set complementary policies to reduce the overall consumption of resources (see chapter 1) and share and valorise these resources through recycling and as waste (see chapter 3) – otherwise the effects of ecodesign risk being offset by increased consumption levels.

Beyond environmental savings, ecodesign parameters that extend lifespans and enable repair and remanufacture can contribute to Europe's competitiveness, resilience and security by reducing our dependence on materials from abroad. Besides, if products are designed to be more durable and of higher and more modular quality, re-use and repair will also become more profitable.

For this aim to become reality, the ecodesign criteria need to set a high bar across all 16 impact categories⁴ and the roll-out must be quick and encompass virtually all products placed on the EU single market. Importantly, compliance with the ecodesign rules will need to be checked and enforced rigorously on all products placed on the European market ([EEB, 2023](#)) – by European and third-country traders, offline and online alike. Considering the ever-increasing volume of products reaching European consumers via online sales, online marketplaces must assume more responsibility for the products offered on their platforms.⁵

Empowering Consumers for the Green Transition & Right to Repair Directives

Other key pieces of legislation adopted during the 2019-2024 mandate include the Empowering Consumers for the Green Transition Directive (ECGT) and the Right to Repair Directive (R2R). The ECGT Directive introduces obligations on traders to provide information on the reparability and durability of a product at the point of sale, for example, via new labelling requirements to remind consumers of the length of the legal durability guarantee and any available longer commercial guarantees ([European Commission, 2025b, 2025b](#)).

The R2R Directive enshrines in law the right for consumers to repair their products, access affordable spare

⁴ ESPR legal text: durability; reliability; reusability; upgradability; reparability; the possibility of maintenance and refurbishment; the presence of substances of concern; energy use and energy efficiency; water use and water efficiency; resource use and resource efficiency; recycled content; the possibility of remanufacturing; recyclability; the possibility of the recovery of materials; environmental impacts, including carbon footprint and environmental footprint; expected generation of waste. Source: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1781&qid=1719580391746>

⁵ More info: <https://eeb.org/en/library/espr-online-markets-report/>

parts, and the ability to dismantle key components. It has clear environmental benefits and keeps the many small and medium-sized enterprises that offer repair-related services competitive. However, there are still gaps. The R2R Directive's product scope is as limited as the former Ecodesign Directive, and the speed of the rollout of ESPR, as it only applies to product groups which are already covered by ecodesign criteria. It also needs better definitions on key issues. What does "affordable" mean? For how long should spare parts reasonably be available?

Further policy tools

In addition, there are specific enablers in sectoral legislation (e.g. Batteries Regulation, Vehicle Design and End of Life Vehicles (TBC), etc.) and in various EU countries (e.g. repair vouchers, support for re-use actors through the establishment of online platforms or privileged collection, reparability scores, lower VAT for repair, green public procurement, Extended Producer Responsibility (EPR) scheme financing for re-use and repair). There are good examples among these schemes, but they are not harmonised, and in many member states' EPR schemes suffer from unclear governance structures and prices that are too low to cover the costs of waste management (and may disincentivise repair/re-use).

All these adopted pieces of legislation depend to some degree on national implementation, enforcement, or detailed criteria determined through secondary legislation. At the EU level, the Commission's current simplification agenda, with its rapid succession of Omnibus proposals and implementation delays, is casting uncertainty on the impact these laws will have on extended lifespans.

Challenges for extended lifespans in the EU context

There are several challenges in the current context, which can be summarised as a misalignment between short- and long-term narratives and actions. The challenges can be seen through the lens of issues with our economic model, remaining policy loopholes, and political challenges.

Issues with our economic model: A fundamental flaw in the system is the inability to consistently price in externalities – in particular, the long-term costs of extraction to society. Conversely, quality jobs are not (and should not be) cheap. Repair and remanufacturing are relatively labour-intensive, and they are competing against unfairly priced extractive new goods.

At the same time, information about access to re-use, repair, and related services is drowning amongst much better-funded advertising for new sales, leading to overconsumption, amplified by online shopping. This particularly applies to the exponential rise of low-value items, of which 4.6 billion parcels were imported into the EU in 2024 – 12 million parcels every single day ([European Commission, 2025d, p. 2](#)). This is not only problematic as it signals overconsumption, but also because many of these imported goods do not comply with EU safety and sustainability rules, and are produced under poor social conditions ([EEB, 2024](#)). Due to the sheer volume of incoming parcels, customs controls and market surveillance cannot keep up, leaving the vast majority of parcels unchecked. This loophole needs to be closed. Customs actions are underway as part of the EU Customs Reform, which will include an EU handling fee for small parcels, among other new rules and reforms, but more measures are needed to prevent these products from entering the EU market in the first place ([European Council, 2026](#)).

Remaining policy & compliance loopholes: Some important steps towards better design for durability and repair and restricting early obsolescence have already been taken with the adoption of the ESPR and specific pieces of sectoral legislation as described above. However, implementation is far from complete, with only limited product groups in scope and a slow roll-out (product group-specific criteria through secondary legislation), with not nearly sufficient resources dedicated from the Commission side. There is also no guarantee that the final criteria of each product group will incorporate and set high minimum information/performance standards for all impact categories in a meaningful way.

Extended Producer Responsibility schemes are an effective tool in theory, as they embody the Polluter Pays Principle (PPP) by charging a fee from producers to manage the end of life of the products they place on the

market. Member states can apply eco-modulated EPR fees, where the amount to be paid depends on the product's sustainability. In the case of textiles, the recent revision of the Waste Framework Directive even allows member states to set higher fees for unsustainable commercial practices. In practice, however, EPR systems are fragmented, and EPR fees are insufficient to cover the cost of waste management – and in some cases even encourage recycling over extended lifespans because of the set-up and governance of the system ([Simon, 2025](#); [Mallick et al., 2024](#)).

The reality is that social actors are overburdened with low-value goods, and the arrival of new online marketplaces for consumer-to-consumer sales has led to some of the higher-value products no longer being donated for re-use. Regulation has struggled to keep up. Even if the EU mandates design for re-use and durability, it is meaningless if the EU cannot uphold basic safety compliance.

Political challenges: The current EU political climate is strong on resilience and unfair competition in rhetoric. In practice, the focus on simplification and competitiveness has led to at least 10 Omnibus proposals rushed through without proper consultation and impact assessment in less than one year, alongside delays and watering down of the implementation of several pieces of existing legislation. There is therefore a high risk that the current political climate will focus less on the environmental, social and economic benefits of repair, and more on the immediate short-term economic demands of manufacturers.

Policy proposals for the current legislative mandate

Based on the identified gaps, there are different types of solutions, which we have clustered around six groups that tackle the three angles of the issue identified above: Product Design, Extended Producer Responsibility (EPR), Taxation and Price, Skills, Logistics and Market Surveillance.

1. Product design for durability and repairability, and really doing it

The ESPR already sets the foundation for improved product design in the future, as outlined above. Its actual effect will depend on how it is implemented in the future. Ideally, ESPR criteria should raise the bar and set high minimum acceptability thresholds, there should be high fines for non-compliance, and it should be rapidly rolled out to encompass all products placed on the EU market. As a priority, harmful chemicals should be kept out of products to create clean material loops and avoid toxic lock-ins. A single aggregated ESPR score would be too simplistic and too likely to hide trade-offs.

Importantly, in accordance with the waste hierarchy, recyclability and recycled content criteria should not be given more importance than durability and repairability criteria. This prioritisation could be enacted through designated re-use targets in the relevant legislation, such as the Waste Framework Directive, the Waste Electrical and Electronic Equipment (WEEE) Directive or other potential future laws and reopenings of legislation. There is also an opportunity to deliver social co-benefits by connecting re-use targets with social objectives to support the local social economy.

The current ESPR overlooks some important elements which should be added to the legal framework in the future: mandatory lifetime data, bans on planned obsolescence, and a ban on the destruction of all unsold goods. Legislation should also address marketing obsolescence, as it does not matter much if a product is durable, if consumers are still pushed to buy a new version before its useful end of life.

Linked to this, criteria should be set regarding which environmental labels and green claims can be used on products. Especially given that the Green Claims Directive did not manage to conclude the legislative process, more actions will be needed to ensure the credibility and meaningfulness of green claims and labels.

Finally, loopholes in the R2R Directive need to be addressed ([Right to Repair, 2024a](#)), notably in scope (extending to all products), the definition of what is an affordable and accessible spare part, and access to repair information. Re-licensing and warranties of products for re-use should also be made simpler (without compromising the quality of consumer protection).

2. Towards pricing in externalities: improving Extended Producer Responsibility (EPR) schemes

One major potential avenue to shift the focus towards extended lifespans is in changing the incentives for EPR and eco-modulation. Most EPR discussions are about waste management, but to truly embed the polluter pays principle, they should be about commercial practices and extending lifespans. Starting from full cost coverage, including waste stream prevention and preparing for re-use, combined with binding and separate re-use targets, this could shift funding in line with the waste hierarchy, avoiding products going directly to recycling or waste.

The French example of earmarking a percentage of EPR fees to provide repair vouchers appears to have beneficial effects ([Right to Repair, 2024b](#)). Reforming EPR towards extended lifespans could also create real financial incentives for manufacturers producing longer-lasting products, if the EPR fees are high enough to serve as a deterrent or if eco-modulation is applied to its fullest potential to fight overproduction. The governance would need to be inclusive, with earmarking of funding and privileged access to high-quality products for social enterprises, and more public oversight of Producer Responsibility Organisations (PROs).

Practically, EPR fees could be split into a waste management fee and a prevent/re-use fee, to avoid mixing up the two ([Zero Waste Europe, 2025](#)). This could then feed a fund for circularity and innovation (earmarking for re-use, repair and rental).

3. Making use of price signals

As noted above, products with extended lifespans suffer from unfair competition with extractive practices that do not price in the environmental and social externalities associated with their production. In economic terms, taxation provides the strongest price signal, but it is also the most difficult lever at the EU level since it requires unanimity.

However, updates to the VAT Directive and other guidance could send strong signals to member states to encourage better use of taxation to favour products with longer lifespans and encourage re-use and repair. One oft-cited solution implemented in several member states would be to reduce VAT for repair, re-use and spare parts or apply a zero VAT rate for social enterprises to level the playing field. The labour portion of repair/remanufacture should be prioritised for lower rates. Conversely, there should be absolutely no recuperation of VAT for the destruction of unsold products. Countries could consider adding a materials tax on third-country traders facilitating direct-to-consumer imports or lowering the tax on labour by increasing the tax on goods made with virgin resources.

Other price incentives could be encouraged through public procurement. Removing the Most Economically Advantageous Tender (MEAT) criterion in the EU Public Procurement Directive would allow more emphasis on non-price criteria such as privileging repair, refurbishment or non-ownership models, as well as social conditionalities.

Non-ownership (e.g. well-designed product-as-a-service models that consider social, environmental and economic impacts) should also be encouraged to a higher degree, through procurement and otherwise, to further decouple resource use from the creation of economic value. However, these incentives and models should always put the public interest first and not lead to predatory subscription dependencies or other harmful practices.

Lifespan-extending levers should also be better integrated in future updates of the EU taxonomy for sustainable activities – both as criteria for substantial contribution⁶ and the do no significant harm principles for circularity ([European Commission, n.d.](#); [EEB, 2022](#)).

4. Creating the framework for better jobs

As mentioned, most jobs in the circular economy are in the repair sector. More public funding should therefore be funnelled towards teaching mending, repair and repurposing skills in schools and workplaces. Manufacturing companies should be mandated to teach their employees not just how to make goods, but

⁶ <https://science-based-taxo.org/> independent science-based taxonomy where environmental civil society organisations rate the official taxonomy and propose improvements

also how to repair the goods they make, and make repair information free and accessible to all. Combining this with investments in automation solutions and software would expand the variety of jobs in the refurbishment process.

An opportunity for the still-to-be-defined circularity hubs, which are to be established via the upcoming Circular Economy Act, could be to focus these on skills – enabling small businesses to exchange and connect, providing advisory support and creating awareness and skills hubs. Similarly, social conditionality needs to be mainstreamed in the circular skills discussion, especially with an eye on upcoming legislation such as the Union of Skills and existing frameworks like the Just Transition Fund/Mechanism and the European Pillar of Social Rights. Across these files, ensuring that the circular transitions follow the tenets of a just transition is key. Working conditions are an important entry point, ranging from occupational health and safety aspects to ensuring appropriate coverage by the right EU regulations, which is even more crucial for emerging circular occupations.

5. Improving the logistics around sharing and collection

To improve collection and preparation for re-use, there are several important policy areas that could enhance re-use logistics. Targets (be they sectoral or overarching) for re-use (and repair/refurbishment), separate from recycling targets, would be an important first step. Each municipality should be required to establish collection points specifically for re-use.

Similarly, end-of-waste criteria (in particular for larger composite items such as ships) should have the flexibility in all member states to automatically declare only the parts that are truly waste as waste, encouraging the re-use and repair of functioning parts.⁷ There are also other waste policies that hinder the extension of lifespans, which will be further discussed in the next section.

6. Measuring and monitoring what really happens on the market

To address the lack of data, the EU should mandate a one-stop shop for accurate, transparent, certified data, encourage open-source repair data, and set targets so that the EU and its member states will have to monitor waste and re-use schemes. This needs to come with a clear delineation of responsibilities spelling out who is in charge of monitoring re-use and how (e.g. one stop shop, market surveillance authority).

How to garner political support?

As the current political context has shifted away from environmental considerations, it will be important to communicate problems and solutions for extended lifespans in a way that appeals to actors across the political spectrum. To this effect, narratives around resilience, security and competitiveness can be framed around small businesses, local circularity and skills hubs. There is a strong political push for EU-based jobs and industry local-content requirements, the most recent example being the “Made in the EU” criteria of the Industrial Accelerator Act. These proposals could offer synergies with the principle of extended lifespans and repair/remanufacture, if implemented with the focus on prevention, sustainability and quality. At the same time, there is a strong community and sharing/caring element that can help bring people together and overcome political divides.

Conversely, there is a risk that the simplification agenda could miss opportunities to encourage lifespan-extending activities, because of the legislative speed of Omnibuses and the relative distance between the fragmented but vast number of re-use/repair/remanufacture actors and the policymaking process. This could lead to contradictory political incentives that skip over re-use and repair, going straight to recycling and waste management. Supporters of a holistic circular economy should be vocal about its economic and social benefits to avoid such trade-offs.

⁷ In Denmark, for example, a Danish-owned vessel sailing in Sweden under a Panama or other non-EU flag (as is unfortunately common practice) would be declared 100% waste, and changing this for a fully functioning (even brand-new) engine takes countless resources both in effort and time.

References

- **Circle Economy (2025)**. Employment in the Circular Economy. Leveraging circularity to create decent work. <https://www.circle-economy.com/resources/employment-in-the-circular-economy>
- **European Commission (2025a)**. Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025-2030. https://environment.ec.europa.eu/document/download/5f7ff5e2-ebe9-4bd4-a139-db881bd6398f_en?filename=FAQ-UPDATE-4th-iteration_clean.pdf
- **European Commission (2025b)**. Harmonised notice on legal guarantee of conformity and harmonised label for commercial guarantee of durability. https://commission.europa.eu/publications/harmonised-notice-legal-guarantee-conformity-and-harmonised-label-commercial-guarantee-durability_en
- **European Commission (2025c)**. Commercial guarantee of durability. https://europa.eu/youreurope/citizens/consumers/shopping/commercial-guarantee-durability/index_en.htm
- **European Commission (2025d)**. E-commerce communication: A comprehensive EU toolbox for safe and sustainable e-commerce. <https://digital-strategy.ec.europa.eu/en/library/e-commerce-communication-comprehensive-eu-toolbox-safe-and-sustainable-e-commerce>
- **European Commission (n.d.)**. EU Taxonomy Compass. <https://ec.europa.eu/sustainable-finance-taxonomy/taxonomy-compass/the-compass>
- **European Council (2026)**. EU customs: Council and Parliament agree on landmark reform. <https://eeb.org/en/library/european-stakeholders-united-for-a-level-playing-field-for-online-marketplaces-and-effective-enforcement/>
- **European Environmental Agency (2025a)**. Turnover in the repair sector. <https://www.eea.europa.eu/en/circularity/thematic-metrics/consumer/turnover-in-the-repair-sector>
- **European Environmental Agency (2025b)**. Europe's environment and climate: knowledge for resilience, prosperity and sustainability. <https://www.eea.europa.eu/en/europe-environment-2025/main-report>
- **European Environmental Bureau (2022)**. 'Do No Significant Harm' to Circular Economy in the Climate Taxonomy. <https://eeb.org/wp-content/uploads/2022/04/Do-No-Significant-Harm-to-Circular-Economy-in-the-Climate-Taxonomy-EEB-report-April-2022.pdf>
- **European Environmental Bureau (2023)**. ESPR online markets report. <https://eeb.org/en/library/espr-online-markets-report/>
- **European Environmental Bureau (2024)**. European stakeholders united for a level playing field for online marketplaces and effective enforcement. <https://eeb.org/en/library/european-stakeholders-united-for-a-level-playing-field-for-online-marketplaces-and-effective-enforcement/>
- **Mallick, P. K., Salling, K. B., Pigosso, D. C., & McAloone, T. C. (2024)**. Designing and operationalising extended producer responsibility under the EU Green Deal. *Environmental Challenges*, 16, 100977.
- **Right to Repair (2024a)**. The Current State of Right to Repair in the EU. https://repair.eu/wp-content/uploads/2024/10/Current-State-of-EU-Right-to-Repair_v3_2.pdf
- **Right to Repair (2024b)**. Reforming Extended Producer Responsibility Schemes to Promote Repair. <https://repair.eu/news/reforming-extended-producer-responsibility-schemes-to-promote-repair/>

- **Simon, J.M. (2025).** Designing EPR to foster the EU's competitiveness and strategic autonomy. Zero Waste Europe. https://zerowasteurope.eu/wp-content/uploads/2025/04/ZWE_Apr25_DesigningEPR_ExecSummary.pdf
- **Zero Waste Europe (2025).** Designing Extended Producer Responsibility to deliver on EU's competitiveness and strategic autonomy agenda. <https://zerowasteurope.eu/2025/04/designing-extended-producer-responsibility-to-deliver-on-eus-competitiveness-and-strategic-autonomy-agenda/>

3. Recycling and material recovery: closing the gap for a green and fair European circular economy

Janek Vähk is a circular economy and sustainability expert working to accelerate Europe's transition to a zero-waste society. He is the Zero Pollution Policy Manager at Zero Waste Europe, where he focuses on landfills and waste incineration, and on the interlinkages between climate and waste policies.

Recycling and material recovery are central to a functioning circular economy, and to the EU's economy in general. Indeed, strengthening recycling systems is essential for reducing dependency on imported virgin materials, improving supply-chain resilience, and creating stable, local and safe jobs across the recycling chain. To some extent, current EU policies already tap into this opportunity, primarily relying on mandatory collection and recycling targets, extended producer responsibility (EPR) schemes, and landfill reduction obligations. Yet progress remains uneven: 18 member states are off track to meet municipal waste and packaging targets, and much landfill diversion has moved towards incineration (25% incinerated vs. 22% landfilled in 2023) ([European Court of Auditors, 2025, p. 27](#); [European Commission, 2023](#); [Eurostat, 2025a](#)).

This chapter identifies the key gaps in EU material recovery and recycling systems and examines the measures needed to address them.

State of play: some progress, but real recycling remains limited

EU recycling policy has grown substantially over the past decade, with binding targets, separate collection obligations and EPR schemes now in place for major waste streams. Yet, as with upstream measures, progress remains partial and uneven and does not amount to a structural transformation of how materials are recovered. Headline recycling rates often mask large gaps between what is collected for recycling and what is actually recycled into secondary raw materials. Overall municipal waste recycling performance varies widely, with multiple member states being at risk of missing mandatory targets for recycling. Germany (67% municipal waste recycling), Belgium (54%), and Sweden (45%) consistently outperform the EU average, supported by mature EPR systems and strong separate collection. In contrast, several Central and Eastern European countries, including Romania (11%), Malta (20%), Croatia (31%) and Hungary (33%), remain far below EU targets due to persistent infrastructural, financial and governance gaps ([EEA, 2025a](#)).

When we look beyond these percentages, four structural issues persist when it comes to waste streams:

1. Collection rates are improving, but material losses remain high

Separate collection for packaging, paper, glass and municipal waste has expanded, yet contamination and inconsistent sorting lead to significant material losses before actual recycling ([JRC, 2020](#)). Plastics illustrate the problem most clearly: although around one-third of plastic waste is captured for recycling processes, only about one-fifth of it is recycled into polymer products that re-enter European markets ([Eurostat, 2025b](#)). Textiles show even wider gaps: yet less than 1% of textile materials are recycled into new fibres, underlying persistent technical and market barriers to textile-to-textile recycling ([European Commission, 2025](#)).

2. Waste exports and low-quality treatment distort reported performance

Significant volumes of plastics and textiles leave the EU under the label of “second-hand goods”, despite many being effectively waste. This practice inflates European “recycling” rates, communicating progress without contributing to EU material security. These flows shift burdens abroad, creating dangerous, long-term damage to ecosystems and local populations, and overburdening local recycling facilitators with dangerous materials ([EEB, 2025](#)).

3. Market conditions still favour virgin materials over secondary ones

Virgin raw materials remain cheaper and more predictable in supply, while secondary materials face fragmented standards, uneven end-of-waste implementation, and limited demand signals. As a result,

recycling infrastructure remains underdeveloped in many member states, and advanced reprocessing technologies are slow to scale. This pattern reflects the challenges identified in the European Environment Agency's assessment of the EU secondary raw material markets, where most markets are not yet functioning as a fair, fully integrated single market ([EEA, 2022](#)).

As a result, too much waste is incinerated or remains in mixed municipal streams, and too little becomes high-quality recycled material capable of replacing virgin inputs. Europe, therefore, retains high dependency on imported raw materials (over 60%).

4. Social dimensions of recycling systems are overlooked

Social aspects remain a critical but underdeveloped pillar of EU recycling policy. Circular economy policies stop short of putting attention on these dimensions, like employment, informal labour and gender inequality ([EEA, 2025b, p. 139](#)).

Unequal access to high-quality collection systems persists across income groups, housing types and regions, reducing participation in the circular economy and reinforcing structural disparities. In high-density buildings, for example, residents frequently face insufficient space, unclear instructions or poorly designed sorting infrastructure, despite evidence that well-designed systems can achieve high performance even in apartment complexes.

At the same time, workers in the waste and recycling sector continue to experience precarious contracts, elevated health risks and inconsistent safety standards, particularly in sorting and manual handling activities. These conditions undermine both the quality of recycling and public trust in the sector, ultimately confining its scope and impact. Ensuring that recycling contributes to stable, well-paid and safe employment is therefore essential for a fair circular economy.

The benefits of closing the gaps on these four structural issues are clear: lower emissions, stronger supply-chain resilience, reduced import dependency and more stable, locally anchored jobs. But achieving the benefits requires a shift from measuring "collection for recycling" to guaranteeing real material recovery, supported by harmonised standards, functioning markets and equitable access to high-quality collection systems.

What is missing: gaps in the current circular economy approach

Despite extensive legislation, the EU's recycling and recovery framework still lacks several core conditions needed to translate high collection rates into high-quality secondary materials.

A central weakness is the absence of harmonised, enforceable rules. EU-wide end-of-waste criteria exist only for a few materials, leaving plastics, textiles, and waste electrical and electronic equipment (WEEE) subject to divergent national interpretations. This inconsistency restricts cross-border use of recyclates and increases compliance costs ([European Court of Auditors, 2020](#); [European Commission, n.d.a](#)). This comes with consequences for the functioning of the EU's single market, its competitiveness and citizen support for the transformation to a circular economy.

Separate-collection systems show similar fragmentation. While some countries collect high volumes of packaging, others still see more than 60% of biowaste and large shares of plastics going into mixed municipal waste. Textile collection remains around 30-40%, well below what is needed ahead of the 2025 obligation. High contamination rates, often 25-30% in plastics, mean that much of what is collected cannot become high-quality recyclate ([EEA, 2020](#); [Eurostat, 2024](#)).

A further gap is the lack of an EU requirement to sort mixed waste before it is incinerated or landfilled. Where sorting is applied, such as in Denmark and the Netherlands, significant quantities of plastics, metals and fibres are recovered. In countries without such systems, these materials are lost entirely.

Extended producer responsibility schemes also remain inconsistent. Fees for identical packaging formats vary widely – from €20 to over €200 per tonne – and many schemes do not cover the full costs of collection

and recycling, weakening eco-design incentives ([OECD, 2016](#)). At the same time, binding recycled-content requirements exist mainly for plastic packaging, leaving major streams such as textiles, construction materials and electronics without comparable demand signals. Recycled plastics often cost 20-40% more than virgin materials when oil prices are low, undermining market stability ([The Pew Charitable Trust & Systemiq, 2020](#)).

Underlying these technical and regulatory gaps are social and infrastructural inequalities. Many households face practical barriers to participating in separate collection – limited space, insufficient collection points and unclear sorting guidance. Furthermore, EU circular economy policies insufficiently address labour rights and social protections in the recycling sector. Many collection and sorting jobs remain low-paid, precarious, and poorly trained, with limited health and safety safeguards, while social dialogue, formal recognition of informal workers, and upskilling measures are largely absent ([EEA, 2025b](#); [Weghmann, 2020](#)).

Finally, fiscal and procurement levers remain underused. Landfill and incineration taxes range from €0 to over €100 per tonne, and public procurement – 14% of EU GDP – rarely mandates recycled content ([European Commission, n.d.b](#)). These gaps mean Europe still operates a collection system rather than a true material-recovery system supported by the single market. Lastly, it is also important to put recycling into the context of a holistic circular economy in which recycling is downstream of more powerful levers, and has been shown to not be able to achieve meaningful resource reduction or respond to the environmental impacts of resource extraction and consumption ([EEA, 2025c](#)).

Ideas and proposals: from fragmented measures to a coherent, understandable, and fair recycling system

Closing the gap between what Europe collects and what it actually recovers requires coherent reforms that address policy fragmentation, weak demand for secondary materials, infrastructure gaps, and social and labour conditions, ensuring fair and inclusive transition across all member states.

1. Build a coherent and harmonised policy framework for recycling and waste
 - Set EU-wide end-of-waste and quality criteria for plastics, textiles, waste electrical and electronic equipment (WEEE), and construction materials to eliminate national inconsistencies and unlock cross-border recycling markets.
 - Mandate mixed-waste sorting before incineration or landfill, ensuring plastics, metals and fibres are recovered rather than lost in residual streams.
 - Harmonise EPR schemes with minimum EU rules on fee modulation, transparency and full-cost coverage for collection, sorting and high-quality recycling.
2. Strengthen demand for secondary materials
 - Expand binding recycled-content targets beyond packaging – to textiles, construction materials, electronics and public procurement sectors.
 - Use public procurement strategically, requiring minimum recycled content and high circular-performance criteria in public works, infrastructure and service contracts.
 - Correct price distortions by reducing VAT on recycled materials, removing favourable tax treatment for energy-from-waste, and introducing consistent landfill/incineration taxation.
3. Invest in infrastructure, technology and traceability
 - Upgrade separate-collection and sorting systems, prioritising regions and communities with high contamination or low access.
 - Expand high-quality reprocessing capacity, including plastics reprocessing, textile-to-textile recycling and advanced sorting technologies.
 - Roll out digital product passports and traceability tools in tandem with public awareness campaigns to support reliable markets for secondary raw materials.
 - Finance the sorting and treatment of products in mixed municipal waste through mandatory EPR

cost coverage, reducing the burden on municipal budgets.

4. Ensure a fair and inclusive transition

- Improve access to separate collection systems in low-income, rural and high-density urban areas through better infrastructure, proximity standards and clear communication, including effective solutions to multi-unit buildings.
- Strengthen working conditions across the recycling chain by establishing EU-wide minimum safety, training and employment standards, including the development and dissemination of sectoral collective agreements covering all companies – public, private and multinational – to harmonise labour rights and good practices; recognise recycling as essential environmental work, supported by just transition measures for upskilling and reskilling.
- Embed social dialogue – involving workers, municipalities and civil society – in the design and implementation of recycling reforms to build trust and participation.

Political opportunities and next steps

The forthcoming Circular Economy Act offers a pivotal opening to embed these proposals into EU law. By revising the Waste Framework Directive, Landfill Directive and WEEE Directive, this legislation aims to make EU recycling markets actually function, through harmonised standards, stronger demand for recycled content and reduced loss of valuable materials. When coupled with the Clean Industrial Deal, it can shift Europe from a fragmented collection model to a true, socially fair material-recovery system that strengthens resource security, creates stable local jobs and reduces dependence on imported virgin materials.

References

- **European Commission (2023)**. Report from the commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. Identifying Member States at risk of not meeting the 2025 preparing for re-use and recycling target for municipal waste, the 2025 recycling target for packaging waste and the 2035 municipal waste landfilling reduction target. <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52023DC0304>
- **European Commission (2025)**. Sustainable and Circular Textiles Strategy. https://environment.ec.europa.eu/strategy/textiles-strategy_en
- **European Commission (n.d.a)**. Waste Framework Directive. https://environment.ec.europa.eu/topics/waste-and-recycling/waste-framework-directive_en#end-of-waste-criteria
- **European Commission (n.d.b)**. Public procurement. https://single-market-economy.ec.europa.eu/single-market/public-procurement_en?
- **European Court of Auditors (2020)**. EU action to tackle the issue of plastic waste. https://www.eca.europa.eu/Lists/ECADocuments/RW20_04/RW_Plastic_waste_EN.pdf
- **European Court of Auditors (2025)**. Special report 23/2025: “Municipal waste management: Despite gradual improvement, challenges remain for the EU’s progress towards circularity”, Publications Office of the European Union, 2025. https://www.eca.europa.eu/ECAPublications/SR-2025-23/SR-2025-23_EN.pdf
- **European Environmental Agency (2020)**. Plastics, the circular economy and Europe’s environment. <https://www.eea.europa.eu/en/analysis/publications/plastics-the-circular-economy-and>
- **European Environmental Agency (2022)**. Investigating Europe’s secondary raw material markets. <https://www.eea.europa.eu/publications/investigating-europes-secondary-raw-material>
- **European Environmental Agency (2025a)**. Waste recycling in Europe. <https://www.eea.europa.eu/en/analysis/indicators/waste-recycling-in-europe?>
- **European Environmental Agency (2025b)**. Europe’s environment 2025 - Main report Europe’s environment and climate: knowledge for resilience, prosperity and sustainability. https://europokune.eu/dok/2025/RapEurEnvKlim2025/RapEurEnvClim2025_MiniTotal.pdf?
- **European Environmental Agency (2025c)**. Circular material use rate in Europe. <https://www.eea.europa.eu/en/analysis/indicators/circular-material-use-rate-in-europe>
- **European Environmental Bureau (2025)**. EU exports of used clothing wear out African second-hand markets. <https://meta.eeb.org/2025/06/02/eu-exports-of-used-clothing-wear-out-african-second-hand-markets/>
- **Eurostat (2024)**. Waste statistics. https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Waste_statistics
- **Eurostat (2025a)**. Plastic packaging waste in the EU: 35.3 kg per person. <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20251022-1>
- **Eurostat (2025b)**. Municipal waste down by second consecutive year. <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20250213-1>
- **Joint Research Centre (JRC) (2020)**. Quality of Recycling - Towards an operational definition.

<https://publications.jrc.ec.europa.eu/repository/handle/JRC122293>

- **OECD (2016)**. Extended Producer Responsibility: Updated Guidance for Efficient Waste Management. OECD Publishing. <https://doi.org/10.1787/9789264256385-en>
- **The Pew Charitable Trust & Systemiq (2020)**. Breaking the Plastic Wave: A Comprehensive Assessment of Pathways Towards Stopping Ocean Plastic Pollution. https://www.systemiq.earth/wp-content/uploads/2020/07/BreakingThePlasticWave_MainReport.pdf
- **Wegmann, V. (2020)**. Safe Jobs in the Circular Economy. Health and Safety in Waste and Wastewater Management. European Federation of Public Service Unions (EPSU). https://www.epsu.org/sites/default/files/article/files/FINAL_Safe%20Jobs%20in%20the%20Circular%20Economy_EN.pdf?

Conclusion

Philippe Pochet, Friederike Möller

In an era of escalating geopolitical turbulence, economic tensions, and broad societal, technological and demographic changes, the circular economy could be perceived as a niche, technocratic topic that is not sufficient to rise to the challenges that Europe faces. We do not pretend that the circular single market is the answer to all challenges, but we are convinced that a transformative circular economy project is an essential part of Europe's sovereignty.

The starting point for this publication is a clear political will for a holistic European circular economy – to achieve environmental and climate goals, but also to provide quality of jobs, products, and life ([Pochet & Van Melkebeke, 2024](#)). This focus is a natural continuation of the foundation's previous work on the green transition, encompassing the wellbeing economy, transformative eco-social policy, and the single market.

Our work on these ambitious but realistic proposals has a continuous guiding line. Rather than focusing on what Europe cannot do, shouldn't do, or should stop doing altogether, we want to point to where action is possible and needed. In this brief, we propose practical steps forward in a framework of structural change within planetary boundaries. In this context, a circular economy is not merely a functional adaptation of the economic status quo but part of a transformation of our economic and social model.

The circular economy is not widely seen as a real, encompassing answer to economic and environmental challenges. It should be. But to seize this potential, we need to recognise its social dimension, understand the diversity of challenges, and be clear about the kinds of business models that we want to develop.

At long last, the just transition is becoming part of the discussion on the circular economy. This connection was recognised by the European Parliament in the January 2026 legislative initiative report for a Just Transition Directive in the world of work, which states that: “direct public and private investment into clean infrastructure, renewable energy projects and circular economy activities are necessary to revitalise local economies and contribute to the creation of quality jobs” ([European Parliament, 2026](#)). Adopted by a majority in the European Parliament, this report now calls on the European Commission to develop a legislative framework to address the challenges and opportunities of a just transition.

While our recommendations touch upon different policies and measures, they all follow two clear objectives.

First, the recommendations are geared to expand our understanding of the circular economy from a recovery method for waste needs to an ambitious model that limits overconsumption, extends lifespans and is clear-eyed about the tail end of waste and recycling.

Second, the policy proposals aim to increase the EU's economic and environmental resilience. From energy crises to trade wars, the supply chains and provisioning systems that Europe long relied on for its prosperity are no longer secure or certain. In this new reality, the circular economy is an agenda to futureproof the single market against emerging eco-social risks to ensure prosperity and autonomy.

The EU is entering a decisive moment for climate, economic and social policymaking. While the debate is ongoing, this publication presents common threads to pull in the short and long term.

Policymakers need to meet the moment and advocate for an ambitious, holistic circular economy model that takes people and businesses on board and provides tangible co-benefits for society and nature.

If the single market is to persist as a core pillar of the European project, the discussions on its reform must prioritise economic, social and environmental resilience. The turn towards a circular single market is an opportunity to be taken.



References

- **European Parliament (2026)**. REPORT with recommendations to the Commission on just transition directive in the world of work: ensuring the creation of jobs and revitalising local economies. European Parliament. https://www.europarl.europa.eu/doceo/document/A-10-2025-0261_EN.html
- **Pochet, P., & Van Melkebeke, T. (2024)**. A European Single Market for the future. Green European Foundation. https://gef.eu/wp-content/uploads/2024/04/GEF-Political-Brief_A_European_Single_Market_for_the_Future_1704.pdf

About GEF's Policy and Research Hub

The Green European Foundation (GEF) is a European-level political foundation whose mission is to contribute to a lively European sphere of debate and to foster greater citizen involvement in European politics. GEF strives to mainstream discussions on European policies and politics both within and beyond the Green political family. The foundation acts as a laboratory for new ideas and offers cross-border political education and a platform for cooperation and exchange at the European level.

GEF's Policy and Research Hub is centred on a Knowledge Communities methodology, fostering networks for knowledge production, exchange, and dissemination. It tackles key European issues, particularly related to the intersecting domains of energy, climate, social, and economic affairs. Ultimately, our Policy and Research Hub aims to deliver ideas and proposals that can inform and incentivise policies for an equitable and systemic green transition.

About the authors

Philippe Pochet is a Fellow of the Green European Foundation, Affiliate Professor at Sant'Anna College, Pisa and the former General Director of the European Trade Union Institute (ETUI). Before joining ETUI in 2008, he was director of the Observatoire social européen for 16 years.

Rebecca Tauer leads the circular economy team within the business & markets department at WWF Germany, where she implements projects that advance a circular and resource-efficient economy.

Eva Bille is in charge of the European Environmental Bureau's activities on circular economy policy, leading the team and co-chairing the working group across rethink, refuse, re-use, recycling, all the way to waste. This work includes both technical and political involvement in performance and information criteria across different policy areas related to circularity.

Janek Vähk is a circular economy and sustainability expert working to accelerate Europe's transition to a zero-waste society. He is the Zero Pollution Policy Manager at Zero Waste Europe, where he focuses on landfills and waste incineration, and on the interlinkages between climate and waste policies.

Friederike Möller is the Policy Assistant at the Green European Foundation across several key areas related to the green transition and the nexus of tech and democracy.

About the editors

Jamie Kendrick is GEF's Head of Policy and Research. Formerly, he was a political advisor on European affairs at the European Green Party (EGP) and the editor-in-chief of the Green European Journal.

Friederike Möller is the Policy Assistant at the Green European Foundation across several key areas related to the green transition and the nexus of tech and democracy.

Acknowledgements

We would like to wholeheartedly thank all participants of the Knowledge Community meetings that were held in Brussels and online between May 2025 and February 2026, during which earlier versions of this policy brief were discussed. The generous and insightful input and the lively discussions between the participants allowed us to further develop our thinking and identify the final political opportunities in this publication. We would also like to thank GEF's Laurent Standaert, the Director of the Foundation, and former colleague Taube Van Melkebeke for their support and contributions to this work.

Proofreading by Jamie Kendrick

Layout and design by Klär.graphics

This policy brief is published by the Green European Foundation with the financial support of the European Parliament to the Green European Foundation. The European Parliament is not responsible for the content of this publication. The views expressed in this publication are solely those of the authors and contributors and do not necessarily reflect the views of the European Parliament or the Green European Foundation.