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EUSurvey

PUBLIC CONSULTATION QUESTIONNAIRE
Circular Economy Act

Fields marked with * are mandatory.

Introduction

As announced in the Clean Industrial Deal (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52025DC0085), the European Commission is preparing a proposal for a circular economy act for adoption in 2026. The main objective of this new legislation is to accelerate the transition to the circular economy in the EU. It will target several obstacles, such as the lack of sufficient demand and supply for secondary raw materials (including critical ones); and the fragmentation of the single market for circular products, waste and secondary raw materials.

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

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

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

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

PART 1. ABOUT YOU

About you

* Language of my contribution

* I am giving my contribution as

* First name

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The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

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PART 2. GENERAL QUESTIONS ON THE CIRCULAR ECONOMY

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

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Prices for secondary raw materials are generally higher than prices of primary raw materials	○	x○	○	○	○	○	○
b. The quality of secondary raw materials is generally lower than the quality of primary raw materials	○	○	x○	○	○	○	○
c. A lack of standardised certification for secondary raw materials affects their marketability	○	**X** ○	○	○	○	○	○
d. There are too many regulatory obstacles to a well-functioning single market for secondary raw materials	○	x○	○	○	○	○	○
e. There are too many other barriers (financial, information, etc.) obstructing economies of scale for the supply and demand of secondary raw materials	○	x○	○	○	○	○	○
f. There is insufficient supply of secondary raw materials	○	○	x○	○	○	○	○
g. There is insufficient demand for secondary raw materials	○	○	x○	○	○	○	○

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
h. EU-made secondary raw materials face competition from imported secondary raw materials that are cheaper, of lower quality and/or of uncertain origin	○	○	x○	○	○	○	○
i. There is not enough high-quality, sorted waste in the EU to produce secondary raw materials	○	x○	○	○	○	○	○
j. There is inadequate infrastructure for the collection, sorting, and transportation of secondary raw materials within the EU	○	x○	○	○	○	○	○
k. Circular economy business models are not receiving the necessary financial support	○	○	x○	○	○	○	○
l. Current public procurement practices do not sufficiently prioritise or incentivise the use of secondary raw materials	○	○	○	x○	○	○	○
m. Key actors in the products' value chains (e.g. producers and recyclers) are not sufficiently working together to improve circularity	○	○	○	x○	○	○	○
n. Consumer awareness and acceptance of products made from secondary raw materials is low	○	○	○	x○	○	○	○

Other, please specify:

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The regulators' view on this complex issue is that enhancing the EU market for SRM requires a set of policies and tools. Integrating SRM markets through the establishment of trading platforms and mechanisms would help the whole recycling chain to benefit from the opportunities arising from larger dimensions and more transparency on prices, quality and availability. To make trading platforms and hubs effective, a major effort is required in the standardization domain. Increasing quality of sorted waste due to being recycled is also of utmost importance: this can be obtained through appropriate economic incentives for citizens and operators, what in turn requires a consistent tariff system supporting circular-oriented behavior and choices. Finally, the "supply side" matters. Reducing the price gap between virgin and recycled materials calls for making the integrated chain (sorting, selection, treatment, recycling) more cost-effective.

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

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)

a. Extended Producer Responsibility schemes (e.g. producers are held financially responsible for the entire lifecycle of their products, including their waste management)	○	x○	○	○	○	○	○

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

Other, please specify:

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While recognizing the importance of adopting a balanced mix of policies and tools, regulators wish to underline the role of economic rationality and incentive-based financing models. For instance, given the expectedly growing capital intensity of the waste management system due to the circular-driven technology needs, it is desirable to attract more and more private resources. This can be done through appropriate regulatory provisions: in a balanced system, capital cost recovery must be ensured, while providing for fair returns. Balancing interests to the benefits of all the actors is precisely one of the major tasks of independent regulation.

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

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Set up EU-wide public awareness campaigns	○	○	x○	○	○	○	○

b. Set up national or local public awareness campaigns	○	x○	○	○	○	○	○

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

Other, please specify:

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Standardisation is key to foster circular economy "via" market integration and the reduction of trade/use barriers. It is also important to understand and frame the fundamental role of governance: circular economy's success relies on convergence of behaviors, objectives and decisions of a significant range of different actors, operators and institutions. This means that we need neutral rules and/or institutions to balance different interests so to reach common objectives. Technical skilling and preparedness of local and national institutions is also a key success factor.

PART 3. WASTE ELECTRICAL AND ELECTRONIC EQUIPMENT (WEEE)

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

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Make producers legally responsible for meeting national WEEE collection targets	○	x○	○	○	○	○	○
b. Increase collection targets	○	○	x○	○	○	○	○

c. Impose financial penalties on producers that fail to meet WEEE collection targets	○	○	○	x○	○	○	○

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
d. Increase inspection to uncover illegal exports of WEEE from the EU	○	○	○	x○	○	○	○
e. Require all actors handling WEEE to register and report quantities through a unified national system	○	x○	○	○	○	○	○
f. Conduct recurring, product-specific awareness campaigns at national level	○	○	x○	○	○	○	○
g. Investigate consumer behaviour and barriers to WEEE return as a basis for targeted initiatives	○	○	x○	○	○	○	○

Other, please specify:

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

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Mandating online sellers to offer free WEEE take-back for delivered electronics	○	○	x○	○	○	○	○
b. Making door-to-door WEEE collection mandatory for municipalities above a certain population size	○	○	**X** ○	○	○	○	○
c. Making Commission Recommendation (EU) 2023/2585 that aims to increase the return of used and waste mobile phones, tablets and laptops mandatory	○	x○	○	○	○	○	○

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
d. Establishing deposit return systems for small appliances (or other products, please specify below)	○	○	○	x○	○	○	○
e. Requiring sellers of electrical and electronic equipment to accept WEEE, regardless of where the product was purchased	○	X ○	○	○	○	○	○
f. Developing incentives based on consumer preference (e.g. preferences for vouchers over deposit schemes)	x○	○	○	○	○	○	○

Other, please specify:
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Economic incentives generally prove to be more effective tools than mere obligations.

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

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. WEEE diverted to scrap metal yards or large shredders	○	○	x○	○	○	○	○
b. Lack of infrastructure (e.g. collection, sorting and recycling)	○	x○	○	○	○	○	○
c. Lack of scale / a fragmented market	○	X ○	○	○	○	○	○
d. Insufficient technology readiness	○	○	x○	○	○	○	○
e. The concentration of CRMs in electrical and electronic equipment components is too low to qualify for recycling	○	○	x○	○	○	○	○
f. Insufficient removal of electrical and electronic equipment components	○	○	x○	○	○	○	○
g. Low price of virgin primary CRMs	○	○	○	x○	○	○	○

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
h. Low price of imported secondary CRMs	○	○	○	x○	○	○	○
i. The quality of secondary CRMs is lower than primary ones	○	○	x○	○	○	○	○
j. Insufficient demand for secondary CRMs	○	○	x○	○	○	○	○
k. High energy costs of recycling	○	x○	○	○	○	○	○
l. Insufficient information on CRMs in WEEE available to recyclers	○	○	x○	○	○	○	○
m. Electrical and electronic equipment not designed for recycling	○	○	x○	○	○	○	○

Other, please specify:

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As the general considerations above put forward, it would be of great help to adopt regulations and incentive measures devoted to enhancing the cost-effectiveness of the chain, so to reduce the existing gap between recycled and virgin raw materials. This holds true also for waste from electric and electronic equipment. Correct, balanced and incentive-based rules for collecting, treating and recycling WEEE are as much, perhaps more, important than the establishing quantitative goals and legal obligations.

PART 5. DEMAND AND SUPPLY OF SECONDARY RAW MATERIALS

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

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Minimum recycled content targets	○	○	x○	○	○	○	○
b. Minimum EU-made recycled content targets	○	○	x○	○	○	○	○
c. Public procurement rules favouring products/companies using secondary raw materials	○	○	X ○	○	○	○	○
d. Public procurement rules favouring products/companies using EU-made secondary raw materials	○	○	○	X ○	○	○	○

e. EU-wide standards on the quality and traceability of secondary raw materials	○	x○	○	○	○	○	○

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
f. Measures to further reduce the landfilling of waste	○	X ○	○	○	○	○	○
g. Information on the quality and origin of secondary raw materials	x○	○	○	○	○	○	○
h. Price incentives for products or companies using EU-made secondary raw materials (e.g. value-added tax exemptions and tax credits)	○	○	○	x○	○	○	○
i. Price disincentives for products or companies using primary raw materials (e.g. taxes and carbon cost)	○	○	○	x○	○	○	○
j. Stronger support from extended producer responsibility schemes for the uptake of secondary raw materials (e.g. eco-modulation of Extended Producer Responsibility fees)	○	X ○	○	○	○	○	○
k. Stronger market surveillance	○	x○	○	○	○	○	○
l. Support to increase waste recycling activities in the EU (e.g. financial support for new capacities)	○	x○	○	○	○	○	○

Other, please specify:

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Market integration policies, reinforcing EPR schemes also through provisions intended to increase their economic and financial responsibility, spreading information to consumers and the industry on the quality/availability/prices of the secondary raw materials, adopting stable and transparent rules on standardization and end-of-waste criteria are all useful tools to support the circular economy by ensuring efficiency, transparency and choice for consumers. Regulators' view as a priority to increase the availability of SRM through better management of the waste chain, make the SRM more attractive and reasonably priced, as well as tradeable on transparent and integrated markets. This means also adopting tariff systems in the waste service industry aimed at increasing efficiency and reducing costs for citizens, It is worth noting that WFS already provides EPR to cover most costs related to waste collection in view of recycling and calls for fair assessment of these costs. It is then time to give Member States a stable legal framework to ensure that independent, neutral bodies carry out this fundamental assessment.

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

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Public procurement can be a significant driver of the circular economy	○	○	x○	○	○	○	○

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

Other, please specify:
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Question 18: In order to support the transition to circular economy in the EU, which goods or services should be prioritised for public procurement criteria?
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PART 6. IMPROVING WASTE MANAGEMENT AND CIRCULAR PROCESSES

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

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Strengthening the provisions on enforcement of EU legislation concerning landfilling and uncontrolled dumping of waste	○	x○	○	○	○	○	○
b. Introducing a general ban on landfilling of waste	○	○	○	x○	○	○	○
c. Introducing (additional) bans on landfilling for specific types of waste	○	○	x○	○	○	○	○
d. Tax policy aimed at taxation of landfilling waste in the EU	○	x○	○	○	○	○	○
e. Tax policy aimed at taxation of incinerating waste in the EU	○	○	x○	○	○	○	○

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
f. Introducing a market-based instrument (e.g. cap-and-trade systems) for landfilling waste in the EU	○	x○	○	○	○	○	○
g. Ensuring a level playing field for circular products by eliminating value added tax (VAT) embedded in the value of recycled goods used as input	○	x○	○	○	○	○	○

Other, please specify:

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Market-based instruments should be prioritized, as well as tariff policies and rules intended to incentivize recycling vs. landfilling. To this end, it is envisaged to provide tariffs and fees for treatment/disposal installation reflecting the environmental impact of different technologies. Cap-and-trade can be an interesting tool too, if it does not conflict with environmental criteria. EU-wide cap-and-trade may require a virtual trading mechanism, given the ban to cross-border shipment of waste due to be disposed.

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

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

Other, please specify:

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Spreading information, favoring contacts, making it possible for operators and stakeholders to cooperate on a transnational basis are key enablers to ensure cohesion and promote true EU-wide support to circular economy development. Digital platform matching supply and demand, as well as collecting and making available standardised information on prices, quantities and quality, can be seen as a first significant move towards an integrated market for SRM.

PART 7. OPEN COMMENT BOX + UPLOAD DOCUMENTS

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

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

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

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