

# MAPPING THE PRIORITIES OF THE EU CIRCULAR ECONOMY PACKAGE FOR SELECTED STAKEHOLDER GROUPS

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## Abstract

In July 2018 the EU Circular Economy Package (CEP) became law after its first publication in 2014 and the publication of a revised version of the CEP in December 2015. The CEP was the joint result of European institutions in dialogue with a broad range of stakeholders. To support stakeholder involvement in CEP implementation, the European Circular Economy Stakeholder Platform (ECESP) was founded by the European Commission and the European Economic and Social Committee. Given the vast and ambitious goals and set of measures in the context of circular economy, the question of priorities arises. A limited survey was carried out among the members of the ECESP Coordination Group to identify stakeholder priorities in the EU CEP, the EU Action Plan for the Circular Economy and the European Strategy for Plastics in a Circular Economy. The highest priorities for the four groups of multi-stakeholder networks examined, business and civil society, public authority networks and knowledge communities encompassed the design of a product to reuse, repair, remanufacture or recycle, improving the cooperation between stakeholders/member states, better implementation of EU waste legislation and, finally, the comprehensive elaboration of EPR schemes. From the perspective of cooperation and information, interest has been expressed for an exchange of best practices and knowledge in several fields, from waste collection systems and recycling to innovation or the reduction of plastic waste, reparability and the cooperation between surveillance bodies.

*Keywords: Circular economy, EU Circular Economy Package, action plan, stakeholder platform, prioritization*

## 1 Background

On 2 December 2015 the European Commission published a document entitled "*Closing the loop - An EU Action Plan for the Circular Economy*"<sup>1</sup>, frequently referred to as the "*EU Circular Economy Package (CEP)*". This represents the basis for the transition to a more circular economy,

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<sup>1</sup> *Closing the loop - An EU action plan for the Circular Economy*, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, COM(2015) 614 final.

maintaining the value of products, materials and resources for as long as possible, reducing waste, making economic, social and environmental gains as well as boosting EU competitiveness.

Following a first initiative from 2 July 2014, the new CEP was the joint result of the European Commission, the European Parliament, the European Economic and Social Committee, the Committee of the Regions as well as a broad range of stakeholders. More than 1,400 interested parties participated in the public consultation between June and August 2015.<sup>2</sup>

The participatory process that the CEP and the Action Plan resulted from in 2015 takes into account the fact that the transition to a circular economy constitutes a far-reaching transformation process and an interference in established patterns of production and consumerism.

Consequently, the European Commission also states that the transition towards a circular economy requires the commitment and involvement of public authorities, businesses and civil society. In the CEP the European Commission already identified at least two initiatives to facilitate stakeholder cooperation: (1) engagement of stakeholders in the implementation of the Circular Economy Action Plan (CEAP) through existing fora in key sectors and (2) offering support to a range of stakeholders through actions on public-private partnerships, cooperation platforms, support for voluntary business approaches, and exchanges of best practices.

## 2 Objectives of the survey

Generally speaking, the CEP comprises two parts: firstly, legislative proposals to revise six EU waste directives<sup>3</sup> which are complemented by, secondly, an Action Plan for the Circular Economy. Its 54 measures divided into seven chapters present the Commission's plans on the life-cycle phases of production, consumption and waste management, on specific projects for the market for secondary raw materials, five selected waste streams,<sup>4</sup> innovation and investment, and on monitoring progress towards a circular economy.

Given the comprehensive programme, the question of priorities arises as it is hardly possible to tackle all activities simultaneously or consecutively. The European Commission has set a timetable for elaborating on the respective measures, and it reported in March 2018 that they have delivered more than 80 % of the actions already. The public consultation in the summer of 2015 offered a basis to assess the perspective of stakeholders as to which issues are of greatest importance and should thus be given preference in terms of developing a knowledge basis, goals, programmes, instruments and, ultimately, in terms of implementation. The Commission itself didn't

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<sup>2</sup> [http://ec.europa.eu/environment/consultations/closing\\_the\\_loop\\_en.htm](http://ec.europa.eu/environment/consultations/closing_the_loop_en.htm).

<sup>3</sup> The first legislative acts of the CEP were published on 14 June 2018 after the decision of the European Parliament and Council of 30 May 2018: Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste; Directive (EU) 2018/850 of the European Parliament and of the Council of 30 May 2018 amending Directive 1999/31/EC on the landfill of waste; Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018 amending Directive 94/62/EC on packaging and packaging waste; Directive (EU) 2018/849 of the European Parliament and of the Council of 30 May 2018 amending Directives 2000/53/EC on end-of-life vehicles, 2006/66/EC on batteries and accumulators and waste batteries and accumulators, and 2012/19/EU on electrical waste and electronic equipment.

<sup>4</sup> Plastics, food waste, critical raw materials, construction and demolition waste, and biomass.

make any ranking. It can, however, be assumed that the priorities differ not only among the member states, depending on their respective economic and environmental situation, but also among interest groups.

The present survey therefore aims at identifying the most important aspects of the Circular Economy Action Plan from the point view of different economic operators and stakeholders.

### 3 Research design

The study is based on the results of a web-based survey, conducted with the IT tool Survey Monkey. The target group of the survey was defined as experts in the field of Circular Economy who represent different branches of stakeholders. The participants received a link giving them access to the questionnaire.

The survey itself addressed specific technical aspects of the Circular Economy Package. This is why it was decided to invite experts in the field of Circular Economy, who also have an overview of the status of the legislative projects at the European level. Bearing in mind the complexity and extent of the different aspects of the CE Package, a substantial knowledge of the Circular Economy on the part of participants seemed essential to receive conclusive results. This is why it was decided to invite the stakeholders of the European Circular Stakeholder Platform, who represent different types of stakeholders and are all experts in the field of the Circular Economy.

To determine the priorities of each stakeholder group, each question of the survey addressed a certain aspect of the Circular Economy Package. Hence, all 54 measures of the Circular Economy Action Plan were covered by the survey. Further questions focused on European strategies and legislative proposals that are based on the CE Action Plan.

As the revision of the waste directives was currently being published in the official European journal, whereas other measures of the CE action plan are still being discussed at EU level, it seemed prudent to divide the questionnaire into the following three different groups with the aim of providing better orientation for the participants when answering the questionnaire:

- The revision of the waste directives, primarily the Waste Framework Directive<sup>5</sup> and the Directive on Packaging and Packaging Waste<sup>6</sup>
- EU Action Plan for the Circular Economy<sup>7</sup>
- Circular Design and Strategy for Plastics<sup>8</sup>.

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<sup>5</sup> Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste

<sup>6</sup> Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018 amending Directive 94/62/EC on packaging and packaging waste

<sup>7</sup> Annex to the communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Closing the loop - An EU action plan for the Circular Economy, COM(2015) 614

<sup>8</sup> A European Strategy for Plastics in a Circular Economy, COM(2018) 28

### 3.1 The EU Circular Economy Stakeholder Platform

The European Circular Economy Stakeholder Platform (ECESP) was launched jointly in March 2017 by the European Commission and the European Economic and Social Committee (EESC), at equal level. ECESP is designed as a "network of networks" going beyond sectorial activities and highlighting cross-sector opportunities and challenges. The platform as well as the respective website <https://circulareconomy.europa.eu/platform> function as a hub for collecting growing sources of knowledge on circular economy and for offering a place for stakeholders to interact. Its activities will be reported in the annual report on the implementation of the Circular Economy Action Plan as well as in the report five years subsequent to adoption of the CEAP.<sup>9</sup>

ECESP's activities are coordinated by a coordination group (CG), established in November 2015. The coordination group consists of 24 representatives of circular economy-related entities, with up to six each from the following sectors:

1. Multi-stakeholders networks/platforms: existing national, regional and local multi-stakeholder networks specialized in the field of the circular economy
2. Circular economy-relevant groupings/organisations of businesses, of trade union groupings, and actors from civil society
3. Networks of public authorities at national, regional or local level that are circular economy-relevant
4. Circular economy-relevant organizations from the knowledge community, including universities, research organizations and think tanks specialized in the circular economy

### 3.2 The ECESP Coordination Group

The members of the coordination group were selected according to the following criteria:

1. Individual criteria constituting a requirement for the organisation/network (the member):
  - The member should have cross-sectorial expertise and a proven track record allowing them a broad vision of the circular economy
  - The member should have documented experience in identifying and exchanging good practices and be willing to share case studies and good practices which will be made publicly available free-of-charge through the Platform
  - The member should be willing and committed to participating proactively in the CG's activities and have sufficient time and resources to dedicate to the activities of the CG.
2. Individual criteria constituting an asset for the representative:
  - The member should have documented experience in representing their organisation or their sector in other relevant bodies/initiatives at EU level or at national level.
3. Global criteria for the CG:
  - The CG should preferably be geographically and gender balanced

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<sup>9</sup> European Commission, DG ENV, Directorate B – Circular Economy and Green Growth: Terms of reference for the Coordination Group, European Circular Economy Stakeholder Platform

- The CG should ensure adequate representation of the main circular economy sectors and value chains (e.g. production, consumption, waste management, secondary raw materials, environment, economy, research and innovation).

Representing a diverse scope of backgrounds and interests, the members of the ECESP Coordination Group were considered a suitable sample of stakeholders for the purpose of the study and were invited to participate in the survey.<sup>10</sup>

13 participants took part in the survey. According to the ECESP CG selection criteria, they were divided into the following four groups:

1. Multi-stakeholder networks (4)
1. Business and civil society (5)
2. Public authority networks (2)
3. Knowledge community (2)

One participant from category 4 filled out the questionnaire twice. As only one of the questionnaires was filled out completely (the second one was only answered up to question No 11 out of 76), this study only considers the results of the completed questionnaire.

### 3.3 Questionnaire

The questionnaire consisted of 76 questions divided into three sections. As the European Commission already took action on some of the measures foreseen in the action plan, part of the questionnaire also focuses on these initiatives of the Commission.

- The first part of the questionnaire addressed the (then planned) revisions of the waste directives.
- The second part focused on the EU Action Plan itself. For a better overview, the questions were further divided into the 7 fields of production, consumption, waste management, markets for secondary raw materials, sectorial action, innovation, and investment.
- The third part contained questions about the EU Strategy on plastics of January 2018 and related subjects such as circular design.

The questions aimed at determining the relevance of each foreseen measure for the respective organization on a rating scale from 1 – 6, with 1 as "least important" and 6 as "most important". There was also the opportunity to answer with n/a and to add comments in open questions.

For each question an average score per stakeholder group was determined by calculating the arithmetic average based on the number of participants within the stakeholder group that answered the respective question. Hence, it was possible to determine comparable results for each group showing the generalised opinion of the group about the questions asked. To gain a total average for each question it was assumed that all stakeholder groups were

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<sup>10</sup> The members of the ECESP Coordination Group are listed under <https://circulareconomy.europa.eu/platform/en/dialogue/cg-names-contacts>

equivalent - not taking into account the respective numbers of participants. Thus the total average for each question was determined by calculating the arithmetic average based on the results for each stakeholder group.

#### 4 Main results

Taking all respondent categories into consideration, the following three aspects were considered most relevant:

- The design of a product for the purpose of reuse, repair, remanufacturing or recycling;
- Improving the cooperation between stakeholders/member states as well as better implementation of EU waste legislation;
- The comprehensive elaboration of extended producer responsibility (EPR) schemes.

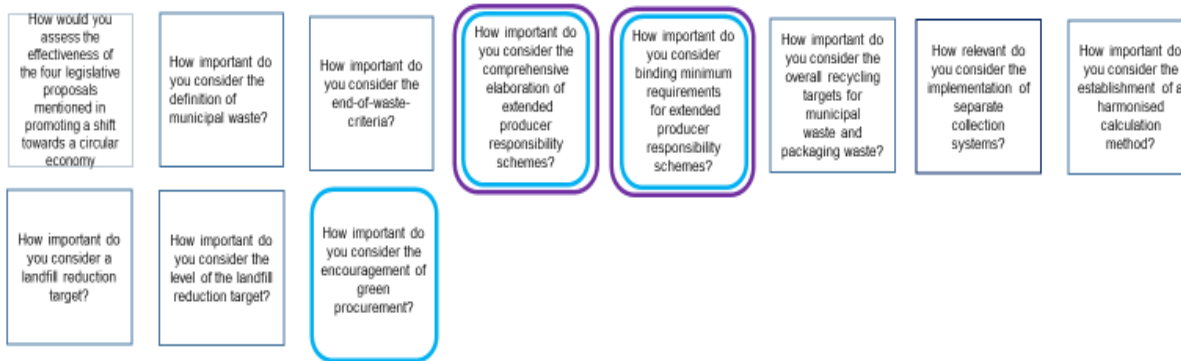
The aspects considered of least relevance were the following:

- The impact that eco-design labels have on the behaviour of consumers
- The Eco-Management and Audit Scheme (EMAS) as well as the program on environmental technology verification
- The inclusion of best practices in relevant best available technique reference documents (BREFs)

The following topics were considered high priorities among all participating entities:

	Multi-stakeholder networks	Business and civil society	Public authority networks	Knowledge community
The design of a product to reuse, repair, remanufacture or recycle it	x	x	x	x
Improved cooperation between stakeholders / member states as well as better implementation of EU waste legislation	x	x	x	x
Comprehensive elaboration of extended producer responsibility schemes	x			x
Support of the industry and the circular economy by means of Horizon 2020			x	x
Binding minimum requirements for extended producer responsibility schemes	x			x
The interface between chemicals, products and waste legislation		x	x	x
The establishment of minimum requirements for the reuse of water			x	
The support of innovation (e.g. through EIP and Horizon 2020) and of investments	x		x	
The environmental performance of buildings		x	x	

Table 1: Topics with highest priorities by respondent category



■ Multistakeholder networks 
 ■ Business and civil society 
 ■ Public authority networks 
 ■ Knowledge community

Fig. 1: Part 1 – Amendments to waste directives: Topics with highest priorities

Production	Consumption	Waste Management	Markets for secondary raw materials	Sectorial action	Innovation and Investments
The efficiency of currently used materials	The enforcement of product guarantees	The improved cooperation between stakeholders/IAS and a better implementation of EU waste legislation	The elaboration of quality standards for secondary raw materials	The establishment of a common methodology and indicators to measure and define food waste	The support of the industry and the CE by means of Horizon 2020
The regulation on TVs & displays to promote their reparability, upgradability, durability and recyclability	The fitness check of legislation in the context of the CE-package	Combat against illicit shipments of end-of-life vehicles	The regulation on revised fertilisers	Disseminating good practices in food waste prevention	The projects addressing possible regulatory obstacles for innovators
The implementation of BREF - documents	Increase the effectiveness and contribution of the Ecolabel to the CE	The enforcement of the revised waste shipment regulation	The establishment of minimum requirements for the reuse of water	Rules concerning food donations and food utilisation	The encouragement of applications for funding under the EFSI
Best practices for mining waste (waste from extractive operations)?	The elaboration of an independent testing programme on planned obsolescence	The initiative "waste to energy" to create synergies with the EU energy and climate policy	The safe and cost-effective reuse of water	Date marking for the tolerable use of food	The cohesion policy funds for the CE
Advanced manufacturing technologies for SMEs	The evaluation of the Product Environmental Footprint (PEF)	The dissemination of good practices in waste collection systems	The inclusion of best practices in relevant BREF documents	The exchange of information between manufacturers and recyclers on electronic products	Strengthening innovation by smart specialization
The knowledge base for the substitution of hazardous substances			The support of innovation (e.g. EIP and Horizon 2020) and investments	The development of European standards for material-efficient recycling methods	The development of a platform together with the European Investment Bank (EIB) and national banks to boost innovation
Eco-Management, Audit Scheme (EMAS) and the programme on environmental technology verification schemes			The interface between chemicals, products and waste legislation	To recover materials from mining waste and landfills	The involvement of stakeholders through the existing fora in key sectors
			The facilitation of waste shipments across the EU, including the exchange of electronic data	The development of assessment guidelines on pre-demolition	The support for public private partnerships
			The development of a European information system on raw materials	The establishment of a voluntary recycling protocol	The support for cooperation platforms
				The environmental performance of buildings	The support for voluntary business approaches
				Disseminating best practices on the cascading use of biomass	Encouraging the exchange of best practices
				The sustainability of bioenergy under the Energy Union	
				The contribution of the 2012 Bioeconomy Strategy to the CE-package	

■ Multistakeholder networks 
 ■ Business and civil society 
 ■ Public authority networks 
 ■ Knowledge community

Fig. 2: Part 2 – Circular Economy Action Plan: Topics with highest priorities

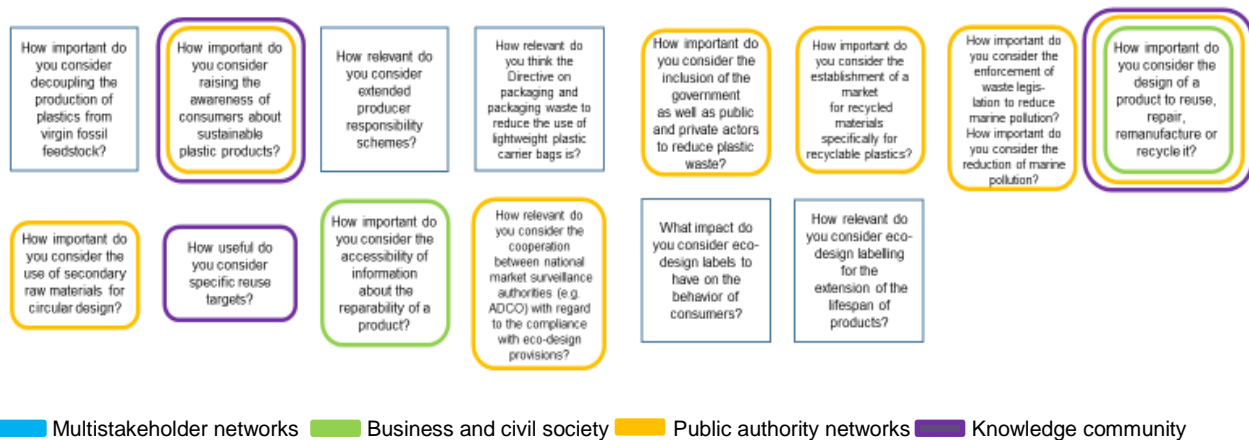


Fig. 3: Part 3 – EU Plastics Strategy: Topics with highest priorities

With regard to the EU waste directives that have already been amended, extended producer responsibility and the qualified implementation of EPR through binding minimum requirements are of primary importance. Interestingly, the new recycling targets for municipal and packaging waste are also understood within the context of a new harmonized calculation method, probably to allow better comparisons in the future.

Surprisingly, the answers to the 54 chapters of the EU CE Action Plan give relatively little priority to the sections production and consumption in general. However, with respect to the EU Plastics Strategy and the related chapters of the Action Plan, eco-design is regarded as the key priority.

Technical standards and certifications such as BREF, PEF, EMAS or Ecolabel received little attention. On the other hand, legal clarification and harmonization such as the implementation of current EU legislation and the interface between chemicals, products and waste legislation are regarded as issues that are worth being addressed.

From the perspective of cooperation and information, interest has been expressed for an exchange of best practices and knowledge in several fields, from waste collection systems and recycling to innovation or the reduction of plastic waste, reparability and cooperation between surveillance bodies.

## 5 Conclusions

The survey among members of the ECESP Coordination Group addressing the CEP showed different interests among the four groups of multi-stakeholder networks examined, business and civil society, public authority networks and knowledge communities although there were common priorities evident along the value chain from production and use of products, waste management to the generation of secondary raw materials.

In the field of production, the design of plastic products for reuse, repairing, remanufacturing or recycling has turned out to be a major priority. These areas have already been granted priority status in the EU Strategy on plastics, which covers new eco-design measures to support the



recyclability of plastics. Moreover, the amendment of the EU Directive on packaging and packaging waste stipulates that such measures be taken by EPR systems.

The resulting importance of communication and interaction between stakeholders along the value chain was also confirmed by means of the questionnaires.

A key topic in the waste management sector is the improved implementation of EU waste legislation, which addresses large performance differences among EU member states. The new legislative proposals take these obstacles into account by combining long-term and interim targets, by requiring implementation strategies and by providing technical assistance to member states. Moreover, the exchange of best practices between countries and regions is facilitated.

Extended producer responsibility schemes have been identified to be an essential factor on the way towards a circular economy. Nevertheless, there have been huge differences in performance and elaboration observed in the different member states. To achieve efficient circulation of relevant products, from responsible producers to recyclers producing secondary raw materials, it is crucial to impose general requirements as minimum responsibilities and operating conditions for extended producer responsibility schemes. Concrete specifications have already been included in the EU Directive on Packaging and Packaging Waste.

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