

PUBLIC CONSULTATION QUESTIONNAIRE

Circular Economy Act

Fields marked with * are mandatory.

Introduction

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

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

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

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

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

PART 1. ABOUT YOU

About you

* Language of my contribution

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

* I am giving my contribution as

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

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

*** First name**

Marie-Jeanne

*** Surname**

Gaertner

*** Email (this won't be published)**

marie-jeanne.gaertner@reuse.org

*** Organisation name**

255 character(s) maximum

RREUSE

*** Organisation size**

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

Transparency register number

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

05052317999-60

*** Country of origin**

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

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

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

- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine

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

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

* Contribution publication privacy settings

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

Anonymous

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

Public

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

I agree with the [personal data protection provisions](#)

PART 2. GENERAL QUESTIONS ON THE CIRCULAR ECONOMY

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

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

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

Other, please specify:

500 character(s) maximum

Focusing solely on secondary raw materials (SRM) constitutes a narrow vision of the circular economy, which should focus on implementing the waste hierarchy, starting with waste prevention. The current unsustainable and linear production model constitutes a major barrier to the single market for SRM by making it difficult for them to compete with primary materials. The EU should regulate overproduction practices e.g., by setting rationing quotas for certain primary raw materials.

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)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Deposit refund schemes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Public procurement criteria supporting the circular economy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Taxes or fees on incinerating and/or landfilling of waste	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Taxes on exports of waste	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Tax breaks and other fiscal incentives supporting circular economy practices	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. EU funding for circular economy practices	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. National funding for circular economy practices	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Reduction of subsidies which prevent circularity (e.g. subsidies for landfills and incineration)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Pay-as-you-throw schemes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Product-as-a-service models	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

EPR fees: cover reuse costs, repair bonus, earmarked for social circular enterprises (SCE). DRS: for WEEE. Taxes/fees on incinerating/landfilling of waste: need dedicated support for reuse. Export should be tax-free for reuse and forbidden for waste outside the EU. Funding/tax break: for reuse, especially SCE. PAYT schemes: fees need to be adjusted to the waste hierarchy. PAAS models: focus on product categories with the most environmental impacts. Zero VAT scheme for repair/reuse by SCE

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	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Set up national or local public awareness campaigns	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Systematically introduce the circular economy into educational curricula	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Introduce standardised product labelling, product information, including toxic substances, and other consumer transparency measures and tools focusing on circularity	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Support Member States authorities' capacity building for the circular economy through training, exchanges on best practices and advisory services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Support Member States authorities in developing a diverse trainings programme and skill set to meet emerging challenges of circularity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Work on prevention (e.g. reducing resource use, waste generation, foster re-use)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Other measures: Set reuse targets to foster collaboration/investment; Introduce visible EPR fees; EPR to fund campaigns explaining to citizens how to donate used goods to social enterprises; Set restrictions and fines on ultra-fast fashion, as well as bans on advertising practices that encourage wasteful consumption; Develop certified circular training schemes to support economic operators' circular transition and the inclusion of skills related to waste prevention/management in VET curricula.

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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Increase collection targets	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Impose financial penalties on producers that fail to meet WEEE collection targets	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Increase inspection to uncover illegal exports of WEEE from the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Require all actors handling WEEE to register and report quantities through a unified national system	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Conduct recurring, product-specific awareness campaigns at national level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Investigate consumer behaviour and barriers to WEEE return as a basis for targeted initiatives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

c. The financial penalties should be paid by producers only. It is key to increase reuse rates by: Covering reuse costs; Setting separate reuse targets; Mandating channeling of collected WEEE to reuse operators; Granting social enterprises priority access to WEEE; Carrying out careful collection to preserve materials; Guaranteeing dismantlable/reparable appliances, access to spare parts for a period longer than the standard lifespan, and repair/reuse operators' access to DPP information.

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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Making door-to-door WEEE collection mandatory for municipalities above a certain population size	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Making Commission Recommendation (EU) 2023/2585 that aims to increase the return of used and waste mobile phones, tablets and laptops mandatory	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Establishing deposit return systems for small appliances (or other products, please specify below)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Requiring sellers of electrical and electronic equipment to accept WEEE, regardless of where the product was purchased	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Developing incentives based on consumer preference (e.g. preferences for vouchers over deposit schemes)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Prioritise reuse: Organise take-back via reuse networks; Grant priority access to social enterprises; Set a minimum percentage of appliances intended for reuse in operators' obligations. Improve collection systems: Increase municipalities' EPR funds' share; Producers to cover door-to-door collection costs; Set widespread WEEE collection systems. Deposit should be: Set at a level that does not influence the purchasing decision; Linked to repair schemes (bonus, extended warranties).

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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Lack of infrastructure (e.g. collection, sorting and recycling)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Lack of scale / a fragmented market	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Insufficient technology readiness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. The concentration of CRMs in electrical and electronic equipment components is too low to qualify for recycling	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Insufficient removal of electrical and electronic equipment components	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Low price of virgin primary CRMs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Low price of imported secondary CRMs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. The quality of secondary CRMs is lower than primary ones	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Insufficient demand for secondary CRMs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. High energy costs of recycling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
l. Insufficient information on CRMs in WEEE available to recyclers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m. Electrical and electronic equipment not designed for recycling	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Barriers to CRM recycling: High WEEE treatment costs; Weak collection rates; Infrastructure is not geared towards CRM recovery; Recovery technologies' Technology Readiness Level varies across different CRMs; Low CRM concentration in consumer products. Insufficient demand for secondary CRM; Lack of reliable data on WEEE flows and component composition; Lack of design for recycling; Since CRM recycling rates remain low, it is key to mitigate demand by prolonging EEE lifespan through reuse/repair.

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

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

Other, please specify:

500 character(s) maximum

Solar panels are classified in category 4 "large equipment". This classification is problematic because: - Solar panels have a long life cycle (20-30 years), meaning that do not yet constitute waste in large quantities; - Current collection targets are based on the volume of products placed on the market, which is not suitable for solar panels; - This distorts producer responsibility, as producers have to compensate for the low return of solar panels by collecting more other waste.

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

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

Other, please specify:

500 character(s) maximum

EPR to prioritise reuse: Binding, separate reuse targets; Mandate all WEEE streams to undergo sorting that prioritises reuse before any other form of treatment; Earmark EPR funding to social enterprises' reuse activities; Inclusive PRO governance. Harmonise EPR fee calculation: EPR to finance reuse; Cost-covering EPR fee calculated by PROs, combined with a modulated fee managed by national clearing bodies based on sustainability criteria; Mandate disclosure of EPR fees allocation structure.

PART 4. SINGLE MARKET BARRIERS FOR CIRCULARITY

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

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

Other, please specify:

500 character(s) maximum

Harmonisation should enforce the waste hierarchy. Harmonise EPR fee calculation: Mandatory cost coverage of reuse; Reflect operational realities of reuse/recycling; EPR fee calculated by PROs, combined with a modulated fee managed by national clearing bodies, based on EU-wide sustainability criteria. Harmonise reporting responsibilities: Define who must track reusable items, and how; Connect producer registries, Include indicators (units refurbished, sold, donated).

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

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

Other, please specify:

500 character(s) maximum

In some Member States, waste legislation prevents products from being reused once they become waste, since only products that have undergone a recycling process can reach end-of-waste status. This means that waste items prepared for reuse cannot be sold on the second-hand market, despite the fact that preparing for reuse occupies a higher position than recycling in the waste hierarchy and has greater job creation potential.

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

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

Other, please specify:

500 character(s) maximum

Approved reuse centres should determine the EoW status of waste items after preparing them for reuse. This involves sorting and examining waste, and if required, testing, repairing and cleaning it. Reuse operators then ascertain that the item can be reused safely. Art. 6 of the WFD should emphasise preparing for reuse more. Social enterprises active in this area should be consulted due to their experience in developing detailed reuse /repair protocols (e.g. as for the Austrian EoW criteria).

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

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

j. Ensuring high recycling rates is a key objective of Extended Producer Responsibility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Ensuring minimal landfilling of waste is a key objective of Extended Producer Responsibility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Ensuring minimal incineration of waste is a key objective of Extended Producer Responsibility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

EPR schemes should: Fully cover waste prevention/management costs; Earmark funding for social enterprises' (SE) reuse activities; Align funding with the waste hierarchy; Set binding quantitative reuse targets separate from recycling targets; Grant SE equal/preferential treatment in the collection points' location for all relevant waste streams; Maintain SE's ownership of collected goods; Grant SE decision-making power; Set cost-covering fees separated from ecomodulated fees.

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

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Agricultural plastics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
b. Tyres	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
c. Mattresses	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Furniture	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Construction products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Harmonised EPR schemes should drive waste prevention, including through binding reuse targets and mandatory reuse channeling. Furniture has a high reuse potential and ecomodulation scope. Mattresses are a challenging waste stream due to their size/complex material composition, but with an immense untapped potential. 30M are discarded annually in the EU, mostly landfilled/incinerated, despite 85% being recyclable and the existence of mattresses' lifecycle extension examples.

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

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

Other, please specify:

500 character(s) maximum

Revising EPR rules should aim to ensure the implementation of the waste hierarchy. Digitalisation measures are welcome only if they support local reuse by connecting producer registries and harmonising reporting requirements across Member States. Any additional costs arising from digitalisation must be covered by EPR fees, particularly for social enterprises (SE). Any digital systems should be made accessible and manageable for SE, for example, through training programs and dedicated funding.

PART 5. DEMAND AND SUPPLY OF SECONDARY RAW MATERIALS

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

- Yes
 - No
 - Do not know
-

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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Minimum EU-made recycled content targets	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Public procurement rules favouring products/companies using secondary raw materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Public procurement rules favouring products/companies using EU-made secondary raw materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. EU-wide standards on the quality and traceability of secondary raw materials	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Measures to further reduce the landfilling of waste	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Information on the quality and origin of secondary raw materials	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Price incentives for products or companies using EU-made secondary raw materials (e.g. value-added tax exemptions and tax credits)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Price disincentives for products or companies using primary raw materials (e.g. taxes and carbon cost)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Stronger support from extended producer responsibility schemes for the uptake of secondary raw materials (e.g. eco-modulation of Extended Producer Responsibility fees)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

k. Stronger market surveillance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Support to increase waste recycling activities in the EU (e.g. financial support for new capacities)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

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

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

Other, please specify:

500 character(s) maximum

Prioritise reuse in PP: Criteria: reparability, reusability, spare parts availability; Reuse indicators in tender requirements; Minimum reuse thresholds in construction materials PP. Involve social enterprises (SE): Reserved tenders for waste collection/treatment to SE; Best Price-Quality Ratio criteria as default option for bids evaluation; Targets for social and circular objectives; Large contracts divided into smaller lots; SE involved during the tendering process' pre-procurement phase.

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

500 character(s) maximum

Firstly, it should be noted that no material should be excluded from green public procurement processes. With this in mind, circular public procurement criteria should first be applied to high-impact sectors that combine a large environmental footprint with strong potential for reuse, repair, recyclability, and recycled content. Examples of such sectors include construction, mobility, electrical and electronic equipment (EEE), textiles (official clothing and uniforms), and furniture.

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

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Additional scrap classifications for recycled steel	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
b. More granularity in trade codes for recycled steel	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
c. Additional scrap classifications for recycled aluminium	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
d. More granularity in trade codes for secondary aluminium	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Other materials: please specify

500 character(s) maximum

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

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

Other, please specify:

500 character(s) maximum

PART 6. IMPROVING WASTE MANAGEMENT AND CIRCULAR PROCESSES

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

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

Other, please specify:

500 character(s) maximum

a. Abolish these derogations. b. The methodology should be partly funded by the EPR. Prioritise waste prevention: - Cover reuse costs; - Set collection models to maximise reuse (separate collection happens at the earliest stage to prevent damage); - Set binding quantitative reuse targets; - Priority access and ownership of waste to social enterprises; - Inform citizens on product disposal/donation; - Safeguard reuse potential with careful collection and handling.

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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Introducing a general ban on landfilling of waste	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Introducing (additional) bans on landfilling for specific types of waste	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Tax policy aimed at taxation of landfilling waste in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Tax policy aimed at taxation of incinerating waste in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Introducing a market-based instrument (e.g. cap-and-trade systems) for landfilling waste in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

To ensure an even level playing field, zero VAT should only be considered for social enterprises, which are prohibited from distributing profits. Research into waste treatment for recycling is lacking (for example, for textiles). The root of the problem lies in the design of products and the materials used. If non-biodegradable/non-recyclable materials are used, it will be difficult to find any use for them other than landfill or incineration.

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

500 character(s) maximum

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

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

Other, please specify:

500 character(s) maximum

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

- Yes
- No
- Do not know

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

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

Other, please specify:

500 character(s) maximum

Such hubs should be established only for specific flows where it has been established that no more local solutions can be found. They may be useful for steel beams, for example, where transport represents a negligible part of the LCA. For other flows, it would be nonsensical. Ideally, they should be regional or located within a maximum of 150 km from the place where the waste is generated. It is important that waste can be managed within a reasonable distance, following the proximity principle.

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

- Yes
- No
- Do not know

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

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

Other, please specify:

500 character(s) maximum

PART 7. OPEN COMMENT BOX + UPLOAD DOCUMENTS

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

500 character(s) maximum

Measures supporting EU circularity have the potential to: - increase trade inside the EU and decrease trade outside of the EU; - improve the fairness of trade conditions; - reduce EU's dependency, in providing strategically critical materials (including raw materials) and products.

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

1000 character(s) maximum

It is highly concerning that the Commission plans to rely solely on Article 114 TFEU as the legal basis for the CEA. Since it primarily addresses waste, an environmental legal basis should be included to ensure a higher level of environmental protection and to prevent potential infringement procedures arising from an inappropriate legal foundation. The consultation's focus on creating a single market for waste and boosting recycling contradicts the EU waste hierarchy, which prioritises prevention and reuse over recycling. If this direction continues, the CEA risks missing a key opportunity to enable a genuine circular economy. The CEA must emphasise waste prevention and local reuse, which deliver the greatest environmental and social benefits (a single social enterprise creates up to 70 jobs per 1,000 tonnes of reused waste). Extending product lifetimes through repair and (preparing for) reuse also reduces the extraction of CRM, reinforcing the EU competitiveness and strategic autonomy.

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

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