



Call for Evidence for the upcoming Circular Economy Act

The Swedish Society for Nature Conservation (SSNC) welcomes the opportunity to provide feedback on the Call for evidence for the upcoming Circular Economy Act. SSNC is a non-profit environmental organisation, working with more than 40 organisations around the world, with almost a quarter of a million members and more than 270 local associations.

Background to the announced Circular Economy Act and the proposed priorities is EU's commitment to accelerate the transition towards circularity, and the Circular Economy Act (CEA) will be adopted by the end of 2026. With this initiative, the Commission aims to reinforce the single market for waste and secondary raw materials, increasing the supply and demand of quality secondary raw materials at competitive prices, and 'getting the economics right' for these markets. The EU is dependent on the import of many raw materials, including critical ones, its resource efficiency is insufficient, and ***environmental externalities from the linear economy are not internalized***. The main problem that the CEA seeks to address is the slow transition to circularity in the EU. This problem is driven by several regulatory and market failures. The baseline scenario (status quo) already includes legislation advancing circularity (e.g. Waste Framework Directive, Ecodesign for Sustainable Products Regulation) Packaging and Packaging Waste Regulation). However, these initiatives cannot unfold their potential unless the barriers to circularity in the single market are removed and there is sufficient and cost-effective supply of high-quality, verifiable secondary raw materials. Fragmentation of the single market, making it costly for businesses to convert waste into valuable secondary raw materials and preventing economies of scale. ***Secondly, higher prices of secondary raw materials do not reflect their lower environmental impacts***. The act will facilitate the free movement of 'circular' products, secondary raw materials and waste. It will also increase the supply of high-quality recycled materials and stimulate demand for these materials within the EU. The Act aims to strengthen both the supply and demand for secondary raw materials, including critical raw materials, and to establish a well-functioning single market for waste and secondary raw materials. As a first step, specific measures will be undertaken to address the challenges related to electronic waste. Subsequently, a coherent set of policy interventions may be developed to further facilitate the circulation of waste and secondary raw materials within the Union and to promote their integration into products placed on the internal market.



Specific comments

SSNC believes that circular economy has the potential to drive the transition towards a more sustainable, climate-resilient, and resource-efficient society and economy. A circular economy offers the opportunity for an economy within planetary boundaries. That opportunity is central. Today, the EU's material footprint per inhabitant is very high, and the extraction of materials and the life cycle of products places great strain on our common environment.

In this submission, SSNC presents key recommendations to strengthen the act and the key opportunity for sustainable resource use.

Set science-based targets on resource use

The Commission's 2020 Circular Economy Action Plan committed to "initiating discussions on an international agreement on the management of natural resources". In June 2024, all Member States took this ambition further by calling the Commission to assess "the setting of ambitious and economically feasible science-based targets to keep material and consumption footprints within the planetary boundaries". These targets should be science-based, economy-wide, and accompanied by a robust progress monitoring framework. This will create alignment and confidence in the public and private investments needed to reconcile our economy with planetary boundaries. (EEB et al. Open letter, august 2025)

The right order (recycling should be last in the waste hierarchy)

By placing excessive emphasis on recycling, which represents the final stage of the waste hierarchy, the substantial environmental benefits of the circular economy risk not being achieved. The full potential lies in keeping products and components in use for as long as possible, rather than focusing solely on material recovery. The Act should therefore prioritise reuse, repair, refurbishment, and remanufacturing over recycling. This objective can be achieved by introducing specific targets for waste prevention, reuse and preparation-for-reuse within the relevant legislative framework. (EEB et al. Open letter, august 2025).

Accelerate safe material circulation by integrating chemical and circular economy legislation

To ensure a safe circulation of products and materials, the principles of the Chemicals Strategy for Sustainability should be integrated within all relevant product and waste legislations.



This includes enhancing access to information on substances of concern and ensuring full traceability of chemicals embedded in products. To rapidly increase European material stocks suitable for reuse and recycling, the most harmful chemicals should be swiftly removed from consumer products. At the same time, robust control systems must be established for imported recyclates to avoid health and environmental risks (EEB et al. Open letter, august 2025).

Don't erode the ambition in the legislative package for environmentally sustainable products

For the circular economy to effectively contribute to resource-efficient product use, the ambition of the Green Deal for environmentally sustainable products must be fully embedded. This entails that criteria established in the Ecodesign Directive should set requirements for the design and the proportion of recycled materials in products. Extended Producer Responsibility (EPR) schemes should serve as strong policy instruments steering the market towards products that are easier to recycle using eco-modulated fees that reward products with the desired characteristics, namely, products that are durable, used for a long time and easy to recycle. While the Commission highlights this as a baseline in the background section, there is considerable pressure for simplifications that risk undermining the full potential of the circular economy.

Wood, textiles and plastic

The Act will first address e-waste. By creating competitive recycling of critical raw materials, the Union's dependency on imports of critical metals and minerals will decrease. Other material streams, such as wood, plastic and textiles are likewise being used in ways that result in the loss of valuable resources. It is therefore of great importance that these material streams are managed in a responsible way and that their secondary use attributes appropriate value.

" Get the economics right"

The Commission pinpoints the problem with external environmental costs not being internalized in the price of primary raw materials noting that "environmental externalities from the linear economy are not internalized". Conversely, it also observes that, "higher prices of secondary raw materials do not reflect their lower environmental impacts". These so-called market failures constitute significant barriers to the circular economy. Appropriate economic instruments should therefore be considered, whether in the form of taxes, subsidies, or a green tax exchange.



Procurement as a tool

Public procurement can play a key role in advancing the circular economy by promoting resource efficiency, sustainable product life cycles and waste reduction. The EU Circular Economy Action Plan (CEAP) 2020 highlights the role of public procurement in fostering and promoting sustainable production and consumption, emphasizing the need for mandatory circularity criteria in procurement processes. Furthermore, setting clear requirements for reused, remanufactured, or recycled materials in procurement can accelerate circular business models.

This response has been developed by the Department of Sustainable Consumption at SSNC, mainly by Karin Kruse (Policy advisor), with the aid of Lanja Rashid (Head of Unit) and Sofie E Munteanu (Director of Department).

For Swedish Society of Nature Conservation

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