

REPLY TO THE PUBLIC CONSULTATION TO THE CIRCULAR ECONOMY ACTION PLAN

ACE supports an ambitious new Circular Economy Action Plan. This is a unique opportunity to scale up the contributions of a circular economy to climate neutrality by incentivising use of low carbon and circular products. The use of materials with the lowest carbon impact, such as sustainably-sourced renewables that reduce the need for fossil-based resources, are key to reach climate neutrality. The future Sustainable Product policy should, therefore, encourage the use of products made from renewable materials with low environmental impacts, including on climate and biodiversity. New rules to ensure sustainable sourcing of all raw materials should also be part of the future EU product policy. We recommend using internationally recognised standards and certification mechanisms, such as FSC for forest-based products, to demonstrate compliance with requirements on sustainable sourcing.

Increased recycling is key to keep valuable resources in the economy. We support an ambitious implementation of waste legislation, with particular regard to separate collection. Separate collection is essential to achieve a circular economy, as it increases the volume and the quality of materials available for recycling. To ensure compliance with the legal obligation on separate collection, we support EU-wide mandatory collection targets for packaging formats such as beverage cartons. By ensuring the legal certainty that beverage cartons are collected, mandatory targets provide a strong incentive for further investment and innovation in the recycling infrastructure, while increasing consumer awareness on the need to separately collect beverage cartons. For instance, Belgium and Germany set up ambitious mandatory targets driving up the recycling rate of beverage cartons.

Lastly, we recommend basing all future legal measures on a comprehensive and evidence-based impact assessment, in line with Better Regulation principles. Before setting new requirements on waste prevention and reuse, the Commission should assess their overall environmental impacts. In addition, the Commission should consider mandatory provisions on recycled content only for products or materials for which the use of recycled content is technically and environmentally meaningful (i.e. it leads to overall positive environmental impacts and does not disturb well-established and functioning recycling loops), is safe for consumers based on EFSA assessment of its suitability in food contact materials, and does not decrease the recyclability of the new product.