

The background of the entire page is a dynamic, golden-yellow pattern of concentric, swirling lines that resemble ripples on water or a vortex. The lines are most dense and dark in the center, gradually becoming lighter and more spaced out towards the edges. This pattern is overlaid with a white rectangular box at the top and a dark blue rectangular box on the left side.

# **Circular Economy for Europe: bridging the gap between policy and implementation**

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# Circular Economy for Europe: bridging the gap between policy and implementation

**Published:** August 2021

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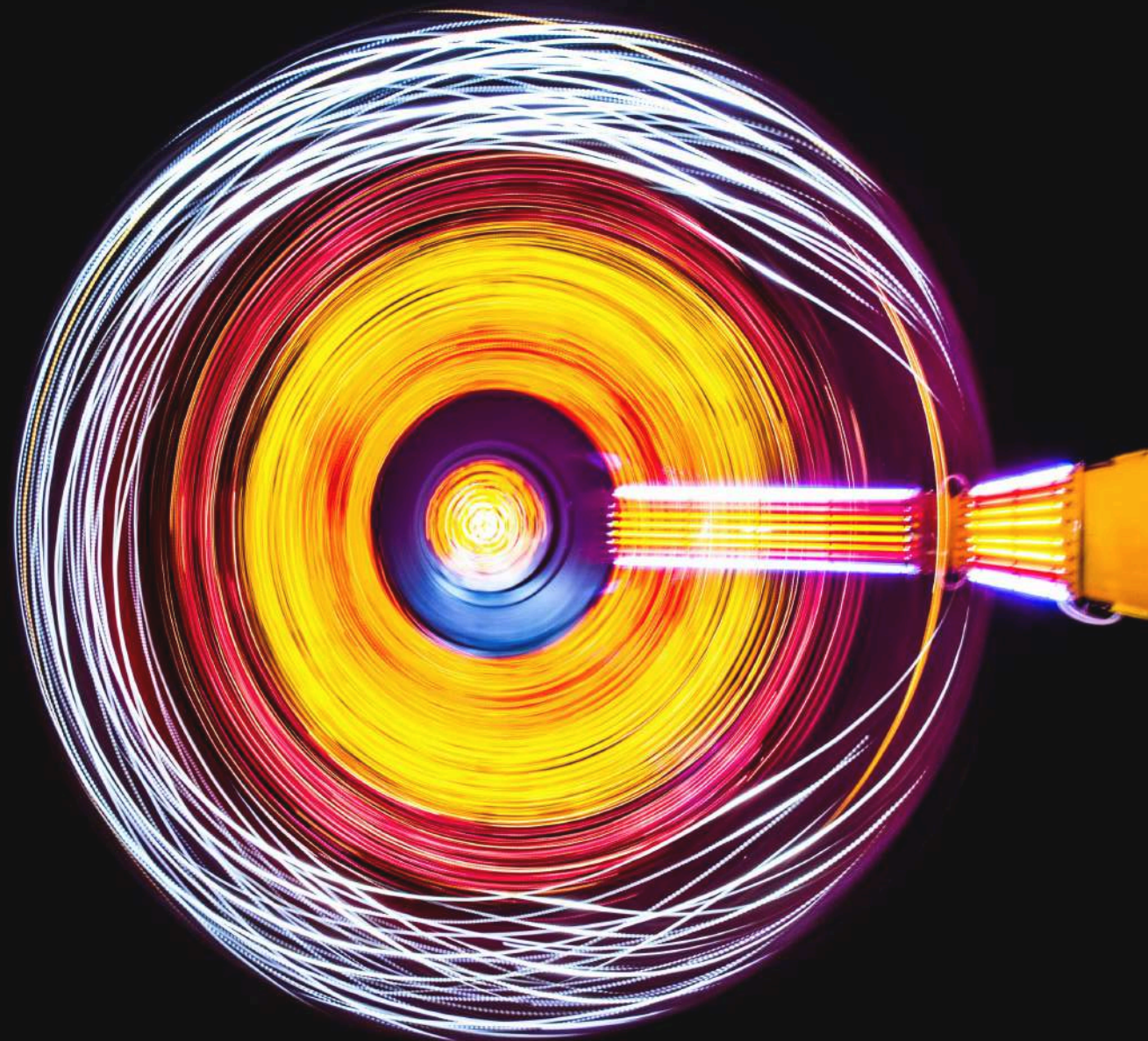
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# Creating a Circular Economy in Europe

The concept of Circular Economy (CE) is a new approach to economic systems aimed at reducing the number of materials needed and waste created by businesses' products, services and operations.



## Ambitious sustainability commitments

Ambitious sustainability commitments are being solidified by the EU's Green Deal<sup>1</sup>, and the new Circular Economy Action Plan<sup>2</sup>. They are dedicated to transitioning away from the current linear economic model and reflect overarching policy ambitions across European governments. Among the European Commission's (EC) series of ambitious goals:

- **Sustainable Product Initiative (SPI)** ensures the integration of reusability, durability, recyclability and 'right to repair' standards to improve the ecological footprint of a broad range of products<sup>3</sup>.

- **Revised Waste Framework Directive** sets new targets such as achieving a **75% recycling rate for packaging** and capping **municipal waste sent to landfill at 10% by 2030**.

- **Circular Electronics Initiative** will put forth a series of measures such as further regulatory requirements for electronics and ICT under the Eco-design Directive, **right to repair obligations** (including a right to update obsolete software), and regulations regarding a 'common charger' on mobile phone and similar devices.

- **A number of other initiatives** are further being developed and implemented, including the Chemicals Strategy for Sustainability and the Strategy for Sustainable Textiles, to achieve circularity-related ambitions, with a number of EU countries following suit with the introduction of CE related policies/statements. These have been further outlined and analysed in the below chapter.

→ **Circular Economy policies in Europe must be careful not to overwhelm businesses and thus affect their ability to be enablers of the Circular Economy.**

This report maps and assesses CE policies at the EU level and at national governmental level in France, Germany, Italy, the Netherlands, Poland, Spain, Sweden and the UK. These are referred to as '**key countries**' and were selected for this analysis due to their ambitious CE related policy initiatives (not to imply other states beyond this scope do not hold relevant policy developments).

The mapping has found over **87 CE policy initiatives (non-exhaustive) across the EU and key countries**<sup>4</sup> with relevance for

businesses operating in these states. Policy initiative is referred to here as a broad overarching regulation under development (for instance France's Circular Economy Roadmap, Spain's 'Circular Spain 2030' strategy or the EU's Sustainable Product Initiative and Strategy for Sustainable Textiles). Within these policy initiatives we have identified and assessed over 471 'policy elements' defined in this context as any part of a law, regulation, procedure, administrative action, incentive, or voluntary practice put in place by the EU or the key countries.

<sup>1</sup> [https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal\\_en](https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en)

<sup>2</sup> [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_20\\_420](https://ec.europa.eu/commission/presscorner/detail/en/ip_20_420)

<sup>3</sup> Particular focus on electronics, chemicals, textiles, furniture and batteries.

<sup>4</sup> these include France, Germany, Italy, Netherlands, Poland, Spain, Sweden and UK – and are referred to as 'key countries' due to their ambitious CE related policies.

Figure 1 illustrates the correlation between the terms ‘policy initiatives’ and ‘elements’:

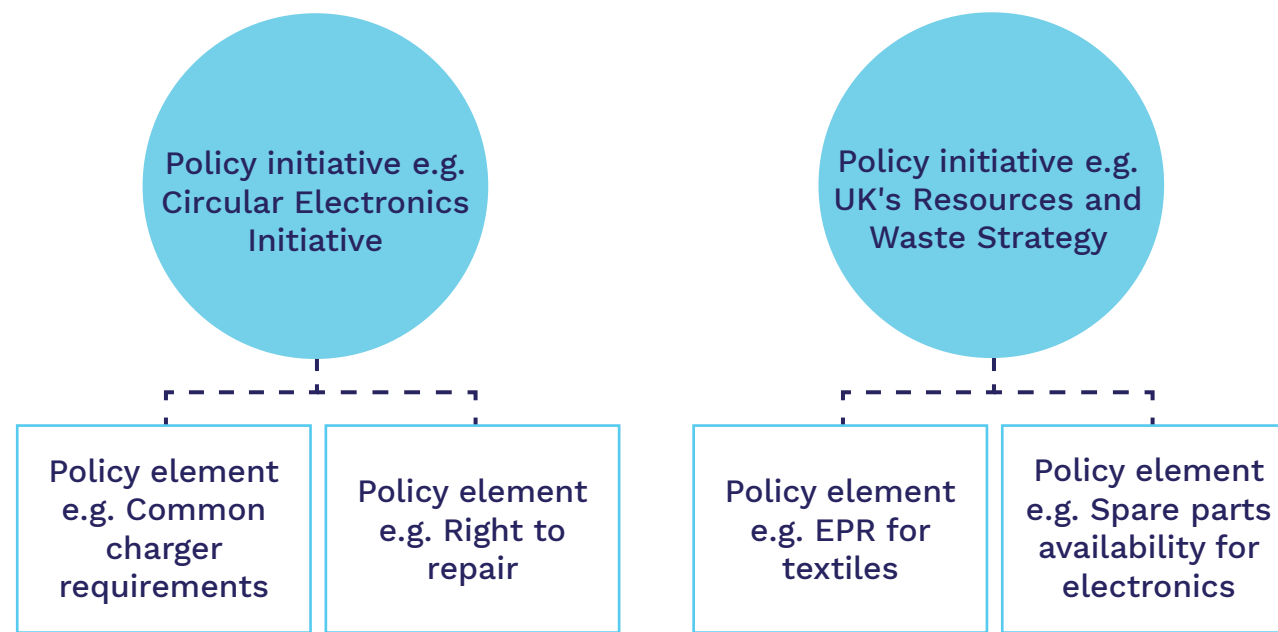


Figure 1: Illustration of correlation between policy initiative and policy element.

Given the high number of policy initiatives and elements identified, businesses operating in the EU & UK will have to ensure they are compliant with new requirements, as well as to provide a seamless transition to expected sustainability thresholds (e.g. recycled content requirements for packaging; requisites on information to consumers regarding environmental footprint of products). This is no small challenge given the number of policies businesses must keep track of and thus would require substantial administrative time and resources. For example, if we assume that one analyst would be able to track 5 policy initiatives at a time within a business, a company will hypothetically require around 17 analysts to follow the 87 mapped policy initiatives.

The policy ambitions analysed represent a positive push towards more sustainable production and consumption patterns, a direction the public overwhelmingly supports with surveys showing 77% of EU

citizens are willing to pay more for environmentally friendly products<sup>5</sup>.

However, policies need to be simple and feasible enough to be adopted by businesses. The role that these actors play in the shift towards a Circular Economy is fundamental and policies must support this.

Following the mapping of relevant policy, an assessment was conducted to investigate the direction that policies are taking to identify any potential compliance difficulties and/or potential compromise to the attainment of sustainability goals. Based on this analysis, policy recommendations have been put forth which are believed to be necessary to create a level-playing field and incentivise businesses to integrate CE principles in their strategy, whilst facilitating ease of compliance.

The report concludes with overarching recommendations on harmonising and streamlining policies across Europe.

“Policies need to be simple and feasible enough to be adopted by businesses. The role that these actors play in the shift towards a Circular Economy is fundamental and policies must support this.”

<sup>5</sup> [http://ec.europa.eu/public\\_opinion/archives/flash\\_arch\\_374\\_361\\_en.htm#367](http://ec.europa.eu/public_opinion/archives/flash_arch_374_361_en.htm#367)

# Policies enabling a Circular Economy



01

There are a wide variety of strategies put forth by businesses in order to bolster a CE, and **policy plays an essential role in facilitating the implementation of these strategies**. In this vein, this report has assessed over 87 policy initiatives related to CE – spanning from end-of-life to product design and reparability – that are in development in the key target countries. Out of these policies, **a non-exhaustive list of 471 policy elements** were further investigated.

Through an in-depth analysis of the 471 policy elements we found that:

- **The most popular policy topics were those targeting communications** about sustainable practices (9.6%), waste management (8.7%) and Eco-design (8.1%).



## ↳ The most popular policy topics

- Regarding the **business area** that policies would most impact we found that most were related to operations (47%), followed by product & product packaging (37%) and relationship towards consumers (16%). Waste management, tracking and data collection, and the use of sustainable material alternatives account, together, for 46.4% of the policy elements mapped which impact operations.



## ↳ business areas that policies would most impact

- At EU-level (whereby developments shall apply to all Member States), a **non-exhaustive list of 74 policy elements currently under development were identified**: most of them are related to operations (41%), followed by products & products packaging (39%). Use of sustainable materials, tracking and data collection, and communication about circularity represent, together, 36% of policy elements mapped in the EU.

**41%** related to operations      **39%** related to products & products packaging

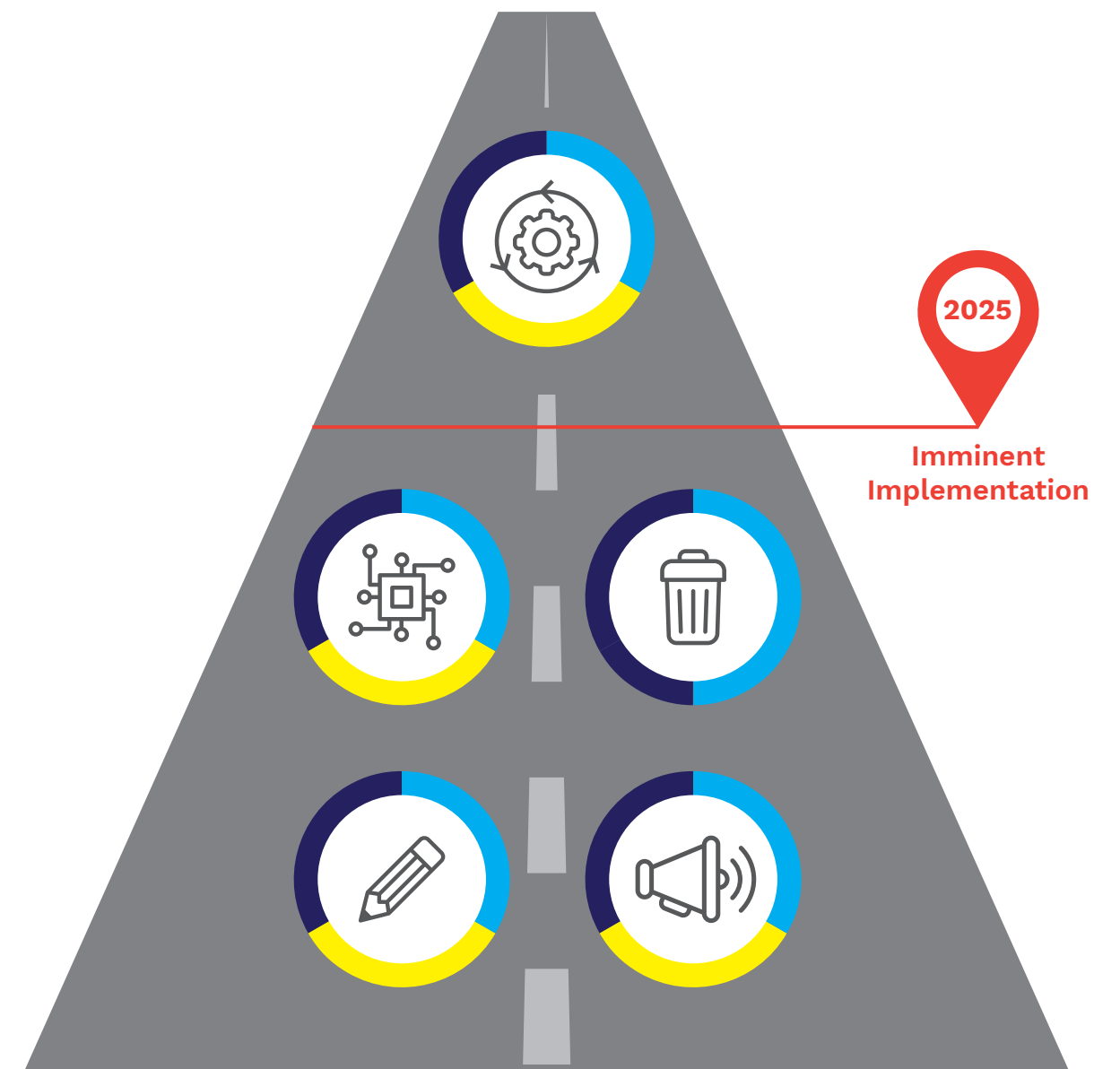
## ↳ policy elements currently under development

In the interest of streamlining and harmonising the array of upcoming policy initiatives, our analysis identified **specific strategic areas that are of significant importance** due to the high number of policy initiatives set to be introduced (both at EU and key countries' level). The strategic areas are:

-  **Eco-design of products and packaging**
-  **Consumer information**
-  **Repair services and reused/recycled goods**
-  **End-of-life programs and waste management systems**
-  **Use of technologies and data**

These strategic areas were highlighted as topics of importance based on analysis that looked at three distinct points of reference (see Figure 2 below):

- the policy initiatives' imminent introduction timelines (expected before 2025);
- expected high impact on business operations;
- and effect on more than one stage of a products' lifecycle.



**Impacted stages of product lifecycle**

- Design & Production
- Use
- End-of-Life

Figure 2: High priority policy areas based on analysis.

Our analysis identified **a series of recommendations** for consideration. Governments can develop policy initiatives that ensure increased sustainability across all lifecycle stages of products and **facilitates the ease of compliance for businesses without compromising environmental ambitions.**



# 1.1

## Eco-design of Products & Packaging

### EU level

At the EU level, the policy landscape is marked by **an accentuated concern for product sustainability and eco-design**. Most notably, the **Sustainable Products Initiative (SPI)** will introduce a series of design requirements for products in line with **standards for durability, reusability, upgradability and reparability**. Many of these objectives will be internalised in future Eco-design legislation. For example, the proposal for Eco-design and Energy Labelling Working Plan for 2020-2024 will include material efficiency requirements on durability, reparability and recyclability of products and review the methodology underpinning the Eco-design Directive. Specific components of the Eco-design and Energy Labelling Working Plan for 2020-2024 include the eco-design requirements for vacuum cleaners (Q1 2022), professional refrigerator products (Q3 2023), mobile phone and tablets, and the Common Charger Initiative.

There is also a strong push across Europe for the **promotion of re-use and recyclability of packaging**, as well as for the reduction of the use of plastic in packaging:

↪ The upcoming review of the EU Packaging Directive (Q4 2021) will aim at reinforcing mandatory requirements for packaging to be allowed in the EU market and promoting the design for re-use and recyclability, including restrictions on the use of certain packaging materials.

↪ The Single Use Plastic (SUP) Directive which has introduced a ban on a range of

single-use plastic products and set requirements for plastic beverage containers, tobacco products and wet wipes.

### Country level

Most key countries' governments have already **outlined the intention to set out Eco-design requirements** (which in the case of EU Member States will have to be aligned with EU-level requirements that are decided). Examples include:

↪ The UK's Resource and Waste Strategy intends to introduce Eco-design standards in line with the ones developed at the EU level, while also expanding the scope to non-energy related products, in particular for textiles and furniture (entry into force in 2023).

↪ France's CE Act introduced requirements for product's durability, reparability, and reusability, including the introduction of a 'reparability index' for EEE.

↪ Germany's new Digital Policy Agenda for the Environment introduces requirements on mandatory warranty statements and product's obsolescence.

**Similar developments can be observed for packaging**, where multiple governments are introducing new requirements for recycling and reuse of packaging, including specific targets for the proportion of reusable packages placed on the market. Examples include Germany (as part of the revision of the Packaging Act), Sweden (through its Circular Economy Action Plan) and Italy (through the transposition of the EU Packaging Directive). The key countries are currently also adopting the SUP Directive and imposing taxes on certain disposable plastic products.

The aforementioned policy initiatives are expected to have a **high impact on producers' operations**, as new requirements on e.g. durability,

repairability, and reusability will have to be considered when designing products as well as packaging. Considerable efforts are required to **rethink the design of certain energy-related products**, further impacting companies' supply chain and sourcing of materials.

These policy initiatives will therefore not only affect the design stage of a product, but also the use and end-of-life management and can lead to substantial administrative burdens if they end up stipulating a multitude of requirements.

## Policy recommendations



Eco-design requirements must be harmonised at EU level and at product category level to avoid fragmentation across countries and disproportionate administrative burden, particularly for SMEs.



EU Chemicals Sustainability Strategy should provide funding for the development of safe and sustainable - by - design advanced materials. Innovative business models for the creation of bio-based polyesters for products and packaging should also be covered in the financial incentives. e.g., Sweden's Circular Economy Strategy is looking at replacing fossil-based raw materials with bio-based ones.



Governments should provide financial support for the development and use of new plastic packaging materials, which have a lower environmental impact. Existing examples include the UK's Plastic Research and Innovation Fund whose aim is to explore new ideas and innovations that can bring changes in the UK's plastics manufacturing and consumption patterns or the Netherlands' government who is already incentivising as much as possible the use of sustainably produced bio-based plastics in packaging in order to reduce the use of fossil-based ones.

# 1.2

## Consumer information

### EU level

Consumer information is an overarching top priority for most states as upcoming policies shall strive to ensure **consumers have adequate knowledge about the products they are purchasing** regarding a range of characteristics (environmental footprint, durability, repairability,

end-of-life options, etc). At EU level a range of policy initiatives are in development to **increase product transparency** for consumers with a notable policy element in this area being the **Digital Product Passport (DPP)**, set to be outlined through the EC's adoption of the SPI in Q4 2021.

Particular efforts are being made towards ensuring that 'green claims' made by companies are not misleading in order to **avoid 'greenwashing'**. The EU currently **lacks harmonised legislation on the use of environmental labelling and green claims** but aims to remediate this with its upcoming policy initiatives including:

↪ The upcoming legislative proposal on strengthening the role of consumers in

the green transition (December 2021);

↪ The legislative proposal on the substantiation of green claims (December 2021);

↪ The extension of eco-labelling beyond energy-related products to increase transparency with consumers through SPI Q4 2021;

↪ The Circular Electronics Initiative (Q4 2021) which introduces a range of consumer information e.g. product repairability; a distinction between corrective and user-driven updates and the carbon data impact of data consumption;

↪ The Strategy for Sustainable Textiles (product care information, disposal information);

↪ The Review of Packaging and Packaging Waste Directive (Q4 2021) introducing a series of labelling requirements.

### Country level

A wide range of **initiatives on product labelling** have been published across the key countries alongside a series of labelling requirements through national implementation of the Single Use Plastics Directive e.g. Spain's single use plastic labelling requirements including end-of-life instructions (to enter into force latest by Jan 2023). Other important examples include:

↪ The UK's Eco-design and Energy Labelling Regulations 2021;

↪ Italy's Draft law 'Green New Deal and the Ecological Transition of the Country' to promote products marked with Ecolabel or equivalent labels compliant with UNI EN ISO 14024;

↪ France's multiple requirements through the CE Act such as for producers to provide durability and repairability index of EEE, or for the environmental impacts of products (including incorporation of recycled material, recyclability, presence

of hazardous substances using Life Cycle Analysis) to be made visible to the consumer at point of purchase.

Additionally, **regulations to hold companies accountable for greenwashing** are currently being deliberated by the UK Competition and Markets Authority (stance expected in the Consumer Protection Law guidance in Summer 2021).

**The introduction of DPPs** is also currently being discussed at country level:

↪ The UK intends to introduce a product passport for which it will hold a consultation by end of 2022.

↪ Aside from an EU-wide DPP to apply across all Member States, Germany, the Netherlands (materials passport for construction sector), and Sweden have all produced statements regarding plans for a product passport (yet to be determined how national efforts will align with the EC's model).

These policies are expected to have a **high impact on businesses' operations**, as well as on all product lifecycle stages - notably through an increased administrative burden with development of new reporting requirements across different product lifecycle stages (design, manufacturing, use and end-of-life stages). The **vast amount of new disclosure requirements may incur compliance difficulties** regarding product transparency due to difficulties to acquire data from breadth of suppliers, heightened costs, and potential duplication of requirements (where standardisation from policy bodies is not adequately pursued).

## Policy recommendations



Product information must fulfil a specific set of pre-determined and consequential uses (e.g. consumer information on reparability, environmental footprint etc.) rather than integrate an overabundance of inconsequential datapoints that burden producers and that are difficult to acquire which would obstruct compliance abilities. The EC should ensure the integration of existing reporting systems that businesses must already comply with into the DPP to avoid the duplication of reporting requirements (e.g. with SCIP, REACH) and to minimise the necessary datapoints needed. Ultimately, the DPP should add value by reducing administrative burden and unnecessary paperwork, so that if information is contained in a DPP, it should not be necessary to report it elsewhere. Furthermore, for all upcoming eco-labelling initiatives (including the DPP) the EC should prioritize reporting on product groups that can make the biggest contribution to a CE due to their high environmental and social sustainability impact (e.g. electronics and textiles).



The EC must ensure that new eco-labelling requirements are harmonised across the EU to avoid the risk of fragmentation of the internal market by the proliferation of national scoring and labelling requirements.

# 1.3



## Right to Repair and Reused/Recycled Goods

### EU level

Boosting repair services and the sale of reused/recycled goods is a core priority amongst governments, offering the possibility of extending products' lifetime in pursuit of reduced waste targets. The commitment to the employment of these tools for the achievement of a CE is illustrated by the range of related policy initiatives including:

↪ A variety of recyclability/reusability and recycled content requirements shall be introduced through eco-design policies (outlined above).

↪ The Circular Electronics Initiative (EC adoption in Q4 2021) is set to introduce Right to Repair requirements for electronics and ICT, likely mandatory software updates, availability of spare parts and repair manuals, and reparability index requirements.

↪ The Sustainable Textiles Strategy (EC adoption in Q3 2021) will include actions that explore ways to ensure that consumers have easy access to reuse and repair services (including potentially enabling key countries to use value added tax (VAT) rates to promote repair services).

### Country level

Multiple policy initiatives are being developed in this area with several key countries aiming to boost reused and recycled good markets as well as use of repair services. Examples include:

↪ The French CE Act intends to extend reparability index beyond EEE to other sectors to be determined by decree.

↪ The German Digital Policy Agenda for the Environment sets out mandatory warranty statements and right to repair (obsolescence).

↪ The Italian legislative decree transposing the EU Waste Framework Directive (published Sept. 2020) aims to facilitate the replacement of spare parts as well as the repair and reuse of software products.

↪ The Spanish Draft for Waste and Contaminated Soils Law puts forth the goal of ensuring products are designed with ease of repair (in development, enforcement at the latest on 5<sup>th</sup> January 2023).

These policies are expected to have a **high impact on producers' operations** requiring compliance with design requirements to ensure products are easy to repair/easily recyclable (described in point 1.1). A range of other 'right to repair' related initiatives including providing repair manuals, providing reparability index for products, conducting mandatory software updates; or introducing warranties for certain products will also be required. These policies are expected to affect all product life-cycle stages including design, manufacturing, use, and end-of-life management.

## Policy recommendations



The EC and key countries should reconsider requirements regarding the storage of spare parts (both required time-length and quantity of parts), as research<sup>6</sup> shows these requirements have little impact on whether repair services are conducted, and instead repair services occur when it is commercially feasible for producers to do so. Furthermore, keeping spare parts in stock generates significant costs for producers without necessarily providing environmental benefits of less waste generated from less sales.



As such, to boost repair services, EU and key countries should instead follow through with promises to incentivise repair services as well as recycled/reused goods markets. This has been exemplified by Sweden's CEAP, which extends the Cleaning, Maintenance and Laundry tax reduction (RUT) to the transport of furniture and other household goods to second-hand shops, flea markets and other places where such goods can be reused. Similar policies should be incorporated across Member States to reduce costs of repair and enable attractive prices for reused/recycled products. Several countries including the UK and Spain have also mentioned intentions to introduce public procurement to promote use of reusable and recyclable goods with timelines and concrete commitments still to be delivered by the governments.



Consumers show a low willingness<sup>7</sup> to pay for recycled products that present a high level of functional risk (e.g. toners, cell phones). As such, quality assurance schemes (e.g. certified marks) for second-hand / refurbished products should be developed in a harmonised manner across Member States to reduce consumers' perceived risk regarding these products and thus increase demand for them.

<sup>6</sup> <https://www.applia-europe.eu/statistical-report-2018-2019/pillar-1/index.html#&panel1-21>

<sup>7</sup> Hamzaoui-Essoussi, Leila & Linton, Jonathan. (2010). New or recycled products: How much are consumers willing to pay?. Journal of Consumer Marketing.



The EC's focus should be on ensuring product sustainability through design requirements (e.g. recycled content, recyclability etc.) whereas the effectiveness of other tools such as Product-as-a-service (PaaS) should be further explored before promoting them. This would allow confidence that they do contribute to the sustainability aims (given uncertainty around its efficacy for circularity, particularly with regards to resource efficiency as the model does not look to directly influence the quality of the product itself).

# 1.4

## End-of-life Programs and Waste Management Systems

### EU level

Waste prevention through end-of-life programs represents an increasingly important area across Europe, with a particular interest for take-back obligations.

Key upcoming policies include:

↪ The exploration of options for an EU-wide take back scheme to return or sell back old mobile phones, tablets and chargers (actions to be detailed in the Circular Electronics Initiative, Q4 2021).

↪ EPR requirements for textiles are likely to incur obligations to cover end-of-life waste management (e.g. collection and treatment) for textiles producers/retailers (EU strategy for sustainable textiles expected in Q3 2021).

### Country level

There are a high number of take-back obligations incoming or under development with some notable examples including:

↪ UK's 2021 Review of WEEE regulations to potentially include duties for retailers to take-back equipment, and methods to incentivise reverse logistics;

↪ Germany's revision of the Electrical and Electronic Equipment Act (ElektroG) which introduces an extension of the liability of online marketplace operators and fulfilment service providers (from 2022 onwards);

↪ France's ambitious CE Act (Loi AGECE), which also targets extended EPR obligations for marketplaces;

↪ Sweden's requirement for producers to offer a deposit system for packaging as of August 2020.

These policy initiatives are expected to have a high impact on producers' operations, most notably stemming from the operational costs that may be incurred through the new required take-back schemes. Similar costs are expected to surge in the textiles sector (in parallel of the existing ones for electronics sector) across key countries, which alongside the practicality aspects that businesses must account for when establishing reverse logistics, make this strategic area a key priority for companies.

## Policy recommendations



An EU proposal aiming at harmonising the waste management model across Member States to avoid further and future policy fragmentation. It is critical to prevent requirements on recycled content incorporation and recyclability from eco-design being hampered by waste policies, which increase the complexity around waste recycling. Ambitious waste reduction targets that are accompanied by incentives for take-back, reuse and repair are fundamental.



EPR reporting must be simplified and harmonised to avoid an uneven implementation of waste collection and waste recovery measures and lift the current administrative and financial burden for producers and for SMEs in particular, thereby avoiding the distortion of competition between large and small producers. For instance, with regards to the development of an EU-wide textiles scheme, governments should ensure the regulations are harmonised, also by investigating existing textile schemes (e.g. in France) to gain further perspective on best practices.



Regarding the recently proposed new Batteries Regulation, the administrative and financial burden that businesses, especially SMEs, are facing when registering and reporting batteries Put-On-Market (POM) is still too high and disproportionate for SMEs placing only small volumes of Batteries on the European market. As such, the new batteries Regulation should be amended to establish a central coordination mechanism at EU level. This would allow producers to register and report their POM quantities only once in any of the Member States and to one competent authority. This centralised solution represents the best option for lifting the administrative and financial burden that businesses, especially SMEs, are facing when registering and reporting batteries POM. This solution will further contribute to a fully harmonised regulatory framework, avoiding distortion of competition and barriers to trade for batteries.



Provide tax exemptions for the donation of unsold goods by businesses to charitable causes as is currently being developed in France under the CE Act, with a decree expected to further define the requirements.

# 1.5

## Use of Technologies and Data

### EU level

The use of technology and data is a growing subject at the EU and country level with governments viewing digitalisation as a critical tool to ensure the traceability of materials. The EC has already stated its aim to introduce initiatives such as: the establishment of a European Database for Smart Circular Applications to grant access to most relevant data to enable circular value

creation across supply chains (particular focus on built environment, packaging, textiles, electronics and plastics); revision of the rules on waste shipments tracking (2021) and the awaited DPP (outlined in SPI Q4 2021).

## Country level

Most of the key countries analysed are **developing or have developed policies in relation to technologies and data**.

Examples include:

↪ France's draft on a Sustainable Digital Sector;

↪ UK's New Plastic Tax through which producers and importers of plastic materials must register and keep the records of tax documents as proof (compliance from 2022)

↪ Italy's 'Piano Transizione 4.0' (entered into force in November 2020), which aims to digitalise the interactions between different operators of the supply chain, including the development of information

sharing models for tracing products within the supply chain to improve cooperation

↪ Germany's Resource Efficiency Programme (ProgRes) III which sets a strategy to allow for a systematic analysis of the ecological effects of e-commerce to be carried out (date tbd)

↪ the Netherlands plans to introduce the use of IoT to improve material yields (the government has already created the research platform Smart Industry 2018-2021 for these purposes).

These policies are expected to have a **medium impact on producers' operations** due to their introduction of increased reporting requirements across all product lifecycle stages. Additionally, the EU and key countries are also looking at **the influence that the use of technologies and data could have on circular economy** which is mirrored in the French CE Act with specific decrees aiming at tackling programmed obsolescence and software updates (as discussed in the section on Eco-design of products).

## Policy recommendations



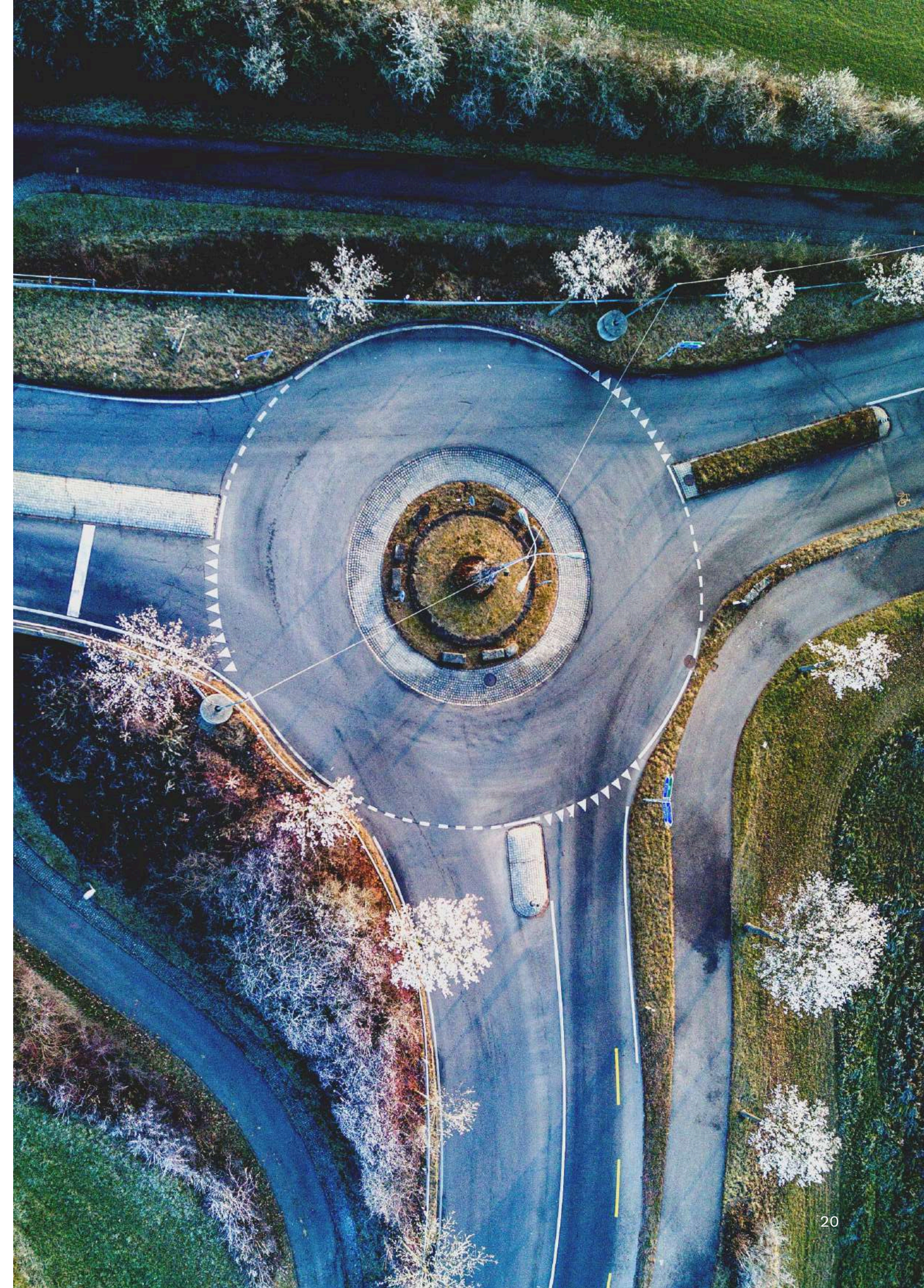
Ensure harmonised DPP system across the EU and, given the current abundance of various digital reporting/monitoring initiatives at national level, ensure these are streamlined at EU level to avoid duplicity of reporting obligations and maximise utility of information collected while foregoing accumulation of data in an unnecessary number of databases.



Advocate for the development of a harmonised database across the EU and the UK that will aggregate all data relevant to waste and material supply management. France is already working on this subject through the CE Act and a decree is expected in 2021 for a centralized access of data regarding EEE and other products. A harmonised system across the EU and UK would benefit businesses in mandating the suppliers to take sustainability objectives and adhere to sustainability/CE assessments through the access of a common database.



The need to ensure a sustainable digital sector should be considered an important policy priority given the substantial GHG emissions associated with the digital economy. As such, increasing the energy efficiency of digital tools (such as websites) and incentivising research and efforts to produce solutions for reducing digital pollution (as already recognised in the French draft on Sustainable Digital Sector) is crucial.



# Conclusions: Key policy actions to facilitate a Circular Economy



02

While the wealth of policies being developed are signs of positive progress, it is crucial to keep in mind that moving away from a linear economy **requires collaboration between industry actors and policymakers** to successfully implement strategies that achieve sustainability goals. Policymakers must ensure that **regulations put in place ensure a level-playing field that is simple and incentivises and facilitates businesses to offer green products in pursuit of a CE.** Only through policies that are harmonised and uncomplicated for businesses to implement, without compromising environmental ambition, will initiatives be able to secure products' sustainability across all lifecycle stages in line with growing consumer demand.

To do so, the EC and key countries' governments should ensure:



**Harmonised eco-design standards and eco-labelling requirements across the EU to facilitate compliance and avoid fragmentation** between Member States, which are developing initiatives on reparability and durability indexes prior a full alignment with initiatives at EU level.



**Tax incentives for recycled/reused goods market and repair services as well as to promote donation of unsold goods** by businesses to charitable causes.



**Harmonised EPR implementation across Member States for all targeted waste streams and establishment of a central coordination mechanism at EU level for the registration and reporting of batteries put-on-market (POM)** to allow businesses to easily comply with EPR regulations related to all the products sold in any given European country, whilst at the same time reducing the administrative and financial burden of registering.



**Information on product sustainability:** Product information must be standardised (e.g., consumer information on reparability, environmental footprint etc.) and policy initiatives such as the DPP must be aligned with existing reporting systems to avoid overlap of administrative work and data duplication (e.g. avoid overlap of DPP with SCIP, REACH).

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