



Report on the EU Circular Economy rapporteurship Members of parliament Gabriëls (GroenLinks-PvdA) and Buijsse (VVD) 25 September 2025

Introduction

Serving as EU rapporteurs on the circular economy was a highly rewarding and engaging experience for us. The circular economy is a broad and complex subject that can spark discussions on a wide range of different topics. On the one hand, the subject relates to tangible matters such as plastic cups, nappies and textiles. On the other hand, however, the circular economy is about much bigger things: transitioning to a new economy, changing the way we use raw materials, ensuring strategic autonomy and working towards international climate goals¹. Moreover, achieving a circular economy would improve public health and contribute to a better living environment. In short, this is not simply a 'waste-related subject', as it was once labelled by the Ministry of Infrastructure and Water Management (I&W) and its predecessor, the Ministry of Housing, Spatial Planning and the Environment (VROM). Circularity will be at the core of our new economy. This has also been argued by Mario Draghi and Enrico Letta, whose reports on EU competitiveness and the European single market form the basis for the current European Commission's Clean Industrial Deal². Based on our discussions, we have formulated a number of recommendations for both the committee for Infrastructure and Water management within the Dutch Parliament (hereafter: committee I&W) and the Dutch government. We would like to thank our discussion partners for their contributions. The large number of interviews we conducted has yielded a wealth of information, which unfortunately cannot all be reflected in this report. Rather than discussing each contribution in detail, we have sought to identify key themes.

Geert Gabriëls
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¹ There is less need for new raw materials, and resource extraction is a major contributor to climate change.

² [The future of European competitiveness](#) (Draghi) and [Much more than a market](#) (Letti).

Recommendations

To the I&W committee:

We recommend that the I&W committee:

- adopt this report and make it publicly available;
- commission an English translation and send this to the European Commission (DG GROW and DG ENV) on behalf of the Dutch parliament;
- request that the Dutch government respond to the report;
- appoint an EU rapporteur in 2026 in anticipation of the announced Circular Economy Act and other impending regulations.

To the Dutch government:

We recommend that the Dutch government:

- ensure more centralised direction, control and responsibility in relation to the Netherlands' transition to a circular economy, and that it allocate the necessary financial resources. Use a compelling narrative to tell the 'bigger story' and act accordingly;
- devote more attention to circular financing and create a roadmap for its development;
- advocate at EU level for higher recycle percentages and show that this benefits everyone across the political spectrum. Support industry by creating demand and preventing raw materials from exiting the chain;
- increase efforts to prevent unfair competition with third countries through border control and corrective measures at the EU's external borders. Protect the single market and ensure fair competition for EU companies, in line with the recommendations set out in our Clean Industrial Deal report. These recommendations should also inform the Netherlands' position in EU-level discussions on the Circular Economy Act;
- at EU level, work to strengthen the extended producer responsibility (EPR) instrument by expanding its scope, including incentives and circular strategies (higher rungs of the so called R ladder³), and ensuring adequate governance and proper enforcement;
- consider the recommendations from Section 2.7 and Annex II in determining the Dutch position in the WEEE review (and in national policy where necessary), as well as in determining the Dutch position on the Circular Economy Act.

³ This ladder shows which circularity measures or strategies you can take and in what order (refuse, rethink, reduce, reuse, repair, remanufacture, refurbish, repurpose, recycle, recover, remine)

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1. The purpose of the EU rapporteurship and the activities undertaken

The purpose of our EU rapporteurship, as set out in the mandate (adopted on 22 April 2024), was twofold:

- to improve the I&W committee's information position;
- to make effective use of opportunities to influence EU decision-making and, where possible, promote the position of the Dutch parliament.

Member of parliament (hereafter: MoP) Geert Gabriëls (GroenLinks-PvdA) served as EU rapporteur during the first phase and part of the second phase. MoP Martijn Buijsse (VVD) was appointed EU rapporteur at the strategic procedural meeting on 19th February 2025. We also jointly served as EU rapporteurs for the I&W aspects of the Clean Industrial Deal, which partly overlaps with the subject of the circular economy. The [report](#) we published on this latter rapporteurship was adopted at the I&W procedural meeting on 10 September 2025.

- In view of the first objective of our circular economy rapporteurship, MoP Gabriëls primarily engaged with Dutch discussion partners during the first phase. The purpose of these conversations was to gain a better understanding of what is needed to support the transition to a circular economy, specifically from the EU. The outcomes of these discussions were recorded in an interim report dated 20 September 2024 ([sent](#) to the government on 26 September, [response](#) from the government received on 5 December 2024). The list of talking points for EU-level discussions included in the interim report was translated into English and sent to the discussion partners in Brussels for the purpose of the second-phase consultations.
- A [commission debate](#) on the circular economy took place on 19 December 2024.

During the **second phase**, the I&W committee adopted and implemented three recommendations based on the findings from the first phase:

- Two roundtable discussions were held in December 2024 (one focused on incentivisation, standardisation and pricing, and the other on the tax shift).
- In view of the second objective, MoP Gabriëls also visited Brussels during the second phase.

This working visit included informative talks and served as an opportunity to communicate the House's position based on the first phase (list of EU talking points). For more on this working visit, see Annex I. We had also planned a joint second visit to Brussels, part of which would have focused on the Clean Industrial Deal, but this was cancelled due to the collapse of the Dutch government.

- We did jointly visit Road2Work/Road2Re-use in Ede, based on recommendation 3 from the first phase (conduct a more thorough investigation of return issues, specifically in relation to electronics). See conclusion (Section 2.7 and Annex II).
- We also interviewed the economist and publicist Paul Schenderling. Although this conversation was primarily intended to inform our Clean Industrial Deal rapporteurship, it provided insights that may be of value to the circular transition. For the sake of completeness, these are also included here (see Section 2.5 and Annex III).
- Finally, we (first MoP Gabriëls, then the two of us jointly) regularly sent updates on ongoing EU circular economy proposals to the I&W committee ahead of debates on the circular economy or the Environment Council. These updates were sent either directly by us or via the EU adviser of the I&W committee.

Key takeaways from working visit to Brussels on 17 February 2025

- *The narrative about the circular economy needs to expand beyond waste and the environment; circularity is also crucial for our competitiveness and raw materials security, and thus for our strategic autonomy and national security.*
- *Nurture our leadership position, and recognise the importance of the circular economy in the context of EU competitiveness.*
- *Strengthen 'made in EU'. Invest in circularity and the frontrunners in this area, rather than focusing on the stragglers.*
- *While simplification can be useful for reducing bureaucracy, a weak regulatory framework will hinder the transition to a circular economy. EU regulations are particularly important for frontrunners, as is a level playing field.*
- *Focus on the effective implementation and elaboration of pending and adopted proposals.*
- *Create a market for circular products (also essential for recyclers). This means: uptake of mandatory share of recyclate, clarity on 'waste or resource', improved ecodesign regulations and a more robust EPR.*
- *National governments can do a lot to increase purchasing power. This is especially true for the Netherlands, which has already made significant headway. Procurement and tendering should place more emphasis on circularity.*

2. Conclusions and recommendations

2.1 Circular transition requires central direction and better narrative

The circular transition is still viewed as an environmental issue in the Netherlands. While the Dutch government does have an interdepartmental circular economy programme directorate, this is coordinated by I&W. In the House, the subject falls within the remit of the I&W committee. We note that responsibility for shaping the transition from linearity to circularity is currently insufficiently centralised within government. Moreover, the available budget does not do justice to the importance of this transition.

There is growing support for a central embedding of the circular transition in policy, particularly within the EU (see also the reports by Draghi and Letta). In her State of the Union address on 10 September 2025, European Commission President Ursula von der Leyen identified the circular economy and raw materials security as key themes for the EU.

As circularity is a complex topic, it may at times be difficult to communicate about it effectively. While it encompasses a wide range of tangible elements, it also refers to a major systemic transformation. The Netherlands and the EU must be clearer about their objectives: a different approach to dealing with the earth and the living environment, as well as raw materials, products and the economy. Circularity is not something that can exist within the confines of the linear economy; it offers an appealing new framework in its own right. It is important to present a compelling narrative that highlights the opportunities for the Netherlands and the EU, for industry – especially frontrunners – and for the people of the Netherlands.

Recommendation to the government: ensure a broader and more central embedding within government, as well as a stronger steering role, while maintaining the responsibilities and tasks of all parties involved and providing appropriate financial resources.

Use a compelling narrative to tell the 'bigger story' and act accordingly, through policy and financial resources.

2.2 Increased focus on EU – timely input for Circular Economy Act

We see that the circular transition is gaining traction, including within the EU. This process began with the previous European Commission's Green Deal and is expected to gain momentum at the end of 2026 with the implementation of a comprehensive Circular Economy Act.

All of the parties we spoke to agreed that the circular economy should be regulated by

the EU, that the European market is important, and that there should be a level playing field. We would also like to emphasise the importance of early involvement – during the conceptual phase of the Circular Economy Act, for instance – as this makes it easier to exert influence in Brussels.

Recommendation to the new House of Representatives: appoint a new EU rapporteur on this subject with a specific focus on the Circular Economy Act and other impending regulations. Translate this report and send it to the European Commission for their information.

2.3 Circular economy requires circular financing

The interim report recommended a stronger focus on circular financing. Circular financing is an essential component of the circular transition, which, according to our discussion partners, cannot be achieved using a linear financing model. Thus, a stronger focus on circular financing is needed. Many discussion partners have highlighted a bottleneck in the transition to circular financing, namely that banks are reluctant to abandon their linear financing models, based on years of accumulated company data, for circular financing models for which no (or not enough) such data exists yet – a catch-22 situation.

Recommendation to the government: devote more attention to circular financing and create a roadmap for its development.

2.4 Incentivisation, standard setting, pricing and tax shift

A combination of incentives, stricter standards, pricing and tax shifting is widely supported and recommended.

This is why the interim report recommended organising roundtable discussions on these topics. On 12 December 2024, a [roundtable discussion](#) was held on the tax shift in relation to the circular economy. The tax shift would involve a shift of taxation from labour to raw materials, which is important for achieving the goal of moving 'higher up the R ladder'. Participants were asked to reflect on the need for circular financing and tax shifting in light of the required acceleration of the circular transition.

On [18 December 2024](#), a roundtable discussion was held on standard setting, pricing and incentivisation.

Standard setting should preferably take place at EU level to ensure a level playing field and economies of scale, but several stakeholders would also like to see national standards where necessary to gain a first-mover advantage. According to the stakeholders, incentives (for innovative start-ups, but also for existing companies planning to transform their business models), pricing and tax shifting are necessary for

the survival of smaller and more innovative companies. It was pointed out that circular entrepreneurs have to compete with linear business models, which do not consider the value of raw materials. If we want to encourage circular frontrunners, intervention is needed here, as this amounts to unfair competition. Some discussion partners also suggested introducing quotas similar to the Emissions Trading System (ETS). These could be introduced for products containing raw materials whose supply security is finite in the relatively short term.

Many discussion partners mentioned a mandatory recycle percentage as a form of standardisation, which would also drive demand for recycled materials. Such a standard should preferably be set by the EU. While the European Commission is working towards this objective, the Council of the European Union and the European Parliament (EP) are watering down the percentages. This occurred recently on 9 September 2025 when the EP voted on the proposed EU regulation on vehicle circularity and reduced the plastic recycle standard from 25% to 20%.

Recommendation to the government: advocate at EU level for higher recycle percentages and show that this benefits everyone across the political spectrum. Support industry by creating demand and preventing raw materials from exiting the chain.

2.5 Address the issue of unfair competition from third countries

On 10 September 2025, the I&W committee adopted the final report as part of our EU rapporteurship on the I&W aspects of the Clean Industrial Deal (CID). The CID focuses on sustaining and boosting European industry in conjunction with promoting clean technology. For the I&W committee, the circular economy is one of the key aspects of the CID. In connection with the CID rapporteurship, we interviewed the economist and publicist Paul Schenderling, which resulted in a number of recommendations. These recommendations, which are set out in our final report on the CID, are about better guarding the EU's borders against unfair competition from third countries. For example, the environmental and social dumping of products in the EU could be prevented by amending the legal framework of the World Trade Organization (WTO). Given the current dynamics, it seems easier to do this in the present. Another recommendation is to propose a Carbon Border Adjustment Mechanism (CBAM) for materials and products, combined with a materials passport for every product⁴. At national level, it could be useful to introduce an environmental tax, the proceeds of which would be earmarked for promoting circular and sustainable production (leverage⁵).

⁴ A digital materials passport is now underway; a [public consultation](#) on this was held in late 2024, and a proposal is expected in the first half of 2026.

⁵ This has already been introduced for plastics ('plastic tafel') and could also be applied to other materials and/or products.

On a more general note (in the national and EU context), cost concerns could be addressed by considering the longer term. Investing in measures to prevent and mitigate environmental damage and resource shortages will also help to prevent companies from going bankrupt.

Recommendation to the government: focus more on border control and corrective measures at the EU's external borders. Protect the single market and ensure fair competition for EU companies, in line with the recommendations set out in our Clean Industrial Deal report. These recommendations should also be included in the Netherlands' position in EU-level discussions on the Circular Economy Act.

2.6 Strengthen extended producer responsibility (EPR)

Almost all discussion partners agreed that the EPR was an important topic.

A recurring theme in the interviews was the desire to strengthen the EPR, particularly at EU level. Discussion partners also noted that the EPR should be broadened to include more circular strategies, such as promoting reuse, extending the product life span and improving designs through adequate incentives. Moreover, they believed that materials and products vital to the energy transition should be included in the EPR, as advocated by the Netherlands Environmental Assessment Agency (PBL)⁶.

PBL also called for enhanced eco-modulation⁷ in the EPR.

Discussion partners felt that better governance of the EPR is needed, and that this should be developed by a diverse group of stakeholders, including civil society organisations.

The proceeds from this should be used for related purposes, such as product life extension.

The EPR principle is already enshrined in various EU regulations, such as the Waste Framework Directive, the Batteries Directive, the Urban Wastewater Treatment Directive and the Single Use Plastics Directive. The comprehensive Circular Economy Act, which is expected at the end of 2026, will reportedly include an expanded EPR with additional options (including to promote circular strategies).

Recommendation to the government: strengthen EPR and advocate a more comprehensive (more materials and products) and stronger EPR at EU level. This should include incentives and circular strategies to reach higher runs of the R ladder, as well as adequate governance and effective enforcement.

⁶ in its [report](#) entitled 'Towards a more circular energy transition with extended producer responsibility', published on 17 December 2024

⁷ Higher rates for non-sustainable materials and products, lower rates for renewable materials and products.

2.7 Increased focus on raw materials in electrical and electronic waste

On 7 April 2025, we visited Road2Work/Road2Re-use in Ede to learn more about issues related to returns. We were informed that the average Dutch household has around 131 electrical or electronic appliances, 20% of which are defective. Only 2% of discarded electrical appliances are reused. Moreover, newly purchased appliances that are returned often end up in landfill because it is more expensive to sort, check, repackage and resell them. The same is true for other products, such as among others textiles and shoes. The European ban on the destruction of returned items, which was announced alongside the Ecodesign working plan and will hopefully be included in the Circular Economy Act, is expected to play a key role in addressing this issue.

Road2Work/Road2Re-use, which provides employment to people with a disadvantaged position in the labour market, sorts and recycles 80% of the discarded appliances it collects. These appliances often contain precious materials, such as copper, gold, platinum and palladium. A presentation by the Stichting Open (an EPR organisation for electric and electronic waste) drove home the need for a different approach to how we handle these products and materials, based on a greater awareness of the value of appliances. It is also vital that companies honour product warranties and that consumers are aware of their rights in this respect. Environmental taxes on transport and new raw materials should play a role here as well. Annex II provides a comprehensive overview of potential national and European measures.

One potential measure would be to set realistic goals for the 2026 revision of the WEEE Directive, such as ensuring the proper collection of critical raw materials. The collection of critical raw materials (e.g. gold, copper and palladium) should be regulated at EU level, because the Dutch market for these materials is too small to offset the cost of extracting them from appliances. At the same time, these materials are incredibly important, and economies of scale present opportunities for the EU.

Recommendation to the government: consider the above recommendations (setting realistic goals and regulating the collection of raw materials at EU level) and the recommendations listed in Annex II in determining the Dutch position in the WEEE revision (and in national policy where necessary), as well as in determining the Dutch position on the Circular Economy Act.

Annex I – report on interviews conducted during working visit to Brussels

Speaking generally, **EuRIC** noted that recyclers are struggling, and that many in the EU (and the Netherlands) have already folded. This is mainly due to a lack of demand for recycled materials. EuRIC wants the EU's competitiveness agenda to incorporate recycling and circular materials as part of a balanced trade policy. The organisation is also calling for a number of changes to EU regulations, including: (1) better ecodesign regulations (better product design); (2) improvement of the Waste Shipment Regulation (WSR) governing transport to and from third countries (there has been a proliferation of export bureaucracy, making it difficult to export classified waste, also in view of the definition of waste); (3) effective EU end-of-waste criteria (clarity on when something is a raw material instead of waste to ensure cross-border use), as a lack of clarity will result in market fragmentation, making it impossible to export to third countries. EU member states and third countries should be subject to the same regulations. This has to do with point 4:

create demand for recycled materials. This can be achieved by creating a market within the EU, but also by making it possible to transport recycled materials to third countries. Obligations for the use of recycled materials could also help drive demand. The latest figures from [Eurostat](#) show that only 11.5% of the materials used by European manufacturers are recycled, which is far too little. EuRIC also highlighted the need for green steel and recycled steel (investing in steel recycling is important, but demand is still too low to offset the costs). Here too demand creation is crucial, and EuRIC emphasised the need for pricing.

Finally, EuRIC was critical of the Council and EP for diluting the recycling standards in the revised version of the End-of-Life Vehicles Directive. *Following the interview, EuRIC shared its top four priorities for recyclers in the coming years: [EU Recyclers' Top 4 priorities for 2024 - 2029 - EuRIC](#).*

During our conversation with the **European Environmental Bureau (EEB)**, we discussed the circular economy in general, as well as the proposal for circular vehicles, which is currently being reviewed by the Council and EP.

Speaking generally, the EEB observed that there is currently a push to simplify and dilute the Green Deal. This is undesirable, as the purpose of this legislation is to facilitate the transition to a circular economy and ensure that valuable raw materials remain within the chain. It is also crucial to support frontrunners and enhance the EU market's circular competitiveness compared to countries such as China and the US. Recent years have seen the publication of useful regulations in this area, some of which are still awaiting implementation (e.g. the Packaging and Packaging Waste Regulation (PPWR) and the Right to Repair Directive), some of which have to be further elaborated at EU level (this also applies to various secondary rules under the PPWR, and to the

Ecodesign for Sustainable Products Regulation (ESPR)). Some of these regulations are still under negotiation. At the time of writing, this is the case for the Waste Framework Directive, the Green Claims Directive, the Circular Vehicles Regulation and the Plastic Pellets Regulation (which aims to reduce microplastic pollution). It is important that these regulations are properly implemented, both within the member states and by the EU. Furthermore, the expected implementation of the Circular Economy Act at the end of 2026 is a positive development, provided that it incorporates key elements such as regulations to strengthen reuse, improved product design and extended producer responsibility, and stricter processing obligations for recycle. It should also be mentioned that many companies are actually calling for European (rather than national) regulations to ensure a level playing field. Although simplification may be beneficial, since it reduces bureaucracy, it should not result in the elimination of regulations, as this would make it more difficult to create a level playing field while also hindering frontrunners. Moreover, the government itself is a key actor in the circular economy, partly due to its market position. Circular procurement and tendering can greatly strengthen the market.

The EEB also presented its views on the Circular Vehicles Regulation (a revised version of the End-of-Life Vehicles Directive) and the relevant political dynamics.

The EEB's position on the new Circular Economy Act, scheduled for publication next year, in which the R ladder plays a vital role: [Prevention is better than cure: how circularity can put Europe ahead of the game](#).

Our discussion with the Netherlands' **Permanent Representation to the European Union** also touched on the erosion of support in Brussels for issues such as biodiversity, nature and the environment. This could undermine the transition to a circular economy, although the reports by Draghi and Letta have drawn a great deal of positive attention to this objective, as circularity is a crucial element in achieving commodity independence. The Netherlands is still at the forefront of the circular transition.

We also discussed the individual proposals as well as upcoming proposals.

At the **EP**, we spoke with **Bas Eickhout**, who shared his thoughts on how to ensure the transition to a circular economy by enforcing implementation; recognising the importance of frontrunners instead of focusing solely on stragglers; extending product lifespan (including through ecodesign); creating market demand for recyclers through incentivisation, standardisation and pricing; and increasing the role of the Dutch government, including through circular procurement. He also emphasised the importance of expanding the narrative around the circular economy beyond waste, as circularity is crucial for the European economy (raw materials) and for geostrategic purposes (strategic economy) and security. While it is true that certain jobs may be lost, this is inevitable, and the circular transition will create many new jobs as well. Now is not the time to lower our ambitions, he argued, but to redouble them. Eickhout

saw a strong connection with the Clean Industrial Deal and the EU's role in relation to the US and China, noting that the EU should seize the role of pioneer as well as the opportunities created by this position. He stressed that we should cherish and harness our frontrunners and our forward-thinking position on circularity, and that the Netherlands has much to gain from a European vision and cooperation. Led by Europe, the circular transition will enhance our competitive position. Circularity is our strength, and 'Made in Europe' should be seen as a mark of quality.

Finally, we spoke with **the Circular Economy Director of DG Environment**, who is already preparing the introduction of the Circular Economy Act at the end of 2026. He noted that the Circular Economy Act is being drafted by DG ENV in cooperation with DG GROW (the directorate-general for the internal market, industry and entrepreneurship). He expected that the law will include provisions on matters such as ecodesign, which will be crucial in extending the lifespan of products. A ban on the destruction of unsold goods is also expected to be included. In addition, harmonisation of the end-of-waste regulations is important, and the Commission aims to provide clarity on this – and on the distinction between waste and raw materials – in the law. Extended producer responsibility is another key issue. The Director confirmed that EPR will also apply to materials and products that are critical to the energy transition, such as solar panels, car batteries, etc. (see also the [PBL report](#) on this).

When we discussed the recycling sector, we noted that the fact that companies in this sector cannot receive state aid due to restrictive provisions presents certain challenges. The Director responded that member states are sometimes too pessimistic about what is possible in this regard.

Annex II – recommendations on how to deal with (raw materials in) electronics

Possible measures and tips on electrical and electronic appliances – what we can do to facilitate collection and recycling:

National measures

- Introduction of duty to deliver (collectors and dealers) through the Omgevingswet and Besluit activiteiten leefomgeving (Environment and Planning Act and its Living Environment Activities Decree).
- Adequate enforcement of this duty, which is challenging as there is no certification system for treatment and reuse, so a transporter of discarded appliances is hard to catch (and excuses are readily available).
- Registration of exports for reuse.
- Registration of preparation for reuse (by professionals for safety reasons).
- Ensure consistency in collection by municipalities, including a pay-as-you-throw (PAYT) system to reduce unnecessary waste (quote: 'As long as it fits, you can just chuck it in the grey bin, right?'). Municipalities that have introduced a PAYT system report fewer problems with electronic waste being thrown in the general waste bin.
- Declaration of general applicability: central coordination of collective implementation.
- Environmental transport tax on purchases from certain platforms, including Chinese platforms.
- Environmental tax on new raw materials.
- Repairs: reduce VAT on parts, which are often expensive.
- Repair vouchers: frequently mentioned due to Austria's successful implementation. This was done with European funding, however, and the system involves a large amount of bureaucracy.
- Lifetime warranty: the Netherlands is one of the few EU member states where products come with an official warranty for their entire realistic lifetime. The problem is that most people are unaware of this, so action is needed to raise awareness among both consumers and businesses. The Stichting Open would like to be 'assigned' this task.
- Make all batteries the same colour for the sake of findability during waste treatment (this could also be escalated to EU level, suggest during the revision of the Battery Regulation).
- Leasing appliances often leads to greater producer responsibility for a product that is designed to be repairable and longer-lasting (this is why the 'as a service' concept is promoted in the national circular economy programme).

From this perspective, the Chromebook is an example of a 'bad product', as its motherboard cannot be replaced.

- Pricing: the prices of secondary raw materials should be equal to the prices of primary raw materials to raise the value of 'waste' (because waste often contains raw materials, a practical intervention would be to locate recycling/circular craft centres near waste facilities so that appliances can be checked for reusability/repairability).
- Collection should preferably be organised regionally, while processing should take place at a larger scale.
- For the House of Representatives itself (and the ministries): what happens when equipment is replaced (every MP was recently issued a new laptop) – are old devices refurbished?
Eighteen percent of laptops can be reused.
- Returns are a significant part of the problem, and the combination of unlimited orders and returns is creating perverse situations. The problem is that returns are often free (or they at least do not have negative consequences for the buyer). Since Wehkamp began charging customers a small fee for returns, it has seen a significant drop in orders and returns. This problem could also be addressed by amending EU consumer regulations.

EU measures

- Curb imports of products from Asia by imposing stricter requirements for imports/products from third countries. Improve monitoring of platforms such as Alibaba, Shein and Temu. France recently screened all of the cargo on a plane from China for unauthorised products.
- EU ban on vapes (85% of vapes are sold illegally, which means they cannot be collected).
- Stop illegal fatbike imports (illegal fatbikes cannot be collected).
- It is currently difficult to reuse old parts (manufacturers only want proprietary parts, which quickly disappear from the market).
- Increase/accelerate use of recycle.
- In general, a level playing field between member states can only be ensured through EU regulation.
- CENELEC is an EU certificate for recycling and reuse. There are too many requirements that apply to all electronic products. Specific requirements are needed for reuse within the EU.
- The revised WEEE should include realistic objectives, such as ensuring the effective collection of critical raw materials.

The collection of critical raw materials (e.g. gold, copper and palladium) should be regulated at EU level, because the Dutch market for these materials is too small to offset the cost of extracting them from appliances. At the same time,

these materials are incredibly important, and economies of scale present opportunities for the EU.

- Clearly distinguish between waste and resources to enable the creation of an EU market for secondary critical raw materials.
- A common problem is that electronics (but also textiles and other products) are often destroyed; this should be banned.
- Packaging is a problem for returns (e.g. too much packaging, too much air, too many plastics and other undesirable materials, difficult to repackage). Look at the example set by Philips (cardboard packaging for Senseo) and make demands (PPWR adopted by the EU last year; this should be taken into account in drawing up delegated regulation, and during the review/revision of this regulation).

Annex III – report on conversation about Clean Industrial Deal/circular economy narrative

Speaking to the economist and publicist Paul Schenderling on 4 June 2025, we came to the following conclusions (see also the Clean Industrial Deal report):

- **Standards and pricing** are effective and efficient instruments. Once a framework of standards is in place, companies can decide how they want to comply with them, providing freedom and clarity. By contrast, many economists have criticised *incentivisation* for its primary focus on the 'how'; it can also result in an uneven playing field if subsidies are not widely available.
- One of the main challenges currently facing the EU (and the Netherlands) is the bloc's **precarious geopolitical and economic position**. Big countries like China and the US are using economic and trade relations as a tool of power, and the World Trade Organization (WTO) is under considerable strain. High exports from China are causing problems for industries in other countries. Seeing as China's 'economic dumping' is contrary to the WTO treaty, the WTO could impose restrictions on this type of trade. The WTO treaty could also be used to ban or restrict social and ecological dumping, since large-scale imports hinder compliance with social and ecological standards, as is the case here. To comply with WTO provisions, a procedural test should be employed to ascertain whether normative legislation is robustly substantiated, and to determine whether a substantial flow of imports undermines these norms. If this is found to be the case, trade can be limited through an equivalent tariff. Although such action should be initiated by the EU, the Netherlands can advocate for it, preferably together with other member states. Given Trump's use of tariffs and current efforts to build relations with other countries, this may be a risky move. Nevertheless, the possibility of imposing an equivalent tariff could be raised within the EU.
- Another solution to tackle high-volume product dumping would be to **use the Carbon Border Adjustment Mechanism (CBAM)**. One way of supporting the EU's struggling (plastic) recyclers while curbing imports of cheap products that do not meet EU standards (e.g. cheap clothing from retailers like Temu) could be to impose a CBAM levy (border charge). Although this might not be entirely WTO-proof, it is still an option given the WTO's current powerlessness. The advice would then be to solve everything with equivalent border charges. The CBAM currently only applies to carbon; ideally, it should also apply to materials.
- Another solution – which is also being worked on in Brussels – could be to limit excessive imports of cheap online products (which harm European industry and the environment) from China and other countries by introducing a carbon/materials passport.

- When we asked Schenderling about the EU's efforts to simplify regulations, he noted that it would be highly unwise to stop complying with environmental targets. He argued that producing green and carbon-free products will give the EU a competitive advantage moving forward, which should be the EU's long-term economic goal. Such production could be incentivised by **introducing environmental taxes on consumer products**, which would have to be done at national level.

An example:

Price new electronics at 5% and earmark that money for sustainable and circular production.

Ensure that price differences at the border with third countries do not become too big. This would not require additional spending by national governments. The tariff would apply to everything sold here, but not to exports. Some products or processes will require more patience: plastic recycling, for instance, needs to serve a market larger than the Netherlands. Ex'tax has demonstrated that effective models are quickly adopted by other countries. In short, it will take some time and effort initially, but after that the country in question can benefit from a first-mover advantage (see the EZ committee's working visit to Phoenix; very beneficial in the long run).

See also the plastics roundtable, which has recently delivered its results. Here, fossil fuels are taxed in favour of industry; this is a similar solution, with a levy on the consumption side. There is also support for this measure.

Taxation options on the consumption side include a separate environmental tax (with the help of the Tax and Customs Administration), an EPR tariff and rate differentiation (ecomodulation). EPR can also help to promote the value of returned products (cleaner and better quality).

- Another option would be to pursue **standardisation through quotas** – a simple solution with a limited administrative burden. Such a scheme would be similar to the ETS, but instead of focusing on carbon emissions, it would focus on materials to foster the circular transition. These quotas should eventually be phased out for critical materials in order to provide investment security, which requires predictable prices per tonne over several years. A quota for critical materials could be imposed at EU level. For materials, this could be linked to a border tax and import cap. If the rest of the required materials is (re)generated through recycling, there is no need for pricing or other obligations, as the process would then unfold organically.
- It is noteworthy that the **cost** is often raised as an issue here, while the real concern should be the cost of inaction – what happens if we do not invest in a solution? Europe's industry would end up paying the price for this: short-term solutions that focus less on sustainability would prevent the business community from reaping the benefits of being a first mover. In addition, disinvestment in environmental and climate goals will cause significant damage to businesses and the agricultural sector, resulting in costs associated with climate change, environmental damage and shortages of resources, including natural resources such as water.

Annex IV – discussion partners

Interviews were held with (representatives of):

- Special Government Representative for the Circular Economy
- Ministry of I&W
- VNO-NCW/MKB (Industry)
- VNCI (chemical industry)
- Plastics Europe
- FNLI (federation of the Dutch food industry)
- PBL (planbureau voor de leefomgeving)
- Plastic Soup Foundation
- Copper8
- Invest-NL
- Ex'tax
- TechniekNL
- Paul Schenderling
- Road2Work/Road2Re-use
- Stichting Open
- EuRIC (European confederation of recyclers)
- EEB (European Environmental Bureau, a partnership between environmental NGOs)
- Permanent Representation of the Netherlands to the EU
- European Parliament, Bas Eickhout as deputy member and former chair of ENVI and member of ECON (and EP rapporteur on various CE proposals)
- European Commission (Director of Circular Economy)

Briefings:

- Raad voor de leefomgeving
- Ministry of I&W
- PBL

Roundtable discussions:

- Incentivisation, standard setting and pricing
- Tax shift and circular economy

Annex V – documentation

[National Implementation Programme for the Circular Economy](#) (NPCE, from I&W)

PBL: [Reflection on NPCE](#)

PBL: [Integral Circular Economy Report \(ICER\)](#)

PBL: [Progress on the circular transition](#)

PBL: [Towards a circular energy transition with extended producer responsibility](#)

RLI: [Moving away from the throwaway society](#)

[Chemistry Magazine Special](#) on the materials transition

European Sustainable Carbon Package: [Joint Statement](#)

[Antwerp Declaration](#) for a European Industrial Deal

Letta: [Much more than a market](#)

Draghi: [The future of European competitiveness](#)

KPMG: [Plastic waste supply and demand](#)

News release: [Industry subsidy for circular plastics research](#)

Online consultation: [National standard for circular plastics](#)

Plastics Europe: [Roadmap for the plastics transition](#)

Circular financing, DNB: [Roadmap to circular economy](#)

Circular financing, Copper8: [Plenty of money, but not for circular businesses](#)

Circular financing, Copper8: [Circular business models](#)

Circular financing, FinanCE platform: [Money makes the world go round](#)

Ex'tax: [tax shifts](#)

Ex'tax: [Delta Plan for Circular and Social Economy Taxes](#)

Ex'tax: [Press release](#)

Ex'tax: [website](#)

EU: [Green Deal](#)

EU: [Circular economy action plan 2020](#)

[Cabinet position](#) on the Letta report, May 2024

[Public consultation](#) on the Circular Economy Act, 1 August 2025

All position papers for the roundtable discussions on [12 December](#) and [18 December](#) 2024

Former rapporteurs:

EU rapporteur on the Circular Economy Yasemin Çegerek: [report](#)

EU rapporteur on the Circular Economy Kiki Hagen: [final report](#) (2023)