

## 2020 Roadmap for new Circular Economy Action Plan

### ANEC comments

#### 1. The focus needs to be moved from the end-of-life phase to the reduction of environmental impacts

- The [title](#) "Circular economy – new action plan to increase *recycling* and reuse of products in the EU" misleads: the focus should be **moved from recycling to waste prevention by tackling short-lived products**. Reuse is not much further detailed in the roadmap.

The title and scope of the planned communication should instead reflect some actions the roadmap foresees, and the will expressed in front of the European Parliament by Environment Commissioner Sinkevičius "for a paradigm shift during his mandate" compared to earlier Circular Economy action plans, "moving from recycling to preventing and minimising waste in the first place".

- If the new Circular Economy Action Plan is to guide the EU towards a long-term vision for its green policies and contribute to achieving the UN SDGs, it needs to point to the **reduction of environmental impacts**. Hence, we await a bold *sustainable product policy* and meaningful *actions on high-impact sectors*.

#### 2. Chemical safety of products needs to be enhanced to avoid hazardous chemicals stay in the material cycles

- Another reason to urgently move away from the end-phase of product lifecycles is the importance of tackling first the **chemical safety of products** in the market, by filling gaps in existing European regulatory provisions for chemicals in (consumer) products.
- The push towards increased recycling and use of recycled materials in products, before putting in place the EU strategy for a non-toxic environment, overlooks the alarming risk of creating **toxic cycles**.
- The issue is partly touched upon in the Roadmap problem description (A) but is not explicit in the initiative's aim (B) when speaking of fostering an internal market for secondary raw materials.

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### 3. Empowering consumers goes beyond (environmental footprint) information

- The effectiveness of consumer information in changing consumption patterns should not be overrated, nor must information overburden the consumer with the responsibility of identifying sustainable choices. To empower consumers, it is crucial **long-established environmental product policies (such as Ecodesign, Energy labelling and Ecolabel) are fostered** to enable choice editing and help eliminate the most unsustainable products from the market.
- The extension of scope to other non-energy related products could be joined by campaigns promoting the Ecolabel as a label of environmental excellence which could additionally serve as benchmark.
- The intention of addressing **misleading green claims** is laudable, as well as recognising that consumers need reliable, comparable and verifiable information (as the energy label and Ecolabel can provide).
- It must be highlighted that **consumer information based on a choice of LCA indicators cannot serve this purpose**. This is due to the poor precision of the method which does not allow consumers to have a clear indication of a superior product.
- As regards methods to assess reliability of environmental declarations, **no single method** is able to suitably characterise the environmental performance of activities. Different methods have strengths and weaknesses which must be analysed and, combined in a meaningful and cost-efficient manner. Methods based on LCA have limitations (including lack of comparability) that need to be considered. For instance, LCA is not a suitable instrument to address several environmental aspects (e.g. when impacts are dependent on space, time and background levels).

See also our Position Papers:

- ['Keeping hazards in the circle?' - the interface between chemicals, products & waste legislation](#)
- [Future product policy framework to facilitate a transition to a circular economy - reply to DG ENV consultation](#)
- ['Environmental Assessment goes astray: A critique of environmental footprint methodology & its ingredients'](#), and [reply to EC consultation on potential policy applications for the EF methods](#)