CEN – European Committee for Standardization
CENELEC – European Committee for Electrotechnical Standardization

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Position Paper

Call for Evidence on the EU Circular Economy Act

CEN (the European Committee for Standardization) and CENELEC (the European Committee for Electrotechnical Standardization), as the recognised European Standardisation Organisations (ESOs), welcome the European Commission's initiative for a Circular Economy Act (CEA). Harmonized standards are essential to reach the ambitions of the CEA to build a genuine single market for secondary raw materials and circular products. We are committed to working with EU institutions and stakeholders to accelerate Europe's transition to a sustainable, circular and resilient economy.

Executive Summary

To deliver on its ambition of a stronger, more integrated circular economy, the CEA should explicitly recognise the role of standardization and leverage harmonized European standards. A list of concrete recommendations can be found on page 4. CEN and CENELEC stand ready to support the CEA through the **development of European and international standards** that foster trust, interoperability, and innovation.

1. Introduction

Standards are a proven instrument to operationalise EU legislation while reducing regulatory burdens and supporting SMEs. By building on the New Legislative Framework (NLF), the CEA can rely on harmonized standards to **provide presumption of conformity** with legal requirements, while leaving **room for innovation**.

The consultation has identified barriers to a more integrated circular economy, including divergent classifications of waste and secondary raw materials, weak competitiveness of recyclates, insufficient transparency on recyclability and material composition, and

resource loss due to inefficient collection, sorting and data gaps. Today, divergent national practices undermine the single market. Standards can directly address these challenges by establishing common definitions, quality criteria and testing methods across Europe.

Within the CEA, standards also contribute to:

- Reducing legal and market fragmentation,
- Enhancing trust in secondary raw materials through quality and safety criteria,
- Enabling traceability and reliable data exchange,
- Supporting life-cycle and environmental performance assessment,
- Facilitating innovation and competitiveness in line with EU policy objectives.

Finally, active engagement with international standardization (e.g. ISO, IEC), CEN and CENELEC can help ensure that European solutions influence global practices, thereby strengthening the competitiveness of European industry and supporting the EU's open strategic autonomy. For example, better utilizing the ISO 59000 series standards on circular economy at European level would be a strategic move and would accelerate Europe's leadership, as these standards are cross-sectoral, internationally applicable, and represent the most forward looking framework for advancing the circular economy in Europe.

2. Contribution of Standards to the CEA Key Challenges

In this section, we would like to highlight the contribution of standards to three of the four key challenges identified by the CEA:

Key Challenge 1: Divergent classifications of waste and secondary raw materials.

European Standards reduce market fragmentation and legal uncertainty in the single market. This aids industries in the circular economy sector to create secondary raw materials, innovate new solutions and finally to enable scaling-up.

- Divergent interpretations of EU rules by Member States currently create barriers to the single market for secondary raw materials. Publication of European standards oblige Member of CEN and CENELEC to retract national diverging standards. Thereby they can provide common definitions, test methods, sampling protocols, and quality criteria that are recognised across borders, thus ensuring mutual trust and market access.
- Standards can help clarify "end-of-waste" (EoW) criteria and ensure that secondary raw materials are consistently recognised and accepted across the EU. Currently, there is no single European technical standard on EoW criteria. European Commission could make use of this opportunity to request European standards to support or replace end-of-waste rules. A general product group

neutral understanding of EoW, covering framework and generic criteria for non-waste status may be needed. Furthermore, defining e.g. quality thresholds, test methods and conformity procedures per material stream could follow as next steps.

- Particularly the construction sector, which is characterized by substantial demand for natural resources and considerable waste generation, heavily relies on standardization to effectively implement and scale up circular economy practices. This dependency is especially pronounced due to the high proportion of small and medium-sized enterprises (SMEs) within the industry.
- Standardized test methods support research and development (R&D) and enable scale-up of collection and recycling technologies.
- Public tenders can reference standards to drive demand for certified circular products and thus ensure sustainable procurement.

Key Challenge 3: Insufficient transparency on recyclability and material composition.

European Standards support quality, safety, and trust in secondary raw materials. Standards can also enable the integration of environmental performance and life-cycle considerations for waste and secondary raw materials.

- Secondary raw materials often face a perception of lower quality and reliability. Standards can define clear technical specifications, grading systems, and verification methods, which enhance market confidence and facilitate uptake[1].

  For instance, there is no EU-wide scheme for secondary raw material (SRM) quality and chain-of-custody: a proposal is currently being prepared in CEN/TC 473 on adopting ISO 59014 *Environmental management and circular economy — Sustainability and traceability of the recovery of secondary materials — Principles, requirements and guidance*.
- Certification and conformity assessment mechanisms based on standards can provide assurance to buyers and sellers, mitigating fraud risks and reducing transaction costs.
- Standardised methodologies for life-cycle assessment (LCA), recyclability and durability measurement, and environmental performance indicators can ensure comparability across markets and policies[2].

- By using standardised methodologies regulators can better integrate circularity criteria into legislation and industry to innovate towards more resource-efficient solutions.

Key Challenge 4: Resource loss due to inefficient collection, sorting, and data gaps.

European Standard facilitate data, traceability and digital solutions.

- Reliable information is essential to overcome asymmetries and behavioural barriers. Standards are establishing interoperable formats for digital product passports[3], material declarations, and traceability systems, ensuring consistency across sectors and Member States.
- Common data standards also help monitor flows of critical raw materials, reduce leakages, and prevent illegal exports[4].

3. Recommended Actions

In the context of the planned CEA, CEN and CENELEC recommend the following:

- The CEA should explicitly **recognise the role of European standardization as a key instrument** in creating a functioning single market and as an integral tool to increase circularity within it. CEN and CENELEC recommend the CEA to follow the recital 98 of the Net Zero industry act: " (98) The Commission should, as provided for in Article 10(1) of Regulation (EU) No 1025/2012 of the European Parliament and of the Council (44), request one or more European standardization organisation to draft European standards in support of the objectives of this Regulation."

- The Commission should **make systematic use of standardization requests** to CEN and CENELEC in priority areas such as end-of-waste criteria, quality requirements, traceability, extended producer responsibility and digitalisation. For example: **harmonized Digital Product Passports** with standardized datasets on materials, recyclability, and hazardous substances.

- **Cooperation** between regulators, standardizers, industry, and civil society should be reinforced **to ensure timely development and uptake of**

[3] Standards for DPP currently being developed in CEN/CLC/JTC 24 as per standardization request Mandate/604
[4] Standard currently under drafting in CEN/TC 473 'Circular Economy - Product-related data and information sharing along value networks'

standards that reflect societal needs and market realities. CEN & CENELEC technical committees are open to contributing to a mapping of concrete needs of standardization on short- medium and long term.

- **To strengthen EU and international cooperation** to align methods and criteria by supporting and leveraging the work under ISO/TC 323 and CEN/TC 473 on Circular Economy, ISO/TC 308 on Chain of custody and IEC/TC 111 CLC/TC 111x on E-Waste. EU solutions on circular economy should be promoted globally and Europe's competitiveness strengthened by better utilizing international standards such as the *ISO 59000 series standards.*
- Encourage the Commission to include **waste hierarchy[5] and material efficiency hierarchy[6]** in the **regulatory framework of the CEA.** Waste hierarchy should be considered directly and in cases where refurbishment is relevant. These considerations would allow the act to better address the broader opportunities for the European industry and not only in recycling, as a sole focus on improving waste treatment may inadvertently support linear business models.

4. Conclusion

Standards already support specific legislative procedures such as ESPR, WEEE-Directive and PPWR and will continue to do so in the future, by providing detailed technical specifications for requirements. They provide the certainty, quality, and transparency needed to unlock investment, scale innovation, and ensure a level playing field across the EU.

With a wide network of stakeholders involved in standardization across Europe, standards are a **key enabler** of the Circular Economy Act.

By embedding standards into the CEA, the Commission can:

- Build trust in secondary raw materials.
- Enhance the competitiveness of recyclates.
- Drive demand through procurement and EPR systems.
- Ensure coherence with the broader EU policy framework.

Therefore, standards should be a **central pillar of the CEA** to accelerate Europe's transition to a sustainable, resilient, and circular economy. CEN and CENELEC are

[5] e.g. the EPR mechanism is particularly effective in setting up waste management systems for value chains that are not yet mature, standards on EPR are currently being developed within CEN/TC 473 in alignment with the work taking place at ISO.
[6] e.g. as demonstrated in EN 45560 'Method to achieve circular designs of products'

committed to supporting the CEA to deliver on its ambition of accelerating Europe's transition to a circular, sustainable, and resilient economy.

About CEN and CENELEC

CEN (European Committee for Standardization) and CENELEC (European Committee for Electrotechnical Standardization) are recognized by the European Union (EU) and the European Free Trade Association (EFTA) as European Standardization Organizations responsible for developing standards at European level, as per European Regulation 1025/2012. The members are the National Standards Bodies (CEN) and National Electrotechnical Committees (CENELEC) from 34 European countries. European Standards (ENs) and other standardization deliverables are adopted by CEN and CENELEC, are accepted and recognized in all of these countries. These standards contribute to enhancing safety, improving quality, facilitating cross-border trade and strengthening of the European Single Market. They are developed through a process of collaboration among experts nominated by business and industry, research institutions, consumer and environmental organizations, trade unions and other societal stakeholders. CEN and CENELEC work to promote the international alignment of standards in the framework of technical cooperation agreements with ISO (International Organization for Standardization) and the IEC (International Electrotechnical Commission).