



To the attention of:

Commission president Jean-Claude Juncker

CC: Vice Commission president Frans Timmermans

Brussels 24/11/2015

Dear President Juncker,

Last year, your Commission withdrew the Circular Economy package. This led to quite some upheaval, which First Vice-President Timmermans tried to soothe with the assurance that a new and more ambitious proposal would be produced. When voicing our concerns during a Greens/EFA Group meeting on 4 February 2015, First Vice-President Timmermans asked us to give the Commission the benefit of the doubt, allowing the Commission to prove us wrong with regard to our concerns. Unfortunately, the leaked documents we have seen so far do not reassure us that the Commission is about to live up to the promise that have been made.

While at first sight, overall, the new approach seems more comprehensive with regard to the 'product side', it lacks crucial elements that were present in the withdrawn proposal, such as a target to increase resource efficiency at EU level by 30 % by 2030 compared with 2014 levels, and the monitoring of this in the context of the European Semester. As long as circular economy does not contribute to an effective and absolute reduction of resource consumption, and as long as resource consumption is not integrated into the main tool to measure "jobs and growth" - the European Semester - it will not bring us on the path of sustainable development.

Moreover, the initiative for 'waste to energy' in the framework of the Energy Union is most worrying: our economy needs prevention by smart designs, more reuse and more recycling - not more burning.

At the same time we are concerned that the actual legislative proposal with regard to the waste side is weakened down compared to the proposal of the previous Commission:

- the targets for reducing marine litter and food waste have been removed;



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- the waste recycling targets may well be weaker compared to the previous proposal, both in substance and on the time axis, even though your own draft impact assessment shows that the higher the targets, the higher the economic benefits for each Member State;
- for the calculation of the recycling targets, instead of a 2% tolerance, the new calculation method contains a 10% tolerance, which furthermore weakens the waste recycling targets.

Overall, we consider that the new actions intended for the upper half of the circle do not outweigh the lack of a resource efficiency target, the non-integration of resource consumption into the European Semester, the dropping of waste reduction targets, the weakening of recycling targets and the promotion of incineration. From an environmental perspective, the new proposal seems indeed less ambitious.

We shall withhold our judgement until the Commission has adopted its proposal on 2 December 2015. We wholeheartedly hope that our concerns are proven wrong.

Sincerely yours

Rebecca Harms

Philippe Lamberts

Co-Presidents
Greens/EFA Group in the European Parliament