Brussels, 21 May 2024

Orgalim Key Recommendations on the Circular Economy

Policy proposals for the upcoming EU legislative period

Executive Summary

Policy foundations for a successful circular economy of Europe

- Europe must continue to be a world leader in circularity through a legislative framework based on the principle of "starting it small to make it work" enabling industry to deliver more circular solutions, provided that the framework conditions are right and that requirements are feasible to implement in real life for companies of all sizes.
- The "R-strategies" (Rethink", "Refuse", "Reduce", "Reuse", "Repair", "Refurbish", etc) are the foundation for innovative business models and the basis for the successful implementation of the circular economy.
- Enabling innovations that are open to different technological approaches should be continued. We call for more investments in research, development and innovation for circular products and solutions as well as for infrastructure.
- A circular single market with a harmonised approach is essential to avoid a patchwork of different rules.
- Standards are essential and the requirements must be harmonised and based on the New Legislative Framework.
- Robust market surveillance and effective enforcement are preconditions to ensure fair competition and a level playing field among economic operators based both inside and outside the EU.
- Better regulation, policy coherence, regulatory clarity and a reduced administrative burden must be a top priority.
- Transparency of the process and involvement of industry are important elements.
- Legal certainty, predictability and ability to plan should be ensured.
- Industry needs to cooperate with all actors in the value chain.
- Authorisation procedures should be simplified and accelerated.
- Data and digitally-enabling solutions enable the upscaling of the circular economy.
- Information and documentation requirements should be less burdensome and costly.
- The demand for circular solutions should be supported in addition to the supply from producers.

Policy foundations for a competitive product policy for the circular economy

- Ecodesign for Sustainable Products requirements that make products more circular, are easy to understand, comparable, verifiable, enforceable, proportionate and consistent with other legislation, without duplication.
- Dialogue with industry as well as with market surveillance authorities is needed.
- Data requirements must work for both circularity and competitiveness and must respect intellectual property.
- Third-party verification should only be used if absolutely justified.

Policy foundations for EU chemicals policy - no green transition without chemicals

- Chemicals regulation must follow a risk-based approach to ensure predictability, while maintaining CLP, REACH and (for our industries) RoHS as the key regulatory instruments for regulating chemical safety and ensuring a competitive industry with consistency across legislations establishing rules for products and waste.

Policy foundations EU waste policy - from waste to resources in a circular economy

- A legislation that more easily enables companies to avoid waste, reduce, reuse or extend the life of equipment, while handling, recycling and recovering waste, by optimising already existing competences, facilities and market needs across the EU to ensure a high level of resource efficiency.
- A circular single market for waste resources and a well-functioning waste legislation are essential.
- The framework should enable innovation regarding acquiring and using secondary materials.

Technology provides the solutions required to deliver the green transition

Orgalim represents Europe's technology industries, comprised of 770,000 innovative companies spanning the mechanical engineering, electrical engineering, electronics, ICT and metal technology branches. Together they represent the EU's largest manufacturing sector, generating annual turnover of over €2,819 billion, manufacturing one-third of all European exports and providing 11.9 million direct jobs. Our industries are global leaders in the carbon-neutral energy, electrification, alternative fuels and clean manufacturing technologies needed to achieve net-zero, and we are committed to playing our part to deliver the net-zero transformation and the green transition.

Our industries not only see great potential in a circular economy; it is also a pre-requisite for having access to scarce and critical resources in the future. Pursuing the net-zero transformation in a wider resource efficiency agenda will contribute to meeting this goal in a faster and more cost-efficient manner. A circular economy therefore makes sense from all environmental, competitiveness, business continuity, job creation and local added value perspectives. Given that resources and the use of materials are cost factors susceptible to geopolitical pressures, embracing the circular economy also becomes pivotal in striving for greater resilience and economic security.

In this document, Orgalim is providing its key recommendations on the circular economy of Europe for the upcoming EU legislative period 2024-2029. This document is developed in the context of the Orgalim Policy Agenda for a European high-tech manufacturing base for the 2024-2029 legislative cycle which contributes concrete recommendations to unleash Europe's high-tech manufacturing potential and make Europe's prosperous net-zero future a reality. As Europe shifts to implementation mode on its far-reaching Green Deal and digital legislative framework, we highlight six fundamental priorities:

1. Decrease the regulatory burden
2. Regain global leadership in research and innovation
3. Recommit to the single market
4. Make digital legislation work for manufacturing industries
5. Remove trade barriers
6. Ensure a competitive environment and a secure energy supply

Policy foundations for the circular economy of Europe

In the context of the European Green Deal, which strives to make Europe the first climate-neutral continent, the legislative framework for the circular economy has - for the most part - been agreed upon. **Europe must now shift its attention to roll-out and implementation**. If we are to reach our net-zero and circular economy goals, the next five years must be about actually delivering the green transition. This is the hard part and we are now looking at the next steps for the legislation to work in real life and to make the circular economy a reality in Europe.

As the industries that provide the solutions needed to deliver this reality, **Orgalim's members highlight the following policy foundations that are required for the circular economy of Europe to succeed:**

- Europe must continue to be a world leader in circularity through a legislative framework based on the **principle of "starting it small to make it work"** enabling industry to deliver more circular solutions, provided that the framework conditions are right. This means requirements that are feasible to implement in real life for companies of all sizes competing on a global market.
- We see what are known as the "**R-strategies**" as the foundation for innovative business models and as the basis for the successful implementation of the circular economy. In addition to central approaches like "Rethink", "Refuse", "Reduce", this also includes the concepts of "Reuse", "Repair", "Refurbish", "Remanufacture", "Repurpose", "Recycle" and "Recover". These objectives might at times be conflicting and it is therefore of central importance to have a continuous dialogue with industry in order to deliver the Circular Economy Action Plan published in March 2020.

- Technological innovations have long contributed to making the production of goods and the provision of services more efficient and environmentally friendly. This is why it is essential to continue to enable **innovations that are open to different technological approaches**. While much depends on the implementation of new legislation, especially the new Ecodesign for Sustainable Products Regulation (ESPR), other aspects also matter. Our industries call for more favorable conditions for innovation and investments in research and development, including the promotion of feasible and innovative business models for a circular economy. In particular, we call for **more investments in research, development and innovation** for circular products and solutions as well as for infrastructure – both logistical and digital.
- **A circular single market with a harmonised approach** to the various circular economy measures is essential to avoid a patchwork of different rules in the different EU Member States. We fully support the statement in the recent Letta Report that a circular single market is needed, as it will support environmental sustainability while simultaneously driving economic growth by fostering innovative business models and consumer behaviours. We urge Member States to think more European and to stop developing national legislation on the circular economy. We support regulations instead of directives to ensure that the obligations will be implemented at the same time, and in the same way, in all EU Member States. We therefore fully support several regulations that were proposed under the EU Green Deal (e.g. new Ecodesign for Sustainable Products Regulation repealing the Ecodesign Directive, and a proposal for a Regulation on Packaging and Packaging Waste repealing the Packaging and Packaging Waste Directive).
- **Standards are essential** complementary tools to EU legislation for enhancing the sustainability of products and materials in a manner that is feasible for manufacturers to implement. While specific requirements are defined in the legislation, sufficient flexibility must be given to standardisation experts to develop the standards taking into consideration the state of the art on scientific assessment methods through recognised European or ISO /IEC/ITU international standards. **The requirements must be harmonised, based on the New Legislative Framework** (with general requirements in legal text and specification via standardisation), reliable and verifiable, as well as providing a balance between safety, environmental and quality aspects. We call for the Commission to publish standardisation requests as early as possible. As recognised in the recent Letta Report, the EU must continue to champion the development of standards for circular product design through active collaboration with European standardisation organisations.
- **Robust market surveillance and effective enforcement are preconditions to ensure fair competition and a level playing field** among economic operators based both inside and outside the EU. We note that third-party verification is included in several new legislative measures. However, third-party verification should not be considered as a solution for stronger market surveillance and it should be used only if the nature, type and degree of the risks attached to a given product justify it. To ensure effective enforcement of EU circular economy policy, we call for the Commission to include minimum enforcement activities within each policy proposal.
- **Better regulation, policy coherence, regulatory clarity and a reduced administrative burden** must be a top priority. Applying the better regulation principles, including for example impact assessments, and avoiding overly complicated legislation, overlap and double regulation will ensure evidence-based EU legislation and strengthen the competitiveness of the EU. Different legal instruments (e.g. REACH, RoHS, and the Ecodesign and Waste Framework Directive) should be used according to their intended goals: for example, product policy regarding circularity should not regulate safety of chemicals. Regulations and policies must be clear in order not to be subject to interpretation, thereby ensuring a level playing field amongst economic operators within the EU. Finally, special attention is required to reduce the administrative burden as much as possible as this is crucial for an effective adoption of regulation.
- **Transparency of the process and involvement of industry** are important elements. We credit the success of the ecodesign instrument to the strong tradition of involving industry and other impacted stakeholders when setting ecodesign requirements through the Ecodesign and Energy Labelling Consultation Forum and related standards through the standardisation organisations.
- **Legal certainty, predictability and ability to plan** should be ensured because these factors are crucial for companies when making investment decisions. Economic operators should be provided with sufficient time to

prepare for the implementation of new requirements, particularly taking into consideration the needs of micro businesses and SMEs.

- **Industry needs to cooperate with all actors in the value chain** because striving for circularity is challenging for our industries, which cannot achieve this goal alone. It is important that all actors deliver the information that is needed. The responsibilities of the different actors must be clear, and the possible cost implications for the different actors should be defined and proportionate.
- **Authorisation procedures should be simplified and accelerated** to support the transformation towards green production processes and products.
- **Data and digitally-enabled solutions enable the upscaling of the circular economy** because they allow the creation and processing of data and information required for circular business models and the complex demands of circular supply chains. The integration of digital technologies enables a smarter use of resources, for example in the optimisation of production processes, the extension of the life cycle, the reduction of waste and communication in the supply chain.
- **Information and documentation requirements should be less burdensome and costly.**
    - The information and documentation requirements of EU policies (ESPR, Green Claims etc.) are extremely costly and resource intensive. Industry would welcome support from the Commission in alleviating these costs and burdens by providing access to free databases and tools as well as harmonised methodologies to assess the products' sustainability footprint.
    - Efforts focused on rolling out the new legislation should therefore include prioritising easy-to-use tools to help businesses deliver on information and reporting requirements. The tools developed according to different legislations should be compatible.
- **The demand for circular solutions should be supported** in addition to the supply from producers. We call for the Commission to do upfront a thorough analysis in the impact assessments of the interests, motivations and willingness of end-customers to choose circular products and solutions (e.g. leased products in the electronics sector).

A competitive product policy for the circular economy

Our industries **welcome the new Ecodesign for Sustainable Products Regulation (ESPR)** as a key measure to further optimise the way resources are used throughout the economy and society as well as bringing new business opportunities – a win-win for the environment and the economy, making the most of new digital solutions.

In addition to the above-mentioned recommendations which are valid across legislations with different scopes, **Orgalim's members highlight the following policy foundations that are required for product requirements in the circular economy to succeed**:

- Ecodesign for Sustainable Products requirements should make products more circular, are easy to understandare comparable and verifiable, proportionate, consistent with other legislation without duplication and enforceable.
- Dialogue with industry as well as with market surveillance authorities is needed as it will improve the quality of new product requirements.
- As recognised in the recent Letta Report, it is vital to ensure a level playing field for circular materials, products and services, complemented by the provision of reliable information through digital product passports. A key priority must be the diligent implementation of the ESPR and other relevant legislation, particularly its product-specific circularity criteria.

Product requirements that work in real life

We support the **product-by-product legislation** which has delivered energy-efficient products following the previous Ecodesign Directive. The product-specific approach works better to deal with possible trade-offs and establish the most cost-efficient product requirements, by considering individual product characteristics – sometimes even within the same product category. We are concerned about **harmonised horizontal requirements which should only be used as a last resort, when absolutely justified** and only with early warning and a clearcut description of the scope for the

requirements. Also, when setting requirements that have consequences for the design of products, we stress the importance of remembering the "**safety first" principle**.

Changing product design is generally a costly and time-consuming process for manufacturers. To mitigate the challenges of the process, we encourage a thorough analysis in the **impact assessment** of the future ESPR delegated acts to make sure that the scope is set for products and aspects of products with the highest environmental impact at the lowest and affordable costs – following the principle of **proportionality** in the ecodesign instrument. Furthermore, as mentioned earlier, we strongly recommend giving companies **sufficient time** to prepare for the implementation of new ESPR requirements.

The circular economy will be strengthened through the creation of green lead markets. Our industries support public procurement that takes **green and functional demands into account while maintaining the principle of total cost of ownership** (TCO) and of technological neutrality in procurement. This broadened approach to public procurement requires accompanying economic policy measures that can incentivise purchases of green products and technologies. In the long term this will provide positive incentives for circular products and at the same time ensure that the societal costs are kept to a minimum.

Data requirements must work for both circularity and competitiveness

We see potential in the information made available in the Digital Product Passport (DPP) as it may enable **circular business models** and create **transparency** in the value chain. Digital data exchange solutions, including the DPP, will benefit businesses, as well as market surveillance authorities and the overall environmental objectives. However, we also continue to see a pressing need to preserve companies' **competitiveness and confidential business data.** Data requirements under the DPP must therefore not infringe on copyright, trade secrets and intellectual property law. Careful consideration must be given to data privacy and security.

The DPP is an entirely new task for companies, and the technical and digital aspects as well as the information to be provided present a **sizeable challenge, especially for SMEs**. In addition, there is still uncertainty over not only what data will be required in the DPP and how to source it along complex global value chains, but also how to calculate it; for example, which life-cycle assessment (LCA) method to use. On both a European or Member State level, making DPP data as well as tools available and accessible for companies will be helpful for better implementation.

We note that the DPP is shaping up to become a tool carrying *all* information requirements about a product; i.e. not only environmental information. While we support this long-term ambition on the condition that information will have to be provided only once and reused automatically across various EU legislation, we call on policymakers to adjust and harmonise the different legislative acts in order to **streamline information requirements under the DPP**. We strongly advocate for the **"starting small and making it work"** approach to implementing the DPP. The DPP should furthermore not remain a one-way information tool completed by manufacturers but should develop into a system which delivers valuable and relevant information to stakeholders on a need-to-know basis. And the data in the DPP must also be of added value.

The infrastructure for setting up the DPP should be based on a decentralised system and flexible approach and should rely on clear and harmonised standards for information exchange and data format, while being fully interoperable. We advise against setting up more databases and recommend the DPP to rely on existing databases (such as the EPREL and SCIP databases) as well as on established industry solutions. As the supply chains of most European companies are global and complex, it is of paramount importance to **develop a future-proof DPP system which can interface with non-EU suppliers**, preferably based on internationally agreed data exchange formats. The environmental aspects, for example the energy consumption and carbon footprint of the DPP, should be taken into account in the impact assessments for the upcoming products to be regulated under ESPR delegated acts.

Third-party verification should only be used if absolutely justified

We note that third-party verification is included in several new legislative measures without being linked to inherent risks presented by the products. Instead, it is linked to the rate of non-conformities of all-origin products placed on the European market. But third-party verification should not be considered as an alternative to stronger market surveillance,

as identifying non-compliance is not only a competence of public authorities but also an entirely different type of activity. Self-or third-party assessments are options for manufacturers to check and prove the conformity of their products, based on the type of the product, as well as the nature, type and degree of the risks attached to the product.

Applying disproportionate conformity assessment modules constitutes an unnecessary burden for businesses. The principles imposed by Article 4 of Decision 768/2008 on a common framework for the marketing of products put forward "*the need to avoid imposing modules which would be too burdensome in relation to the risks covered by the legislation concerned*". This recognises that generalising third-party conformity assessment would add costs to manufacturing, slow down innovation and hamper competitiveness while not adding value. **We therefore ask not to deviate from the New Legislative Framework. Third-party verification should not be used as a replacement for stronger market surveillance but only if the nature, the type and the degree of the risks attached to the product justify it.** As a general rule, we recommend retaining the possibility for conformity assessments to be carried out by the manufacturer and without the involvement of a third-party body.

In addition to numerous new information requirements, other legislations are calling on companies to **communicate about and document green aspects** of production and products, not least the directive on substantiation and communication of explicit environmental claims (Green Claims Directive). Green communication is an important part of the competitiveness of European industry, and it goes without saying that our industries are very much against greenwashing and misleading environmental claims. However, heavy documentation burdens or high costs of third-party verification undermine the competitiveness of the EU, and lead to "green hushing" where companies choose not to communicate at all on their sustainable achievements. This is an alarming development, as exchange of good practice and workable examples is crucial for mastering the complex tasks within the green transition. Therefore, we recommend ensuring consistency between requirements in different legislations; looking for solutions to reuse documentation for different types of green information requirements while at the same time speeding up the work to create more comparable Life Cycle Assessment (LCA) calculations with harmonised methods. When secondary data is needed, it is important that LCAs rely on the same material impacts database and we call on policymakers to ensure such harmonisation.

Policy foundations for EU chemicals policy - No green transition without chemicals

From photovoltaic materials to recycling of plastic packaging, the world consists of substances – and specific and highly functional chemicals are essential for providing high-tech solutions for our society and for the green transition challenges. Their role across various sectors is instrumental in improving technologies and achieving the goals of carbon-neutrality and resource-efficiency. However, we acknowledge that some uses of certain chemicals are associated with risks and these have to be managed properly.

Europe's technology industries, as downstream users and article producers under the REACH Regulation, are fully committed to reducing the risks associated with the presence of substances in products. Our sector designs, manufactures and services mainly long-life products - with presence of substances - which are highly complex. In most cases these consist of several thousands of articles. They usually require long development times and complex global supply chains.

Design for a circular economy is an important topic for companies in our sector as we strive to reduce the environmental footprint over the entire life cycle of the products we place on the market (energy consumption, durability, carbon footprint, recyclability, presence of hazardous substances, waste disposal, etc.).

For our sector to be competitive and deliver the green technologies, **Orgalim members highlight the following policy foundations for EU chemicals policy to succeed:**

- Chemicals regulation must follow a risk-based approach, ensure predictability, while maintaining CLP, REACH and (for our sector) RoHS as the key regulatory instruments for regulating chemical safety and ensuring a competitive industry with consistency across legislations establishing rules for products and waste.

A competitive industry needs a risk-based approach to chemicals and predictability

Undifferentiated restrictions on whole groups of substances, regardless of the risk profile of an application, and the associated **blanket bans on use and marketing, jeopardise the productive capacity of our industries**. A hazard-based approach does not take into account the specific emissions and exposition linked to the different applications and use scenarios. In addition, the evaluation of available alternative solutions is required to ensure their feasibility in the various end-use applications. Likewise, a general ban on PFAS would contradict this risk-based approach.

Industry needs to be able to continue to produce products using chemicals on **a level playing field** with non-EU countries. Therefore, and in the context of a future REACH revision, we are in favour of a **case-by-case analysis**, leading to the best risk management option, taking into account the negative effects on health and the environment, the impact on businesses and the feasibility for market surveillance authorities. If authorisation and restriction process were to be merged, we consider it essential to maintain a procedure for applying for derogations and for extending existing derogations and introducing mandatory information requirements.

After its publication, it remains unclear how the **Essential Used Concept** (EUC) can help speed up procedures without abandoning the risk-based approach. Any attempt to speed up restriction processes shall not prevent the consideration of justified economic needs and demonstrably safe uses, taking into account the whole life cycle of a product. We consider the current definition of the EUC insufficient for its purpose.

Predictability is also crucial for companies using chemicals in their production processes. Regulatory uncertainty is exemplified by the postponement of the revisions of the REACH Regulation and RoHS Directive, as well as by the significant delay in the PFAS restriction proposal or the RoHS exemption procedure, together with the inclusion of chemical provision in other product legislation such as ESPR, Green Claims, or PPWR. This situation results in an unpredictable landscape for companies, increasing the risks associated with investment decisions.

We support that CLP, REACH and RoHS address issues related to the hazardous properties of chemicals and chemical safety. However, we do not support that these pieces of legislation will regulate technical properties that might hinder circularity. Circular economy issues related to the presence of non-hazardous chemicals in waste stream or recycled material should be addressed in ESPR delegated acts, but only when justified and relevant, given examples that we witness with concern in some national legislation.

Consistency between chemicals, products and waste legislation should be ensured

In our analysis, the objectives of different core legislations of the circular economy differ when it comes to chemicals. To prevent products from becoming waste prematurely, we recommend to generally introduce the **"repair as produced"** principle in European product-related chemicals legislation. Reparability of products should be ensured, and the principle should be generally applied to all spare parts and secondary market operation for products.

However, strict limits on restricted substances in recycled materials may prevent the necessary increase in the use of recycled materials. Today's used equipment was subject to different chemicals legislation when it was placed on the market and contains what are known as "legacy substances". Our recommended solution is to carry out a **case-by-case analysis** before prohibiting the use of legacy chemicals in recycled materials, taking into consideration the exposure of finished products.

We are concerned that the current PFAS restriction proposal does not embrace the reparability and circularity of products and materials. Therefore, we recommend granting **indefinite derogations** for spare parts, refurbished parts, and, if no drop-in alternatives exist, substances and mixtures for the maintenance or repair of manufacturing, production, processing, transport and logistics equipment – as well as for products which have already been placed on the market for the first time.

Likewise, when it comes to information requirements and tools for submission and collection across the different chemicals' information requirements, there is a need for **consistency**. We find different requirements in the EU's chemicals legislation (e.g. EU Waste Framework Directive, REACH, RoHS) and the Digital Product Passport (DPP) as well as in national regulations.

Duplication of data submission and the administrative burden should be reduced by the **simplification of processes for reporting obligations**. For example, information requested under REACH, the EU ECHA SCIP database and the upcoming DPP is redundant. Moreover, with regard to the overlap of DPP and SCIP companies should provide data only once. Legal acts should be streamlined with the goal of reducing the administrative burden. We emphasise the importance of harmonising national legislations, ensuring the confidentiality of the information and solving the problems and shortcomings already identified in the existing databases (SCIP).

To ensure the adaptation of products and manufacturing processes to new requirements, industry needs **sufficient time and predictability**. This is especially the case when Substances of Very High Concern (SVHC's) are affected by REACH and waste management legislation or when substances are not subject to mandatory traceability throughout the supply chain.

Policy foundations for EU waste policy - From waste to resources in a circular economy

In a circular economy the ideal is not to have waste – only resources. For our industries, the handling of our waste and our products in the waste phase is a priority, and at the same time we see waste as a resource for a future where raw materials as well as materials in general are becoming more and more scarce. Therefore, the regulation must enable companies to work towards both handling and sourcing from waste.

Orgalim members highlight the following policy foundations for EU legislation on waste to succeed:

- A legislation that more easily enables companies to avoid waste, reduce, reuse or extend the life of equipment while handling, recycling and recovering waste, by optimising already existing competences, facilities and market needs across the EU to ensure a high level of resource efficiency.

A circular single market for waste resources is essential

As mentioned earlier, a circular single market with a harmonised approach is essential to avoid a patchwork of different rules in the Member States. This is particularly relevant and important for waste legislation as they vary across Member States in the EU, and national waste legislation increasingly acts as a barrier for trade and for developing more circular practices. Therefore, we call for a harmonised and proportionate implementation of the WEEE Directive and the Waste Framework Directive as well as EU-wide end-of-waste criteria to ensure free movement of recycled materials.

We furthermore point to the need for **more guidance documents** from the EU regarding the implementation of EU legislation on waste (e.g. on the Waste Framework Directive and new regulation on shipments of waste), and we believe that **harmonised EU and international waste treatment standards** will make a difference. Waste is increasingly a global problem which requires global solutions.

We recommend that the EU implements the **separate collection provisions** in the existing waste legislation, increases sorting capacity and minimises secondary material incineration.

Legislative coherence is needed to make the most of waste resources

As previously mentioned, coherence between products, chemicals and waste legislation is crucial. A well-functioning market for secondary raw materials is an important part of the circular economy. From our industries' point of view, an important prerequisite for success on that front is that **secondary raw materials fulfil the same performance criteria as virgin materials.**

As noted in the Letta Report, the EU must amplify access to circular materials by **stimulating demand for high-quality recycled materials.** Requirements on recycled content must be accompanied by clear definitions (e.g. post-industrial vs. post-consumer) and based on a harmonised methodology (e.g. quality, calculation). The industry foresees strong challenges ahead when it comes to complying with future requirements on recycled content, especially with regard to plastics, due to an expected mismatch between the availability on the supply side of secondary material, and the needs on the demand side, with regard to quantity – but also importantly in terms of quality of the recycled material.

A broad understanding of the **availability of suitable recycled materials and feasibilities to achieve recycled content quotas** in different legislations should be ensured, based on preparatory / feasibility studies, also taking into account technical aspects, potential restrictions (e.g. due to substance restrictions, limiting requirements in specific applications, such as food contact / drinking water) and existing standards. Possible interactions between regulations with recycled content requirements (e.g. ESPR, Battery Regulation, PPWR, Proposal for End-of-Life Vehicles Regulation) must be considered.

A framework enabling innovation regarding secondary materials is needed

As waste materials should be regarded and used as secondary materials in existing and new applications, research and innovation is needed in several areas. The recovery, treatment and recycling of waste materials needs new and improved technologies in order to generate materials that can actually be used in technical processes. Such secondary materials have to be tested and proven in production processes as well as long-term applications. In addition, the effects of using materials in several, or even many, cycles or reusing materials at the end of long-term applications have to be examined. Therefore, we call for **investments in research and technology** to enhance the potential of secondary raw materials.

A well-functioning waste legislation is essential

To reach a seamless waste framework, it is essential to **strictly enforce the already defined legal obligations** to achieve the objectives (e.g. landfill targets, illegal shipment of waste, free-riders, etc.).

We recognise the role of producers in the proper collection and treatment of their end-of-life products. However, successful Extended Producer Responsibility (EPR) solutions depend on the effective **cooperation of all relevant stakeholders along the whole value chain** such as municipalities, retailers, users, waste companies and recyclers, and enforcement authorities. In our view, obligations, responsibilities, and effective enforcement go hand-in-hand. We therefore recommend requirements for all actors to contribute to achieving the objectives and the enforcement of the different obligations by the relevant authorities.

Links to Orgalim publications

Orgalim Policy Agenda and key recommendations for the upcoming EU legislative period 2024-2029

- Orgalim Policy Agenda for a European high-tech manufacturing base for the 2024-2029 legislative cycle
- Orgalim key recommendations on the single market.
- Orgalim key recommendations on digital policy.
- Orgalim key recommendations for the 2024-2029 legislative cycle on energy and climate will soon be available on Orgalim website.

Orgalim publications on the circular economy and the green transition

- Orgalim's Technology at Heart series present stories showcasing how the technology industries we represent are shaping a future that's good for Europe's environment, economy and society.

Orgalim position papers on products

- Orgalim views and recommendations on the Ecodesign for Sustainable Products Regulation (**ESPR**), 21.03.2024
- Orgalim comments on the **draft Working Plan** of the new **ESPR**, 12.05.2023
- Orgalim position and recommendations on the proposal for a Directive on substantiation and communication of explicit environmental claims (**green claims**), 20.07.2023
- Orgalim position on the proposal promoting the **repair of goods**, 25.05.2023
- Orgalim position & recommendations on the proposed new **ESPR**, 01.06.2022
- Orgalim response and position paper on the "**right to repair**" initiative, 05.04.2022
- Orgalim position on the cross-cutting aspects of the **Ecodesign and Energy Labelling Working Plan** 2020-2024, 02.06.2021

Orgalim position papers on chemicals

- Orgalim position and recommendations on the proposed **PFAS** restriction, 31.08.2023
- Orgalim position and recommendations on the upcoming revision of the **REACH** Regulation, 13.04.2022.
- Orgalim position and recommendations on the upcoming revision of the **RoHS** Directive, 31.05.2022.

- Orgalim calls for an impact assessment and a delay of implementation of the ECHA SCIP database, 30.06.2020

Orgalim position papers on waste

- Orgalim position & recommendations on the upcoming revision of the Waste Electrical and Electronic Equipment (**WEEE**) Directive, 22.09.2023
- Orgalim position paper with preliminary key messages for the upcoming revision of the **Waste Framework Directive** (WFD), 11.08.2022
- Joint industry comments on **modulating producers' financial contributions** for Waste Electrical and Electronic Equipment, 26.07.2019
- Joint industry messages on EU-wide uniform conditions for the proper **quality treatment of WEEE**, 12.12.2019.

- Orgalim recommendations on the proposal for a new Regulation on **Packaging** and Packaging Waste, 24.04.2023

Orgalim position papers on research & development

- Orgalim position paper on the new **EU Research Framework Programme** (FP10), 25.04.2024
- Orgalim recommendations for the **Horizon Europe** Strategic Plan 2025-2027, 23.02.2023

Orgalim represents Europe's technology industries, comprised of 770,000 innovative companies spanning the mechanical engineering, electrical engineering, electronics, ICT and metal technology branches. Together they represent the EU's largest manufacturing sector, generating annual turnover of €2,819 billion, manufacturing one-third of all European exports and providing 11.9 million direct jobs. Orgalim is registered under the European Union Transparency Register – ID number: 20210641335-88.

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