

PUBLIC CONSULTATION QUESTIONNAIRE

Circular Economy Act

Fields marked with * are mandatory.

Introduction

As announced in the [Clean Industrial Deal](#), the European Commission is preparing a proposal for a circular economy act for adoption in 2026. The main objective of this new legislation is to accelerate the transition to the circular economy in the EU. It will target several obstacles, such as the lack of sufficient demand and supply for secondary raw materials (including critical ones); and the fragmentation of the single market for circular products, waste and secondary raw materials.

As an integral part of the analysis, the Commission is launching this public consultation to gather views from all interested parties. The questionnaire consists of seven parts:

- Part 1 collects some key information about you;
- Part 2 covers general questions on the circular economy;
- Part 3 focuses on waste electrical and electronic equipment (WEEE);
- Part 4 contains questions related to single market barriers to circularity;
- Part 5 contains questions about the demand and supply of secondary raw materials;
- Part 6 contains questions on improving waste management and circular processes;
- Part 7 provides an opportunity to submit open comments and upload documents.

Your feedback will feed into the impact assessment. This questionnaire is launched in parallel to the call for evidence.

You can save your replies as a draft and finish later.

PART 1. ABOUT YOU

About you

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☐ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☒ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
- ☒ Business association
- ☐ Company/business
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation

- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

* First name

* Surname

* Email (this won't be published)

* Organisation name

255 character(s) maximum

* Organisation size

- ☐ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☒ Large (250 or more)

If applicable, which NACE code ([Nomenclature of Economic Activities](#)) best describes your primary area of business activity?

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

*Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

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| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
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| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
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| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Africa |
| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Georgia and the South Sandwich Islands |
| <input type="radio"/> Barbados | <input type="radio"/> Gabon | <input type="radio"/> Monaco | <input type="radio"/> South Korea |
| <input type="radio"/> Belarus | <input type="radio"/> Georgia | <input type="radio"/> Mongolia | <input type="radio"/> South Sudan |

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| <input type="radio"/> Bhutan | <input type="radio"/> Greenland | <input type="radio"/> Myanmar/Burma | <input type="radio"/> Svalbard and Jan Mayen |
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| <input type="radio"/> Botswana | <input type="radio"/> Guatemala | <input type="radio"/> Netherlands | <input type="radio"/> Taiwan |
| <input type="radio"/> Bouvet Island | <input type="radio"/> Guernsey | <input type="radio"/> New Caledonia | <input type="radio"/> Tajikistan |
| <input type="radio"/> Brazil | <input type="radio"/> Guinea | <input type="radio"/> New Zealand | <input type="radio"/> Tanzania |
| <input type="radio"/> British Indian Ocean Territory | <input type="radio"/> Guinea-Bissau | <input type="radio"/> Nicaragua | <input type="radio"/> Thailand |
| <input type="radio"/> British Virgin Islands | <input type="radio"/> Guyana | <input type="radio"/> Niger | <input type="radio"/> The Gambia |
| <input type="radio"/> Brunei | <input type="radio"/> Haiti | <input type="radio"/> Nigeria | <input type="radio"/> Timor-Leste |
| <input type="radio"/> Bulgaria | <input type="radio"/> Heard Island and McDonald Islands | <input type="radio"/> Niue | <input type="radio"/> Togo |
| <input type="radio"/> Burkina Faso | <input type="radio"/> Honduras | <input type="radio"/> Norfolk Island | <input type="radio"/> Tokelau |
| <input type="radio"/> Burundi | <input type="radio"/> Hong Kong | <input type="radio"/> Northern Mariana Islands | <input type="radio"/> Tonga |
| <input type="radio"/> Cambodia | <input type="radio"/> Hungary | <input type="radio"/> North Korea | <input type="radio"/> Trinidad and Tobago |
| <input type="radio"/> Cameroon | <input type="radio"/> Iceland | <input type="radio"/> North Macedonia | <input type="radio"/> Tunisia |
| <input type="radio"/> Canada | <input type="radio"/> India | <input type="radio"/> Norway | <input type="radio"/> Türkiye |
| <input type="radio"/> Cape Verde | <input type="radio"/> Indonesia | <input type="radio"/> Oman | <input type="radio"/> Turkmenistan |
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| <input type="radio"/> Christmas Island | <input checked="" type="radio"/> Italy | <input type="radio"/> Paraguay | <input type="radio"/> United Kingdom |
| <input type="radio"/> Clipperton | <input type="radio"/> Jamaica | <input type="radio"/> Peru | <input type="radio"/> United States |
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
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| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena Ascension and Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer**

association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* **Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☐ **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☒ **Public**




































Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

PART 2. GENERAL QUESTIONS ON THE CIRCULAR ECONOMY

Question 1: To what extent do you agree with the following statements about barriers hampering the EU single market for secondary raw materials?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Prices for secondary raw materials are generally higher than prices of primary raw materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. The quality of secondary raw materials is generally lower than the quality of primary raw materials	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. A lack of standardised certification for secondary raw materials affects their marketability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. There are too many regulatory obstacles to a well-functioning single market for secondary raw materials	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. There are too many other barriers (financial, information, etc.) obstructing economies of scale for the supply and demand of secondary raw materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. There is insufficient supply of secondary raw materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. There is insufficient demand for secondary raw materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. EU-made secondary raw materials face competition from imported secondary raw materials that are cheaper, of lower quality and/or of uncertain origin	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. There is not enough high-quality, sorted waste in the EU to produce secondary raw materials	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

j. There is inadequate infrastructure for the collection, sorting, and transportation of secondary raw materials within the EU							
k. Circular economy business models are not receiving the necessary financial support							
l. Current public procurement practices do not sufficiently prioritise or incentivise the use of secondary raw materials							
m. Key actors in the products' value chains (e.g. producers and recyclers) are not sufficiently working together to improve circularity							
n. Consumer awareness and acceptance of products made from secondary raw materials is low							

Other, please specify:

500 character(s) maximum

Premessa: le risposte possono variare per settore e materiali. I prezzi delle MPS sono spesso più alti, ma non sempre: nuove tecnologie permettono qualità pari al vergine. Criticità: scarsa disponibilità e purezza, costi elevati, ostacoli normativi e logistici, esportazioni di rottami. Servono norme coerenti, incentivi al riciclo, infrastrutture efficienti e un'EPR trasparente, con autorità locali coinvolte.

Question 2: How important are the following economic incentives in boosting the EU circular economy?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Extended Producer Responsibility schemes (e.g. producers are held financially responsible for the entire lifecycle of their products, including their waste management)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Deposit refund schemes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Public procurement criteria supporting the circular economy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Taxes or fees on incinerating and/or landfilling of waste	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Taxes on exports of waste	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Tax breaks and other fiscal incentives supporting circular economy practices	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. EU funding for circular economy practices	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. National funding for circular economy practices	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Reduction of subsidies which prevent circularity (e.g. subsidies for landfills and incineration)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Pay-as-you-throw schemes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Product-as-a-service models	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

I finanziamenti UE dovrebbero favorire soluzioni circolari efficienti e campagne di sensibilizzazione per l'uso di materiali riciclati. L'economia circolare non equivale a "zero waste" e non va spinta con tasse su discariche e incenerimento, ma con buone pratiche, progetti PA, simbiosi industriale e innovazione. Servono incentivi per hub locali, start-up innovative e ricerca sulle tecnologie di recupero. I proventi UE (ETS, plastica) dovrebbero alimentare un Fondo per la Competitività e ridurre

Question 3: To what extent do you agree that the EU can take the following measures to help raise awareness and encourage a change of mindset among the broader public and economic operators towards a more circular economy?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Set up EU-wide public awareness campaigns	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Set up national or local public awareness campaigns	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Systematically introduce the circular economy into educational curricula	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Introduce standardised product labelling, product information, including toxic substances, and other consumer transparency measures and tools focusing on circularity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Support Member States authorities' capacity building for the circular economy through training, exchanges on best practices and advisory services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Support Member States authorities in developing a diverse trainings programme and skill set to meet emerging challenges of circularity	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Work on prevention (e.g. reducing resource use, waste generation, foster re-use)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Le misure sulle informazioni e sulla riduzione dei rifiuti dovrebbero rientrare in normative specifiche per prodotto, adattandosi alle diverse categorie. Il Circular Economy Act dovrebbe promuovere sistemi di raccolta efficienti per tutti gli imballaggi immessi sul mercato UE, garantendo il miglioramento dei tassi di raccolta e riciclo dei materiali. Ciò dovrebbe costituire un requisito essenziale per tutti i sistemi di raccolta.

PART 3. WASTE ELECTRICAL AND ELECTRONIC EQUIPMENT **(WEEE)**

Question 4: How important are the following measures to increase the collection of waste electrical and electronic equipment (WEEE)?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Make producers legally responsible for meeting national WEEE collection targets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Increase collection targets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Impose financial penalties on producers that fail to meet WEEE collection targets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Increase inspection to uncover illegal exports of WEEE from the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Require all actors handling WEEE to register and report quantities through a unified national system	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Conduct recurring, product-specific awareness campaigns at national level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Investigate consumer behaviour and barriers to WEEE return as a basis for targeted initiatives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

L'attuale EPR per i RAEE è superato: la gestione coinvolge molti attori e deve evolvere in una responsabilità condivisa, con obblighi di rendicontazione e un meccanismo di attuazione rigoroso. L'aumento dei target non garantisce maggiore efficienza; serve migliorare il metodo di calcolo e coinvolgere tutti gli attori. I RAEE sono una fonte essenziale di materiali e metalli preziosi, il cui recupero è cruciale per l'industria UE.

Question 5: How important are the following measures to incentivise waste electrical and electronic equipment (WEEE) take-back?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Mandating online sellers to offer free WEEE take-back for delivered electronics	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Making door-to-door WEEE collection mandatory for municipalities above a certain population size	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Making Commission Recommendation (EU) 2023/2585 that aims to increase the return of used and waste mobile phones, tablets and laptops mandatory	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Establishing deposit return systems for small appliances (or other products, please specify below)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Requiring sellers of electrical and electronic equipment to accept WEEE, regardless of where the product was purchased	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Developing incentives based on consumer preference (e.g. preferences for vouchers over deposit schemes)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

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Question 6: What is currently impeding the recycling of critical raw materials (CRMs) from waste electrical and electronic equipment (WEEE) in the EU?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. WEEE diverted to scrap metal yards or large shredders	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Lack of infrastructure (e.g. collection, sorting and recycling)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Lack of scale / a fragmented market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Insufficient technology readiness	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. The concentration of CRMs in electrical and electronic equipment components is too low to qualify for recycling	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Insufficient removal of electrical and electronic equipment components	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Low price of virgin primary CRMs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Low price of imported secondary CRMs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. The quality of secondary CRMs is lower than primary ones	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Insufficient demand for secondary CRMs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. High energy costs of recycling	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Insufficient information on CRMs in WEEE available to recyclers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m. Electrical and electronic equipment not designed for recycling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

.....

Question 7: To what extent do you agree that the current waste of electrical and electronic equipment categories should be expanded?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Setting a new category for renewable energy related equipment, including photovoltaic panels, wind turbines and others	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Setting a new category for photovoltaic panels (from current category 4 into to a new category)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Setting a new category for wind turbines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
d. Setting a new category for digital and telecommunications equipment (e.g. data servers)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
e. Setting a new category for seabed cables, large industrial cables	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Setting a new category for non-mobile road machinery	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Setting a new category for large-scale stationary industrial tools	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Setting a new category for large scale fixed installations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

L'esperienza dell'open scope dei RAEE mostra la necessità di introdurre nuove categorie per i prodotti emergenti destinati al riciclo. Inoltre, potrebbe essere utile creare una categoria specifica per le infrastrutture di ricarica elettrica, così da adottare criteri armonizzati per la loro classificazione e gestione, in coerenza con la crescita della mobilità elettrica e i principi dell'economia circolare.

Question 8: To what extent do you agree with the following measures to improve the Extended Producer Responsibility (EPR) system for waste electric and electronic equipment (WEEE)?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. EPR financing needs to be harmonised across the EU as well as registration and reporting requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. EPR fees for electrical and electronic equipment should remain unchanged	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
c. Member States should do regular compositional surveys of collected mixed municipal waste stream to determine the share of WEEE	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. EPR fees should cover costs additional to the costs currently covered under the current WEEE Directive (from collection to recycling). These include awareness campaigns, compositional surveys, data gathering and reporting, and deducting any revenues obtained from preparation for re-use or preparation for repurposing or from the value of secondary raw materials recovered from recycled WEEE	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. EPR business-to-business and business-to-consumer obligations should remain different (as is the case in the current WEEE Directive)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. The difference between EPR business-to-business and business-to-consumer obligations should be reduced to the minimum	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. EPR fees should also be eligible for financing behavioural research and targeted consumer initiatives, because the consumer's decision to return or not return WEEE is crucial to the quantity and quality of collected material	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Il principio EPR è superato: non solo i produttori, ma più attori gestiscono i RAEE. Tutti dovrebbero condividere la responsabilità in base alla loro influenza sul sistema, al fine di aumentare raccolta, recupero e riciclo. L'imminente Circular Economy Act e la revisione della direttiva RAEE sono occasioni fondamentali per allineare la legislazione alle realtà del mercato odierno e attribuire responsabilità effettive a ciascun soggetto coinvolto.

PART 4. SINGLE MARKET BARRIERS FOR CIRCULARITY

Question 9: How important is it to simplify (e.g. through harmonisation) the following rules in order to improve the single market for waste and secondary raw materials?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Extended Producer Responsibility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. End-of-waste criteria	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. By-product criteria	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Permits (e.g. for establishing a recycling facility)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Rules on cross-border waste shipments within the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

È fondamentale armonizzare i criteri sull'End-of-Waste e sui sottoprodotti per favorire il mercato unico europeo. Serve accelerare la valutazione delle nuove tecnologie di riciclo per i materiali a contatto con alimenti. La mancanza di chiarezza normativa genera incertezza e oneri amministrativi eccessivi per le spedizioni transfrontaliere intra-UE, ostacolando potenziamento su larga scala del riciclo.

Question 10: How important are the following obstacles preventing waste from being recognised as reaching the end-of-waste or a by-product status?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Heterogeneity of end-of-waste and by-product criteria	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Existence of sub-national/local end-of-waste and by-product criteria	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Existence of national end-of-waste and by-product criteria	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Lack of mutual recognition between national end-of-waste and by-product criteria	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Lack of EU-wide end-of-waste and by-product criteria	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

La complessità burocratica, la mancanza di linee guida e la scarsa fiducia del mercato limitano la circolazione e l'uso delle materie prime seconde. I criteri EoW devono essere armonizzati in tutta l'UE e, in via transitoria, va rafforzato il mutuo riconoscimento delle autorizzazioni nazionali. Ogni nuovo criterio EoW dovrebbe prevedere un periodo di transizione, tenendo conto delle autorizzazioni esistenti, per permettere l'adeguamento delle parti interessate.

Question 11: How important are the following reforms to facilitate the attainment of the end-of-waste and by-product status?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Swiftly develop additional EU-wide end-of-waste and by-product criteria	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. No longer allow sub-national/local end-of-waste and by-product criteria	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Enable mutual recognition of national end-of-waste and by-product criteria	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Further develop the provisions for the end-of-waste and by-product criteria in the Waste Framework Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Servono orientamenti UE sui criteri EoW per ridurre disallineamenti e favorire chiarezza. In via transitoria, va rafforzato il reciproco riconoscimento delle autorizzazioni tra Stati membri e modificato l'art. 29(2) del Regolamento sulle spedizioni per garantire coerenza. La classificazione EoW dovrebbe valere solo intra-UE; per export extra-UE restano obblighi e controlli sulle spedizioni di rifiuti.

Question 12: To what extent do you agree with the following statements about Extended Producer Responsibility schemes?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Producer responsibility organisations should be regulated at Member State level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Producer responsibility organisations should be regulated at EU level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Various actors in the life cycle of the product should be represented in producer responsibility organisations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Extended Producer Responsibility fees should cover the entire waste management costs (e.g. collection, transport and treatment)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Extended Producer Responsibility fees should cover waste prevention (e.g. re-use, repair and waste prevention campaigns)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Extended Producer Responsibility fees should be modulated (lower or higher) depending on the circularity performance of related products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Transparency should be required on how fees are determined and how they are spent	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. The issue of 'free riders' (producers that do not register for Extended Producer Responsibility) needs to be addressed	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Ensuring cost efficiency is a key objective of Extended Producer Responsibility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

j. Ensuring high recycling rates is a key objective of Extended Producer Responsibility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Ensuring minimal landfilling of waste is a key objective of Extended Producer Responsibility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Ensuring minimal incineration of waste is a key objective of Extended Producer Responsibility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Le domande a) e b) sono troppo generiche. Alcuni elementi EPR vanno regolati a livello UE, altri a livello nazionale, per rispettare le specificità dei sistemi esistenti. L'EPR può favorire la circolarità (f), ma è limitato da norme su sicurezza e salute. È uno strumento per ridurre i rifiuti (j), mentre altri aspetti spettano a norme come l'ESPR. La registrazione UE dovrebbe essere unica. Per i RAEE, la modulazione del contributo ha effetti limitati e non incentiva comportamenti più sostenibili

Question 13: To what extent do you agree that EU mandatory Extended Producer Responsibility systems would benefit for the following product groups?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Agricultural plastics	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Tyres	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Mattresses	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Furniture	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Construction products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Assicurare il raccordo tra l'ESPR, che stabilisce le regole su come i prodotti devono essere progettati, inclusa la gestione del fine vita, e l'EPR, che stabilisce regole che rendono i produttori responsabili della gestione dei loro prodotti al termine del loro ciclo di vita, pur mantenendone chiaramente separate le competenze.

Question 14: How important are the following digitalisation measures to simplify Extended Producer Responsibility (EPR) systems?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Setting up a national webpage for each EPR system	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Setting up an EU-level webpage for all EPR systems	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Turning an EU-level online registration of producers into an EU-level EPR register	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Turning an EU-level online registration into national EPR registers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Setting up an EU-level online platform to register and access national EPR schemes (one-stop-shop)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

PART 5. DEMAND AND SUPPLY OF SECONDARY RAW MATERIALS

Question 15: Would you be in favour of the Commission proposing minimum bio-based content targets at EU level?

- ☒ Yes
- ☐ No
- ☐ Do not know

Please specify for which end product(s)?

500 character(s) maximum

Gli obiettivi devono coprire sia i prodotti bio-based sia quelli bio-attributed, e includere tutte le tecnologie che favoriscono la circolarità. Devono basarsi su valutazioni d'impatto per applicazione, considerando disponibilità di biomassa sostenibile, fattibilità tecnica ed economica, mercato, norme, fattori socio-economici e riciclabilità. Gli obiettivi vanno fissati a livelli realistici nelle normative settoriali, come PPWR per imballaggi ed ELVR per veicoli.

Question 16: How important are the following measures in increasing the demand of secondary raw materials?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Minimum recycled content targets	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Minimum EU-made recycled content targets	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Public procurement rules favouring products/companies using secondary raw materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Public procurement rules favouring products/companies using EU-made secondary raw materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. EU-wide standards on the quality and traceability of secondary raw materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Measures to further reduce the landfilling of waste	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Information on the quality and origin of secondary raw materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Price incentives for products or companies using EU-made secondary raw materials (e.g. value-added tax exemptions and tax credits)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Price disincentives for products or companies using primary raw materials (e.g. taxes and carbon cost)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Stronger support from extended producer responsibility schemes for the uptake of secondary raw materials (e.g. eco-modulation of Extended Producer Responsibility fees)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

k. Stronger market surveillance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Support to increase waste recycling activities in the EU (e.g. financial support for new capacities)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Per rafforzare il mercato delle MPS è prioritario integrare le risorse di rifiuti UE. I requisiti di contenuto UE nei materiali riciclati stimolano domanda e circolarità, ma vanno basati su un'offerta sufficiente e valutazioni su commercio, obblighi internazionali e catene del valore. Misure sulla domanda possono aumentare i prezzi. Poiché normative come SUPD, PPWR, ESPR, ELV e CPR già fissano obiettivi, nuovi interventi nel CEA devono essere coerenti. Nessun target serve per carta e cartone.

Question 17: To what extent do you agree with the following statements on public procurement?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Public procurement can be a significant driver of the circular economy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Circularity criteria should complement price criteria	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Circularity criteria should be optional for contracting authorities to use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Circularity criteria should be mandatory for contracting authorities to use	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Circularity criteria should apply to specific products' aspects (e.g. durability, reparability, recyclability and recycled content)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Le politiche di Appalti Pubblici Verdi devono essere allineate e coerenti con le più ampie strategie di creazione della domanda e con le politiche sui criteri non tariffari (CEA, IDAA, ESPR) per evitare complessità. È fondamentale sviluppare standard e metodologie armonizzate, garantendo qualità e sicurezza. Il value based procurement rappresenta la cornice ideale per integrare efficacemente i criteri verdi negli acquisti pubblici.

Question 18: In order to support the transition to circular economy in the EU, which goods or services should be prioritised for public procurement criteria?

500 character(s) maximum

Priorità a prodotti con contenuto minimo di materiali riciclati, recuperati e sottoprodotti, a basse emissioni di carbonio e valutati sull'intero ciclo di vita. Incentivare beni circolari e di origine europea, corredati da certificazioni di performance circolare e/o da EPD. Serve superare la frammentazione degli appalti verdi, rafforzando cultura, attuazione e approcci innovativi come il value based procurement.

Question 19: To what extent do you consider it important to improve the scrap classifications and trade codes for steel, aluminium and other secondary raw materials?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Additional scrap classifications for recycled steel	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. More granularity in trade codes for recycled steel	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Additional scrap classifications for recycled aluminium	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. More granularity in trade codes for secondary aluminium	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other materials: please specify

500 character(s) maximum

Il termine “recycled steel” per indicare il rottame ferroso non risulta appropriato e può risultare fuorviante, poiché può creare confusione nella definizione di adeguate proposte legislative. Il rottame, anche se ha ottenuto lo status di EoW, non può essere considerato acciaio riciclato: il riciclo si completa solo con la rifusione, quando dal rottame si producono nuovi semilavorati o prodotti siderurgici.

Question 20: How important are the following measures in reducing the export of products and waste streams containing critical raw materials and increasing recycling capacity within the EU?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Introducing export fees for certain waste streams that contain critical raw materials and reinvesting the revenues generated into domestic recycling infrastructure and technology	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Tightening controls or restrictions on the export of waste that contains critical raw materials	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Enhancing transparency and reporting requirements for exports of secondary raw materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Introducing further regulatory requirements (e.g. for environmental objectives) on exports of secondary raw materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Prioritising access to critical raw materials for strategic EU sectors before authorising exports	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Aligning with practices of non-EU countries that restrict critical raw materials exports to support domestic recovery	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

PART 6. IMPROVING WASTE MANAGEMENT AND CIRCULAR PROCESSES

Question 21: How important are the following elements into improving waste management systems?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Further limit the use of derogations from the obligation on Member States to establish separate collection systems for certain waste streams (Article 10(3) of the Waste Framework Directive)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Establish a harmonised methodology at EU level to conduct compositional analysis of the mixed waste	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Introduce a legal obligation to use advanced sorting facilities for mixed municipal waste	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Per migliorare la trasparenza e l'efficienza in termini di costi, è necessaria un'applicazione efficace dell'armonizzazione dei principi che regolano la Responsabilità Estesa del Produttore (EPR) per i rifiuti organici (bio-waste).

Question 22: To what extent do you agree with the following measures to reduce the landfilling or incineration of waste and incentivising recycling?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Strengthening the provisions on enforcement of EU legislation concerning landfilling and uncontrolled dumping of waste	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Introducing a general ban on landfilling of waste	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Introducing (additional) bans on landfilling for specific types of waste	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Tax policy aimed at taxation of landfilling waste in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Tax policy aimed at taxation of incinerating waste in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Introducing a market-based instrument (e.g. cap-and-trade systems) for landfilling waste in the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Ensuring a level playing field for circular products by eliminating value added tax (VAT) embedded in the value of recycled goods used as input	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Non si sostiene un divieto generale del conferimento in discarica, ma misure mirate a limitarlo. Per favorire riuso e recupero servono incentivi e buone pratiche, non maggiori costi di smaltimento. Inoltre, per i rifiuti sanitari, serve un'armonizzazione a livello UE delle modalità di raccolta e dei flussi di riciclo, con particolare attenzione ai rifiuti infetti.

Question 23: Which are the most important barriers hindering the use of sewage sludge and bio-waste as secondary materials?

500 character(s) maximum

Question 24: How important are the following measures for the management of extractive waste and supporting the recycling of critical raw materials (CRMs) from extractive waste?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Improved data availability on the recycling potential of CRMs in extractive waste facilities across the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Ensuring a high level of environmental and human health protection	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Promoting research and innovation in new and emerging technologies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Adopting mandatory best available techniques (BAT) conclusions for the management of extractive waste	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Question 25: Do you agree that amending the List of Waste (Commission Decision 2000/532/EC) to cover new waste streams or to revise existing entries would benefit the efficient and circular management of waste?

- ☒ Yes
- ☐ No
- ☐ Do not know

How important is it to specifically include the following waste streams into the List of Waste?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. Waste from photovoltaic panels	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Waste from permanent magnets	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Waste from glass and carbon fibre composite materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Separately collected bio-waste	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Metal waste from mechanical and physical treatment going beyond specification of ferrous and non-ferrous	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify

500 character(s) maximum

Per facilitare le spedizioni di rifiuti intra-UE è necessario ampliare le tipologie incluse nell'elenco verde, comprendendo flussi a basso rischio ambientale e destinati al recupero, in linea con gli obiettivi di sostenibilità dell'UE. L'introduzione di soglie troppo rigide di contaminazione potrebbero ostacolare le spedizioni di rifiuti, sebbene esistano tecnologie in grado di rimuovere livelli di contaminazione più elevati. Serve quindi un approccio più equilibrato.

Question 26: To what extent do you agree with the following interventions to facilitate the establishment of trans-regional circularity hubs that promote smart specialisation and economies of scale for (separate) collection, sorting and recycling?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. Legal enablers (e.g. permitting, licences and permits)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Financial enablers (e.g. tax breaks and public and private funding)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Information provision (e.g. digital platforms matching supply and demand)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Capacity building in national, regional and local authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

Per favorire la transizione verso un'economia circolare, i poli di circolarità vanno sostenuti come catalizzatori di specializzazione intelligente ed economie di scala. In parallelo, servono strumenti finanziari mirati per favorire l'adozione industriale e l'innovazione. È inoltre fondamentale scoraggiare le pratiche di trattamento dei rifiuti non circolari, che minano gli obiettivi ambientali e l'uso efficiente delle risorse.

Question 27: Industrial processes often not only produce the core output but also provide side streams or by-products. Those could become an input for another industrial process, which could then be valorised, creating an industrial symbiosis. Is that the case for your industry?

- ☒ Yes
- ☐ No
- ☐ Do not know

How important are the following hindering factors?

	1 (very important)	2 (important)	3 (neutral)	4 (less important)	5 (not at all important)	6 (do not know)	7 (not applicable)
a. No EU harmonised definition of by-products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Insufficient harmonisation / clarity of rules for waste classification	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Overly burdensome waste shipment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Lack of platforms or hubs to facilitate matchmaking between companies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Lack of facilitation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Lack of awareness of or expertise in industrial symbiosis	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. High initial investments costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Uncertain return on investment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Data confidentiality	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. Insufficient regulatory incentives or regulatory push	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Insufficient tax incentives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Limited support for SMEs participation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m. Proximity/transport	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
n. Risk of unstable supply of by-products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

o. Doubts about quality of by-products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
p. Fragmented policy conditions in EU Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

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Question 28: Do you agree with the following statements about the benefits and challenges in conducting pre-demolition and pre-renovation audits?

	1 (strongly agree)	2 (agree)	3 (neutral)	4 (not agree)	5 (not agree at all)	6 (do not know)	7 (not applicable)
a. The audit improves planning of selective demolition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. The audit increases reuse/recycling of materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. The audit reduces landfilling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. The audit allows better cost estimation and project control	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. The audit supports circular economy targets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. The audit leads to high administrative burden	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. A harmonised database would improve pre-demolition and pre-renovation audits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Pre-demolition and pre-renovation audits should be mandatory	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Pre-demolition and pre-renovation audits should be digital	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j. High costs (especially for small-scale projects)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Lack of expertise is a challenge	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l. Lack of a market for recycled materials is a challenge	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m. Demolition contractors would duplicate the audits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

500 character(s) maximum

PART 7. OPEN COMMENT BOX + UPLOAD DOCUMENTS

Question 29: What impact do you expect measures supporting EU circularity (particularly measures on WEEE; improving the single market for secondary raw materials; measures on the supply and demand of secondary raw materials; and measures improving waste management systems) to have on international trade?

500 character(s) maximum

If you wish, please provide additional comments/suggestions related to this consultation

1000 character(s) maximum

Il CEA è parte chiave della strategia UE per decarbonizzare l'economia e sostenere la competitività industriale. Non esiste un approccio unico: le opportunità di circolarità variano per prodotto, modello di business e valore del materiale. Il CEA deve tener conto di tali specificità, garantire coerenza normativa, favorire il mercato unico dei rifiuti, rendere attrattivi i materiali secondari. Inoltre: TARIC (Reg. CEE 2658/87): introdurre codici doganali per prodotti circolari e sostanze bio-based; NACE (Reg. UE 2023/137): creare sottocodici per sostanze bio-based; definire criteri armonizzati per sottoprodotti ed EoW, inclusi i processi di riciclo chimico; semplificare la valutazione EFSA sulle nuove tecnologie; adottare norme europee armonizzate; standard obbligatori per RAEE e materiali riciclati; rivedere target di raccolta e rafforzare la vigilanza. NB: Si rimanda al Documento di Confindustria allegato per ulteriori dettagli e proposte puntuali.

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