



Council of the European Union  
General Secretariat

**Brussels, 12 November 2025**

**WK 15348/2025 COR 1**

**LIMITE**

**ENV  
CLIMA  
COMPET  
MI  
IND  
AGRI  
FORETS**

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## **CONTRIBUTION**

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<b>From:</b>	General Secretariat of the Council
<b>To:</b>	Working Party on the Environment
<b>Subject:</b>	Council conclusions on Europe's Environment - Building a more circular and resilient Europe: WPE meeting on 7 November follow-up: Comments from delegations - Correction of an attachment

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In document WK 15348/25 the attachment from LT was incorrectly marked as "LATVIA". Delegations will find attached the document with the correct header "LITHUANIA".

Brussels, 31 October 2025  
(OR. en)

13681/1/25  
REV 1

LIMITE

ENV 976  
CLIMA 419  
COMPET 989  
MI 753  
IND 412  
AGRI 472  
FORETS 81

**NOTE**

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From: General Secretariat of the Council  
To: Delegations

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Subject: Europe's Environment 2030 - Building a more climate resilient and circular  
Europe  
- Revised draft Council conclusions

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LT's suggestion

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**Europe's Environment 2030 - Building a more climate resilient and circular Europe**

**- draft Council conclusions -**

**THE COUNCIL OF THE EUROPEAN UNION,**

1. RECALLS the Decision on the 8th Environment Action Programme (EAP)<sup>1</sup> and the Communication from the Commission on the European Green Deal<sup>2</sup>, the global goal on climate adaptation set out in Article 7 of the Paris Agreement<sup>3</sup>, and the UN 2030 Agenda for Sustainable Development (in particular SDG 12 and SDG 13)<sup>4</sup>.
2. ~~RECALLS~~ **REAFFIRMS** previous Council conclusions, ~~including in particular~~ those of 17 June 2024 on the mid-term evaluation of the 8<sup>th</sup> EAP<sup>5</sup> and their comprehensive guidance to promote the objectives set out in the programme. **CALLS ON the Commission and Member States to deliver on the ambitions as set out in these conclusions.**
3. WELCOMES the report of the European Environment Agency on Europe's Environment 2025<sup>6</sup> as well as the Agency's monitoring reports on progress towards the 8<sup>th</sup> EAP objectives **to be discussed annually in high level political dialogues** and UNDERLINES the Agency's role in providing objective, reliable and comparable information to inform environment and climate policies.

**3a. RECOGNISES the insufficient progress towards the objectives set out in the 8th EAP, the unsatisfactory state of nature and biodiversity and their integral role in climate resilience and circular economy.**

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<sup>1</sup> Decision (EU) 2022/591 of the European Parliament and of the Council of 6 April 2022 on a General Union Environment Action Programme to 2030 (OJ L 114, 12.4.2022, p. 22).

<sup>2</sup> Document 15051/19 + ADD 1 - COM(2019) 640 final.

<sup>3</sup> OJ L 282/9, 19.10.2016, p. 4.

<sup>4</sup> [Sustainable Development Goals: 17 Goals to Transform our World | United Nations](#)

<sup>5</sup> Document 11326/24 + CoR1

<sup>6</sup> EEA: Europe's Environment 2025, published 29 September 2025 ([link](#))

## LITHUANIA

**3b. REGRETS that the Commission has not presented a legislative proposal to add an annex to the 8th EAP with actions for the period post-2025 to address the insufficient progress towards the 8th EAP objectives. REITERATES the request to the Commission, based on Article 5(2) of the 8th EAP, to present a legislative proposal to add an annex to the 8th EAP with actions for the period post-2025 to maintain its continuity and ambition.**

**3c. RECALLS that EAPs provide transparency and a long-term commitment of all relevant actors on how a green transition can be achieved in an economically beneficial and socially just way, and should contain concrete actions to ensure predictability and reliability.**

### **I. OVERARCHING REMARKS**

**3d RECOGNISES the interlinkages between climate resilience, circularity, and other environmental objectives such as the protection and restoration of biodiversity and ecosystems, and pollution prevention and control.**

4. UNDERLINES that stepping up action on climate resilience and ~~the circularity~~ transition is increasingly urgent, **given the triple planetary crisis of climate change, pollution and biodiversity loss**, and will contribute to the overall preparedness and security of our societies, ~~and the economy, and to~~ Europe's competitiveness, and drive innovation while at the same time protecting citizens, ~~and~~ businesses, **infrastructures, and ecosystems** from threats such as environmental degradation, extreme weather events, **water** and resource scarcity, **and negative impacts on human health.**

**4a. EMPHASISES that actions must ensure a just transition and just resilience, protecting in particular the most vulnerable groups, while leaving no-one behind.**

**4b. UNDERLINES the need to ensure effective protection of the environment through full and effective implementation of adopted legislation and funding.**

## LITHUANIA

5. **RECOGNISES that investments are necessary to promote climate resilience and circularity objectives.** STRESSES that the levels of risk exposures and costs of inaction should be considered when assessing the needs of climate resilience and circularity initiatives. **HIGHLIGHTS estimates that the cost of not implementing EU environmental law amounts to €180 billion per year in relation to current environmental targets, rising to €325 billion per year in relation to environment targets which will apply in the near future**<sup>7</sup>. **TAKES NOTE OF estimates that the investment gap for the circular economy in the EU amounts to EUR 27 billion per year**<sup>8</sup>. Further **HIGHLIGHTS that weather- and climate-related extremes caused about 822 billion EUR of damage to assets in the EU in the past 40 years, and that 25% of these costs have occurred in the last four years**<sup>9</sup>, **and that the expectation is that they continue to increase.**
6. WELCOMES the intention of the Commission to **further** address challenges related to climate resilience and circularity, including ~~by strengthening the legislative framework through the upcoming proposals for a Circular Economy Act and an Integrated Framework for Climate Resilience~~ **and CALLS ON the Commission to ensure that the proposals are flexible enough to accommodate diverse national approaches, and existing best practices.**
7. HIGHLIGHTS the overarching principles of subsidiarity and proportionality.
8. UNDERLINES that measures and actions should take into account the different geographical, **climatic,** economic and social conditions in Member States and regions, including outermost regions, **small island Member States, and the Arctic.**
- 8a. **EMPHASISES that primary and secondary biomass is the foundation of a circular bioeconomy and climate-resilience, and an important contribution to a prosperous European society, thus WELCOMES [LOOKS FORWARD to] the Commission's [upcoming] Bioeconomy Strategy as a vehicle for maintaining sustainable and circular use of natural resources, including agricultural and forestry materials and energy in all Member States.**

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<sup>7</sup> [European Commission: Update of the costs of not implementing EU environmental law \(link\)](#)

<sup>8</sup> [European Commission: 2025 Environmental Implementation Review \(link\)](#)

<sup>9</sup> [European Environment Agency: Economic losses from weather- and climate-related extremes in Europe \(link\)](#)

## **LITHUANIA**

**9. EXPRESSES DEEP CONCERN over the extensive environmental degradation, pollution, and resource depletion resulting from russia’s ongoing war of aggression against Ukraine, which has led to severe and long-lasting damage to ecosystems, infrastructure, and communities. STRESSES that such destruction undermines efforts to build a circular and climate-resilient Europe, while exacerbating vulnerabilities to pollution, biodiversity loss, and climate change.**

### **II. CLIMATE RESILIENCE**

**8b. NOTES WITH CONCERN that many of the risks identified in the European Environment Agency’s report on European Climate Risk Assessment (EUCRA) have reached critical levels and could become catastrophic unless urgent and decisive action is taken.**

9. CONSIDERS that climate resilience is fundamental for the Union’s **security, and prosperity and competitiveness**; STRESSES that transformational change is needed to make the Union and Member States better prepared and more resilient.

**9a. UNDERSCORES the strategic importance of climate resilience as a fundamental pillar for safeguarding public health and well-being, social cohesion, and for ensuring the long-term preservation of natural heritage. ACKNOWLEDGES the importance of social dimensions in shaping future policy actions related to climate resilience.**

**9b. RECOGNISES that climate risks vary significantly between Member States and within regions; UNDERLINES the need for flexibility to ensure that actions are appropriately targeted towards the most significant risks and the most vulnerable sectors.**

10. UNDERLINES the importance of cross-border cooperation, **including well-functioning cross-border early warning systems**, to tackle transboundary climate risks and the importance of EU-level cooperation to address shared transnational and cross-sectoral risks.

#### *Competitiveness and innovation opportunities*

11. EMPHASISES the economic opportunities arising from the need to further develop innovative resilience technologies, products, and services, **including with a view to securing leadership on the global market.**

**LITHUANIA**

12. INVITES the Commission and Member States to promote research and foster innovation, thereby contributing to solutions benefitting **concomitantly** climate resilience, **ecosystem restoration, disaster risk reduction,** and competitiveness **and STRESSES the need to improve knowledge about costs, benefits, business opportunities and inclusion of social justice in policies for climate resilience.**

## **LITHUANIA**

### ***Climate r****Resilience by design*

13. CALLS FOR pro-active and decisive integration of climate resilience across all relevant **legislation and** policies, sectors, and governance levels, **taking into account existing legislations, initiatives and plans and adopting common climate/temperature reference scenarios to guide sectoral planning, risk assessments and investment decisions.**
- 13a. NOTES that linking climate resilience and development planning, budgeting and infrastructure unlocks multiple benefits and improves sustainable investment opportunities.**
14. RECOGNISES the necessity of cross-sectoral engagement, involving all relevant stakeholders in the design and implementation of policies that build climate resilience, **UNDERLINES the importance of a sector-specific approach to climate resilience to ensure targeted responsibility for risk assessment and NOTES that clear sectoral risk ownership is key for accountability and targeted responses to the unique vulnerabilities and needs of each sector.**
15. UNDERLINES the importance of **healthy ecosystems, biodiversity and scaling up of nature-based solutions as cost-effective means for** climate resilience **so that these solutions are systematically used when relevant.**
16. ~~ACKNOWLEDGES~~ the importance of social dimensions in future policy actions

### *Legal framework*

17. ~~WELCOMES~~ **TAKES NOTE of** the development of a legal framework **which should respect the principles of subsidiarity and proportionality, and** that supports action at EU level and in Member States including common definitions and methodologies ensuring a common language on climate resilience.
- 17a. RECOGNISES the importance of strengthening monitoring and evaluation of climate resilience efforts and HIGHLIGHTS the need to identify opportunities to streamline, improve, and simplify existing reporting requirements, thereby enhancing transparency and effectiveness, BEARING IN MIND the need to minimise the administrative burden.**

## LITHUANIA

### Financing

**17b. UNDERSCORES that sufficient financing remains key to ensure climate resilience action; RECOGNISES that both private and public financing are necessary to mobilise the necessary funding and investments for climate resilience building.**

**17c. HIGHLIGHTS the crucial role of EU programmes in facilitating the implementation and financing of climate resilience measures at national, regional, and local level.**

### *Digital tools and citizens empowerment*

18. ENCOURAGES the establishment of tools and the improved **collection and** use of data ~~that~~ **to** facilitate information exchange and cooperation between Member States; **UNDERLINES the need for easy and accessible access to information on climate resilience and, in this regard, UNDERSCORES the role of digital tools in facilitating access to information and raising awareness and that the digital tools should take into account the needs of the end-users.**

**18a. Further ACKNOWLEDGES, that digitalisation can have significant impact on reducing administrative burden while at the same time improving the quality of data for example through improved registries and appropriate reporting obligations.**

~~18b. support~~ **SUPPORTS public participation and** enabling **dynamic** evidence-based decision-making for citizens, businesses, and policy-makers **as key elements in promoting fairness, inclusiveness, and social cohesion towards climate resilience.**

### *Local and regional governance*

19. RECOGNISES the importance of **a whole-of-government approach involving** actors ~~at~~ local and regional levels **in building climate resilience** and EMPHASISES ~~that~~ future policy actions should support local and regional capacities and measures, **also to ensure effective implementation, including by supporting Member States in tailoring resilience strategies to local conditions and encouraging early stakeholder engagement to ensure inclusive and regionally adapted solutions.**

## **LITHUANIA**

### **III. CIRCULAR ECONOMY**

20. CONFIRMS the need for a comprehensive **and practicable** legislative framework on circular economy to bring about systemic change towards the EU's long-term objectives and ensure the necessary enabling conditions as set out in the 8th EAP, **as well as ensuring incentives necessary for the circular transition**.

**20a. REITERATES the importance of swift implementation of adopted legislation and development of the upcoming secondary legislation.**

21. WELCOMES the Commission's intention to present a Circular Economy Act to enable transition to a circular economy, boost competitiveness, economic security, **high quality green jobs**, resilience, strategic autonomy, and to support the **environmental and climate** objectives in the 8th EAP.

22. INVITES the Commission to address barriers and bottlenecks through existing legislation ~~such as the Waste Framework Directive and the WEEE Directive~~ to speed up the circular transition, ensure predictability, policy coherence, simplification and effective implementation, **while ensuring a high level of health and environmental protection**.

23. CALLS ON the Commission to maintain the focus on **all the** key sectors with high environmental impacts, high strategic relevance, and high potential for circular solutions **as identified by the 6th priority objective of the 8th EAP**.

*Facilitating implementation, simplification, and EU added value*

24. ~~HIGHLIGHTS the importance~~ **RECOGNISES the potential** of simplification ~~as a way~~ to reduce **unreasonable unnecessary** administrative burdens for business **and competent authorities** and ensure effective implementation in Member States. **UNDERLINES that such simplification should not impede or lower the level of health and environmental protection, should follow the principles of better legislation and ideally occur when reviewing existing legislation to provide for long-term legal stability for business and society.**

## LITHUANIA

25. UNDERLINES the potential of ~~further~~ digitalisation and harmonisation of data as tools for **better management and** simplification.
- 25a. STRESSES the importance of establishing harmonised methodologies and indicators at EU level that addresses each level of the waste hierarchy and ensures the priority order from prevention, to preparing for re-use, recycling, other recovery, and disposal to enable coherent monitoring, progress evaluation, and impact assessment.**
26. SUPPORTS the continued work of the Commission on **harmonisation of the** Extended Producer Responsibility and in that context ~~CALLS ON the Commission to address sales via large online platforms; and unfair import practices.~~ **while ensuring that this reflects the unique circumstances of each Member State. STRESSES the need to regulate distance selling, and online marketplaces to ensure that all operators comply with product safety and legal compliance requirements, consumer and environmental protection, including in relation to both import and export of products, used goods, and waste while ensuring that EU meets its international obligations.**

### *Creating a Single market for secondary raw materials*

27. HIGHLIGHTS the importance of a well-functioning single market for secondary raw materials as a precondition to **reduce material extraction and waste generation, enhance recycling, circularity and security of supply, in particular for secondary critical minerals under the Critical Raw Materials Act;** and in that context; UNDERLINES the importance of strengthening efforts to ensure the quantity and quality of recycled materials and INVITES the Commission to address **clear** market failures and fragmentation.
- 27a. RECOGNISES that circular business and the market for secondary raw materials often cannot compete with the import of cheaper virgin materials, ENCOURAGES the Commission to explore potential pricing and stimulating mechanisms to level the playing field between circular and linear business models and to ensure that materials produced from waste, collected, and processed outside the European Union comply with environmental and health standards equivalent to EU standards.**
- 27b. CALLS for the systematic implementation of mirror measures for recycled materials that contribute to European regulatory targets for the incorporation of recycled materials and CALLS on the Commission to combat dumping practices.**

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28. CALLS on the Commission to strengthen EU-added value through further harmonisation of ~~End of Waste~~ criteria with a view to **ensure more consistent implementation, combat illegal waste shipments, and** facilitate the single market for secondary raw materials, **as well as eliminating the bottlenecks that hinder the integration of recycled materials into economic flows.**

**28a. ENCOURAGES on the Commission to introduce binding recycling targets to guide long-term planning and investment with a view to facilitate the single market for secondary raw materials, and further INVITES the Commission to address trade and enforcement aspects of the secondary raw material market.**

29. ACKNOWLEDGES the need to further stimulate supply and demand side measures for secondary raw materials including **by improving and increasing** through separate waste collection and recycled content requirements, **positive market-based incentives, and quality standards for secondary raw materials.**

**29a. RECALLS the important role of innovation at all stages of the recycling value chain, including the design stage, in producing European recycled raw materials capable of meeting the needs of European manufacturers in terms of quantity, quality, and at a reasonable cost. In this regard, CALLS on the European Commission to make the circular economy a priority in its innovation support programmes.**

**29b. EMPHASIZES the need to ensure a level playing field and effective market surveillance to preserve European competitiveness in a fair and circular Single market.**

**29c. HIGHLIGHTS the need to address the ambiguous and inconsistent interfaces between waste, product, and chemical legislation and the importance of establishing non-toxic material cycles by a rapid phase-out of harmful substances to support access to and confidence in recycled materials of high-quality. CALLS ON the Commission to fully implement the Chemical Strategy for Sustainability with a particular focus on revising and modernising REACH. UNDERLINES that harmonization and guidelines on the application of product and chemical legislation is needed and should aim to ensure that secondary raw materials are safe to use and comply with EU legislation. Further EMPHASIZES the importance of creating a legal framework that enables the chemical industry to accelerate efforts to overcome the various technical and economical constraints of chemical recycling.**

## **LITHUANIA**

*Waste, ~~prevention and~~ **sustainable consumption and production***

- 29d. UNDERLINES the importance of enabling sustainable resource use as it supports climate and environmental objectives, drives economic growth and competitiveness, secures the supply of raw materials, strengthens supply chain resilience, and fosters innovation in technologies and business models, including through fiscal measures.**
30. ACKNOWLEDGES the need to realise the full potential for waste reduction through further incentives to increase durability, reparability, and reuse of products, and the facilitation and incentivisation of circular business models **and ENCOURAGES the Commission to ensure this as part of the Circular Economy Act.**
- 30a. UNDERLINES the importance of the Ecodesign for Sustainable Products Regulation (ESPR) and URGES the Commission to maintain full support, to timely implementation of, and where possible, acceleration of the ESPR-work plan and the introduction of Digital Product Passport.**
- 30b. CALLS ON the Commission to establish design requirements for electrical and electronic equipment that cover the full product lifecycle, in particular on reparability and recyclability, and set clear collection, recovery and treatment standards for components and materials.**
31. UNDERLINES the significant potential for public procurement to act as a driver for circular economy **and the need to take further action to promote green public procurement that prioritises durability, reparability, reuse, and resource efficiency, and enables procurement of second-hand, refurbished and remanufactured products, and products-as-a-service, thereby supporting circular business models and creating demand for sustainable products and services in the Union.**
- 31a. EMPHASISES the importance of EU level tools such as EU Ecolabel and EMAS to ensure better products on the EU market.**
32. EMPHASISES the importance of consumers and the need for reliable information and awareness-raising to empower consumers. **In this context UNDERLINES the importance of EU and Member State level awareness-raising campaigns to facilitate circular consumer choices.**

**LITHUANIA**

**32a. SUPPORTS infrastructure innovation in collection, sorting, reuse, preparation for reuse, and recycling technologies to advance the circular economy and STRESSES the importance of providing targeted support, in different ways, for SMEs, particularly those active in repair, reuse, rental, and sharing sectors.**

**International Action**

**32b. SUPPORTS the continued negotiations and outreach to develop an ambitious and effective international legally binding agreement to end plastic pollution, including in the marine environment, based on a comprehensive approach that addresses the full life cycle of plastic.**