



Council of the European Union
General Secretariat

Brussels, 12 November 2025

WK 15348/2025 INIT

LIMITE

ENV

CLIMA

COMPET

MI

IND

AGRI

FORETS

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CONTRIBUTION

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

Following the call for comments on the above set out in WK 15059/2025, delegations will find attached comments received from the BE, CY, CZ, EE, ES, FI, IT, HU, NL, LT, LU, AT and SE delegations.

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

From: General Secretariat of the Council
To: Delegations

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

BELGIAN COMMENTS

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)¹ and the Communication from the Commission on the European Green Deal², the global goal on climate adaptation set out in Article 7 of the Paris Agreement³, and the UN 2030 Agenda for Sustainable Development (in particular SDG 12 and SDG 13)⁴.
2. ~~RECALLS~~ **REAFFIRMS** previous Council conclusions, ~~including in particular~~ those of 17 June 2024 on the mid-term evaluation of the 8th EAP⁵ 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 2025⁶ as well as the Agency's monitoring reports on progress towards the 8th 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.

¹ 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).

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

³ OJ L 282/9, 19.10.2016, p. 4.

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

⁵ Document 11326/24 + CoR1

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

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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 existing funding.

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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**⁷. **TAKES NOTE OF estimates that the investment gap for the circular economy in the EU amounts to EUR 27 billion per year**⁸. 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**⁹, 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.**

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

⁸ [European Commission: 2025 Environmental Implementation Review \(link\)](#)

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

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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 require swift 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.**
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.**

Commented [A1]: Some BE colleagues don't want the text to sound overly alarmist.

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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 the Commission's plans, in line with its published 2026 Work Programme, to develop a legal framework to support climate resilience action at EU and at various levels of governance in Member States, through common definitions, objectives, methodologies for climate risk assessments and toolbox including the common temperature reference scenarios; CALLS FOR, in line with the overarching principles of subsidiarity and proportionality, focus on assessment and management of transboundary climate risks as well as systemic threats to competitiveness, security and prosperity of the EU as a whole. WELCOMES TAKES NOTE of the development of a legal framework which should respect the principles of subsidiarity and proportionality, and** that supports action

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~~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.

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.

17d. STRESSES the importance of ensuring accessible and affordable insurance to address residual risks.

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.**~~and~~

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.

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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, **and STRESSES that enhancing tools and capacity-building for regional and local actors is essential, including through leveraging on the experiences of the EU Mission on Adaptation, also to ensure effective implementation, including** ~~and~~ **by supporting Member States in tailoring resilience strategies to local conditions and encouraging early stakeholder engagement to ensure inclusive and regionally adapted solutions, to ensure effective implementation.**

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, while ensuring synergy and alignment with the EU's industrial policy objectives to maintain coherence and strengthen Europe's competitiveness.**

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

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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-regulation and should ideally occur when reviewing existing legislation to provide forensure long-term legal stability and predictability for business and society.**

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.**

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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. ENCOURAGES the Commission to work on a fair, competitive secondary materials market, with sufficient demand for EU recyclates and ensuring imported products are safe. 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.~~
28. CALLS on the Commission to strengthen EU-added value through further harmonisation of ~~End of W~~waste ~~E~~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 consider all options 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~~ **separate** waste collection and recycled content requirements, **positive market-based incentives, and quality standards for secondary raw materials.**

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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 sustainable and high-quality recycled materials of high-quality. CALLS ON the Commission to fully implement the Chemicals 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.

*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.

29e. REITERATES paragraph 28 of the Council Conclusions of 17 June 2024 on the mid-term evaluation of the 8th EAP and URGES the Commission to launch the requested process leading towards an integrated EU long-term vision for the transition to a circular economy and sustainable resource use, including the necessary assessments.

30. ACKNOWLEDGES the need to realise the full potential for waste reduction through further incentives to increase durability, repairability, 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.

Commented [A2]: Which "inconsistent interfaces" are being referred to ?

Commented [A3]: The matter is sensitive. Some BE colleagues have asked to add the following: [...] substances, **in a well-managed process, as soon as possible while respecting the scientific findings of the risk assessment process and, where appropriate, the transition time needed to develop safe and sustainable alternatives,** to support [...]

Commented [A4]: This part is too vague. What is meant by "harmonization and guidelines on the application of product and chemical legislation"? Is this OSOA or interface REACH-ESPR in CARACAL discussion (but not concrete for the moment) or end of waste criteria or something else?

Commented [A5]: It is important to clarify what is meant by "to overcome various technical and economic constraints of chemical recycling." Innovation and chemical recycling are indeed important and should be supported while making sure that the waste and processing hierarchy is respected and implemented. It is correct that the current Waste Framework Directive does not provide sufficient clarity on chemical recycling, and this deserves further attention.

Commented [A6]: «Waste» should be deleted because the paragraphs underneath are not about waste. If the word 'waste' however needs to stay, the title should be changed to "waste and sustainable consumption and production"

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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.**

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.

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CZECHIA

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

CZ Comments (on doc. 13681/25 REV1) – **para 21, 27b, 28a, 29c**

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 **while preserving an open economy**, and to support the **environmental and climate** objectives in the 8th EAP.

27b. **CALLS for the systematically promoting equivalent standards in third countries 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.**

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.**

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 securing a legal framework that enables the chemical industry to accelerate efforts to overcome the various technical and economical constraints of chemical recycling.**

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)¹ and the Communication from the Commission on the European Green Deal², the global goal on climate adaptation set out in Article 7 of the Paris Agreement³, and the UN 2030 Agenda for Sustainable Development (in particular SDG 12 and SDG 13)⁴.
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 3. WELCOMES the report of the European Environment Agency on Europe's Environment 2025⁶ as well as the Agency's monitoring reports on progress towards the 8th 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.**

¹ 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).

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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.

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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.**

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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 future⁷.** **TAKES NOTE OF estimates that the investment gap for the circular economy in the EU amounts to EUR 27 billion per year⁸.** 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 years⁹, 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.**
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⁷ **European Commission: Update of the costs of not implementing EU environmental law ([link](#))**

⁸ **European Commission: 2025 Environmental Implementation Review ([link](#))**

⁹ **European Environment Agency: Economic losses from weather- and climate-related extremes in Europe ([link](#))**

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. ACKNOWLEDGES in particular the growing frequency, intensity and territorial spread of forest fires and other natural disturbances, which pose increasing risks to ecosystems, biodiversity, human health, and economic activity, especially in Mediterranean and island regions.

8c. NOTES WITH CONCERN the increasing frequency and severity of droughts and water scarcity events across Europe, particularly in Mediterranean, island, and outermost regions, which threaten water security, agricultural productivity and ecosystems. CALLS for enhanced integration of water management and climate resilience policies, including drought preparedness, water reuse, and nature-based water retention measures.

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. STRESSES, in this regard, the importance of addressing the specific adaptation needs of Member States and regions disproportionately affected by recurrent forest fires, and CALLS for enhanced cooperation on prevention, preparedness and response capacity at Union level.

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.

CYPRUS

Competitiveness and innovation opportunities

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CYPRUS

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.**
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15. UNDERLINES the importance of **healthy ecosystems, biodiversity and scaling up of** nature-based solutions **as cost-effective means for** climate resilience **including through sustainable forest management, restoration of burned areas, and the use of fire-resilient species and landscape planning to reduce vulnerability to forest fires and strengthen natural carbon sinks, 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,**

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improve, and simplify existing reporting requirements, thereby enhancing transparency and effectiveness, BEARING IN MIND the need to minimise the administrative burden.

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.**and

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**

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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.

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**

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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.

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.

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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.

28. CALLS on the Commission to strengthen EU-added value through further harmonisation of ~~End of W~~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

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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.

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.

29e. UNDERLINES the need to promote circular approaches to water management, including water reuse, recycling, and efficiency measures in industrial, agricultural, and urban sectors, in order to address increasing water scarcity, enhance resource efficiency, and strengthen resilience to climate-related risks.

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.**

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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.**

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.

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

From: General Secretariat of the Council
To: Delegations

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

ESTONIAN COMMENTS

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)¹ and the Communication from the Commission on the European Green Deal², the global goal on climate adaptation set out in Article 7 of the Paris Agreement³, and the UN 2030 Agenda for Sustainable Development (in particular SDG 12 and SDG 13)⁴.
2. ~~RECALLS~~ **REAFFIRMS** previous Council conclusions, ~~including in particular~~ those of 17 June 2024 on the mid-term evaluation of the 8th EAP⁵ 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 2025⁶ as well as the Agency's monitoring reports on progress towards the 8th 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.

¹ 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).

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

³ OJ L 282/9, 19.10.2016, p. 4.

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

⁵ Document 11326/24 + CoR1

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

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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.

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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**⁷. **TAKES NOTE OF estimates that the investment gap for the circular economy in the EU amounts to EUR 27 billion per year**⁸. 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**⁹, 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.**

⁷ European Commission: Update of the costs of not implementing EU environmental law ([link](#))

⁸ European Commission: 2025 Environmental Implementation Review ([link](#))

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

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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.**
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.**

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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.**

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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.**

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III. CIRCULAR ECONOMY

20. CONFIRMS the need for a comprehensive ~~and practicable~~ **actionable** 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.**

Commented [A1]: We propose "actionable" as this describes the goal better.

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.**

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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 platforms marketplaces to ensure that all operators comply with product safety, extended producer responsibility and other 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.**

26a. RECOGNISES the importance of the users of online platforms to comply with all obligations arising from extended producer responsibility schemes and that the provider of the online platform must provide sufficient evidence prior to allowing producers to use the services, including the registration and verification.

26b. NOTES that single EU-wide extended producer responsibility register or digital interface with MS registries of producers would reduce administrative burden and ensure data quality and efficiency of EPR, together with simplifying producer compliance.

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.

Commented [A2]: This Regulation should specify how the traceability of traders' obligations laid down in Regulation (EU) 2022/2065 of the European Parliament and of the Council (28) is to be applied to online platforms allowing consumers to conclude distance contracts with producers offering batteries, including batteries that are incorporated in appliances, light means of transport or other vehicles, and to consumers located in the Union in relation to the registers of producers established pursuant to this Regulation. For the purposes of this Regulation, any producer offering batteries, including those incorporated in appliances, light means of transport or other vehicles, by means of distance contracts directly to consumers located in a Member State, whether established in a Member State or a third country, should be considered to be a trader as defined in Regulation (EU) 2022/2065. Pursuant to that Regulation, providers of online platforms, falling within the scope of Section 4 of Chapter III thereof and who allow consumers to conclude distance contracts with producers, should obtain from those producers information on the register of producers where they are registered as well as their registration number and a self-certification committing to comply with the extended producer responsibility requirements laid down in this Regulation. The implementation of the rules on the traceability of traders for the sale of batteries online are subject to the enforcement rules laid down in Regulation (EU) 2022/2065.

Commented [A3]: There is urgent need to tackle third country online platforms in EPR schemes and WFD is the best place to ensure that these products are covered. We also make proposal to have one additional paragraph addressing specifically them (26a).

Commented [A4]: We believe that central EPR digital interface that allows the connection with all MS EPR registers would reduce administrative burden. We find that in the future the best and the easiest solution is to have a central info of producers through digital interface, providing the producer the opportunity to be connected to all relevant EPR national registers in order to fulfil their EPR compliance duties. This way producer have a possibility to fulfil EPR obligation earlier and faster. Digital interface simplifies the registration process and reporting phase. Helps with the payments associated with EPR. It allows producers to comply with EPR across all EU Member States. Digital interface simplifies the registration process and reporting phase. It allows producers to comply with EPR across all EU Member States.

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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.

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.

Commented [A5]: Why is this being deleted, it seems important to stress the separate waste collection issues.

We propose to add it back.

Commented [A6]: Why only limit to innovation? Wouldn't it make sense to give CE a priority in other support programmes as well?

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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.

Commented [A7]: This seems to repeat previous council conclusions, is it necessary to add here?

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~~ timely delivery of Digital Product Passport.

Commented [A8]: There is a lot of uncertainty about DPP on the market and ESPR general requirements do not give much information. In order to effectively implement DPP, we need to set those. ESPR is already being late with its implementing acts and this doesn't ensure the regulative stability.

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. HIGHLIGHTS the need**

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to target major sectors with significant market volume and environmental impact together with the need to enable ~~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.**

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.

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NOTE

From: General Secretariat of the Council
To: Delegations

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

In view of the meeting of the Working Party on Environment on 7 November 2025, delegations will find attached revised draft Council conclusions entitled 'Europe's Environment 2030 - Building a more climate resilient and circular Europe'. Changes to the previous version is marked in **bold and underlined**, deletions in ~~strike through~~.

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)¹ and the Communication from the Commission on the European Green Deal², the global goal on climate adaptation set out in Article 7 of the Paris Agreement³, and the UN 2030 Agenda for Sustainable Development (in particular SDG 12 and SDG 13)⁴.
2. ~~RECALLS~~ **REAFFIRMS** previous Council conclusions, ~~including in particular~~ those of 17 June 2024 on the mid-term evaluation of the 8th EAP⁵ 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 2025⁶ as well as the Agency's monitoring reports on progress towards the 8th 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.

¹ 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).

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

³ OJ L 282/9, 19.10.2016, p. 4.

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

⁵ Document 11326/24 + CoR1

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

SPAIN

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.

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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**⁷. **TAKES NOTE OF estimates that the investment gap for the circular economy in the EU amounts to EUR 27 billion per year**⁸. 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**⁹, 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.**

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

⁸ [European Commission: 2025 Environmental Implementation Review \(link\)](#)

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

SPAIN

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.**

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.**

SPAIN

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** in 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 WELCOMES** 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.**

Commented [A1]: We believe that, overall, this paragraph seems rather inconsistent because, on one hand, it recognizes the importance of strengthening the monitoring and evaluation of resilience efforts, only to then advocate, in the second sentence, for simplifying reporting requirements. The element of simplification, while might be valid, could be mentioned in a more general manner elsewhere. We therefore suggest the deletion of this last part, specially the last element, BEARING IN MIND...

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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.**

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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.**

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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.

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*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 **and prevention in material extraction** through further incentives to increase durability, repairability, and reuse of products, **servitization** and the facilitation and incentivisation of circular business models, **including through fiscal measures such as taxation, 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 **INVITES the Commission to establish harmonized criteria for eco-score labelling systems that reflect the environmental impacts of products in the Single Market, in line with the climate and environmental objectives set out in the EU**

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Taxonomy. **-In this context UNDERLINES the importance of EU and Member State level awareness-raising campaigns to facilitate circular consumer choices.**

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.

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

From: General Secretariat of the Council
To: Delegations

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

FINNISH COMMENTS

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)¹ and the Communication from the Commission on the European Green Deal², the global goal on climate adaptation set out in Article 7 of the Paris Agreement³, and the UN 2030 Agenda for Sustainable Development (in particular SDG 12 and SDG 13)⁴.
2. ~~RECALLS~~ **REAFFIRMS** previous Council conclusions, ~~including in particular~~ those of 17 June 2024 on the mid-term evaluation of the 8th EAP⁵ 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 2025⁶ as well as the Agency's monitoring reports on progress towards the 8th 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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² Document 15051/19 + ADD 1 - COM(2019) 640 final.

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

⁵ Document 11326/24 + CoR1

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

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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. STRESSES the importance of climate change mitigation in line with the objectives of the Paris Agreement; RECOGNISES the interlinkages between climate change mitigation, 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.

Commented [A1]: 3d We would like to add text underlining the importance of climate change mitigation, the success of which also defines the need for adaptation; but also recognising the interlinkages between mitigation and the circular economy. This text could be added for instance to para 3d

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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**⁷. **TAKES NOTE OF estimates that the investment gap for the circular economy in the EU amounts to EUR 27 billion per year**⁸. 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**⁹, 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.**

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

⁸ [European Commission: 2025 Environmental Implementation Review \(link\)](#)

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

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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~~ **EMPHASISES** that climate resilience is fundamental for the Union’s **security, and prosperity and competitiveness**. ~~ensuring coherence with other key EU policies such as the Preparedness Union Strategy and the Water Resilience Strategy~~; STRESSES that transformational change is needed to make the Union and Member States better prepared and more resilient.

Commented [A2]: We also would like to have more explicit references to preparedness and water resilience.

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 and population groups.

Commented [A3]: 9b we would like to add also vulnerable population groups in the text “... most vulnerable sectors **and population groups**”

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

Commented [A4]: 10 We appreciate that the text acknowledges transboundary risks. We suggest revising the wording to address transboundary risks more broadly and also emphasising the need for broader EU level cooperation in addressing them. Transboundary risks encompass also wider spillover effects through international trade, such as raw materials and inputs of production supply chains.

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.**

Commented [A5]: 10 Another suggestion for this paragraph is to include a reference to cascading climate risks, which are still poorly recognised but are becoming increasingly significant as climate-related risks intensify.

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**

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improve knowledge about costs, benefits and business opportunities and including social justice dimension inclusion of social justice in solutions policies for climate resilience.

Commented [A6]: 12 We would like this para to include also the private sector, and suggest using 'solutions' rather than 'policies.' This would also increase consistency with the earlier part of this section, which refers to solutions.

Climate rResilience 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.**

Commented [A7]: Reconsider if this para should this be in the legal framework sub-section , see also next comment.

13a. NOTES that linking climate resilience and development planning, budgeting and infrastructure unlocks multiple benefits and improves sustainable investment opportunities.

Commented [A8]: We suggest to add climate reference scenarios into para 17. This part of the para would then be overlapping with para 17

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.**

Commented [A9]: We thank Romainan colleagues for the clarification of the para and support their suggestion:

RO: 13a. **NOTES that linking climate resilience by design and development the early planning stage, budgeting and infrastructure unlocks multiple benefits and improves sustainable investment opportunities.**

15. UNDERLINES the importance of **healthy ecosystems, biodiversity and scaling up of nature-based solutions as cost-effective means for in 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 WELCOMES of the development of a legal framework which that should respects the principles of subsidiarity and proportionality, and that supports focusing on strengthening implementation of adaptation action at EU level and in~~

Commented [A10]: 17 We support the BE suggestion to use word WELCOMES in this part of the text.

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Member States. CALLS ON the Commission when developing the legal framework to consider elements including but not limited to goals, common reference scenarios, common definitions and monitoring, reporting, evaluation and learning framework and methodologies ensuring a common language on climate resilience.

Commented [A11]: 17 We believe it could be beneficial for the text to outline possible content elements of a legislative proposal to help understand the aims and scope of the proposal.

17a. RECOGNISES the importance of strengthening monitoring, reporting and evaluation of climate resilience efforts at EU and Member State levels in order to better support the effective implementation of adaptation actions and HIGHLIGHTS the need to identify opportunities to streamline, improve, and simplify existing reporting requirements at multiple levels, thereby enhancing transparency and effectiveness, BEARING IN MIND the need to minimise the administrative burden.

Commented [A12]: 17a We are quite pleased with this paragraph, as it highlights both the importance of monitoring, reporting, and evaluation (MRE), as well as the need to streamline and simplify existing reporting requirements. We would add a text emphasising, that the purpose of MRE is to better support the effective implementation of adaptation actions at both the EU and Member State levels.

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.

Commented [A13]: Like other Member States, we would like to underline that these conclusions should take into account that negotiations on the MFF are still ongoing

17c. HIGHLIGHTS the crucial role of EU funding instruments and 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 improved 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.**~~and~~

Commented [A14]: 18 We would suggest a small text improvement

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.

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18b. 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.**

Commented [A15]: 18b It is unclear to us what dynamic means in this para. Evidence-based as such includes up-to-date, best available information.

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 **STRESSES that enhancing tools and capacity-building for regional and local actors is essential to ensure effective implementation-, including by drawing on the experiences and lessons learned from the EU Mission on Adaptation.** **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, to ensure effective implementation.**

Commented [A16]: 19 We support texts that are in line with formulations such as “enhancing tools and capacity-building for regional and local actors is essential to ensure effective implementation”. We also support the suggestion from BE to include reference to “the work and experience gained through the EU Mission on Adaptation” in the text.

III. CIRCULAR ECONOMY

New para in the chapeau.

INVITES both the Commission and the Member States to accelerate the circular economy transition through investment, innovation, enabling infrastructures and updated national strategies with clear targets and measures for key sectors in order to decouple growth from carbon and resource use and advance the circular economy.

Commented [A17]: We propose a new para to better acknowledge that achieving a truly circular economy requires systemic policy coherence, cross-sectoral collaboration, public-private partnerships and investment in both technological and social innovation.

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.**

We are also interested to see the written proposal highlighting the importance of a long-term vision Belgium promised to submit.

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

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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**.
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**

Commented [A18]: We would like to know what is meant by this para and to which methodologies and indicators does the para refer to?

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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.

Commented [A19]: Could this sentence in yellow be a separate paragraph, as it concerns issues beyond extended producer responsibility?

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.

28. CALLS on the Commission to strengthen EU-added value through further harmonisation **and development** 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.** **NOTES that it is important to preserve the possibility for case-by case national decision-making when EU-wide criteria is not practically feasible.**

Commented [A20]: We propose adding development in this para.

Commented [A21]: We support the wording in this paragraph but would suggest adding that it is important to preserve the possibility for case-specific national decision-making. The possibility for Member States to make such case-specific decisions is essential, as waste quality, treatment infrastructure, markets, and environmental and health risks vary significantly between Member States. This flexibility ensures the protection of the environment and human health while promoting the circular economy in practice. EU-level criteria are necessary when the same type of recovery is carried out extensively at multiple facilities across the EU. However, for rarer types of waste recovery that take place only at a few facilities, developing EU-wide criteria is not practically feasible, and these cases should allow for case-by-case End-of-Waste (EoW) decision-making.

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

FINLAND

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.

*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.

Commented [A22]: We would like more detailed information on which waste streams additional recycling targets are being proposed for. If new targets are to be set, they should be based on reliable data and harmonised calculation rules. It would also be important to assess how effective the existing recycling targets have been before introducing new ones.

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29c EMPHASIZES that re-use and preparation for re-use are key to a well-functioning circular economy market, but the administrative burden for enterprises can be disproportionately high. Therefore, the legislative review should align definitions such as “re-use”, “preparation for re-use”, “repurposing” and “remanufacturing” and simplify related procedures where appropriate. NOTES that copyright and trademark rules can create tensions for re-use operators. INVITES the Commission to review intellectual property legislation to ensure it does not create unnecessary barriers to circular business models, while maintaining a fair balance with intellectual property protection.

Commented [A23]: The administrative burden for re-use can be disproportionately high – for example in small-scale craftsmanship and construction products. Copyright and trademark rules can also create tensions between rights holders and re-use operators like small enterprises and artisans. Therefore we propose a new para.

30. ACKNOWLEDGES the need to realise the full potential for waste reduction through further incentives to increase durability, repairability, 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.

30-31. 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.

FINLAND

~~31~~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.**

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.

Brussels, 31 October 2025
(OR. en)

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NOTE

From: General Secretariat of the Council
To: Delegations

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

ITALIAN COMMENTS

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)¹ and the Communication from the Commission on the European Green Deal², the global goal on climate adaptation set out in Article 7 of the Paris Agreement³, and the UN 2030 Agenda for Sustainable Development (in particular SDG 12 and SDG 13)⁴.
2. ~~RECALLS~~ **REAFFIRMS** previous Council conclusions, ~~including in particular~~ those of 17 June 2024 on the mid-term evaluation of the 8th EAP⁵ 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 2025⁶ as well as the Agency's monitoring reports on progress towards the 8th 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.

¹ 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).

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

³ OJ L 282/9, 19.10.2016, p. 4.

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

⁵ Document 11326/24 + CoR1

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

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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, water quality and quantity, circularity, and other environmental objectives such as the protection and restoration of biodiversity, soil 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 stress 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.

Commented [A1]: Furthermore, we propose to integrate the issue of soil protection and restoration, considering the importance of soils for climate resilience.

Commented [A2]: We propose to further explore the interconnections between the various environmental objectives mentioned, adding a direct reference to water quality and quantity. To this end, it should be noted, by way of example, that nature-based solutions and natural water retention measures can generate positive effects not only in terms of protecting and restoring ecosystems but also in terms of water quality and quantity, just as pollution prevention and control systems and circular economy measures (such as the reuse of treated water) can contribute to the same end.

Commented [A3]: We propose highlighting the issue of water stress, which leads to both scarcity of resources and quality deterioration.

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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 future⁷.** TAKES NOTE OF estimates that the investment gap for the circular economy in the EU amounts to EUR 27 billion per year⁸. **Underlines the need to strengthen efforts to close the financing gap for adaptation and 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 years⁹, 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, **also through the upcoming European Climate Adaptation Plan,** 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**

Commented [A4]: It is proposed to emphasise the issue of the funding needed for adaptation, as highlighted in the recent Council conclusions on the water resilience strategy and also in relation to the ongoing discussion in the context of the new financial perspectives.

Commented [A5]: It is proposed to underline the role of the European Climate Adaptation Plan (ECAP). It will support the Member States on preparedness and resilience planning.

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

⁸ [European Commission: 2025 Environmental Implementation Review \(link\)](#)

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

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use of natural resources, including agricultural and forestry materials and energy in all Member States.

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, and integrated monitoring systems, that can help sustainably manage natural resources (such as water, land, forests) under a changing climate, and 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.

12. INVITES the Commission and Member States to promote research and foster innovation, thereby contributing to solutions benefitting concomitantly climate resilience, ecosystem

Commented [A6]: We believe that integrated environmental, land and climate monitoring systems, based on real-time data, are a fundamental prerequisite for the sustainable management of natural resources (such as water, land and forests) in a changing climate and for supporting preparedness for the protection of communities, ecosystems and human settlements.

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restoration, disaster risk prevention and 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.

Commented [A7]: We emphasise that disaster risk management policies include prevention, preparedness, response and recovery actions. The EU develops policies focused on prevention and disaster risk reduction, as such actions will reduce the impact of adverse events.

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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.**

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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 **cross-sector and 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**

Commented [A8]:

It is proposed to underline the need for an intersectoral approach, not only multilevel, to promote strategies and plans that consider the multiple and interconnected impacts of climate change.

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stakeholder engagement to ensure inclusive, **intersectoral** and regionally adapted solutions.

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.

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1. RECALLS the Decision on the 8th Environment Action Programme (EAP)¹ and the Communication from the Commission on the European Green Deal², the global goal on climate adaptation set out in Article 7 of the Paris Agreement³, and the UN 2030 Agenda for Sustainable Development (in particular SDG 12 and SDG 13)⁴.
2. ~~RECALLS~~ **REAFFIRMS** previous Council conclusions, ~~including in particular~~ those of 17 June 2024 on the mid-term evaluation of the 8th EAP⁵ 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 2025⁶ as well as the Agency's monitoring reports on progress towards the 8th 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.

¹ 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).

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

³ OJ L 282/9, 19.10.2016, p. 4.

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

⁵ Document 11326/24 + CoR1

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

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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.

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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**⁷. **TAKES NOTE OF estimates that the investment gap for the circular economy in the EU amounts to EUR 27 billion per year**⁸. 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**⁹, 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.**

⁷ European Commission: Update of the costs of not implementing EU environmental law ([link](#))

⁸ European Commission: 2025 Environmental Implementation Review ([link](#))

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

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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.**
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.**

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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 while taking into account the different national and regional specificities and starting points, and which** that supports action at EU level and in Member States including common definitions and methodologies ensuring a common language on climate resilience.
- 18. STRESSES that the legal framework should carefully define the areas where the EU has ownership and should contribute to and incentivise resilience building through supportive measures; UNDERLINES that the legal framework should also facilitate to**

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determine risk ownership building on the findings of the European Climate Risk Assessment.

17-19. HIGHLIGHTS that excessive administrative burden should be avoided, and effective measures that are fit for purpose should be elaborated, while recognising different adaptation needs and ensuring sufficient flexibility for implementation; UNDERLINES that the framework should also support the strengthening of European competitiveness and the uptake of innovative green technologies that facilitate adaptation and resilience building.

Monitoring

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.

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

18-20. 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, and**

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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

~~19-21.~~ 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.**

III. CIRCULAR ECONOMY

~~20-22.~~ 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.

~~21-23.~~ 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.

~~22-24.~~ 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

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transition, ensure predictability, policy coherence, simplification and effective implementation, **while ensuring a high level of health and environmental protection.**

23-25. 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

24-26. 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.**

25-27. UNDERLINES the potential of ~~the~~ 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.**

26-28. SUPPORTS the continued work of the Commission on ~~the~~ **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. **facilitate a more effective cross-border EPR system, while ensuring proper flexibility for existing Member States' EPR schemes 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.**

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Creating a Single market for secondary raw materials

27-29. 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.

28-30. CALLS on the Commission to strengthen EU-added value through further harmonisation of ~~End of Wwaste~~ 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.

29-31. 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.**

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- 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.**

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.**
- 30-32. 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.**

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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.

~~31-33.~~ 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.

~~32-34.~~ 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.

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.

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ANNEX

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)¹ and the Communication from the Commission on the European Green Deal², the global goal on climate adaptation set out in Article 7 of the Paris Agreement³, and the UN 2030 Agenda for Sustainable Development (in particular SDG 12 and SDG 13)⁴.
2. **RECALLS REAFFIRMS** previous Council conclusions, ~~including~~ **in particular** those of 17 June 2024 on the mid-term evaluation of the 8th EAP⁵ 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 2025⁶ as well as the Agency's monitoring reports on progress towards the 8th 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.

¹ 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).

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

³ OJ L 282/9, 19.10.2016, p. 4.

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

⁵ Document 11326/24 + CoR1

⁶ EEA: Europe's Environment 2025, ~~published 29 September 2025~~ ([link](#))

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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, **droughts, floods and rising sea levels**~~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.

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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**⁷. **TAKES NOTE OF estimates that the investment gap for the circular economy in the EU amounts to EUR 27 billion per year**⁸. 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**⁹, 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.**

Commented [A1]: The use of biomass is not related to improving climate resilience on the contrary, excessive use might be detrimental). For mitigation the situation is different of course. The use of nature based solutions on the other hand is in general a welcome option for climate resilience, but the use of primary and secondary biomass is not a nature based solution as meant in the climate adaptation debate

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

⁸ [European Commission: 2025 Environmental Implementation Review \(link\)](#)

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

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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.**
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.**

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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) strategies and 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, and UNDERLINES the need to coordinate those sectoral approaches to avoid maladaptation and a shift of the problem to other sectors and to maximize the potential use of synergies.
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.

Commented [A2]: After consulting our Minister, we can support the use of "WELCOMES" within this paragraph.

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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.

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

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19. RECOGNISES the importance of **a whole-of-government approach involving actors at national, on** 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.**

III. CIRCULAR ECONOMY

20. CONFIRMS the need for a comprehensive **and practicable** legislative framework on circular economy to bring about **and accelerate** 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.**

Commented [A3]: We accept removing this from the paragraph. Nonetheless, we prefer some kind of references to WFD and WEEE in these conclusions. Suggestion par. 28 en 30b.

Facilitating implementation, simplification, and EU added value

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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.**
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 explore the possibility to expand producer responsibility schemes towards more products,** 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.**

Commented [A4]: Full support!

Commented [A5]: Text from 8EAP conclusions 2024

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, **and improve the free movement circular products and secondary materials.**

THE NETHERLANDS

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.

28. CALLS on the Commission, **when reviewing the Waste Framework Directive**, to strengthen EU-added value through further harmonisation of **waste legislation across the EU, such as harmonising** ~~End of W~~ ~~aste C~~ ~~riteria~~ **and clarifying the legal definition of waste**, 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, explore waste- or material-specific European landfill and incineration bans, such as for unsorted municipal waste.

28b. EMPHASISES the importance of sustainable carbon, including recycled content, sustainable biomass and CO₂, for a circular transition in the chemical industry. RECOGNISES the need for green demand creation to stimulate the use of sustainable carbon. CALLS ON the Commission to explore measures supporting sustainable carbon in the chemical industry.

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.**

Commented [A6]: *Rationale for comments:*
Binding targets

As there is currently no long-term trajectory to continue the targets for recycling following the WFD, the Commission should establish binding recycling targets for the period which is currently not covered in the WFD (2035-2050).

Commented [A7]: *Landfilling/incineration*

The CEA should further restrict landfilling and incineration as waste treatment options, since both processes destroy valuable resources at a time when resource security and strategic autonomy are crucial. It is therefore of paramount importance to reduce such waste treatment methods to the absolute minimum, while guaranteeing environmentally safe waste treatment through incineration and landfilling for waste streams that cannot be processed through other means.

Commented [A8]: We are working on an alternative text, that reflects the outcome of last WPE.

THE NETHERLANDS

- 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.**

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.**

THE NETHERLANDS

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.**

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.

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

From: General Secretariat of the Council
To: Delegations

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

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)¹ and the Communication from the Commission on the European Green Deal², the global goal on climate adaptation set out in Article 7 of the Paris Agreement³, and the UN 2030 Agenda for Sustainable Development (in particular SDG 12 and SDG 13)⁴.
2. ~~RECALLS~~ **REAFFIRMS** previous Council conclusions, ~~including in particular~~ those of 17 June 2024 on the mid-term evaluation of the 8th EAP⁵ 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 2025⁶ as well as the Agency's monitoring reports on progress towards the 8th 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.

¹ 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).

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

³ OJ L 282/9, 19.10.2016, p. 4.

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

⁵ Document 11326/24 + CoR1

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

LATVIA

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.

LATVIA

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**⁷. **TAKES NOTE OF estimates that the investment gap for the circular economy in the EU amounts to EUR 27 billion per year**⁸. 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**⁹, 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.**

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

⁸ [European Commission: 2025 Environmental Implementation Review \(link\)](#)

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

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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.**

LATVIA

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.**

LATVIA

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.**

LATVIA

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.**

LATVIA

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.**

LATVIA

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.
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LATVIA

28. CALLS on the Commission to strengthen EU-added value through further harmonisation of ~~End of Waste~~ ~~Criteria~~ 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.**

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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.

LATVIA

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.**
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LATVIA

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.

LUXEMBOURG

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

- Draft Council conclusions –

Written feedback on 2nd draft from Luxembourg, 11. November 2025

II. CLIMATE RESILIENCE

17. ~~WELCOMES TAKES NOTE~~ of the development of a legal framework which should respect the principles of subsidiarity and proportionality, and supports action at EU level and in Member States including common definitions and methodologies ensuring a common language on climate resilience.

Welcome “reflects the signal we would like to express; we cannot support watering down the language

LU supports BE proposals made during the WPE meeting concerning **paragraphs 17.e and 19**

III. CIRCULAR ECONOMY

26. SUPPORTS the continued work of the Commission on harmonisation of the Extended Producer Responsibility while ensuring that this reflects the unique circumstances of each Member State. **STRESSES** the need to regulate distance selling, and online marketplaces **and to create adequate enforcement tools** to ensure that all operators, **including those based in other Member States or third countries**, 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.

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)¹ and the Communication from the Commission on the European Green Deal², the global goal on climate adaptation set out in Article 7 of the Paris Agreement³, and the UN 2030 Agenda for Sustainable Development (in particular SDG 12 and SDG 13)⁴.
2. ~~RECALLS~~ **REAFFIRMS** previous Council conclusions, ~~including in particular~~ those of 17 June 2024 on the mid-term evaluation of the 8th EAP⁵ 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 2025⁶ as well as the Agency's monitoring reports on progress towards the 8th 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.

¹ 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).

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

³ OJ L 282/9, 19.10.2016, p. 4.

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

⁵ Document 11326/24 + CoR1

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

AUSTRIA

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.

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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, the EU water resilience strategy 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 as well as effective climate resilience through full and effective implementation of adopted legislation and funding.

Commented [A1]: The draft CC also does not mention the European Water Resilience Strategy published by the EC on 4 June 2025 in REV1. We believe that water resilience and climate resilience are inextricably linked. Water and its changing availability in the context of climate change are an irreplaceable resource and a prerequisite for many economic sectors. We therefore propose that reference be made to the European Water Resilience Strategy in Para3d.

Commented [A2]: Inclusion of effective climate resilience in the text. Measures to effectively improve climate resilience should be given equal weight to measures for effective environmental protection.

AUSTRIA

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**⁷. TAKES NOTE OF estimates that the investment gap for the circular economy in the EU amounts to EUR 27 billion per year⁸. 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 years⁹, and that the expectation is that they continue to increase. **UNDERLINES that the costs and damages due to inaction or insufficient action are expected to be significantly higher than effective climate action.**
6. WELCOMES the intention of the Commission to **further** address challenges related to climate resilience and circularity, **including** by strengthening the legislative framework **exploring effective options for a 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.**
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- 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**

Commented [A3]: AT considers it important that the negative effects of inaction and the resulting costs and damage are addressed in the text.

⁷ European Commission: Update of the costs of not implementing EU environmental law ([link](#))

⁸ European Commission: 2025 Environmental Implementation Review ([link](#))

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

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use of natural resources, including agricultural and forestry materials and energy in all Member States.

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, economic stability and for ensuring the long-term preservation of natural heritage. ACKNOWLEDGES the importance of social dimensions in shaping effective 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 and groups.

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.

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

Commented [A4]: AT expressly welcomes this new paragraph and believes it should remain in the text in its current form.

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implement existing as well as innovative evidence based solutions and to improve knowledge about costs, benefits, business opportunities and inclusion of social justice in policies for climate resilience.

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. EMPHASISES that concomitantly cross-sectoral considerations including coordination and cooperation of all affected stakeholders and governance levels are fundamental in order to reduce risks of maladaptation and utilize synergies across sectors.

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 WELCOMES the development of a legal framework which should respect the principles of subsidiarity and proportionality, and that supports action

Commented [A5]: Strengthening the cross-sectoral approach, involving all relevant stakeholders and levels of governance, is crucial in order to avoid maladaptation and to be able to exploit synergies. We have drafted a text proposal to this end.

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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 effectively minimise the administrative burden.

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 significant and effective progress on 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 scenarios, risks and possible 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,and**

18a. Further ACKNOWLEDGES, that effective provision and exchange of information by 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.

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~~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.~~

Commented [A6]: Unclear what is being referred to here? Whose resilience strategies? Suggestion to delete this part again.

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~~ **balanced 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** and ~~to this effect~~ **CALLS ON the Commission to comprehensively evaluate and chose the most appropriate legal form.**

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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.**
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 economic 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 in order to guarantee a level playing field-field while ensuring that EU meets its international obligations.**

Creating a Single market for secondary raw materials

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27. HIGHLIGHTS the importance of a well-functioning single market for secondary raw materials as a precondition to ~~reduce-optimise 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.

Commented [A7]: We do not consider waste generation to be appropriate at this point – secondary raw materials cannot reduce waste generation, as secondary raw materials are produced from waste.

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-measures~~ for the incorporation of recycled materials and CALLS on the Commission to combat dumping practices.

28. CALLS on the Commission to strengthen EU-added value through further establishment of EU-wide harmonisation of End of Waste criteria supported by an EU-Platform 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 ~~together with measures to ensure that recycled materials substitute primary raw materials 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.

Commented [A8]: The word 'separate' must not be deleted – separate collection is an essential prerequisite for the quality of secondary raw materials.

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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 sustainable~~-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 measures that~~ enables the chemical industry to accelerate efforts to overcome the various technical and economical constraints of chemical recycling.

Commented [A9]: Does not match the basic message.

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

Commented [A10]: Waste prevention is the first stage in the waste hierarchy – the focus must be placed on this, so it must not be deleted.

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.

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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.**

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.

Commented [A11]: From a public procurement perspective, we agree on Para31. However, we can only endorse the requirement contained therein for the 'procurement of second-hand, refurbished and remanufactured products' insofar as this wording 1) does not cause any additional complications for the contracting authority (e.g. in terms of specifications, submission of evidence, etc.) and 2) no fixed quotas for the 'procurement of second-hand, refurbished and remanufactured products' are to be expected.

Brussels, 31 October 2025
(OR. en)

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LIMITE

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

NOTE

From: General Secretariat of the Council
To: Delegations

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

SWEDISH COMMENTS

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)¹ and the Communication from the Commission on the European Green Deal², the global goal on climate adaptation set out in Article 7 of the Paris Agreement³, and the UN 2030 Agenda for Sustainable Development (in particular SDG 12 and SDG 13)⁴.
2. ~~RECALLS~~ **REAFFIRMS** previous Council conclusions, ~~including in particular~~ those of 17 June 2024 on the mid-term evaluation of the 8th EAP⁵ 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 2025⁶ as well as the Agency's monitoring reports on progress towards the 8th 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.

¹ 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).

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

³ OJ L 282/9, 19.10.2016, p. 4.

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

⁵ Document 11326/24 + CoR1

⁶ EEA: Europe's Environment 2025, ~~published 29 September 2025~~ ([link](#))

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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.

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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**⁷. **TAKES NOTE OF estimates that the investment gap for the circular economy in the EU amounts to EUR 27 billion per year**⁸. 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**⁹, 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.**

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

⁸ [European Commission: 2025 Environmental Implementation Review \(link\)](#)

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

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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.**
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.**

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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 STRESSES the importance of using best available science in applying climate reference scenarios]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-in 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,

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improve, and simplify existing reporting requirements, thereby enhancing transparency and effectiveness, BEARING IN MIND the need to minimise the administrative burden.

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 importance crucial role of existing 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, ENCOURAGES improved collection and use of data that to facilitate information exchange and cooperation between Member States;
UNDERSCORES the role of digital tools in facilitating access to information and raising awareness and STRESSES that new or improved the digital tools should be based on take into account the needs of the end-users.^{and}

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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

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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 and effective implementation.**

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, **open** 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

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24. HIGHLIGHTS the ~~importance~~ **RECOGNISES the potential** of simplification as a way to reduce ~~unnecessary 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.

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 and digitalisation of** the Extended Producer Responsibility **in order to reduce the regulatory burden so that** ~~administration across EU Member States is minimized~~ 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.**

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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.

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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.

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 reused and 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.

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29c. HIGHLIGHTS the need to address ~~the-any~~ 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.

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, repairability, 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, reuse, upgrade and recyclability, and set clear collection, recovery and treatment standards for components and materials, especially critical raw materials. A harmonized calculation method for the recycling targets is needed and such calculation method should take into account that electronics have a long lifespan and that electronic waste often remains in households.

SWEDEN

31. UNDERLINES the ~~significant~~ potential for public procurement to act as a driver for circular economy, ~~and the need to take further action to promoting 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.

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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.

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.