



Brussels, 18 June 2026

Ms. Ursula von der Leyen  
President of the European Commission  
Rue de la Loi 200, 1049, Brussels, Belgium

Cc:

Ms. Teresa Ribera, Executive Vice-President for a Clean, Just and Competitive Transition  
Mr. Stéphane Séjourné, Executive Vice-President for Prosperity and Industrial Strategy  
Ms. Jessika Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy

**Subject: Putting Demand for Recycled Materials at the Heart of the Circular Economy Act**

Dear President Von der Leyen,

The Circular Economy Act (CEA) represents the key opportunity to establish a genuine Single Market for secondary raw materials<sup>1</sup> and address structural barriers. To deliver on the EU's circularity ambitions, the CEA must place stronger and more predictable demand for recycled materials at the centre of its framework through robust and harmonised demand-side measures.

The undersigned organisations call on the European Commission to prioritise:

- **Financial support for the incorporation of recycled materials in new products through Extended Producer Responsibility (EPR) eco-modulation;**
- A level playing field that promotes the **uptake of European recycled materials** and strengthens Europe's circular value chains.

The CEA should establish a coherent framework to stimulate the uptake of recycled materials produced and processed in Europe. This should include harmonised **minimum eco-modulation criteria** within EPR schemes that incentivise the use of European recyclates. It should also strengthen the integration of circularity criteria into **Green Public Procurement (GPP)**, including procurement criteria that prioritise European recycled content in purchasing decisions. Similarly, the **Green VAT** initiative should be expanded beyond second-hand products by introducing reduced VAT rates for products containing recycled content and support for recycling activities.

These measures are urgently needed. Demand for European secondary raw materials is weakening, while recyclers face increasing pressure from volatile prices, high operating costs, and low-cost imports of virgin and recycled materials from third countries. Without stronger market incentives, investment in Europe's recycling capacity and circular value chains will remain at risk<sup>2</sup>.

By creating strong and predictable market signals, the EU can unlock investment, strengthen domestic recycling capacity, increase resource resilience, and accelerate progress towards resource independency in the current geopolitical context. The undersigned organisations, therefore, urge the European Commission to ensure that the **CEA delivers a robust and coherent set of demand-side measures** that place recycled materials at the centre of Europe's circular transition.

Sincerely,

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<sup>1</sup> [The Clean Industrial Deal: A joint roadmap for competitiveness and decarbonisation](#), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions.

<sup>2</sup> [Plastics Value Chain Demands Immediate Action to Save EU Industry](#), Plastics Recyclers Europe.

## The undersigned organisations:



FEAD is the European Waste Management Association, representing the private waste and resource management industry across Europe, including 20 national waste management federations and 3,000 waste management companies. Private waste management companies operate in 60% of municipal waste markets in Europe and in 75% of industrial and commercial waste. This means more than 320,000 local jobs, fuelling €5 billion of investments into the economy every year.



Plastics Recyclers Europe (PRE) is an organisation representing the voice of European plastics recyclers, who reprocess plastic waste into high-quality material destined for the production of new articles. Recyclers are important facilitators of the circularity of plastics and the transition towards the circular economy. The plastics recycling industry in Europe represents over €8.6 billion in turnover, 13.5 million tonnes of installed recycling capacity, around 850 recycling facilities, and around 30,000 employees.



Recycling Europe (formerly EuRIC) is the voice of Europe's recycling industry, including 80 national federations and companies across 24 EU & EFTA countries. From metals and paper to plastics, textiles, tyres, ships, construction & demolition waste and WEEE, our members transform waste into resources-powering Europe's circular economy, ensuring resource autonomy, and boosting competitiveness and sustainable industrialisation across the continent.



VinylPlus is the European voluntary commitment to sustainable development of the European Polyvinyl Chloride (PVC) industry. We represent a unique value chain built over more than 25 years of continuous investment, bringing together companies from across all stages of PVC production, use, and recycling, with a complete production and recycling footprint established in Europe. VinylPlus empowers a future-proof PVC value chain by supporting and challenging its partners companies in achieving their sustainability goals, and by being backed by trusted, science-based data.