



Executive Vice-President Frans Timmermans
European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels

Brussels, 14th February 2020

Dear Executive Vice-President Timmermans,

Following the publication of the European Green Deal, and as you finalise the new EU Circular Economy Action Plan, Friends of the Earth Europe, the European Environmental Bureau and the Institute for Ecological Economics at the Vienna University of Economics and Business, urge you to commit to strong measures to realise a true circular economy. At its core, **this means reducing the absolute quantity of natural resources that enter our economy, and reducing the quantity of waste coming out. Only by doing this will we manage to stay within ecological limits.**

The EU currently consumes unsustainably, as if we had almost three planets available to produce the resources we use and absorb the waste we produce. Indeed, the European Green Deal notes that the *“consumption of materials and energy, as well as the generation of non-mineral waste have continued to increase, despite the increases in circular material use and recycling”* and that *“resource extraction and processing account for more than 90% of global biodiversity loss and water stress impacts, and for approximately half of global climate change emissions”*.

It is clear we must take more direct action on reducing EU pressure on limited global resources and leverage policy measures with the common goal to reduce absolute resource use. This is in line with the European Parliament’s resolution on the Green Deal, which demanded that the new CEAP *“must aim at reducing the total environmental and resource footprint of EU production and consumption”*.

Therefore, we ask you in the new Circular Economy Action Plan to:

- **Set limits on absolute natural resource consumption by establishing a clear headline target to halve EU material footprint by 2030:** such a target would guide the implementation of a true circular economy and provide a legal

driver to support ambitious resource reduction legislation and initiatives. It could play a similar role to the EU climate and energy targets. The headline target should be based on the material footprint indicator, as included in SDGs 8.4 and 12.2 and as reported by Eurostat, and should aim for a 50% reduction by 2030 (baseline 2015 levels). This should be broken down into specific targets for individual material groups (i.e. biomass, fossil energy carriers, metals and non-metal minerals). The headline target should be included explicitly in the annex list of actions of the plan to ensure there is a strong focus on its ambitious development. The Commission should complement this target with the monitoring of equivalent indicators on land, water and carbon footprints, with the aim to set reduction targets in the future.

- **Set an EU level binding waste prevention target:** Member States have been obliged to establish waste prevention programmes since 2012. However these have so far mostly focused on recycling rather than absolute reductions in waste generation. A binding EU target needs to be set with a maximum level of commercial and municipal solid waste in kg per capita per year. Specific sectoral targets could also be set in key areas such as for food waste, construction waste, hazardous waste, electronic waste and packaging waste.

Please see the attached document with more information on why we need these targets and how they can be included in the new Circular Economy Action Plan.

We remain available for contact by email, phone or face-to-face meeting.

Yours sincerely,



Jagoda Munic
Director of Friends of the Earth Europe



Jeremy Wates
Secretary General of the European Environmental Bureau



Dr. Stefan Giljum
Deputy Head of the Institute for Ecological Economics at the Vienna University of Economics and Business (WU)