



JOINT STATEMENT

Enabling competitiveness and circularity of the consumer goods industry: Joint call for the future Circular Economy Act

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Our associations represent **manufacturers of consumer goods across Europe**. Every day, millions of Europeans rely on our trusted and safe products to care for themselves, their families and their homes. **We strive to meet consumers' evolving expectations, from affordability, product quality and performance to sustainability**. To meet these demands, **we drive continuous innovation across supply chains**, investing in our products and production processes, ensuring the highest standards expected by consumers – while navigating global economic challenges and disruptions. Through Extended Producer Responsibility schemes, our companies also support local waste management systems, contributing to improving waste collection and recycling.

Recently adopted EU legislation, including the Packaging and Packaging Waste Regulation (PPWR), Waste Framework Directive (WFD), Ecodesign for Sustainable Products Regulation (ESPR) and Single-Use Plastics Directive (SUPD), has set ambitious environmental objectives that require significant investments from our industry. **Companies are already mobilising investments to secure clean technologies and safe, high-quality materials, strengthening partnerships across supply chains to prepare for compliance**. In an increasingly challenging global economic environment, **legal certainty and regulatory predictability are essential to timely channel investments** and ensure companies can rely on a **well-functioning Single Market to scale solutions and achieve economies of scale**.

The upcoming **Circular Economy Act (CEA)** will be crucial to provide the right **enabling framework to deliver on circular economy objectives**. It should serve as a high-level, horizontal framework that strengthens the Single Market for circularity. Its purpose should be to enhance the efficiency of **Extended Producer Responsibility schemes** (e.g., through harmonisation of EPR reporting formats and timelines and fees transparency), facilitate efficient collection, sorting, and the creation of competitive markets for high-quality secondary raw materials that can be used for all applications, including sensitive ones, relying on advanced recycling technologies. It should include well-designed and evidence-based measures that ensure **legal certainty, minimise burdens, avoid duplicating requirements, and support speed, flexibility, and competitiveness**. At the same time, **any policy measure aimed at supporting specific segments of the value chain should align with the EU's simplification agenda and avoid shifting the burden on downstream manufacturers**, which would ultimately translate into **higher costs for consumers**.

While our associations remain committed to constructively engaging in the policy debate on how to achieve the above-mentioned ambitions, **we urge the European Commission to avoid setting new or higher recycled or bio-based content requirements under the CEA**.

Critically, the CEA is not the right tool to impose prescriptive product design requirements, such as mandating the use of specific materials. Such mandates pre-empt the specific needs of each product group,

disregard crucial trade-offs with product performance, safety and affordability, and undermine technology-neutral, outcome-based approaches, therefore stifling innovation. Any product-specific measures should be exclusively addressed under product-specific legislation (e.g., PPWR, ESPR, etc.), based on thorough evidence-based impact assessments for each product category. Introducing horizontal **“one-size-fits-all” design mandates in the CEA would create legal uncertainty, contradict the EU’s simplification agenda, and impose significant burdens on manufacturers.**

We thus call on the European Commission and the co-legislators to ensure that the CEA proposal, as well as any future amendments, focus on the creation of an enabling framework that can advance circularity, while safeguarding the whole European industry.