Open letter to

Ursula von der Leyen, President of the European Commission
Frans Timmermans, Executive-Vice-President of the European Commission
Virginijus Sinkevičius, European Commissioner for Environment, Oceans and Fisheries
Thierry Breton, European Commissioner for Internal Market

Brussels, December 5, 2022

Subject: Keeping up the ambition in times of crisis

Dear Ursula Von der Leyen, President of the European Commission, dear Frans Timmermans, Executive-Vice-President of the European Commission, dear Virginijus Sinkevičius, European Commissioner for Environment, Oceans and Fisheries, dear Thierry Breton, European Commissioner for Internal Market.

We live in times of multiple crises in which important decisions have to be taken. We are aware that, in face of the impending energy crisis, there is the temptation to prioritise perceived short-term gains at the expense of long-term solutions.

We, the signatories of this letter – the progressive industry and civil society organisations – are concerned that the European project is not capable of delivering on its objectives of peace, prosperity, and equality with the current policies.
Instead, we believe the European Union (EU) needs to redouble its efforts to increase resource efficiency and decarbonise production and consumption. Consequently, the policies on circularity and net-zero should be reinforced and remain at the top of the EU agenda.

With the 1.5°C warming limit, the Paris Agreement indirectly sets a cap on the carbon budget for the EU; respecting it not only requires carbon neutrality and circularity, but also a reduction in resource consumption. Evidence shows that industry sectors such as plastic, cement, and steel are projected to use far more resources than those compatible with our climate goals - even when pushing recycling and decarbonisation levers to the extreme. Achieving an absolute reduction in natural resource use is a blind spot in current climate and sustainability strategies. Reducing resource use is unavoidable given the scale of the challenges we face - and the longer we wait to address the issue, the harder it will be to solve.

Europe has enough resources to provide for everyone’s needs, but not for everyone’s greed. We are convinced that Europe can get organised to ensure health, education, housing, food, and mobility are provided for everyone - just not with the current tools.

In order to abide by the Paris Agreement - to which the EU is a signatory - there is a need for radical, positive changes in the way we produce and consume. The policies that the EU is currently implementing, or planning to implement in the near future, remain far short of what is needed to deliver the very EU climate commitment.

We believe there is a tangible path available that can reduce the EU’s exposure to high prices and instability, whilst also delivering on our climate commitments and supporting good health, peace, and prosperity for citizens. The path we need to follow is one that avoids all unnecessary extraction, production, and recycling of products and materials which are not crucial to increase people’s well-being, sufficiency, and resilience.

For these reasons, we call on you to:

1. **Set general and sectoral targets for reduction in resource use in line with the Paris Agreement’s commitments, and introduce waste prevention targets.**

2. **Plan for a radical scale-up for reuse and second-hand infrastructure for consumer goods in key sectors** - i.e. packaging (including all beverages, e-commerce, takeaway food, food retail, cosmetics and cleaning products), textiles, and electronics - **accompanied with ambitious legally-binding targets and due monitoring processes.** On packaging in particular, provide clear guidance and harmonisation for reusable formats and the systems needed to operate these to ensure that these are run effectively, locally or regionally, at scale, and backed by strong hygiene and safety measures.

3. **Create real incentives for dematerialisation and better resource use.** This includes promoting, financially supporting, and creating legal certainty for business models which are local and designing out waste; shifting taxes from labour to resources, expanding Extended Producer Responsibility (EPR) to all products and organise EPR fees not only around cost coverage but also to incentivise design change; mandating pay as you throw (PAYT), among many others.)
4. **Design products to be durable, reusable, repairable, recyclable, toxic-free and energy-efficient;** and target overproduction and planned obsolescence via the Ecodesign for Sustainable Products Legislation (ESPR).

5. **Declare fossil fuels a scarce strategic resource and ration/use them wisely.** We must stop using them for non-essential operations such as single-use plastics or fast-fashion textiles.

6. **Shift the burden of proof from consumers to producers when it comes to the safety of materials** by making producers liable for their lack of transparency and any unknown impacts of new materials placed in the market.

7. **Create efficient markets for safe secondary raw materials and phase-out products which cannot be repaired or recycled with existing infrastructure.**

8. **Set ambitious residual waste targets,** thus sending a clear signal to producers that the era of linear economy personified by waste is coming to an end.

9. **Introduce harmonised environmental criteria in all policies related to the circular economy** and further develop the holistic approach needed to meet our long-term objectives.

10. **Stop the construction of new waste disposal facilities,** direct instead all the efforts into reducing resource use and waste generation.

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Yours sincerely,

A.O. E-Circular  
Circular Economy Portugal  
Climate Action Network Europe  
ConsomAction  
Društvo Ekologi brez meja  
Ecoteca  
Environmental Action Germany (DUH)  
Friends of the Earth – SPZ  
Fundación Vida Sostenible  
GLOBAL 2000 – Friends of the Earth Austria  
Hnutí DUHA  
Humusz Szövetség  
Let’s Do It Foundation  
Mehrwegverband Deutschland e.V.  
New ERA  
Polish Zero Waste Association  
Recycling Netwerk Benelux  
Réseau Consigne  
Réseau Vrac
Rezero
VOICE Ireland
Za Zemiata
ZERO – Association for the Sustainability of the Earth System
Zero Waste Europe
Zero Waste France
Zero Waste Germany e.V.
Zero Waste Kiel e.V.
Zero Waste Latvija
Zero Waste Montenegro
Zero Waste North West