

European Commission
Rue de la Loi / Wetstraat 170
B - 1049 Bruxelles/Brüssel
Belgium

Public Consultation: EU Circular Economy Act

On August 1st 2025 the European Commission announced its public consultation on the Circular Economy Act initiative.

The Norwegian Consumer Council (NCC) hereby take the opportunity to provide the European Commission with input on some of the subthemes listed in the consultation. In addition to responding to the questionnaire, we will also submit some general comments in this document on part 2, part 3, part 4, part 6 and part 7 respectively.

Part 2: General questions on the circular economy

The Norwegian Consumer Council (NCC) strongly supports the general goal of a transition from a linear economy to a circular economy. A circular economy keeps materials and products in use as long as possible, through design for longevity, reuse, sharing, and recycling.

Promoting a circular economy will improve consumer welfare, lower costs over time, reduce climate impact, and increase national resilience. It will also foster circular innovation and may contribute to fairer resource distribution.

We call for practical solutions that make circular choices cheaper, simpler, and safer for consumers. Important barriers are lack of availability, affordability, and simplicity of circular options. The Circular Economy Act also need to address social and behavioural factors that drive overconsumption.



The Norwegian Consumer Council will point out the following key policy principles:

- Consumers play an important role in achieving circularity. Consumer choices drive demand; hence, policies must empower and protect them.
- Standardization must include consumer interests from the start.
- Priority should be on prevention and product longevity rather than recycling alone. Hence regulations should ensure products that are durable, repairable, and fairly priced.
- Policies should consider consumer affordability during times of high living costs.
- Policies must balance price increases for non-sustainable options with financial support and incentives for circular choices.
- The Circular Economy Act should ensure equal consumer protection for rented or shared goods as for purchased goods.
- Repair options must be made more convenient, by being fast process which include the right to loan temporary replacement products.
- Promoting repair also requires better availability of spare parts, qualified repairers nationwide, and clear information about repairability are essential.
- Labels should show product lifespan, repairability, and sustainability credentials to help consumers choose quality products.
- The precautionary principle should guide standards involving chemicals or materials.
- Gaps in current legislation must be highlighted, and the need to strengthen regulation regarding chemicals (REACH), software update rights, and social standards in recycling chains must be addressed.
- Environmental and social costs (“negative externalities”) need to be reflected in market prices. Regulation and pricing must internalize these costs while encouraging and incentivizing circular solutions. Stronger producer responsibility schemes need to be introduced.
- There is a need for stricter regulation and enforcement of ‘dark patterns’ that manipulate consumers to buy more than they need. This must be addressed in the EU digital Fairness Act.
- Marketing incentives such as bulk discounts, and “buy now, pay later” schemes should be limited due to their role in promoting wasteful overconsumption.
- Public purchasing should actively promote circularity.
- Public demand can drive innovation, reduce prices, and normalize circular solutions.



Part 3: Waste electrical and electronic equipment (WEEE)

The consultation on the Circular Economy Act addresses some important issues and challenges related to the collection and management of waste from electrical and electronic equipment (WEEE). It is necessary to introduce concrete measures to increase repairs, extend product lifetime, and to reduce waste streams and the need for new raw materials.

The Norwegian Consumer Council supports better systems to encourage consumers to hand in electronic waste such as household appliances, mobile phones, computers, and other electronics. Also, these products often contain valuable and critical raw materials like rare earth elements, copper, lithium, gold, and palladium, as well as other components that can be reused or recycled. Today, large quantities of electronics end up in residual waste or are stored at home, leading to resource loss and improper waste handling.

A solution could be a deposit-return system, where consumers receive payment when handing in electronic waste—either based on the product's remaining use value or on the intrinsic value of the critical raw materials it contains if the product cannot be repaired or reused. A combination of such approaches could create a direct economic motivation for consumers - and businesses - to return used products for proper treatment.

The system could work by including a deposit in the purchase price of electronic products, which is refunded when returned to an approved collection point—a model that would be familiar to Norwegian consumers, given the successful national deposit system for bottles and cans.

The deposit or refund amount could vary depending on the product's type, size, and resource content, reflecting the potential residual value of the product or its materials. This would not only improve collection rates but also promote better sorting, disassembly, and recycling. Products in good condition could be reused or repaired directly, while others could be dismantled in order to reuse components and/or raw materials.

By collecting more electronic waste through a deposit scheme, critical raw materials can be more efficiently and safely recovered instead of being lost in waste streams. This would reduce the need for new resource extraction—often in countries with weak environmental standards—while strengthening European preparedness and resource security. Additionally, the scheme could stimulate creating new jobs in repair, reuse, and recycling sectors.



Hence, the Norwegian Consumer Council proposes that a deposit-return scheme for electronic waste should be introduced in all EU/EEA countries, in which consumers are paid upon returning used electronics. The refund should reflect a portion of the intrinsic value of the critical raw materials contained in products that cannot be repaired or reused.

Part 4: Single market barriers to circularity

The Norwegian Consumer Council are in favour of increased consumer rights, like extending complaint (reclamation) periods, and generally opposes proposals that weaken consumer rights, e.g., limiting free shipping, returns, or lowering return-value thresholds.

The Norwegian Consumer Council are aware that free shipping and open return policies can be misused. However, banning them outright would be impractical and also detrimental to consumers. Instead, prohibiting destruction of returned goods (as was introduced in France in 2022), would be a better approach.

The Norwegian Consumer Council propose the following:

- Consumer rights should be strengthened, not weakened.
- Introduce guarantees on repairs and used goods, mandatory long-term software updates, interoperability across brands, and fair rules for independent service providers.
- Strengthen the Craftsmen Services Act to protect consumers in repair and maintenance markets.
- Policies for a more circular economy must combine regulation and incentives, not rely solely on taxation.
- Repair, reuse, and sharing must be made easy, safe, and affordable.
- Ensure strong enforcement and accountability for international online sellers/e-commerce platforms.
- Apply precautionary principles regarding the use of chemicals in consumer products and strengthen documentation requirements.

Part 6: Improving waste management and circular processes

The Norwegian Consumer Council is particularly concerned about the sharp increase in the use of plastics in recent decades, and especially single-use plastics and plastic packaging. Plastic littered in nature pose a major environmental



challenge and represents a major pollution problem, regardless of whether the plastic has been recycled or not.

Plastic contains many chemicals that are harmful to human and animal health and to the environment, and these chemicals are released through use and when the product becomes waste. Plastic decomposes slowly, and microplastics in nature are an increasing environmental and health problem.

Large quantities of plastic are used only for a short time before it becomes waste, often without being recycled. To reduce the environmental burden associated with plastic production and plastic waste, it is essential to reduce unnecessary plastic use - especially in packaging - while facilitating greater reuse and recycling of the plastic that is used.

An important measure is to increase the use of secondary raw materials, that is, plastic recycled from previous products, instead of producing new plastic from fossil raw materials. This not only reduces resource extraction but also greenhouse gas emissions and littering.

To achieve real change, economic incentives must be established to make it profitable to use recycled plastic and to design products for reuse and recycling. Therefore, a producer responsibility scheme should be introduced for all products containing plastic. Such a scheme must have both a life-cycle perspective and eco-modulated fee structures, so that products designed for long life and reuse, repairability, and recyclability - and that use recycled materials - are charged lower fees than those with higher environmental impact.

Good waste management will reduce some of the environmental problems from plastics, but even where there are effective recycling and deposit systems, there is leakage of harmful chemicals from packaging into food and beverages.

The Norwegian Consumer Council believes that reducing overall plastic use should be an important goal in itself. This is particularly important for products made of or containing a high proportion of plastic, where major challenges arise in the production, use, or waste phase.

The Norwegian Consumer Council propose the following:



- Producer responsibility schemes should be established for all products containing plastic, including life-cycle perspectives and eco-modulated fees.
- Plastic and packaging taxes should be structured so that plastics based on secondary raw materials become cheaper, while plastics based on primary raw materials and that are difficult to recycle become more expensive.
- Measures should be introduced to reduce overall plastic consumption, to prevent growing challenges to health and environment.

Part 7: Open comments

While not currently relevant on a European level, national taxation by EU and EEA member states on repair services (e.g. value-added tax) are seen as a significant barrier by many consumers.

In Norway, multiple surveys conducted by the Norwegian Consumer Council during the last five year's (in 2021, 2023, 2025 respectively) show that roughly 90 percent of Norwegian consumers are in favour of reducing or removing VAT on repair services and second-hand goods. Reduced VAT would stimulate demand, create repair-sector jobs, and encourage reuse.

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The Norwegian Consumer Council

Elin Volder Rutle (s.)
Head of sustainability

Bjarki Eggen (s.)
Senior Adviser