

How does civil society have an impact on circular economy legislation in the European Union?

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Well before the introduction of the **Circular Economy** into EU policy, civil society¹ has been advocating to bring this concept out from the margins and into mainstream thinking about how to organise society, economies and communities for sustainable development. At the time of writing, the European Commission is expected to publish the *Circular Economy Act* (CEA) in the third quarter of 2026. According to the European Commission (EC), 'A circular economy is a system which maintains the value of products, materials and resources in the economy for as long as possible and minimises the generation of waste. This means a system where products are reused, repaired, remanufactured or recycled². This comes at a time when only 12% of the EU economy is circular, up 0.4% since 2004, and almost 90% of the material base of the European economy still relies on primary materials. These figures are not on track to meet the target of 24% circularity by 2030, with EESC Civil Society Organisations' President and rapporteur for an EESC exploratory opinion regarding the expected CEA, [Cillian Lohan](#) noting that the last decade has seen 'visible but insufficient progress'. In 2014, the EC announced its first legislative package on the circular economy (CE), *Towards a Circular Economy: A Zero Waste Programme for Europe*. This was followed by the first action plan in 2015 and a second one in 2020. In an opinion on the first CE Action Plan in 2016, with rapporteur Cillian Lohan, the EESC proposed an open European platform to facilitate open and cross-sectoral stakeholder engagement in the circular economy. From this, the European Circular Economy Stakeholder Platform ([ECESP](#)) was set up as a joint initiative between the European Commission and the EESC. A stakeholder-owned platform, ECESP serves as a critical piece of infrastructure for engagement in CE legislation. The Circular Economy Act aspires to stand out as it is positioned as part of European competitiveness, while previous action plans were part of EU environmental policy, giving the Act extra potential to deliver on civil society's demands and years of advocacy. As illustrated by Lohan 'as the Commission itself points out, there is much still to be done on the path towards circularity...but I remain, more than ever, confident that this will happen, and this is why we concur in calling the Circular Economy Act a milestone'.

This paper will examine how and what civil society demands as its priorities for the circular economy's position within the EU agenda and policy landscape. In the first decade of the 21st century, civil society organisations and stakeholder groups strategically framed the CE along the lines of pre-existing values and priorities in the policy community to best achieve its success. The role of civil society is crucial when informing the CEA as is demonstrated in the EC's public consultation ahead of the Act and when the EC requested an opinion on the Act from the European Economic and Social Committee (EESC) before its publication. Civil society has also shown to advocate for and influence CE policy

¹ Civil society comprises the organised and voluntary activities of citizens and their associations, independent of public authorities, through which people represent their interests, participate in public life and contribute to democratic decision-making. It includes NGOs, consumer organisations, environmental organisations, youth organisations, associations representing persons with disabilities, women's organisations, social economy operators, professional associations, farmers' organisations, and the social partners (employers' and workers' organisations)

² [Circular economy - EUR-Lex](#)

through collective stakeholder action and stakeholder networks. On-the-ground grassroots civil society engagement in local communities has been shown to both engage citizens in circular initiatives and to expand the number of circular companies, building the CE from the ground up. Business interests also carry weight in the advancement of the CE policies, showing to both advance and hinder it³. As the CEA is due to come out in September 2026, civil society has made recommendations and demands using the above tools and practices.

The case for the CE in Europe is a strong one given geopolitical, social and environmental concerns. Since gaining momentum in the late 1970s, CE is now viewed as strategically necessary for the European Union. The EU is under pressure from multiple fronts, including the triple planetary crisis of climate emergency, biodiversity loss and pollution as well as rapid technological transformation, concerns about competitiveness and geopolitical instability. Once stable supply chains have become fragile as the linear economy is breaking the planetary boundaries, deepening social instability and failing to deliver resilience for businesses. Europe is often considered a resource-poor continent, relying on imports of oil, gas and coal and lacking in raw materials. Important amounts of these materials are already present in the waste we generate and can be recovered and recycled. Adopting a CEA would progress sustainable development, economic prosperity and make communities more resilient to external shocks. A just circular economy would create jobs at entry and semi-skilled levels, improving communities living standards and resilience. It would be easier for companies to trade materials recycled from waste across the Single Market making circular solutions more affordable and widespread across the EU⁴.

How does civil society influence the circular economy legislation?

Both strong civil society engagement and collective stakeholder action have contributed to the circular economy being at the centre of current EU policymaking, beginning in 2014 up until today with the CEA due to come out in September 2026. Civil society influences circular economy policy making in the EU by sharing its views and expertise in a collaborative and co-produced policy process. Civil society empowers citizens to participate in circular economy practices, with increased engagement resulting in the expansion of the number of circular companies and employment in the circular economy.

Civil society played a key role in **framing the circular economy** to fit it within the pre-existing values of relevant policy actors, setting the concept up for success. In its third report *Towards the Circular Economy: Accelerating the Scale-Up Across Global Supply Chains*, The Ellen MacArthur Foundation (EMF) referenced its efforts to collectively define the circular economy as a business practice. This report was supported by several strategic partners such as Cisco, Renault-Nissan and Nestlé⁵. Defining the CE allowed it to become adopted into EU policy communities and discussion. A variety of key civil society organisations, including the EMF, align ideas of circular economy to EU priorities to increase the likelihood of its adoption. As sustainability is often in viewed as restrictive for businesses and the economy, the CE was framed as an economically positive thing that helps to avoid material consumption costs. Environmental preservation was avoided as an explicit objective. In an open

³ Livio Ferrante and Federica Scandurra, 'I want to be Green! The role of social engagement in a circular economy transition', *Journal of Policy Modeling*, 2025, 47, pp. 941-957.

⁴ https://environment.ec.europa.eu/strategy/circular-economy_en

⁵ Laura Albareda and Jaan-Pauli Kimpimäki, 'How did it come to be? Circular Economy as Collective Stakeholder Action' from *Stakeholder Engagement in a Sustainable Circular Economy*.

letter to the European Commission seven civil society organisations made their demands for the content of the CEA, framing it as a key tool for Europe's long-term competitiveness and strategic resilience in addition to reaching carbon neutrality and restoring nature. Four of the seven signatories are members of the ECESP coordination group 2025-2028 mandate - the European Environmental Bureau (EEB), EMF, Reuse and Recycling European Union Social Enterprises, and the Environmental Coalition on Standards. The other three are the Institute for European Environmental Policy, Cambridge Institute for Sustainability Leadership and Zero Waste Europe (a former member of the ECESP coordination group). Aligning the CE with key points of the European Commission's work programme (competitiveness, security and sustainability) and with business interests allows for the expansion of the range of stakeholders and makes it attractive to both policymakers and industry. This has allowed the CE to enter into the centre of EU policymaking⁶.

Policy intervention towards sustainability has the potential to be more effective if civil society is sensitized and involved in the decision-making process. In an era where more emphasis is being placed on **collaborative and co-produced policy making**, a plurality of actors and a bottom-up approach allow policymakers to leverage society skills and active participation. This creates a window of opportunity for ambitious and transformative change and ideas that are often marginalised or disregarded can be fostered to provide solutions to the ecological crisis⁷. An example of this is when civil society organisations, businesses, citizens, NGOs, public authorities and other stakeholders gave their input in the European Commission's public consultation for the CEA. The purpose of public consultations is to ensure all stakeholders can provide their expertise to support preparations for the CEA, to improve the evidence base underpinning the Act and to enable the commission to take their points into consideration on potential problems and solutions. 820 responses were received with 656 based in the EU-27, displaying a high level of public engagement, as well as high business sector representation⁸.

Fostering civil society engagement also allows for **collective stakeholder action**, where stakeholders and institutions work together on collective action. In the case of EMF, stakeholder engagement brought businesses together on the issue and framed practice-oriented conceptions of the circular economy. The EMF's 2015 report *Growth within: A circular economy vision for a competitive Europe* was used in the European Commission's first action plan in 2015. In 2009, the EMF created CE100, a set of 100 businesses in support of CE. CE100 was crucial in promoting the adoption of CE. In 2012, Macarthur attended discussions in the Resource Efficiency Stakeholder Platform where she advocated for the adoption of CE-based policies. The discussions led to the emergence of the idea of a CE-based legislative package. The European Circular Economy Stakeholder Platform (ECESP) is a key example of civil society organisations' engagement and influence in CE legislative thinking⁹. The ECESP creates long term structured mechanisms to facilitate stakeholder action through a dedicated and funded coordination group, leadership groups, organising 'Circular Talks' collaborative conference, a permanent secretariat through the EESC and its annual conference. The ECESP's annual conference is a flagship event that brings together policymakers, business leaders, financial experts, civil society

⁶ [Joint letter on the EU Circular Economy Act](#)

⁷ Joseph Pinyol Alberich and Sarah Hartley, 'The Circular Economy in European Union Policy: Explaining an idea's success through policy learning', *Environmental Policy and Governance*.

⁸ [Circular Economy Act](#)

⁹ [Circular Economy Stakeholder Dialogue: the report is now available! | European Circular Economy Stakeholder Platform](#)

representatives, youth leaders and regional stakeholders for genuine two-way communication¹⁰. The EC act as essential partners alongside the on-the-ground stakeholder expertise to foster a shared ownership and success of the transition. The platform works because it is stakeholder owned and driven. This two-way policymaking have resulted in extra resources for business experimentation in circular practices, notably with the commission's *Circular Economy Finance Support Platform* in 2017¹¹. This provided policymakers in member states and in Brussels with more evidence and positive feedback of the viability of the CE which leads to policy change, and advocacy for a Circular Economy Act.

In addition to framing the CE as a concept, organised civil society contributes directly to CE policymaking through **EESC opinions**, with no fewer than 13 opinions published with 'circular economy' in the title. Its most recent opinion was an exploratory opinion requested by the European Commission titled *Circular Economy Act - Circular economy and responsible resource consumption within planetary boundaries* (NAT/986)¹². Adopted in June 2026, 3 months before the CEA is due to be published, the recommendations in the opinion will inform the Act, allowing the EESC to make a direct impact on EU legislation at the earliest stages. The European Commission Executive Vice-President Teresa Ribera participated in a debate on the circular economy during the EESC plenary and a common vision emerged that a circular economy will strengthen the EU's competitiveness, security and resilient communities faced with geopolitical shocks and insecure supply chains¹³. The EESC also shared its key demands for the content of the CEA when member Corina Murafa Benga attended the MEP Group on Climate Change, Biodiversity and Sustainable Development's meeting on *Navigating the Circular Economy Act: Implications and opportunities for a sustainable EU* on 10 June 2026. Representatives from the EEB were also present and the key points were published on the ECESP website¹⁴.

A key part of civil society's impact on CE policy, and arguably more difficult to measure, is its local membership and **empowering civil engagement**. Being a member of a civil society association (CSA) is positively associated with engaging in informal circular economy activities. In the event of market and governmental gaps, CSAs fill these gaps and empower citizens. CSAs mainly engage in repair, reuse and sharing initiatives in their communities and they enhance accessibility and trust in an inclusive and just informal circular economy¹⁵. Strong civil society engagement is a main driver to the expansion of the circular economy. It is positively correlated with the number of circular companies and workers employed in circular practices. According to an Italian study from 2010-2020, each 1% point measuring civil society engagement across the Italian provinces corresponds to 0.13% increase in the number of circular companies¹⁶. This affirms the role of civil society associations as key stakeholders in developing circular initiatives and driving the transition to sustainable development forward,

¹⁰ [Circular economy at the heart of Europe's strategic autonomy | EESC](#)

¹¹ Albareda and Kimpimäki

¹² [Circular Economy Act - Circular economy and responsible resource consumption within planetary boundaries | EESC](#)

¹³ [EESC PLENARY: EESC presents exploratory opinion on Circular Economy Act to Commission Executive VP Ribera | EESC](#)

¹⁴ [What was said during the MEP Group's meeting on 'Navigating the Circular Economy Act' | European Circular Economy Stakeholder Platform](#)

¹⁵ Wilm Van Opstal, Nancy Bocken and Jan Brusselaers, 'The Roles of Civil Society Associations in Organising the Informal Circular Economy', *Sustainable Development*, 2025, 34, pp. 148-169.

¹⁶ Ferrante and Scandurra

illustrating the need to involve them in policy-making processes. Best practices within the circular economy are highlighted on the ECESP's website and at its annual conference¹⁷. The 2026 conference highlighted how businesses, regions, civil society and social partners can turn circular economy ambitions into concrete action, including through circular value chains, skills, financing tools, public procurement, Extended Producer Responsibility and demand creation for circular products and services. This provides real-life examples of circular initiatives on the European stage to key policy actors who take part in this EESC and European Commission joint initiative.

Civil society organisations have played a key role in impacting CE legislation in the EU, however **business interests are consistently over-represented** in policy discussions and therefore have the resources to sway legislation. Alberich and Hartley wrote about the EC's first CE legislative package in 2014 which was subsequently abandoned after opposition from large corporate professional organisations¹⁸. Professional corporate groups often dominate stakeholder platforms and policy discussions. EC working groups often consist of 20 business seats and only 2-3 civil society seats. Policymakers are receptive to industry groups because of the expertise and feedback they provide. Environmental organisations and workers organisations possess less resources to advocate for their interests in comparison. This influences the aforementioned framing of the CE, aligning it with economic interests. It is argued that this prevents the CE from achieving transformative change and the current 'win-win' narrative for businesses could be misleading. A true circular economy would change business models and could disrupt those who have invested more in the linear model, according to Cillian Lohan¹⁹. After the withdrawal of the 2014 CE legislative package, Member States, NGOs, big companies and other stakeholders reacted to express their disappointment to the decision. New negotiations between the EC and the Resource Efficiency Stakeholder Platform began as a result and the first CE action plan was published in 2015. This is an example of how public pressure from key stakeholders, including NGOs and civil society organisations, notably the EMF, can empower an idea and influence policymakers.

Looking to the CEA - What does civil society demand?

Looking ahead to the CEA, civil society expresses its priorities and demands for the content and focus of the Act through various ways, including through EESC opinion, the EC consultation, civil society representatives attending MEP Group meetings and through open letters to the EC. The main recommendations are harmonisation and the removal of barriers to strengthen the single market for secondary raw materials, with reduce, reuse and repair initiatives. The EC consultation saw recommendations to improve waste management, increase electronic equipment collection, implement demand levers and public procurement and raise awareness within society about circularity. The EESC recommends reforming Extended Producer Responsibility (EPR), involving stakeholders such as with the ECESP, a clear mapping of circular economy legislation, diversifying recycling, action plans and regulations and the installation of transition brokers to facilitate the transition. In civil society's open letter to the EC, they demanded science-based targets on resource use, a focus on keeping products in use rather than solely materials and to group chemical and CE legislation together for safe material circulation.

¹⁷ [Good practices | European Circular Economy Stakeholder Platform](#)

¹⁸ Alberich and Hartley

¹⁹ [The challenge of the circular economy for Europe - TO VIMA](#)

Despite this wide range of recommendations, the EEB notes that the consultation processes leading up to the Act have revealed that 'what we are seeing looks far more like a waste management law'. 'Recycling has its place but it's a last resource, not the only strategy'. A wide range of civil society organisations, businesses and Member States have called for prevention, reuse and responsible resource management to be central to the Act, if not it risks missing the point²⁰.

Conclusion

Civil society organisations advocate for and progress the circular economy in the EU policy framework using stakeholder network, local level civil engagement and by working together with policymakers and businesses. Pressure applied from stakeholder networks and consultations between civil society, businesses and EC helps advance the CE as part of the sustainable development agenda and the competitiveness agenda. Documents such as the EESC opinion on the CEA will be used to directly inform and influence the Act. Institutional collaboration is coupled with local initiatives empowering citizens and communities to take part in the shift from a linear to a circular economy. Advocacy for a circular economy faces barriers from alternative interests that attempt to redirect its standing in EU policy. Framing the CE within capitalism allows it to become entrenched in EU policy but prevents it from moving beyond the current reformist model to a transformative one. If the EC takes the concerns and recommendations of civil society on board, the upcoming CEA has the potential to become an important part of Europe's economic competitiveness and resilience as well as addressing the triple ecological crisis and promoting sustainable development. A successful CEA and implementation require a shared commitment across institutions, businesses, workers' and other civil society organisations, and other stakeholders to build a sustainable and resilient future for Europe's economy, communities and environment.

²⁰ [Commission's Circular Economy Act risks missing the point, EEB warns - and the clock is ticking](#)

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