

Mr. D. Calleja Crespo
Director General DG Environment
European Commission
Rue de la Loi / Wetstraat 200



B-1049 Brussels

- Emailed in advance -

18 May 2017

Dear Mr Calleja Crespo,

Input to the European Commission from European EPAs about monitoring progress of the circular economy transition in the European Union

As a group of members¹ of the European Network of Heads of Environment Protection Agencies (EPA-Network)² we are hereby sending the attached discussion paper “Input to the European Commission from European EPAs about monitoring progress of the circular economy transition in the European Union”. This discussion paper proposes a broadening of the framework of the European Commission for monitoring the transition to the circular economy. A draft version of this monitoring framework has recently become available (after finalization of our discussion paper). Measuring progress of the transition process in our opinion will lift the monitoring framework from measuring as compliance tool, to a smart information system that also facilitates learning in the transition process towards a circular economy, while taking into account administrative burdens.

Our contribution builds on the Resource Efficiency and Raw Materials Scoreboards, but supplements them with elements we regard as relevant for measuring of the circular economy (CE) transition. In our opinion, an adequate monitoring framework should allow for checking if absolute quantities or resource flows decrease and that burden shifting to outside the EU does not take place. Furthermore indicators are needed which facilitate assessing the progress in implementing measures needed to achieve the CE-transition, i.e. the transition process. Social

¹ This letter and enclosed paper are supported by a number of EPA Network members, namely: PBL Netherlands Environment Assessment Agency, Swiss Federal Office for the Environment FOEN, Environment Agency Austria, Finnish Environment Institute (SYKE), Environment Protection Agency (Ireland), German Environment Agency (UBA), Environmental Protection Agency Denmark (Miljøstyrelsen), Portuguese Environment Agency (APA), Flanders Environment Agency (VMM), Latvian Environment, Geology and Meteorology Centre and Slovak Environment Agency.

² The Network is an informal grouping bringing together the heads of environment protection agencies and similar bodies across Europe to exchange views and experiences on issues of common interest to organisations involved in the practical day-to-day implementation of environmental policy.

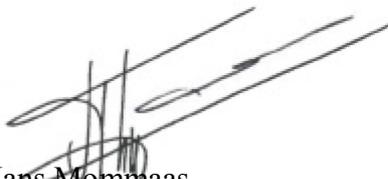
and institutional innovations are an important part of the CE-transition process and it is essential to be able to keep track of them. This means keeping track of the use of means, actions performed and policy performance as a result of that.

Although the draft monitoring framework proposed by the EC includes some elements (e.g. investments and green public procurement), we think that more information is needed to keep track of the transition to a circular economy in Europe. We propose amongst others to include indicators related to the transition process. They will partly not be measurable in the short-term, but need to become measurable in time. This will lift the monitoring framework from merely a tool for measuring compliance to a tool to facilitate learning about the transition process needed for accomplishing the CE-transition.

The relevance of our input is anchored in the national experiences of EPAs with working on the interface between environmental science and policy-making on a national member state level.

We appreciate that there is an ongoing debate on how to best measure progress towards the circular economy in Europe and would like to ask you to take into account the points made in our discussion paper. We would kindly request, as part of the consultation talks you presently have with involved stakeholders, to also have the opportunity to discuss the points raised in this paper with you. We propose that a small delegation of representatives from the EPA Network meet with you in Brussels at your convenience.

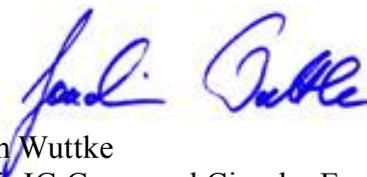
Yours sincerely,



Hans Mommaas
Director
PBL Netherlands Environment Assessment Agency



Riina Antikainen
Co-chair IG Green and Circular Economy
Finnish Environment Institute (SYKE)



Joachim Wuttke
Co-chair IG Green and Circular Economy
German Environment Agency (UBA)

Annex:

Discussion paper “Input to the European Commission from European EPAs about monitoring progress of the circular economy transition in the European Union”

Further recipients:

DG Environment: Hugo Schally and Barbara Bacigalupi

CC: EPA Network Secretariat

For more information on this discussion paper please contact jose.potting@pbl.nl