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Topical in Circular Economy Contributing the Green Transition

Minna Juhola, Counsel



Development of EU circular economy Regulation

- EU's Green Deal 2019
 - Sustainable economic model
- EU Circular Economy Action Plans 2015 and 2020 (CEAP)
 - Transition towards circular economy thinking
 - Legislative and non-legislative measures
 - EU Regulations instead of Directives
 - Detailed regulation
- Upcoming Circular Economy Act (CEA)
 - Cornerstone of new clean industrial policy
 - Creating market demand for recycled materials
 - Developing the internal market for waste
 - Proposal expected in Q4 2026

EU Circular Economy Regulatory Scheme

Circular Economy Act

*Public consultation ongoing until
6 November 2025*

Amendment to Industrial Emissions Directive (IED 2.0)

*(Directive (EU) 2024/1785)
Approved, member states to
transpose by 1 July 2026*

Amendment to the WEEE Directive

*(Directive (EU) 2024/884)
Approved, member states to
transpose by 9 October 2025*

Waste Shipment Regulation

*(Regulation (EU) 2024/1157)
In force*

Packaging and Packaging Waste Regulation Vehicle Circular Economy Regulation

*(Regulation (EU) 2025/40)
Approved, applicable from 12
August 2026*

Amendment to the Waste Framework Directive re food, textiles

(Directive 2008/98)

CRMA - Circular Economy chapter

*Regulation (EU) 2024/1252
In force*

Ecodesign Regulation (ESPR)

*(Regulation (EU) 2024/1781)
In force*

Right to Repair

*(Directive (EU) 2024/1799)
Approved, member states to
transpose by 31 July 2026*

Green Claims Directive

Proposal 2023

Regulation on Microplastics

*(Regulation (EU) 2023/2055)
In force*

Battery Regulation

*(Regulation (EU) 2023/1542)
In force*

National Circular Economy Development

- Strategic Programme for Circular Economy 2021
 - New foundation of economy by 2035
 - Finnish circularity rate 2.4% in 2023 (EU target 24% by 2030)
- Circular Economy Green Deal
 - Science-based
 - Measurement of monitoring the circular economy progress
 - New collaboration partners
 - New circular economy solutions visible
 - Public-private co-operation

Finland's upcoming Circular Economy Act

- Repeals Waste Act (646/2011)
- Clarifying waste regulation and its interfaces
 - Waste Act currently not coherent
- Promoting the recycling market
- Implementing statements of the Finnish Government Programme
 - Life-cycle thinking, promoting the recycling market
- Implementing of the EU regulations
- Simultaneous preparation of national and EU regulation
- Timetable
 - Working Group 8/2024–12/2025
 - Government Proposal Autumn 2026
 - New Act in force earliest 2027/2028

Wishlist from an environmental attorney-at-law

New circular economy regulatory scheme:

1. Predictability
 - Environmental Omnibus – legislative proposal Q4/2025?
2. Creating markets – Circular economy as a business possibility
 - Not only stick but also the carrot
3. Responding to the fast-moving innovative industry
 - Flexible and adaptable legal framework
4. Incorporation of circular economy targets into legislation?
5. Sufficient resources
 - Finnish Supervisory Agency, Administrative Courts

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