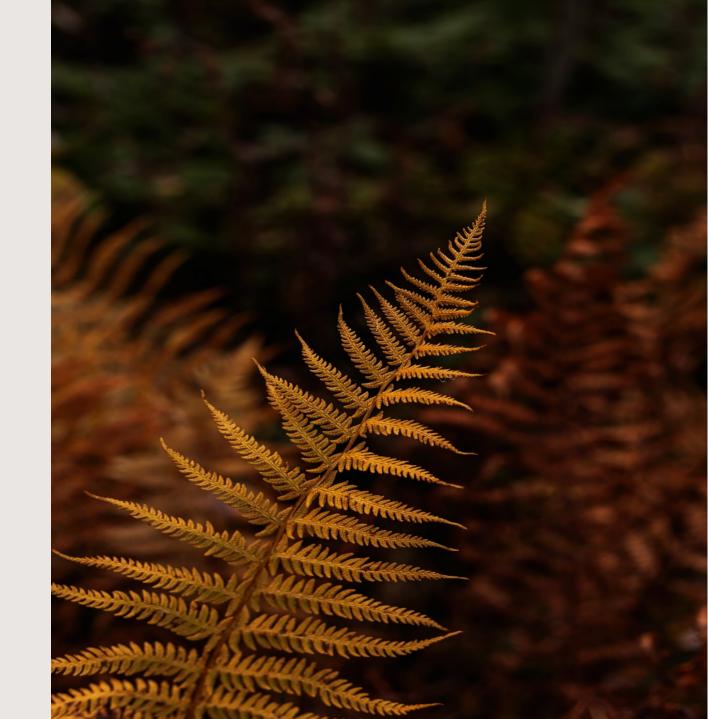
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### Topical in Circular Economy Contributing the Green Transition

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

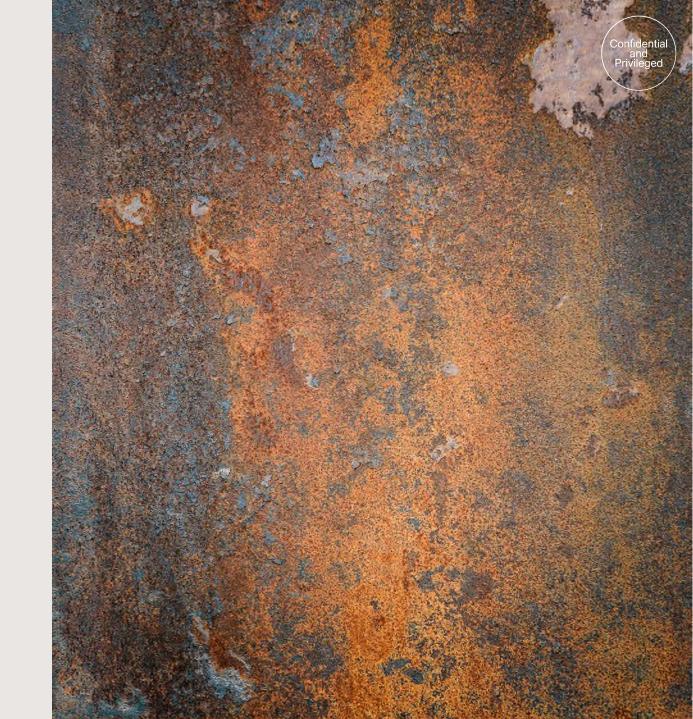
(Directive (EU) 2024/1799) Approved, member states to transpose by 31 July 2026 Green Claims Directive Proposal 2023 Regulation on Microplastics (Regulation (EU) 2023/2055)

In force

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

### National Circular Economy Development

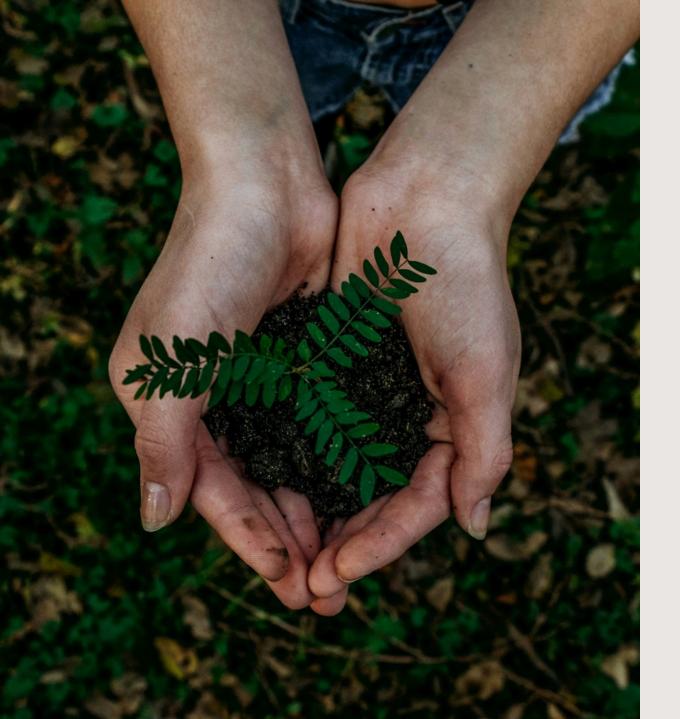
- Strategic Programme for Circular Economy 2021
  - New foundation of economy by 2035
  - Finnish circularity rate 2.4% in 2023 (EU target 24% by 2030)
- Circular Economy Green Deal
  - Science-based
  - Measurement of monitoring the circular economy progress
  - New collaboration partners
  - New circular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