

JOINT POSITION PAPER

NOVEMBER 2025

CIRCULAR ECONOMY ACT & COMPOSITES

Joint contribution by the composite value-chain to the future Circular Economy Act

Our associations - representing the composites value chain including constituent material manufacturers, composites fabricators, composites users (wind and boating) as well as the cement manufacturers - welcome the European Commission's ambition to accelerate the EU's transition to a circular economy through the upcoming Circular Economy Act. By championing secondary raw materials and incentivising circular business models, the Act represents a pivotal opportunity to unlock the full potential of composites for a sustainable future.

The industry has already demonstrated the feasibility of the collect and reuse of composite components and several technologies to reuse or recycle these materials are technology mature¹, making composite circularity a viable and realistic option. However, in the absence of a supportive regulatory framework and incentives, most end-of-life composite materials are not yet recycled and end up in incinerators, landfills, or backfilling operations across Europe.

Our associations believe in the environmental and economic value of composite circularity. As committed stakeholders, we have been working collaboratively to improve the circularity of composite materials. Together, we identified several regulatory solutions that could enable the deployment and commercialisation of sustainable waste treatment solutions for end-of-life composites.

The contribution of the composite value-chain to the Circular Economy Act focuses on three fundamental aspects and related policy asks:

- 1. Support the business case of recycled materials, making it economically rewarding.**
- 2. Strengthen waste classification and traceability**
- 3. Ensure technology neutrality in recycling pathways**

1. Support the business case of recycled materials, making it economically rewarding

The technologies to recycle and re-use composite materials already exist at scale, but their deployment depends on private actors being able to operate viable business models. Legislators can play a decisive role by creating conditions that make the use of recycled materials economically rewarding and competitive. This means ensuring that companies who invest in circular solutions have predictable returns and are not undercut by market conditions that favour lower-cost unsustainable alternatives or imports produced under weaker standards. By combining measures that streamline permitting, stimulate demand, and provide targeted financial support, Europe can unlock the full potential of composite circularity. Such an approach will not only make circular business models more viable, but also prevent the loss of valuable resources, strengthen local value chains, and reinforce Europe's strategic autonomy. Therefore, our industries recommend to:

- **Speed up and streamline permitting** for producers reclaiming waste and for circular infrastructure projects, including those involving collection of pre-consumer waste and on-site pre-treatment operations.
- **Support demand for secondary raw materials² via legislation, including targeted measures that reward local (Europe) sourcing.** This could include reduced VAT for secondary raw materials and for products made from these materials, public campaigns to build acceptance and promotional efforts to raise consumer awareness.
- **Ensure a level playing field:** All products whether imported or domestic that are sold on the EU market must comply with the applicable EU and national laws and regulations.

¹ Joint Research Centre, 2023, Towards a better definition and calculation of recycling, JRC131531.

² Secondary raw materials are originally by-products or materials that have reached the end of the waste phase in accordance with European regulations and that can be used as raw materials.

- Revise the Waste Framework Directive to set **progressive targets for the reuse and recycling of composite material waste** from decommissioned wind turbine rotor blades and nacelles.
- **Continuously reduce landfilling and incineration** of recoverable composite waste, and revise the **landfill directive to set a landfill ban** on the waste from decommissioned wind turbine rotor blades and nacelles, and boats covered by the waste codes in Annex I.
- **Funding & incentives**: Secure support in the next EU Budget to scale-up from demonstration to first-of-a-kind projects and develop circular infrastructure; Explore regulatory options to mobilise additional public and private financing for recycling schemes.
- **Financial support**: such as **lower VAT** for products made from recycled local materials and for secondary raw materials; Explore the feasibility of funding projects through a **tax on exported composite waste** identified by new waste codes (see section 2), with proceeds reinvested in local recycling and circular infrastructure.

2. Strengthen waste classification and traceability

A functioning circular economy starts with clear visibility of material flows. Yet today, the absence of waste classification for end-of-life composites, the fact that parts are not marked, and limited traceability create unnecessary barriers for their recycling and reuse. To unlock the value of composite waste, Europe needs harmonised rules, dedicated waste codes, and streamlined permitting that make it easier to dismantle and transport materials across borders. Such measures will ensure that valuable resources are properly identified, collected and processed so they can be reintroduced into the economy rather than lost to landfilling, incineration, or export. Against this backdrop, our industries recommend the following actions:

- Create dedicated **waste codes for end-of-life composite** materials from decommissioned wind turbine rotor blades and nacelles, and boats, and explore the relevance of developing waste codes for other segments using "other fibre reinforced polymer composite material waste".
- Revise the waste shipment regulation to create **dedicated codes for end-of-life composite materials** from decommissioned rotor blades and nacelles, and boats to allow better intra-European transport. And to ensure composite material waste are subject to the green control procedure of the Basel Convention.
- Enable **on-site dismantling of recreational boats** by simplifying permitting and licensing rules and procedures for occasional dismantling, including the potential use of mobile units (or inclusion in repair and maintenance licenses).
- Harmonise **End-of-Waste criteria** across the EU to create a clear, predictable framework that enables cross-border circulation of secondary raw materials, boosting market confidence and multi-country initiatives.
- Promote **marking** of plastic / composite parts according to existing standards (e.g. ISO1043). Marking of composite parts helps sorting and recycling facilities identify the composition of each composite part.

3. Ensure technology neutrality in recycling pathways

Europe will only achieve a truly circular economy if all proven recycling pathways are recognised and supported on an equal footing. Given the wide variation in both the quantities and qualities of composite waste, no single recycling system can address all streams. Meeting Europe's environmental objectives will therefore require a mix of complementary solutions, and policy should embrace this diversity rather than privileging one route over another. Cement co-processing already provides a large-scale, technically proven option to recycle composite waste by substituting both raw materials and fossil fuels in cement production. At the same time, chemical and thermal recycling technologies can return complex waste streams back into valuable feedstocks, provided product legislation includes clear calculation rules to account for their contribution. Recognising these pathways under EU law would send a strong signal of technology neutrality, accelerate investment, and enable Europe to scale up the full range of recycling solutions needed to meet its circularity targets. Against this background, our industries recommend the following actions:

- **Recognise cement co-processing as a recycling process** according to the Waste Framework Directive 2008/98/EC **for mineral fraction**³. This recognition would accelerate the

³ Joint position paper "Cement co-processing is a sustainable solution for recycling end-of-life composite materials", June 2023, <https://glassfibreeurope.eu/end-of-life-composites-cement-co-processing/>.

adoption of an existing solution for end-of-life composites, while fostering the development of a sustainable collection system that in turn creates the visibility and scale needed to unlock investment in other circular technologies.

- **Include calculation rules in product legislations to enable chemical recycling technologies** to contribute to targets.

ABOUT COMPOSITES

Composite materials are made by combining two or more different materials, usually as polymer matrix and reinforcement fibres. Composites are increasingly used in many sectors, from transport, renewable energy, construction, to electronics and aerospace. By enabling lighter, more efficient products and supporting renewable energy, composites help lower greenhouse gas emissions over the entire lifecycle of products. These qualities also make them vital to Europe's industrial resilience and green transition, and their use leads to lower emissions, greater energy efficiency, and supports the shift to a circular, low-carbon economy.

List of signatories

	Cement Europe, the European Cement Association is the representative organization of the cement industry in Europe. Currently, its Full Members are 23 national cement industry associations and cement companies of the European Union plus Norway, Switzerland and the UK. www.cementeurope.eu
	EBI, the European Boat Industry represents the recreational boating and nautical tourism industry in Europe. It encompasses all related sectors, such as manufacturing, services, infrastructure and tourism. www.europeanboatingindustry.eu
	EuCIA, the European Composites Industry Association is composed by European national composites associations and industry-sector groups. 10,000 companies and 150,000 employees. www.eucia.eu
	Glass Fibre Europe: Founded in 1987, is the voice of the European continuous filament glass fibre industry. The continuous filament glass fibre industry is the cornerstone of the glass-based composite materials and technical textiles value-chains. www.glassfibreeurope.eu
	UP/VE The UPR/VE Resin Association represents unsaturated polyester (UPR) and Vinyl Ester (VE) resins producers of Europe. www.upresins.org EPOXY EUROPE represents the interests of the major European epoxy resins manufacturers since the early 1980s. www.epoxy-europe.eu Both groups are sector groups of Cefic, the European Chemical Industry Council (EU transparency Register n° 64879/42323-90)
	WindEurope is the voice of the wind industry representing over 500 organizations from across the whole value chain of wind energy. www.windeurope.org