



Eric Mamer
Director-General
Directorate-General for Environment (DG ENV)
European Commission
Via email with copy to DG GROW

Brussels, 18 December 2025

Dear Mr Mamer,

We are writing on behalf of the six undersigned European associations representing producers of recycled aggregates, making use of the largest waste-stream in Europe and thus being the base of the European Circular Economy.

We would like to thank the European Commission for its continued work to strengthen the circular economy and to create a more sustainable, resource-efficient Europe.

Recycled aggregates constitute the largest volume of recycled materials in Europe, and their performance is well understood after decades of practical use. Recycled aggregates consistently meet required specifications and have a proven record of not posing any significant risk to the environment, or human health and safety. When appropriate input materials and processing technologies work in harmony with well-designed product standards, recycled aggregates can fully match the performance of primary aggregates. The suitability for use is determined primarily by physical and geometric properties such as shape, texture, grading, and angularity rather than by chemical composition – which is typically inert.

As Europe continues to expand its circular economy ambitions, we must ensure that the growth of recycled materials is not unintentionally constrained. The current JRC draft for End of Waste (EoW) raises concerns, as it introduces a level of complexity that will suppress rather than encourage circularity. The [European Council in the Conclusions of 23 October 2025](#) reaffirmed “the urgent need to advance an ambitious and horizontally-driven simplification and better regulation agenda at all levels”. If proposed EU level EoW criteria are not carefully designed, proportionate, and aligned with industrial reality, they risk undermining their own objective.

In light of this, we will share with JRC our concerns about its proposal for EoW criteria. Some examples include the following:

The sector stresses the need for making intelligent choices regarding the parameters to be measured. Current drafts include a broad range of parameters, many of which are not relevant to environmental safety. These risk diverting resources away from what ensures quality and safety and will redirect suitable waste streams to landfilling instead of recycling. Choosing the correct parameters will enable a step by step widening of the EoW criteria. Only parameters that impose a high environmental risk and occur often should be regulated. Additionally, the two scenarios (high-risk, low-risk) do not reflect the reality of the countless possible applications and should be expanded to at least include a mid-risk tier, which takes into account environmental criteria, such as distance to ground water.

In parallel, we are increasingly concerned by discussions around the possible reclassification of recycled aggregates under REACH and CLP. Recycled aggregates should remain considered as articles. The analysis of options under REACH article 2 or exemptions in Annex V, and the requirements under the CLP will lead to untenable complexity and administrative burden for companies (particularly SME's) operating in the circular economy. The exchange on technical and legal aspects has shown that any potential environmental or health & safety concerns could be addressed by existing product standards or other EU legislation. We remain open to discuss these alternative options further.

In addition, the process is in contradiction to the harmonisation and renewal of the standards within the Construction Products Regulation (CPR). End of Waste Criteria should reduce unnecessary administrative burden and strengthen the functioning of existing quality frameworks, not layer additional obligations onto sectors already operating under rigorous harmonised product standards. At this critical juncture, it is essential that regulatory initiatives intended to support circularity do not unintentionally undermine it. EoW should be an enabling tool to strengthen existing quality systems and facilitate the circulation of recycled materials across the market, not a barrier that discourages investment, innovation uptake or trade.

We thank you for your continued engagement and look forward to supporting DG ENV in shaping an ambitious, workable framework for Europe's circular future.

Your sincerely,

Dirk Fincke
Secretary General
Aggregates Europe

Marco Borroni
President
Concrete Europe

Carsten Karcher
Secretary General
EAPA

Paolo Campanella
Secretary General
FEAD

Geert Cuperus
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Julia Ettinger
Secretary General
Recycling Europe