

Industry response to JRC proposal on pollutant limit values regarding end-of-waste criteria for recycled aggregates



On 27 November 2025 the JRC presented its proposal for pollutant limit values for recycled aggregates, which is fully described in the background document. The undersigned stakeholders have important concerns that should be brought to your attention, as the current proposal risks hindering the recycling of C&D waste and Europe's circular economy. In December of last year, we sent letters to DG ENV and GROW expressing our views. Now we write to you to share our main concerns. Given the short time over the holiday season to respond, this can only be done in a general sense. We will provide further comments after the deadline set by JRC.

Benefits of EU-wide EoW criteria

Stakeholders see the benefits of EU EoW criteria, but wish to put forward some comments.

- a. The rejection of EoW criteria between Member States is not a common concern. We agree on the need for a common EU-wide EoW criteria, but if the EU EoW criteria are set too stringently, it leaves no practical margin for Member State differentiation and risk becoming de facto maximum thresholds, rather than minimum safeguards.
- b. EoW is but one instrument among many that contributes to environmental protection. If EU values are too strict, this may lead to a reduction of recycling and increased primary extraction. Therefore, rules should be most stringent only where needed due to local conditions.

Set of parameters

There are concerns regarding the choice of parameters in the JRC proposal, as the list goes beyond the parameters that are of interest to the recycling of aggregates. Parameters such as Hg, Ni and F are irrelevant for recycled aggregates. They do not occur in presence levels higher than primary aggregates. The list of parameters to be measured should be limited to those with both a high impact and high level of occurrence in CDW. Considering the goals of the Waste Framework Directive and in a broader sense the goals of the Competitive Compass, it is urgent to reduce unnecessary rules.

Leaching limit values

The proposed leaching limit values are too strict to enable circularity and rather restrict it. They also have methodological shortcomings. They compare numerical limits without considering national conditions, risk assessments or testing methods. Also, a lack of proven correlation between leaching tests and the mixing of results from incompatible methodologies risk arbitrary outcomes. This undermines confidence in the robustness and proportionality of the values. This also creates the risk of double or even triple testing to fulfil local requirements.

In order to have common leaching tests, the Commission must put an effort into finding the right tests and limits, with Member States adapting their limits to their particular circumstances. This would be a major task.

Overall JRC proposal

Whilst we appreciate the work the JRC has done, the current proposal poses a threat to recycling and the circular economy. We will send a more detailed letter after the deadline. Given the importance of this matter, we are keen to maintain a constructive and ongoing dialogue.