

Product Risk Radar

The EU Green Deal and Circular Economy

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What is the Green Deal?

The European Green Deal, launched in 2019, is the European Union's flagship decarbonisation strategy. The Green Deal sets the target of a carbon-neutral Europe by 2050 (i.e., "net-zero"). To help achieve this aim, EU Member States have pledged to reduce emissions by at least 55% by 2030, compared to 1990 levels.

The measures and regulations introduced as part of the Green Deal strategy seek to incorporate climate and environmental objectives into all sectors of the economy, and so the impact will be felt by all businesses operating in the EU. A key building block of the Green Deal, particularly relevant to product manufacturers and resellers, is the Circular Economy Action Plan.

What is the Circular Economy Action Plan?

The latest Circular Economy Action Plan ("CEAP") was adopted by the European Commission in March 2020 following the adoption of its first CEAP in December 2015. The CEAP identifies 35 legislative and non-legislative actions to improve the circularity of products in the EU market. It targets how products are designed, promotes circular economy processes, encourages sustainable consumption, and aims to ensure that waste is prevented, and the resources used are kept in the EU economy for as long as possible.

Key legislative developments resulting from the CEAP include:

- [The Sustainable Batteries Regulation](#)
- [The proposed Packaging and Packaging Waste Regulation](#)
- [The Ecodesign for Sustainable Products Regulation](#)
- The EU's proposed greenwashing regime under the proposed Green Claims Directive, and the [Empowering Consumers in the Green Transition Directive](#)
- [The Directive on common rules promoting the repair of goods](#)

The CEAP also provides for non-legislative actions such as the adoption of a new Strategy for Sustainable and Circular Textiles.

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Directive on common rules promoting repair of goods

The Directive on common rules promoting the repair of goods (**Repair Directive**) entered into force on 30 July 2024, and will apply in EU Member States from 31 July 2026 at the latest. It aims to prevent the premature disposal of repairable goods by consumers through measures that enhance the desirability of repair, including:

- an obligation on manufacturers of certain products subject to reparability requirements to repair those products within a reasonable time for a reasonable price;
- establishment of a new online platform called the European Repair Platform for consumers to locate repairers;
- extension of the legal guarantee after repair in the Sale of goods Directive by one year;
- national measures promoting repair, to vary by Member State but include at least one financial (for example, a repair voucher) or non-financial (for example, training or information campaigns) measure; and
- the establishment of a standardized European Repair Information Form for consumers to compare different repair offers.

The Repair Directive is an important part of delivering the Commission's priority of green transition in the European Green Deal, and complements the Ecodesign for Sustainable Products Regulation in trying to extend the lifetime of consumer products.

Why should your business care?

Sustainability requirements will apply to virtually all physical goods placed on the market in the EU and so impact almost all sectors. Circular economy measures will have a transformative effect on the EU market, significantly curtailing the use of the "take, make, break and throw away" model across almost all product categories.

Businesses need to start considering now how they can adapt and modify their products to ensure they can meet these stringent new requirements.

What comes next?

The EU will continue to monitor and implement the range of actions proposed under the CEAP. Product companies will need to track the individual legislative developments applicable to their business so that they can ensure compliance as and when they enter into force.

Contacts



Kate Corby

Partner
London

+44 20 7919 1966
kate.corby
@bakermckenzie.com



Graham Stuart

Partner
London

+44 20 7919 1977
graham.stuart
@bakermckenzie.com



Ulrich Ellinghaus

Partner
Frankfurt

+49 69 2 99 08 251
ulrich.ellinghaus
@bakermckenzie.com



Andreas Neumann

Senior Associate
Frankfurt

+49 69 2 99 08 310
andreas.neumann
@bakermckenzie.com



Joanne Redmond

Senior Associate
London

+44 20 7919 1067
joanne.redmond
@bakermckenzie.com



Rachel MacLeod

Senior Associate
London

+44 20 7919 1364
rachel.macleod
@bakermckenzie.com



Phoebe Bruce

Associate
London

+44 20 7919 1117
phoebe.bruce
@bakermckenzie.com