

(English version)

**Question for written answer E-000414/26
to the Commission
Maria Guzenina (S&D)
(2 February 2026)**

Subject: Resolving regulatory conflict between the circular economy and single market rules

The EU positions the circular economy as being central to competitiveness and climate goals, while the single market's product safety framework ensures consumer protection and fair competition.

Current EU product legislation, designed for linear markets, creates barriers for circular business models. The refurbished electronics sector, growing 10.2% annually and towards EUR 123.4 billion by 2031, faces inconsistent Member State classifications with refurbishers treated as manufacturers in some countries and as distributors in others. This fragmentation undermines single market harmonisation and limits the scaling of circular operations that extend product lifecycles and reduce e-waste.

Consequently, tension exists between product safety and circular economy objectives, even though these goals should reinforce each other. Circular material use has risen from 10.7% to 11.8% in over a decade, while e-waste continues to grow, highlighting a systemic failure to move beyond linear models.

1. How will the Commission resolve regulatory conflict between the circular economy objectives and single market product safety rules, to ensure that they are complementary and do not require trade-offs?
2. Will future product legislation, including the proposed new legislative framework revision and circular economy act, be designed to accommodate both linear and circular business models from the outset, instead of forcing circular operators into frameworks built for new products?

Submitted: 2.2.2026

**Answer given by Executive Vice-President Séjourné on behalf of the European Commission
(13 March 2026)**

Consumer electronics are products falling within the scope of harmonised EU product legislation which is based on the principles laid down in the New Legislative Framework (NLF) ⁽¹⁾ adopted in 2008. Since 2008 circular economy and the related business models have seen an important growth.

Even in its current version, the NLF does not create any regulatory barriers to circularity and it offers the necessary flexibility. The fundamental concept of 'placing on the market' frames the moment when the compliance with all the applicable essential requirements needs to be demonstrated.

Any subsequent changes to the product would not require a full conformity assessment unless they amount to a substantial modification. The Commission has provided guidance on these concepts ⁽²⁾.

To further improve clarity and legal certainty, one of the objectives of the upcoming revision of the NLF is to ensure full coherence between circular economy objectives and single market product safety rules.

The forthcoming Circular Economy Act aims to accelerate the EU's transition towards a circular economy, including review of the Waste Electrical and Electronic Equipment Directive ⁽³⁾.

⁽¹⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32008D0768&qid=177209770421>;
<https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:02008R0765-20210716>.

⁽²⁾ The 'Blue Guide' on the implementation of EU product rules 2022: [https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52022XC0629\(04\)](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52022XC0629(04)).

⁽³⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:02012L0019-20240408>.