PBL Netherlands Environmental Assessment Agency

INTEGRAL CIRCULAR ECONOMY REPORT

Assessment for the Netherlands 2025

Summary and Main Findings

Authors
Aldert Hanemaaijer and Mike Muller (project management)
Michiel de Krom, Astrid Mangnus, Kees Schotten and Daan in 't Veld

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The Integral Circular Economy Report for the Netherlands was produced in the framework of the Work Programme on Monitoring and Evaluation Circular Economy, 2019–2024. The Work Programme is a collaborative effort of several knowledge institutes under the direction of PBL Netherlands Environmental Assessment Agency.

The Dutch Government is pursuing to achieve a fully circular economy by 2050. The aim of the Work Programme is to monitor and assess the charted path towards 2050 and to provide the government with the knowledge required to design and adjust policies. Further information can be found on the Work Programme on Monitoring and Evaluation Circular Economy-website.

The full Dutch report was drawn up with input from the knowledge institutes that take part in the Work Programme on Monitoring and Evaluation Circular Economy:

- Statistics Netherlands (CBS)
- CPB Netherlands Bureau for Economic Policy Analysis
- Institute of Environmental Sciences (CML)
- Netherlands Enterprise Agency (RVO)
- National Institute for Public Health and the Environment (RIVM)
- Rijkswaterstaat – Ministry of Infrastructure and Water Management (RWS)
- Netherlands Organisation for Applied Scientific Research (TNO)
- Utrecht University (UU)

Colophon

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Corresponding author
circulaire_economie@pbl.nl

Author(s)
Aldert Hanemaaijer and Mike Muller (project management), Michiel de Krom, Astrid Mangnus, Kees Schotten, and Daan in 't Veld

With contributions by
Roel Delahaye and Niels Schoenaker (CBS), Arjan de Koning (CML), Sabine de Haes, Julia Koch, Paul Lucas, Trudy Rood, Harry Wilting (PBL), Natascha Spanbroek (RIVM), Astrid Hamer and Thies Peters (RVO), Marc Pruijn (RWS), and Elmer Rietveld (TNO).

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Summary

Every two years, PBL publishes an Integral Circular Economy Report (ICER) at the request of the Dutch Government. In this report, we provide an overview of the state of affairs concerning the CE-transition in the Netherlands. As such, the ICER provides a knowledge base for the societal and political debates around this transition. To this end we delve into the use of material resources and its effects, the progress of the transition towards a circular economy in society, and the development of circular economy policy. This report also offers guidelines to encourage the necessary acceleration of the transition. We therefore pay particular attention in this ICER to the use of policy instruments to speed up the transition towards a circular economy.

This publication contains the main findings and summary of the Integral Circular Economy Report 2025. The full Dutch report with results in more detail and further substantiation of the main findings can be found on the PBL website. An English translation of the full report in English will be available later in 2025.

Material resource use has increased in the Netherlands, but so have supply risks

A circular economy is significantly more efficient with its material resources than is the case in the Netherlands today. This is crucial, since global climate and nature goals are not achievable without reducing the use of new material resources. A high resource use makes the Dutch economy vulnerable, particularly because of a strong dependence on a limited number of countries for the supply of critical raw materials.

The Netherlands Environmental Assessment Agency (PBL) notes that, despite the potential advantages of a circular economy, the urgency to efficiently handle material resources in the Netherlands has been lagging behind other societal challenges, such as housing and the energy transition. Particularly in the case of plastic recycling, we see that businesses collapse due to competitive pressure of low fossil fuel prices from, especially, China and the United States. The demand for new material resources therefore keeps growing. Furthermore, consumers are open to the idea of circular behaviour, such as repairing goods or buying refurbished products, but, in practice, this has hardly led to more circular consumption patterns.

With a continuation of current developments concerning material resource use in the Netherlands and circular economy policy, it is extremely unlikely that the national target of halving the amount of primary abiotic resources by 2030 will be achieved. As a matter of fact, material resource use in 2022 has only increased compared to 2020 levels. Supply risks of the most critical raw materials in the Netherlands have also increased over the past decade. This predominantly affects the manufacturing industry and, there, sectors such as machine construction, transport, and electronic devices.

Committing to circular solutions now offers opportunities for the Dutch economy

The Netherlands has a good starting point for a circular economy. There is a great deal of knowledge and expertise, including in the areas of recycling, innovative product design, and new revenue models, to name a few. This offers Dutch businesses opportunities in terms of export. The coming years, it is expected that there will be a significant increase in material and resource use for housing and the energy transition. It is very important to include circularity strategies in the large planned investments for these societal challenges and to manage a long-term perspective for

material resources. This includes setting requirements for the design of wind turbines to enable reuse and recycling, and splitting or 'topping up' (adding an extra floor) to existing houses. Hence, in the long term, fewer material resources will be needed and the Netherlands will therefore become less dependent on other countries. However, there has to be sufficient capacity for the recycling of critical raw materials, since this hardly takes place at the moment.

Recommendations for policymakers to speed up the circular economy (CE-)transition

The biggest obstacle to speed up the transition towards a circular economy is the lack of markets for circular products. Ambitious policy aimed at all circularity strategies, on both a national and European level, is therefore needed to promote circular innovations and activities. Many existing policy instruments mostly intervene at the back end of the production chain, such as waste collection and recycling. Earlier on in the chain there are potential policy options that still have to be established, such as putting rules in place for design and reuse. To speed up the transition towards a circular economy it is necessary to further develop and implement the plans for goals, policy instruments, and steering of the National Programme Circular Economy (NPCE). PBL offers the following recommendations for policymakers:

1) Keep committing to ambitious European CE-policy to realise an equal playing field for Dutch businesses, particularly new policy following the EU Circular Economy Action Plan, the development of the Right to Repair directive, and the further elaboration of legislation for specific products within the Ecodesign regulation.
2) Make better use of existing national instruments, such as extended producer responsibility (EPR) and circular procurement by governments. Set dynamic requirements that go further than just waste collection and recycling, for example. These requirements, which will become stricter over time, can be aimed at reuse, high-quality use of recyclate, and the use of fewer material resources per product.
3) Focus on the development of policy instruments with potentially large environmental effects. This includes a European tax on primary fossil fuels for plastics, for example, but also, increased circular procurement in the case of ground, road, and hydraulic engineering, and an operating subsidy for circular measures to reduce the price difference between Dutch recyclate and primary material resources (comparable to the successful Dutch subsidy scheme for the energy transition SDE++).
4) Reinforce the existing management model for a circular economy by making clear, binding agreements between ministries, decentralised governments, businesses, and societal organisations concerning roles, responsibilities, and achieving goals.

Findings

Current trends indicate the necessity of a circular economy

Using significantly fewer material resources is becoming more and more urgent

Global resource consumption, from extraction to refining to product, is the cause of 60% of global greenhouse gas emissions and the cause of 90% of biodiversity loss. It is expected that global resource use, without additional policy, will grow another 60% between 2020 and 2060. Global climate and nature goals are therefore not achievable without drastically reducing resource use. There are long global production chains, from extraction to finished product, therefore the consumption of material resources by Dutch businesses and consumers cannot be seen as separate from global resource issues.

Due to ongoing geopolitical developments, the future availability of material resources is not guaranteed. Related to these developments are price fluctuations and disruptions in the production chains, which can be disadvantageous for citizens and businesses. The war between Russia and Ukraine has consequences for the availability and affordability of oil and natural gas in the Netherlands and other EU countries. For many goods, moreover, such as chips for computers and materials for renewable energy, there were steep price hikes and long delivery times, while demand only keeps increasing. Because so many material resources come from outside the EU, and mining and refinery of critical raw materials is concentrated in a handful of countries, Europe and the Netherlands are particularly vulnerable.

The necessity to use significantly fewer material resources, and to use them more efficiently, is very important, especially when taking into account environmental, economic, and geopolitical considerations. This is precisely what a circular economy is aimed at. Through smart product design, fewer (harmful) material resources are needed, or repair is easier because of circular product design. Product design also contributes to a longer lifespan of products and parts and makes high-quality recycling easier to realise. Because of the application of these circularity strategies, fewer new material resources are needed across the whole lifespan of products. Committing to these and other circularity strategies is therefore crucial, also for products already on the market. The more businesses operate in a circular fashion, the more future-resistant they become.

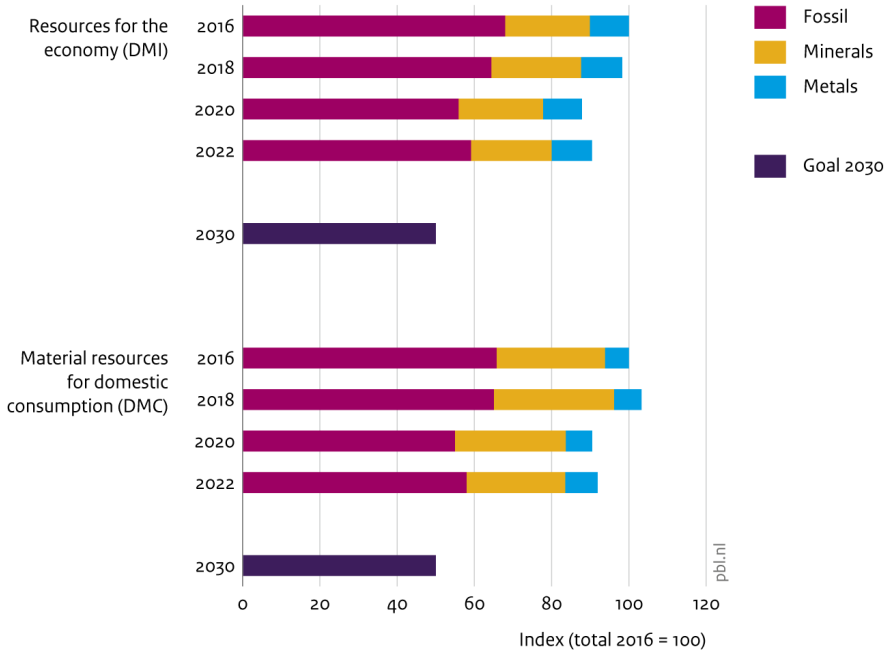
Dutch resource use increased between 2020 and 2022; it is partially because of this increase that it is extremely unlikely that the 2030 target will be reached

There is an increase in total Dutch material resource use in 2022 relative to 2020, the year the previous ICER reported on. For material resource use by the Dutch economy, this concerns an increase of 3%, and an increase of 2% for domestic use. The 2020-2022 increase concerns both direct use of material resources within the Netherlands as well as material resource use throughout the entire production chain (resource footprint). A comparison of these two years is difficult, since the Netherlands consumed significantly fewer fossil fuels in 2020 due to COVID-19 lockdowns. Material resource use in 2022, on the other hand, was strongly influenced by higher prices for energy, food, and other products due to the war in Ukraine.

Alongside the total amount of material resources, consumption of primary abiotic resources (fossil, metals, minerals) also increased between 2020 and 2022. In 2022 (relative to 2016, the start of the National Programme Circular Economy), there was a decrease in direct use of primary abiotic resources in the Netherlands. This concerns a decrease of 8% for domestic use of material resources, and a decrease of 10% for the whole Dutch economy. This decrease appears to be incidental, however, considering the higher prices for energy and other products since the war in Ukraine in 2022. For metals, for example, there was a steep increase in use between 2016 and 2022. This was mostly caused by an increase in the use of metals in electronic machines and (household) devices.

Additionally, it is the expectation that resource use will only keep increasing in the coming years in relation to the three product groups we have analysed in this ICER: plastic packaging, housing, and renewable energy technologies. Considering all developments, it is extremely unlikely that the current policy target will be reached of halving the amount of primary abiotic resources in 2030 relative to 2016 levels (see Figure B.1).

Figure B.1
Abiotic resource indicators



Source: CBS 2024

The global environmental effect footprints (greenhouse gas emissions, land use, and biodiversity), that are caused throughout the whole production chain by Dutch production and consumption have decreased between 2016 and 2021. All three environmental footprints for production and consumption have decreased in this period between 2-7%. For greenhouse gas emissions, this is mainly due to the, albeit incidental, lowered transport movement because of the COVID-19 lockdowns and, therefore, a significantly lower use of fossil fuels. This decrease can also be explained by an increase in renewable energy technologies and the use of more biomass in the energy sector, which means fewer fossil fuels are needed.

An increase in supply risks for the Dutch economy

For many material resources, half-finished products, and finished products, the Netherlands remains dependent on other countries for import. In the case of metals and critical raw materials, the Netherlands is even fully dependent on foreign countries. The supply risks of the most critical raw materials, such as those used in industrial sectors important for the Dutch economy (e.g. manufacturing), have increased over the past ten years. This is particularly the case for the machine construction sector, but also transport and electronics. Increasing supply risks are predominantly evident for critical raw materials that are being applied in (car) catalytic converters, magnets, electric vehicles, wind turbines, and batteries. Examples include platinum-group metals, germanium, and light and heavy rare earth metals that mostly originate from countries with increasing political instability, or where extraction and refining occur in one country, such as China.

The European Critical Raw Materials Act (CRMA) and the Dutch National Resource Strategy are both aimed at improving the security of supply of critical raw materials. Circularity strategies, such as recycling, can be very valuable in reducing these supply risks. Currently, however, hardly any recycling of critical raw materials is happening in either the Netherlands or Europe. To expand the availability of such materials, attention is needed for circular design, reuse of parts, and a realisation of a high-quality recycling infrastructure for critical raw materials, to name a few examples.

Recycling remains the dominant circularity strategy

Currently, excepting that of critical raw materials, recycling is still the dominant circularity strategy applied by Dutch governments and businesses. High-quality recycling, however, is lagging behind such as using recyclate in the same new products. As such, plastic packaging is only made of 7% recyclate. This is worrisome, since the use of recyclate is crucial to using fewer new material resources.

Additionally, the amount of recycled material available is not sufficient to fulfil the expected demand for material resources. For a fully circular economy, then, all circularity strategies are needed, including lifespan extension of products and parts through repair and reuse, substitution of resources by biofuels, and using fewer new material resources.

Most available financial resources for the CE-transition in the Netherlands are still dedicated to recycling and R&D, and less so to other circularity strategies that would help businesses with market formation. The available public resources for a circular economy have increased over the past few years, from 295 million Euros in 2020 to 496 million Euros in 2022. Furthermore, employment and activities in the circular economy increased between 2020 and 2022. Because the total Dutch economy was growing faster than the circular economy, the circular share in the total economy has slightly decreased. This is a decrease of employment in the circular economy of 4.3% to 4.1% between 2020 and 2022. The added value decreased from 4.4% to 4.2%.

There remain persistent obstacles in the transition towards a circular economy

There are various persistent obstacles that make the transition towards a circular economy more difficult. Here, we highlight several. Because environmental damage is not or is insufficiently priced, and laws and legislation remain tailored to a linear economy, there is an unequal playing field for circular businesses. As such, Dutch plastic recycling is under immense pressure because of the low fossil fuel prices from countries like China and the US. This means that keeping the existing recycling capacity in the Netherlands is not guaranteed.

Moreover, the CE-transition is battling various chicken-egg problems. Medium and small businesses, for example, are having a hard time getting bank financing for circular business cases, mostly because, as of yet, there is no track record for this new activity. Another problem is that a large offer of circular products is lagging behind, which makes it relatively expensive and difficult for consumers to purchase circular products. The demand for circular products, therefore, remains relatively small, which means it is hardly attractive for businesses to scale up capacity to increase circular production. The Dutch national government can play a role in solving this problem, for example with new laws and legislation that mandate using a secondary material or by increasing governmental circular procurement.

Up until now, it has been difficult to get a better understanding of the materials used in the composition of products. With an eye to reuse and high-quality recycling, however, this is necessary. The difficulty in getting the right information is partly due to the complexity of international production chains. For example, in the case of plastic packaging and electronics, it is often unclear which harmful materials are included in products, while it also appears to be difficult to get a proper understanding of the production chain using accurate data. For example, there is only limited data available about the lifespan of products. On a national level, there is some data available in the context of extended producer responsibility (EPR). This data is not publicly accessible, however, and is primarily aimed at waste collection and recycling. The challenge is to include data about design and materials used in the composition earlier on in the production chain. That way, businesses can take responsibility for the entire chain. A product passport, for example, is one solution to make information more transparent.

Consumers want to, but circular choices are often too expensive or too complicated

Over the past few years, consumption behaviour has hardly become more circular. Each year, more new products are purchased and there is no noticeable increasing trend in the purchase of second-hand products. The purchase of new products is partially driven by trends, but also by the growing offer of cheaper products of lower quality. Alongside fast fashion, for example, we now also have fast furniture. For various products there are also increasingly shorter lifespans. The majority of Dutch consumers are open to a large number of circular behaviour patterns, such as repairing goods or buying refurbished products. However, practical objections and higher costs do withhold consumers from actually consuming in a more circular fashion.

Governments and businesses can promote circular behaviour by making it cheaper and easier for consumers to make a circular choice. Up until now, influencing consumers occurs mostly through information (e.g. product labels and campaigns) and through pricing policy for selected products (e.g. deposits on bottles and a recycling contribution on electronic goods). Alongside information and pricing, repair is also needed to facilitate circular behaviour, as well as a longer legal warranty on products. Additionally, adjustments in the physical consumption environment are important, adjustments that would facilitate choosing a circular option, such as offering second-hand goods alongside new products in a shop. Finally, it is necessary to commit to a reduction of non-sustainable behaviour, such as the free returns on goods ordered online that are then destroyed.

Committing to a circular economy offers opportunities

A circular economy offers opportunities for Dutch businesses and the economy

Compared to other countries, the Netherlands has a good starting position for a circular economy, offering opportunities for Dutch businesses. Indeed, the Netherlands has had, for years now, one of the highest recycling percentage in Europe. It was also one of the first countries with a government-wide approach to get to a circular economy. Furthermore, there are a relatively large number of circular businesses active and for them, as well as for the Dutch economy on the whole, committing to circularity offers opportunities.

In a recently published report, the Italian economist Mario Draghi points to the circular economy, in combination with lowering current energy prices in the EU and a carbon dioxide-neutral economy, as one of the crucial domains for reinforcing the competitive capacity of the EU. By leading with circular products and services, innovative businesses have the advantage on (international) competition. In the Netherlands, there is plenty of knowledge and expertise already on various aspects of the circular economy, including waste collection, recycling, innovative product design, and new revenue models. This can contribute to the Dutch economy if this knowledge, these experiences, and these products are exported by successful businesses. For a further advancement of circular innovations and activities, however, ambitious policy is necessary, on both a national as well as European level.

Coupling the circular economy to the energy transition and the housing challenge is crucial

At the moment, big investments are taking place in the Netherlands to solve the housing shortage, to taper off of natural gas, and to roll out renewable energy technologies such as wind, solar, and batteries on a large scale. In practice, however, it appears that circular solutions for climate and housing ambitions are still left unused, which means opportunities are being missed. For example, the solutions for the housing crisis are aimed at new construction and less so at circular strategies, such as splitting or topping up existing houses. These strategies could become part of the solution because they require far less material use.

In the case of renewable energy technologies, the focus lies mostly on an as high as possible energy production for as low as possible costs, rather than on more efficient material use. With an eye to current geopolitical challenges, however, it is crucial that critical materials in renewable energy technologies are used as long as possible. At the moment, the design for reuse in the case of wind turbines hardly plays a role, for example. Moreover, the permit period for windfarms is shorter than the economic and technical lifespan of the wind turbines themselves.

By including circularity strategies in the already planned investments for housing construction and renewable energy technologies, we can avoid a waste of material resources and the related environmental effects both now and in the future. At a later stage, fewer new materials are needed and future costs can be saved on, for example by taking into account material use over the entire lifespan of products when planning investments.

Stronger policy is needed to speed up the CE-transition

The development of NPCE-plans has hardly led to more concrete goals and policy instruments

The National Programme Circular Economy 2023-2030 (NPCE) is aimed at accelerating and scaling up the transition towards a circular economy in the Netherlands. It contains, among other things, a framework for goals, proposals for more binding policy, and a selection of priority product groups. The programme has a structural function and provides an overview of policy options to realise circular ambitions.

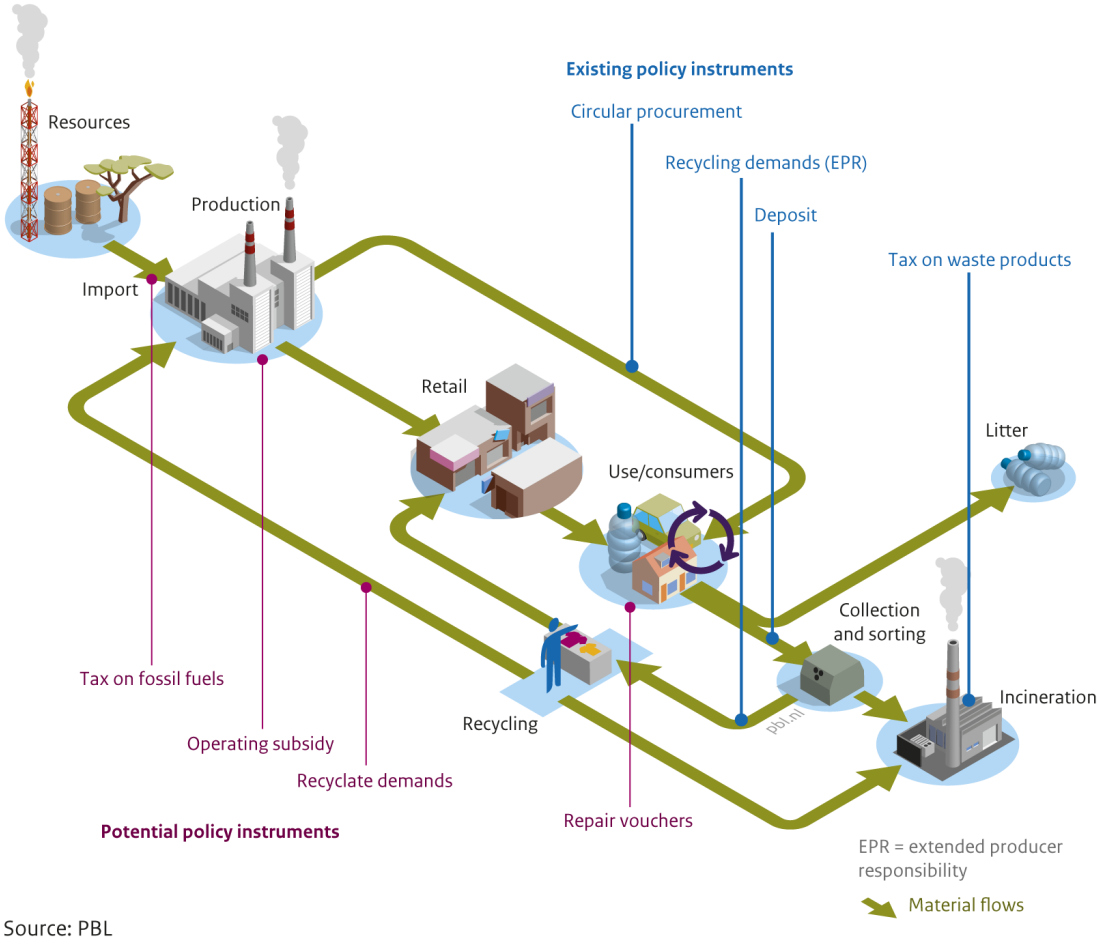
Since the NPCE was published in 2023, Dutch ministries have worked on further developing these plans. Up until now, however, this has hardly led to more concrete results. Indeed, no new quantitative goals have been established for the circular economy, while such goals, on a national level and for product groups, could help spur parties into action. Additionally, the available material resources for the circular economy are restricted by the national budget for the Ministry of Infrastructure and Water Management (IenW) and will drastically decrease after 2026 and 2027.

Even though some necessary outlook studies for more binding policy have been conducted over the past two years, and an EPR has been established for textiles, hardly any other additional normative and pricing policy instruments have been established on a national level. It is necessary to also implement the other outlook studies named in the NPCE and to realise additional normative and pricing policy. This is crucial to make circular production and consumption the norm rather than the exception, and to thereby speed up the transition towards a circular economy.

Speeding up the CE-transition requires a mix of policy instruments

Policy instruments can be implemented at various places in the production chain (see Figure B.2 for several relevant examples). This includes operating subsidies for circular production processes, circular procurement, deposits, a tax on waste materials, recycling requirements, and recyclate requirements. It is noticeable that current policy instruments mostly intervene at the back end of the production chain, while policy options that intervene earlier on still have to be established. In general, for each product group a mix of policy instruments will be needed to spur all participants in the production chain to action. For example, a tax on fossil fuels will mostly have an effect on primary industry and less so on the consumer, while deposits and repair vouchers are primarily aimed at the consumer.

Relevant instruments in the policy mix for a circular production chain



Source: PBL

Circular economy policy by the EU is crucial for a fully circular Netherlands

Out of all existing policy instruments, normative instruments are predominantly established at EU level, which are then primarily aimed at producers. As such, there are various binding agreements at EU level that are important for a circular Netherlands. These agreements ensure an equal playing field, which can benefit leading circular businesses in the Netherlands. This includes agreements such as the Right to Repair directive and the tightening of the Ecodesign regulation. With the Right to Repair, sellers are obligated to restore defective devices during the warranty period, if the customer requests so within a reasonable time frame and for a good price. The Ecodesign regulation ensures the possibility of setting requirements on recyclability, reusability, and lifespan extension. Additionally, it also prescribes a minimum share of recyclate in products and prohibits harmful materials.

The challenge here lies in implementing the regulation for different product groups over a short time period. The Netherlands benefits from strong European CE-policy to realise circular ambitions and to ensure an attractive and equal playing field for Dutch businesses. This requires a continuous and active input from the Netherlands towards the EU. By preparing for and pre-sorting EU policy on time and proposing good examples of national instruments, there will be a bigger chance that European policy takes the direction and at the speed which benefits the Netherlands most.

Focusing on further dynamic requirements for EPR and circular procurement offers many opportunities
Important policy instruments that have been established at a national level are primarily aimed at the end of the production chain and the removal of waste, such as a ban on landfilling and a levy and tax on waste.

The NPCE has big hopes for the expansion of extended producer responsibility (EPR) and circular procurement by governments. Here, it is useful to set dynamic requirements that can be tightened over time and that go further than just collection and recycling. These requirements should be aimed at reuse, use of recyclate, and an overall reduction in resource use. This is possible, for example by using the efforts by leading businesses as a benchmark for the future of the whole sector. By periodically tightening the requirements for circularity, innovation and environmental gains can keep being stimulated and promoted. Where not possible to include such requirements in EPR-systems, it is advisable to apply additional policy instruments to promote innovation.

Considerable environmental profits are feasible with the instruments adopted in the NPCE and additional circular options
On the basis of a selection of 55 of the policy instruments included in the NPCE, an estimation was made of the possible effects of Dutch production and consumption on greenhouse gas emissions. This estimation indicates that the total, annual global climate profit of these circular instruments can be estimated at 3.9-6.9 megatonnes CO_2-equivalents in 2030. The largest potential climate effects can be expected due to the lifespan extension of products, and by circular procurement in the field of ground, road, and hydraulic engineering. Because a large share of the NPCE still concerns adopted and proposed policy, the eventual effects are very dependent on the further development, implementation, and establishment of the policy instruments in question. If the other NPCE proposals are also developed further, the total climate profit caused by the programme can be higher than the bandwidth estimated above.

Alongside the 55 policy instruments in the NPCE for which an effect estimation was made, there are additional policy options with potentially significant environmental effects, such as an operating subsidy for circular measures. Here, for example, the existing pricing difference between Dutch plastic recyclate and the low prices for primary material resources used for plastics can be bridged. Other options with potentially significant environmental effects include a European norm for sustainable carbon in the chemical industry (through biofuels, recyclate, or captured CO_2), the pricing of fossil fuels applied in non-energetic use (e.g. plastics), and measures that stimulate the consumption of plant-based proteins while making the consumption of meat and dairy less attractive.

Further development of proposed and possible additional policy instruments is still necessary. That way, it is possible to get a better understanding of the expected effects for the environment and the economy as well as a better understanding of the acceptability by citizens and businesses. This enables better informed choices about accelerating the transition towards a circular economy. Here, it is useful if policymakers first choose policy instruments which have the largest expected potential environmental effects.

Firm management by the Dutch national government is needed, with sufficient mandate for those parties involved

To speed up the transition towards a circular economy it is not only necessary that the goals and policy instruments in the NPCE are further developed, but also that the existing management model is reinforced. As ministry responsible for circular economy policy, the Ministry of Infrastructure and Water Management (IenW) can steer on clear, binding agreements between ministries, decentralised governments, businesses, and societal organisations, particularly agreements about roles, responsibilities, and the reaching of goals.

Over the past few years, there has been an approach with transition teams – consisting of people in the government, businesses, and societal organisations – and covenants. This approach brought parties together who were motivated to contribute to the CE-transition. The transition teams have set up concrete projects and various covenants have led to concrete points of interest for policy. Building on established networks, experiences, and knowledge is valuable. The NPCE has indicated that it is important that, alongside current leading innovative circular businesses, also the large group of existing linear businesses should be considered, to ensure a better and broader representation of the entire community. It is, however, not yet fully developed, policy-wise, what the step from the so-called leaders to the rest of the community will look like. The NPCE has explicitly foreseen a role here for the transition teams, but the teams have repeatedly emphasised they need more capacity and material resources to fulfil this role.

Earlier on, transition brokers made the difference in many of the covenants named above. Transition brokers can, per region or per product group, with the right mandate and fitting material resources, potentially also fulfil a role in speeding up the CE-transition. To do so, it is necessary that circular activities increase and that the market for circular products expands. As such, changes are needed to existing laws and legislation, for example concerning the end-waste status and the design of products. Additionally, other types of financing will be needed, as well as changes in consumer behaviour and sufficient knowledge (exchange) about the circular economy.

To conclude: acceleration means action is needed now

The transition towards a circular economy is urgent because of increasing supply risks and environmental effects. For the time being however, the progress of the transition remains limited in resource use, the transition process, and applied policy. For a circular economy, a collective commitment is needed by governments, businesses, and consumers alike. This is a complex societal challenge, one for which drastic changes are needed in the production and consumption of goods and services. This will involve multiple generations. Alongside promoting circular activities, this explicitly concerns tapering off of linear activities.

For the acceleration of the transition towards a circular economy, a clear and collective picture is in any case needed of the urgency of circular resource use, but also what opportunities this can offer the economy and the living environment. Establishing concrete goals for relevant product groups is valuable in making the challenges more manageable. Experiences and results by leading parties can help to arrive at an ambitious but realistic speed. Above all, the acceleration of the transition requires an adjustment of the rules, including changes to existing laws and legislation and new types of financing. As such, the steps towards a circular economy already taken can grow out into the new normal.