perspective
.brussels

PERSPECTIVE.BRUSSELS' CONTRIBUTION TO THE CONSULTATION ON THE FUTURE CIRCULAR ECONOMY ACT

Call for evidence of 6 November 2025

NOVEMBER 2025

TABLE OF CONTENTS

Integrating the territorial and multi-scale approach to the circular economy 3
Developing new forms of industrial production in cities 4
Targeting the construction industry as a sector providing structure for circularity 4
Moving beyond critical materials: towards systemic circularity 5
Promoting circularity at the design stage and throughout the life cycle 5
Aiming for enhanced governance and coordination 6
Conclusion 6

COLOPHON

Author
perspective.brussels
Rue de Namur, 59 – 1000 Brussels

Completion date
November 2025

Contact
Ferrão Santos, Alexandre – aferraosantos@perspective.brussels

Perspective is a Brussels-based planning organisation whose mission is to develop regional and territorial strategies in support of the Brussels Capital Region's sustainable, economic and social development policies.

As part of the public consultation on the future *Circular Economy Act*, Perspective wishes to draw the European Commission's attention to the **territorial and spatial aspect** of the circular transition, a major lever for its practical implementation.

This contribution also reflects the concerns of other spatial planning bodies across Europe, expressed in particular in the context of the European ASSET project and resulting in the formation of a EuroDelta-wide Alliance[1].

INTEGRATING THE TERRITORIAL AND MULTI-SCALE APPROACH TO THE CIRCULAR ECONOMY

Circularity unfolds through places and material flows: storage, sorting, repair, assembly, logistics and processing zones. These activities require specific, well-located areas, which are often scarce in dense urban environments. It is therefore essential to **include spatial planning** in circularity policies, to ensure coherence between economic needs, environmental constraints and quality of life. The idea of developing the circular economy without clearly identifying how it can be implemented in terms of space – and therefore without land use planning – is an illusion. This is particularly the case in dense urban environments, where the potential for the circular economy is also highest.

The circular economy cannot be considered on the scale of a single territory. It is based on **regional and trans-national interdependencies**: flows of materials, expertise and skills transcend administrative boundaries. With this in mind, Perspective would like to draw attention to the **potential of the EuroDelta** – a mega-region encompassing the agglomerations and metropolitan areas located in the delta of the Rhine, Scheldt and Meuse rivers, stretching across northern France, Belgium, the Netherlands and the German Ruhr – as a relevant space for developing integrated circular value chains. The **Interreg ASSET project (NWE0300368; https://asset.nweurope.eu/)**, in which Perspective participated, illustrates this macro-regional cooperation aimed at structuring regional markets for the re-use and recycling of materials. Enhanced coordination with EuroDelta Alliance partners could contribute to the practical implementation of the future Act's objectives.

> **Systematically integrating territorial dimensions and trans-regional and trans-national cooperation into the design and implementation of the *Circular Economy Act*, by identifying territorial planning stakeholders as key partners in the circular transition.**

[1] EuroDelta Alliance statement: https://asset.nweurope.eu/letter-of-intent. Signatories: Metrex, City of Amsterdam, perspective.brussels, Brussels Environment, Province of South Holland, The Hague, Delft University of Technology, RWTH Aachen University, Vereniging Deltametropool, Duisburg Business and Innovation.

DEVELOPING NEW FORMS OF INDUSTRIAL PRODUCTION IN CITIES

As populations and consumption are concentrated in cities, these are also the places where the greatest deposits of reusable resources are generated. It is essential to recognise this unique characteristic of urban environments as presenting a high potential for the development of the circular economy. However, the proximity between residential areas and processing activities poses a spatial dilemma: how can we reconcile recycling, reconditioning and repair activities, which are likely to create significant disturbance, with the quality of urban life?

Perspective is calling for a new generation of urban productive activities, integrated into and compatible with their surrounding environment: platforms for sharing space or material flows, local logistics hubs, micro-factories for re-use or circular innovation centres[2]. These activities require the development of new business models and logistical and organisational innovations. Urban planning can facilitate the creation of these activities, not only by providing circularity spaces integrated with the city's other functions, but also by structuring a genuine logistics and production network. This can be achieved by arranging infrastructures of critical size at the gateways to urban centres which are able to support the urban network in terms of its logistics needs, processing and supply of materials.

This approach means rethinking the place of industry in cities, not as a disturbance to be contained, but as a driver of circular innovation. The Brussels Capital Region, through its Shifting Economy economic development strategy[3], is already illustrating this gradual reintegration of sustainable production activities into a dense urban environment. This approach could serve as a source of inspiration for European authorities and other major cities.

> **Supporting the development of new forms of circular industrial production in cities, based on innovation and integrated urban planning.**

TARGETING THE CONSTRUCTION INDUSTRY AS A SECTOR PROVIDING STRUCTURE FOR CIRCULARITY

The **building and construction sector** accounts for a major share of the material resources used in Europe. Promoting a high-performance circular economy therefore means targeting this sector as a priority.

Perspective emphasises the importance of **reusing buildings, materials and spaces**. European policies must encourage transformation rather than demolition, renovation rather than reconstruction, and the requalification of existing spaces rather than the consumption of new land. Extending the lifespan of existing structures through renovation and re-use of materials is a key solution for reducing environmental impact and optimising available resources. It is also essential that the tax framework be adapted in line with this objective.

[2] Examples in the Brussels Capital Region: Circularium – a circular innovation centre, Woodpark – a wood recovery and processing centre, BCCC – a centre for consolidating logistics in construction, Micro Factory – a shared manufacturing workshop.

[3] https://shiftingeconomy.brussels/

This orientation is consistent with the European objective of **"no net land take" set out in the European Biodiversity and Soil Strategies for 2030**. The circularity of land and buildings must be recognised as a pillar of overall circularity, in the same way as the management of critical materials. Experiments carried out in Brussels (e.g. the BMA's *Architecture of Reuse* and the Urban Agenda's initiatives on the circular re-use of buildings) demonstrate the feasibility of this approach. It requires changes to be made at different levels: integrating circular construction into existing regulations, reorganising the construction sector, rethinking the materials supply chain and adapting the way we design architectural projects.

> **Prioritising the re-use of materials, renovation and land circularity in the construction sector, by aligning regulatory and tax frameworks.**

MOVING BEYOND CRITICAL MATERIALS: TOWARDS SYSTEMIC CIRCULARITY

The draft Act rightly focuses on strengthening the market for **secondary raw materials**, but the issue goes beyond just the supply of critical raw materials. **Flows of building materials, biomass, infrastructure and consumer goods** represent much larger volumes, and the circularity of these materials would have a major knock-on effect on the entire European economy. These material flows need to be structured into specialised channels, with action plans drawn up at European level to take account of their specific needs, constraints and characteristics. European authorities could play a more active role in supporting the development of these specialised channels, particularly when they require a trans-national approach.

Furthermore, circularity cannot be achieved without taking into account the **associated externalities** – grey energy, transport, inputs, pollution – at the risk of substituting one dependency for another. Perspective therefore recommends that the impact assessment and future regulatory framework assess the indirect effects of circularity measures on energy, climate and space. For example, it's important to assess the social acceptability of these impacts, and the conditions in terms of financing and circularity infrastructures to make them viable.

> **Adopting a systemic approach to circularity in the design of the Act, by regulating all material flows and their externalities through appropriate legislation.**

PROMOTING CIRCULARITY AT THE DESIGN STAGE AND THROUGHOUT THE LIFE CYCLE

Circularity must be integrated **upstream**, right from the design stage of products, buildings and infrastructures. Sustainable design requirements should include criteria on the capacity for dismantling and repairing products, and on modularity, to facilitate re-use. European product standards therefore need to be adapted to take greater account of this re-use objective in the design of products.

Perspective insists on giving priority **to re-use and repair** over recycling alone. Recycling remains essential, but it should not be the default solution. On the contrary, recycling should be the last resort when it has not been possible to use other means, such as extending the life of items and materials or ensuring they can be repaired. These are all are more efficient solutions, both environmentally and economically, and they create more local jobs.

These new modes of production and consumption have spatial implications that need to be integrated into the strategy supported by the Act.

> **Imposing circularity right from the design phase of products and projects, giving priority to re-use and repair over recycling.**

AIMING FOR ENHANCED GOVERNANCE AND COORDINATION

The success of the *Circular Economy Act* depends on **coordination between levels of governance** and on the recognised role of local players. Local and regional planning authorities, like Perspective, can help translate European objectives into coherent development strategies tailored to the unique characteristics of the local area. But for this to happen, they need to be involved in the European decision-making process, which is not currently the case.

The Act's impact assessment should also examine the **interaction between different European legislation on land use**, including the **Nature Restoration Regulation (NRR)**, the **Soil Monitoring Law**, the **"no net land take"** objectives and policies for **reserving space for renewable energy production, as well as the future European Affordable Housing Plan.**

These instruments pursue complementary but sometimes competing goals: biodiversity conservation, energy production, housing, infrastructure or productive activities. An **integrated approach** to these legislative frameworks would make it possible to **avoid contradictions between sector-specific policies** and promote the **territorial coherence of the transition**, by supporting balanced land use planning on a European scale.

It should also be noted that the development of circular chains and markets for secondary raw materials may be adversely affected by current legislation regulating competition, which will need to be adapted accordingly.

> **Involving the various levels of power concerned (and in particular local and regional authorities) in the design and effective implementation of the Act, to enable its spatial implementation.**

CONCLUSION

The transition to a circular economy cannot be fully achieved without **explicit consideration of its territorial dimension**. Space is not just a medium, but a strategic resource: it's in territories that circularity takes shape, finds structure and adds value.

Perspective is calling on the Commission to make **land use and spatial planning** fully fledged levers of the *Circular Economy Act*. This can be achieved by involving urban designers and town planning agencies and departments in the development and implementation of this Act, and by supporting regional, urban and trans-national initiatives that are already experimenting with these new forms of circularity.