

What is the CMP?

By 2050, the Netherlands aims to become fully **circular**.

In a circular economy, we use raw materials and products efficiently and intelligently.

Through reduced consumption, increased reuse, and better recycling, we extend the lifespan of materials and reduce dependence on other countries.

This ensures raw materials remain accessible and affordable for Dutch businesses.

It also contributes to mitigating **climate change**, **biodiversity loss**, and **environmental pollution**.

The Circular Materials Plan (CMP)

The CMP is a key instrument for achieving a circular economy.

It supports the transition by providing knowledge and frameworks for governments and businesses on:

- the use of raw materials,
- waste management, and
- the issuing of permits.

The CMP helps businesses make more circular choices in their operations.

Competent authorities use it to guide their decisions, inspections, and enforcement activities.

The CMP acts as a **bridge between policy and practical implementation**—informative, hands-on, and motivating.

From LAP to CMP

The CMP is the successor to the **National Waste Management Plan (LAP)**.

Since 2003, the LAP has provided a clear overview of national rules on waste management, enabling consistent application by different competent authorities.

Now, 20+ years later, we are deep in the transition from a **linear** to a **circular** economy.

This shift demands a broader perspective than the LAP provided, which focused mainly on waste treatment at the **end of a product's life cycle**.

In contrast, the CMP emphasizes the **preservation of material value** for as long as possible. Materials are reused carefully, and when they finally reach end-of-life, they are **recycled at the highest possible quality**. Remaining waste is treated responsibly, minimizing risks to humans and the environment.

Landfilling and incineration are avoided as much as possible — but still allowed for non-recyclable waste.

The CMP also covers earlier phases of the product cycle: **design**, **production**, and **(re)use** of materials and products.

1. Structure of the CMP

The CMP is divided into several parts.

The document as a whole is informative for all, but certain sections provide **assessment frameworks** specifically for competent authorities.

The four main parts of the CMP are:

1. **About the CMP**
 2. **Themes**
 3. **Materials**
 4. **Instruments**
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About the CMP

This section provides general information, including its legal foundation and its future development.

It also describes the procedure authorities must follow if they intend to deviate from a CMP assessment framework.

Themes

This section contains general chapters—such as circular material use principles and an overview of relevant circular economy legislation.

It also includes guidance on which **regional regulations** should take the CMP into account and how subnational authorities can contribute to the circular transition.

Each chapter:

- defines the **target audience**,
- explains the **importance to the circular economy**, and
- outlines **relevant policy and legislation**.

If applicable, it includes **assessment frameworks** for permits and exemptions.

At the end of each chapter, you'll find **future plans** and **links to tools or further information**.

2. Instruments for the Circular Economy

The national government has access to a range of instruments to help achieve goals related to **raw material use**.

These instruments range from overarching visions to highly specific tools.

One key policy instrument for the CMP is the:

National Circular Economy Programme 2023–2030 (NPCE).

In addition, the following legislation is essential:

- The **Environmental Management Act (Wet milieubeheer)**
 - The **Environmental and Planning Act (Omgevingswet)**
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National Circular Economy Policy: NPCE

The NPCE outlines the actions the Netherlands will take to become circular by 2050. It focuses on the following **four circularity strategies**:

1. Reduce Resource Consumption

Use fewer (primary) raw materials by:

- Avoiding unnecessary products,
 - Sharing products, or
 - Designing more efficient alternatives (“**narrow the loop**”).
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2. Substitute Raw Materials

Replace primary raw materials with:

- **Secondary materials** (i.e., recycled content),
 - **Sustainable bio-based alternatives**, or
 - Other, more widely available raw materials with a lower environmental footprint (“**substitution**”).
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3. Extend Product Lifespan

Encourage products to be used longer and more intensively through **reuse and repair**, thereby delaying the need for new resources (“**slow the loop**”).

4. High-Quality Processing of Materials

Close the loop by recycling materials at the **highest possible quality**, thereby:

- Reducing incineration and landfill,
 - Increasing the supply of high-grade secondary raw materials (“close the loop”).
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Policy Mix: Taxes, Incentives, and Regulation

The government employs a **mix of pricing, incentive-based, and regulatory measures**, including:

- **Pricing instruments** (e.g., taxes or fees) to charge polluters directly,
- **Incentives** (e.g., subsidies or vouchers),
- **Regulatory tools** (i.e., laws and rules).

The Environmental Management Act contains provisions on substances, products, and waste. Currently, a **Circular Economy Act (CE Act)** is being developed within this framework.

This CE Act will align terminology, concepts, and approaches with the circular economy vision.

It aims to view substances, products, and waste **more holistically**, promoting a **circular chain approach**.

The Role of the CMP

Among these instruments, the CMP plays a vital role. It provides both **practical guidance** and **legal assessment frameworks** to help:

- Businesses implement circular practices
- Authorities issue consistent decisions

The CMP functions as a **practical, informative, and motivating bridge** between policy and implementation.

3. CMP’s Contribution to the Circular Economy

The core of waste policy — and therefore of the CMP — is the **protection of the environment and public health** through responsible waste management.

The **Circular Materials Plan** contributes to the four **circularity strategies** of the NPCE (National Circular Economy Programme) by providing relevant **knowledge and frameworks** across all stages of a product’s lifecycle:

- Design
- Production
- Use

- Waste processing

This structure is reflected in the CMP's layout, with chapters focusing on:

1. Reducing raw material consumption
2. Replacing raw materials
3. Extending product lifespan
4. Processing materials efficiently

Different Stages, Different Stakeholders

These strategies target different stages of the materials cycle, each involving different players:

- Designers
- Producers
- Users
- Repair technicians
- Refurbishers
- Sorters
- Recyclers
- Waste incineration plants
- Landfills

Each chapter in the CMP specifies its **relevant target audience**.

Legal Guidance per Strategy

The CMP provides **explanations and tools** for implementing legal requirements across all four strategies. For example:

- The **[Raw Material Use and Waste Prevention]** chapter explains existing legislation on reducing raw material usage and waste generation.
- The chapters on **[Secondary Raw Materials]**, **[Substances of Very High Concern (ZZS) and Other Hazardous Substances]**, and **[Waste or Not-Waste]** deal with **substitution**.
- The **[Repair and Reuse]** chapter supports **lifetime extension**.
- High-quality waste processing is addressed in chapters like:
 - **[Separate Household Waste Collection]**
 - **[Immobilisates, Fillers or Additives]**

Assessment Support

The CMP also supports authorities in **evaluating** how well certain actions or decisions contribute to circularity.

For instance, the chapter on **[Circular Material Use]**:

- Defines what constitutes circular design and use
 - Offers criteria for assessing how to apply raw materials and products more circularly
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The Waste Hierarchy and the CMP

The **waste hierarchy** is the fundamental principle for evaluating whether a method of waste treatment is **more or less sustainable**.

This hierarchy is defined in the **EU Waste Framework Directive (Directive 2008/98/EC)** and serves as the **cornerstone of EU waste policy**.

EU Waste Hierarchy (simplified):

1. **Prevention**
Actions taken before a substance, material, or product becomes waste, aimed at:
 - Reducing waste quantity
 - Minimizing environmental and health impacts
 - Limiting harmful substances
 2. **Preparation for Reuse**
Inspecting, cleaning, or repairing products/components to make them reusable without further processing
 3. **Recycling**
Reprocessing waste into products, materials, or substances — for the original or a new purpose
 4. **Other Recovery** (e.g., energy recovery)
Giving waste a useful purpose, either by:
 - Replacing other materials
 - Preparing it for a specific use
 5. **Disposal**
Any operation that does not count as recovery — even if it results in energy or material recovery
(e.g., **landfilling, incineration**)
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CMP Refinement of the Hierarchy

“The **higher** on the waste hierarchy, the **more sustainable** the treatment — provided it’s safe for people and the environment.”

The CMP **refines** the EU hierarchy and provides **assessment frameworks** to determine the correct level of treatment for each type of waste.

It also introduces the concept of a “**minimum standard**.”

Minimum Standard for Waste Treatment

In the **chain and waste plans** for 60 waste materials, the CMP defines a **minimum treatment level**. This standard serves as a:

- **Reference point** for permit applications
- **Evaluation tool** for competent authorities

If no chain/waste plan exists for a given material, authorities default to the EU waste hierarchy as explained in the CMP's **[Steering Instruments]** chapter.

4. Legal Obligations

The **CMP is not legislation itself**, but it plays a key role in the **implementation of laws and regulations**.

Legislation determines:

- What is allowed or prohibited
- Under what conditions certain actions may take place

The CMP then provides the **frameworks and guidance** to apply that legislation in practice.

Types of Legal Contexts

Some laws apply uniformly across the European Union — for example, those concerning **chemical substances**.

Other laws require **case-by-case permission**, such as through a **permit**. In such cases, authorities must weigh the options carefully.

Legal Status in the Netherlands

Under the **Environmental Management Act (Wet milieubeheer)**, competent authorities are required to:

Take the CMP into account when making decisions related to:

- Permit issuance
 - Monitoring
 - Enforcement
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Local Governments and the CMP

Decentralized (regional or municipal) governments have the power to set **local rules**, such as those found in an **environmental plan (omgevingsplan)**.

They too must consider the CMP where such rules concern **waste management**.

Where to Find Legal Procedures

- The chapter **[Assessment Frameworks]** explains how the CMP influences official decisions.
 - The chapter **[Deviations]** outlines the steps authorities must follow if they intend to **deviate** from the CMP.
 - The chapter **[Emergencies]** explains what to do when an emergency situation requires deviation from the CMP.
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Legal Foundations: EU and Dutch Law

The CMP is rooted in both **EU and national legislation**.

At the EU level:

The **Waste Framework Directive (Directive 2008/98/EC)** requires Member States to:

- **Evaluate** their national waste management plans **every six years**
- Update them if needed (Article 30 of the directive)

The CMP is the **Netherlands' response** to this requirement.

The Directive also defines **mandatory components** of a national waste management plan, such as:

- Policies to **prevent or reduce** the generation of waste
- Rules for **waste handling and processing**

At the national level:

The **Environmental Management Act (Wet milieubeheer, Wm)** further defines what the CMP must include.

(See: Title 10.2, Articles 10.3 to 10.14 Wm)

This includes, for example, the obligation to include a **waste prevention programme** in the CMP.

The CMP must also contain an **Environmental Impact Assessment (EIA)**, presented in a recognizable format.

5. Development and Participation

5.1 Development

The **CMP is a dynamic instrument**, continually updated and adapted to respond effectively to:

- New legislation
- Technological advancements
- Real-world experiences

Why stakeholder involvement is critical:

Stakeholders contribute **practical knowledge** and help identify:

- Emerging trends
- Bottlenecks or pain points

This ensures that the CMP remains aligned with the **needs of both businesses and governments**, thereby supporting the transition to a circular economy.

CMP will be updated regularly

Reasons for updating the CMP include:

- New **policy intentions**
- Changes in **existing policies**
- Updates in **laws and regulations**

Examples:

- New EU or Dutch regulations
 - Developments in national programmes like the **National Circular Economy Programme (NPCE)**
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Future Plans Section

Each CMP chapter includes a paragraph titled “**Future Plans**”, which highlights:

- Anticipated developments relevant to the chapter’s subject
- Trends that may later be formalized into **assessment frameworks**
- Announced legal or policy changes that are **not yet in effect**

These future insights are **not yet definitive**, but may be incorporated in the next CMP update, once fully developed.

The “**Future Plans**” section is revised with every official CMP update to stay current.

5.2 Participation

To ensure continued improvement, it is essential to collect:

- **Feedback from users**
- **Reports of challenges**
- **Suggestions for improvement**

Users of the CMP — broadly defined — can contribute through multiple channels.

Key participation tools:

- **The CMP website**
Integrated with the **Waste Management Helpdesk**, where stakeholders can:
 - Ask questions
 - Share comments or concerns
 - Report intended deviations from the CMP

Reporting Deviations (Legal Requirement)

Dutch law (Environmental Management Act, Article 10.14, paragraph 4) requires:

Public authorities must notify the Minister of Infrastructure and Water Management if they plan to **deviate** from the CMP.

These reports are reviewed, and if multiple similar cases arise, they may indicate a need to **adjust policy** — and thus, the CMP.

Dialogue with Authorities

The Ministry (IenW) actively engages in **discussions with competent authorities** about:

- CMP content
- User-friendliness of the CMP in day-to-day practice

These dialogues provide **valuable insights** for potential improvements.

National Circular Economy Conference

Each year, during the **National Circular Economy Conference**, stakeholders are:

- Informed of the latest CMP developments
 - Given the opportunity to share feedback and propose improvements
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Ongoing Input from Regular Consultations

Finally, the CMP benefits from ongoing signals and insights gathered through:

- The **formal consultation procedure** during CMP updates
- Various routine meetings between stakeholders and national authorities, covering topics like:
 - Material streams
 - Waste collection
 - Hazardous substances
 - Other substantive CMP-related themes