



BRILIAN

Circular Future for Rural Areas

Bioeconomy roadmap: legal framework (Second bulletin)

Deliverable 3.5

WP3 Routes for the development of a sustainable bioeconomy



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EXECUTIVE SUMMARY

This paper serves for Brilian partners, for external stakeholders including policy makers, to understand the rapidly evolving policy and legislative scenarios developing in the European Union and its institutions which relate to policies that may impact the rural bioeconomy. This Deliverable is included in WP3 Task 3.3 and contributes to other Tasks and activities such as helping to inform the discussion with the Advisory Board for Farmers, Task 2.4 Social Innovation, the assessment of market conditions in Task 2.3 and Business Models in Task 4.1, the Assessment of trade-offs and synergies in Task 3.2, the Policy and Standards Proposals in Task 3.3, The Regulatory Market Readiness assessment in Task 6.3 as well as communication and dissemination activities in WP7.

This Policy Bulletin is the second of five that will be produced during the four years of the project. This edition has been drafted building upon the first policy bulletin of September 2024 ([link](#)).

Objectives

The principal objective of this second Policy Bulletin is to illustrate in a concise form the development of European legislation that may have impacts upon rural bioeconomy development and bio-based initiatives deployment at European level. In this sense, the document will focus upon the priorities related to bioeconomy.



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LIST OF ABBREVIATIONS AND ACRONYMS

ABI – Actions for Bio-Innovation

BIC– Bio-based Industries Consortium

BIP– Biomethane Industrial Partnership

BRILIAN – Cooperative and Sustainable business models for bio-based chains in rural areas

BUDG – Budget Committee (European Parliament)

CAP – Common Agricultural Policy

CCUS – Carbon Capture Usage and Storage

CER – Code Européen des Déchets (European Waste Code)

CBE-JU – Circular Based Europe Joint Undertaking

CSRD – Corporate Sustainability Reporting Directive (CSRD)

CSDDD – Corporate Sustainability Due Diligence Directive (CSDDD)

CBAM – Carbon Border Adjustment Mechanism (CBAM)

EBB – European Bioeconomy Bureau

EC – European Commission

ECON – Economic and Monetary Affairs Committee (European Parliament)

ECR – European Conservatives and Reformists Group

EIB – European Investment Bank

EP – European Parliament

EPP – European People’s Party

ESPR –Ecodesign for Sustainable Products Regulation

EU – European Union

MEP – Members of the European Parliament

MFF – Multiannual Financial Framework

NGO – Non-Governmental Organization

NRL– Nature Restoration Law

PFAS – Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS)

PPWR – Packaging and Packaging Waste Regulation

REACH – The Regulation on the Registration, Evaluation, Authorisation and Restriction of Chemicals

REDII – Renewable Energy Directive II

SDG – Sustainable Development Goal

WFD – Waste Framework Directive

WP – Work package

WTO – World Trade Organization

1. INTRODUCTION

The BRILIAN project has been conceived to support the **adoption of sustainable and cooperative business models in rural areas**, to incorporate agricultural by-products valorisation, seeking to increase and diversify primary producers' income.

To achieve this, BRILIAN has established 3 cooperative pilots working with 10 value chains for the validation of a group of actions for bio-innovation (ABI), which will enable the proposition of specific cooperative business models. The design of these business models requires the consideration of the policy framework to achieve a more successful implementation and resilience.

Hence the **need to understand in depth what the policy frameworks in which the rural bioeconomy functions, showing opportunities and challenges from a rapidly evolving policy landscape across the EU**. To address this, the European Bioeconomy Bureau (EBB) is producing periodic policy bulletins, which provide a concise overview of the development of European legislation affecting rural bioeconomy and bio-based initiatives. These bulletins focus on key priorities within the bioeconomy sector, aiming to enhance BRILIAN partners' understanding of the policy environment. Additionally, they serve as a valuable resource for external stakeholders and policymakers, offering insights into the challenges and opportunities faced by rural actors. Ultimately, the bulletins aim to support informed policy decisions that promote sustainable rural development and economic resilience.

This second Policy Bulletin builds upon the [first edition \(D3.3\)](#), which provided an initial analysis of the evolving European legal landscape and its impact on rural bioeconomy initiatives. The first edition focused on key policy developments such as the EU Bioeconomy Strategy, the Green Deal, and the challenges rural producers face in implementing sustainability policies. A concrete example from the first edition was the focus on Circular Economy regulations, particularly regarding the use of agricultural waste for bioproducts, which raised important discussions about regulatory barriers and market opportunities.

In this updated version, the focus continues on European legislation and bioeconomy priorities, but with a deeper exploration of new challenges and opportunities emerging in the policy environment. For example, the European Commission's new work on the Competitiveness Compass and the revised Bioeconomy Strategy consultation. Additionally, the Commission's launch of the Clean Industrial Deal and the second Omnibus Simplification Package, which could help alleviate regulatory burdens for

smaller bioeconomy actors and improve market access for sustainable bio-based products. Finally, the revision of the Common Agricultural Policy, which will begin towards the end of 2026, provides an opportunity to clarify and potentially incentivize the role of farmers in building bio-based industries. These updates reflect the evolving policy landscape and its potential impact on the BRILIAN project's objectives.



2. POLITICAL LANDSCAPE

Following the June 2024 European elections, in July 2024 the European Parliament formally elected Ursula von der Leyen for a second mandate as President of the European Commission (2024-2029), with 401 Members of the European Parliament in favour and 284 against.

The following months, right until the end of 2024, was a time in which the new College of the Commission was formed. This required months of negotiations between different political parties and nation members of the EU, in order to find a balance and a secure majority to govern until 2029.

The College is composed of Commissioners from 27 EU countries. Together, these 27 members of the College were appointed as the Commission's political leadership for a 5-year term. The President of the Commission assigned responsibilities for specific policy areas to each Commissioner¹. The European Parliament voted on November 27th 2024 to approve the Ursula von der Leyen Commission by 370 votes for, 282 against, 36 abstentions. From the voting figures it is clear that the Commission faces a considerable and strong parliamentary opposition.

The second Commission under Ursula von der Leyen inherits several issues from the administration which terminated in June 2024, notably the war in Ukraine following the Russian invasion. This has put severe strain on European budgets as considerable financial assistance has been diverted to support Ukraine, whilst national budgets have seen an increase in spending on defence-especially in eastern Europe. Moreover, the strain caused by the need to move away from the imports of Russian hydrocarbons has increased industrial operating costs as energy prices rose.

The new issue which the administration has been primarily focussed upon since it officially took office on December 1st, 2024, regards the American presidency and the shredding of the post WWII consensus on trade and defence policies. It is not the place here to analyse these but simply to say that the political focus of the Commission has been upon how to 1) keep providing Ukraine with unprecedented political, financial, military and humanitarian support and 2) navigate a complex and confusing industrial

¹ [College of Commissioners - European Commission](#)

landscape, safeguarding jobs and investments in a scenario of a tariff war instigated by the USA.

Each question is one of existential survival of the European Union.

Given that just five months have passed since the Commission officially took office in December 2024, and despite the challenges presented by the tariff situation and the Russian aggression in Ukraine it is worth highlighting that the Commission has also raised the tempo on issues that are important to the bioeconomy. These will be listed and discussed below.

The President of the Commission has formed several cross sectorial groups to ensure cohesion in policies – a move that has long been necessary and which theoretically will overcome the division between various directorates. Among these is a coordination on the Circular Economy, which evidences that this topic remains a high priority of the Commission. The political responsibility for the Bioeconomy has been given to DG ENVI which has traditionally not had a favourable policy view towards the sector but has given greater importance to the role of regional bioeconomy hubs and policies. However, Bioeconomy is included as one of the strategic sectors requiring attention in this early phase of Commission activities. In the first Directors meeting involving Directors from across the Commissions Directorates of January 2025, two main pathways of activities were laid down.

The first, to focus on **enforcement and implementation of existing legislation** related to environment, biodiversity and zero-pollution, taking into account the importance of simplification and dialogue with stakeholders. This is to be welcomed because many industrial and national stakeholders have, in past years, accused the Commission of continuing to create new legislation whilst previous and related legislation has not been fully implemented. One example impacting the bioeconomy can be seen regarding biowaste collection, mandatory across the EU since January 1st, 2024. A Zero Waste Europe and Bio Based industries Consortium (BIC) report of November 2024 highlights how 74% of biowaste is disposed of through incineration and landfills, rather than being separately collected, as legally mandated². For the bioeconomy this implies that resources which could be used are being wasted; biowaste can be transformed into

² [Bio-waste generation in the EU: Current capture levels and future potential – Second edition - Zero Waste Europe](#)

biogas/biomethane creating low-carbon locally produced energy for rural communities, compost to replenish organic carbon in soils, as a feedstock for chemicals, as a feedstock for innovative industries such as the breeding the black soldier fly as an animal/fish feed to substitute soya, and others.

The second pathway of activities discussed in this meeting were the new policy developments which the Commission should bring forward over the five-year mandate. These are: a **Circular Economy Act, the Clean Industrial Deal, a Bioeconomy Strategy and a Chemicals Industry package** all of which should have the over-riding aim to enhance efforts to develop a single market for sustainable biobased products.

These are discussed below but it is necessary to note that at the time of writing no new policy developments have yet been translated into legislative instruments.

3. POLICY STATEMENTS RELATED TO BIOECONOMY

In this chapter, an analysis is made of the principal policy announcements from the Commission in its first four months of activities on issues which could have an impact on the bioeconomy and industrial/farming activities.

On February 11th, the European Commission published its Work Programme for 2025 and Annexes presenting 18 legislative initiatives, and 34 non-legislative ones³. The annexes also mention the annual plan for evaluations and fitness checks and a list of withdrawals of 37 proposals. The von der Leyen II Commission being placed under the sign of regulatory and administrative simplification, a number of new initiatives are presented to achieve this objective. The Work Programme calls for all EU institutions to follow an implementation and simplification agenda, pushing the implementation considerations earlier in the policymaking cycle and making stakeholders' and practitioners' consultation a cornerstone of the Commission's approach.

There are four main bodies of instruments which the Commission has been focussed upon. These are the Competitiveness Compass, the Vision for Agriculture and Food, the Clean Industrial Strategy and the Bioeconomy Strategy.

The Competitiveness Compass

On January 29th, 2025, the Commission presented a 'competitiveness compass', an economic framework to guide its work in the coming years. Grounded in the key role of productivity in financing the EU's competitiveness ambitions, the compass is about simplifying legislation, pooling private and public investment in key technologies and mitigating foreign dependencies to unleash EU innovation. To this end, the Commission intends to issue up to 47 legislative and non-legislative proposals by the end of 2026⁴.

The report issued by Mario Draghi⁵ in September 2024 during the first days of the Commission after the June elections, highlighted how the EU has lost competitiveness with the USA and Asia on many issues it once had leadership in. Mr Draghi suggested a series of structural reforms which were discussed in the first BRILIAN policy bulletin of September 2024, including streamlining the political decision-making processes,

³ [Commission work programme 2025 - European Commission](#)

⁴ https://ec.europa.eu/commission/presscorner/detail/en/ip_25_339

⁵ [The Draghi report on EU competitiveness](#)

reducing the amount of new legislation the Commission puts forward, cutting administrative burdens for industry, and investing across the EU in priority industrial sectors, creating a fund to this end. He highlighted how the EU had not produced, in decades, one new industry able to compete with the technology giants of the USA and how innovators often left the EU to start new businesses elsewhere, due to the costs and bureaucracy involved in establishing businesses in the EU. Moreover, he stressed how the capital markets in the EU were both small and fragmented, risk-averse and unable to provide capital to scale innovations from start-ups to industrial players.

The Commission has responded to this challenge with the above mentioned Competitiveness Compass and currently measures are being elaborated for publication and consultation over the coming months. The Biotechnology and Biomanufacture policy is mentioned an important part of the Compass.

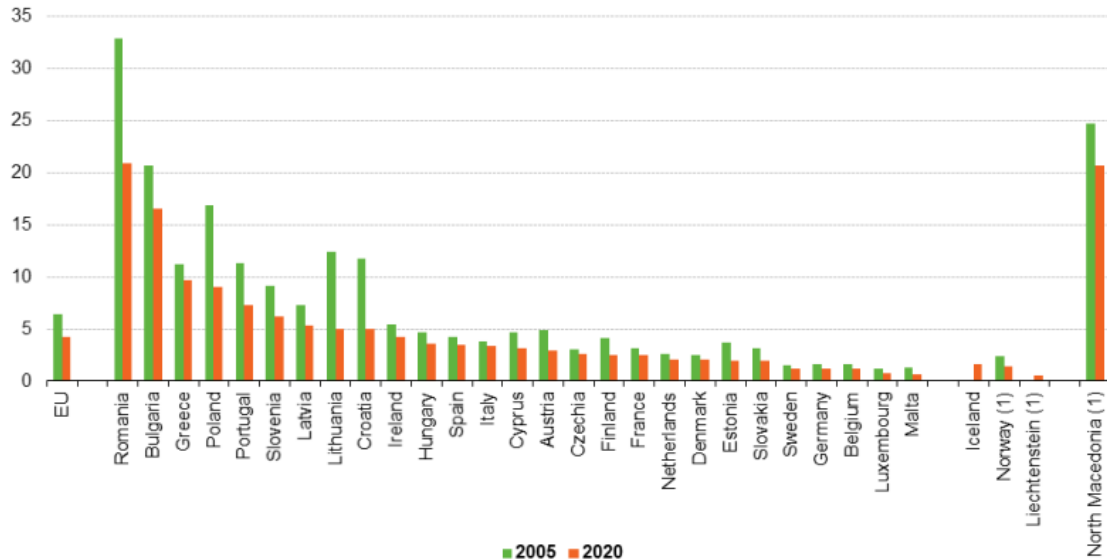
Vision for Agriculture and Food

More relevant to the bioeconomy is the very delicate question of agriculture. The EU budget is heavily dominated by support to farmers, with approximately **31% of total spending dedicated the Common Agricultural Policy (CAP)** representing over the period 2021-2027 € 378,532.3 million out of a total EU budget of €1.21 trillion⁶. Nevertheless, the perception of farmers is that this spending is not effective in improving their incomes. The protests in 2024, which led to the roads of many major cities being blockaded by farmers, are witnesses to the intense dissatisfaction farmers feel towards policies adopted relating to them.

Whilst there are nearly 9 million people across the EU working in the agricultural sector, they represent just 4.2% of all EU employees. As the data shows, the farming population is in decline across the EU, while nations that are lower income economies tend to be where the farming population represents the highest proportion of all employees-Romania, Bulgaria, Greece, Poland. (see figure 1 below)

This requires a careful assessment to identify alternatives regarding how this situation can be improved so the budget produces a higher impact in terms of objectives achieved and increased support to farmers.

Employment in agriculture
(% of total employment, 2005 and 2020)



(1) 2019.
Source: Eurostat (online data code: nama_10_a64_e)

eurostat 

Figure 1 Farmers and the agricultural labour force - statistics - Statistics Explained⁷

Any changes to CAP spending is a highly delicate political matter. In the first BRILIAN policy bulletin an analysis was made of the report undertaken for the President von der Leyen by a wide ranging group of stakeholders from all agricultural sectors who together agreed on the need for reform and how this reform should look. The Strategic Dialogue on Future of EU Agriculture⁸, presented in September 2024, was a significant breakthrough, enabling the Commission to now present a new vision for the farming sector and take up its recommendations.

On 19 February 2025 the Commission presented its Vision for Agriculture and Food, an ambitious roadmap on the future of farming and food in Europe. This roadmap sets the stage for an attractive, competitive, resilient, future-oriented and fair agri-food system for current and future generations.

To benefit farmers, the agri-food chain and ultimately citizens, the vision proposes to the following measures:

⁷ [Farmers and the agricultural labour force - statistics - Statistics Explained](#)

⁸ [Strategic dialogue on the future of EU agriculture - European Commission](#)



- Review the unfair trading practices rules and common market organisation (CMO) Regulation
- Propose a fairer, simpler and targeted common agricultural policy
- Enhance the EU Agri-food Chain Observatory
- Present a Bioeconomy Strategy
- Build an ambitious investment agenda
- Deliver a Generational Renewal Strategy
- Launch an EU Observatory on Farmland

No new policy instruments are as yet proposed but the framework for the development of legislation is now laid down and agreed. During 2025 it is to be expected that a series of policies will be announced for consultation. Indeed, the revision of the CAP is foreseen towards the end of 2025 with the process concluding before the current agreement expires in 2027.

How this works out is of vital importance to rural communities and their capacity to develop new bioeconomy models as envisaged in the BRILIAN project and therefore requires close monitoring by BRILIAN stakeholders.

Clean Industrial Deal

Well before the storm created by American announcements on tariffs, it has been clear to all observers that the EU is at risk of slow but steady industrial decline. This is partly due to unforeseen and unpredictable circumstances such as the increase in energy costs following the Russian aggression in Ukraine. But also the longer-term shift in industrial off-shoring to Asia – chemicals, automotive, electronics, textiles, plastics to name a few – has meant the emptying out of European industrial sectors. Therefore, it is key to solve how it can be ensured that what remains succeeds and that new investments are brought in to create the new industries of the 21st century. Additionally, it is also relevant to address how to maintain and enhance living standards of Europeans in an era of increased competition, tariffs, ageing population, and the need to divert funds into defence spending.

These are the issues which the Clean Industrial Deal faces and its recommendations attempt to reverse the alarming trend of the last decade.

On February 26th, 2025, the Commission published its Communication on “The Clean Industrial Deal: A joint roadmap for competitiveness and decarbonization”

According to VP Teresa Ribera⁹, the communication outlines the European Union’s plan to “*boost competitiveness, ensure economic resilience*” and “*tackle the climate crises*”. On this last aspect, some might have wished that the legislative proposal on the 2040 climate target (90% GHG emissions reduction) would have been presented on the same day, but a different choice was made to keep the narrative focused on competitiveness and simplification for industry.

Main elements of the Clean Industrial Deal are as follows:

- **Affordable Energy**
 - The Affordable Energy Action Plan will speed up clean energy deployment, improve EU energy market interconnections, and enhance energy efficiency to cut reliance on fossil fuels.
- **Boosting Demand for Clean Products**
 - The Industrial Decarbonisation Accelerator Act will promote EU-made clean products through sustainability and “Made in Europe” criteria in procurement.
 - A 2026 Public Procurement Framework review will reinforce sustainability and resilience in strategic sectors.
- **Financing the Clean Transition**
 - €100 billion will support clean manufacturing through: a) faster State Aid approval for renewable energy and decarbonization, b) an Innovation Fund & Industrial Decarbonisation Bank to expand clean tech funding and c) InvestEU mobilizing €50 billion for clean tech and mobility.
- **Circularity & Access to Materials**
 - The EU Critical Raw Material Centre will enable joint purchasing for better supply security.
 - A Circular Economy Act (Q4 2026) aims for 24% material circularity by 2030 to reduce global dependencies. In particular: ***“To move away from fossil materials, it is vital to mandate the use of new raw material sources like recycled and bio-based materials to substitute, for example, virgin fossil materials in plastics. The measures of the Act will be complementary to and facilitate the rolling out of the Ecodesign for Sustainable Product***

⁹ See COM [press corner](#).



Regulation. The work plan under this Regulation will be adopted in April 2025”.

- **Global Trade & Competitiveness**
 - Clean Trade and Investment Partnerships will diversify supply chains.
 - Trade defence measures will protect EU industries.
 - Carbon Border Adjustment Mechanism (CBAM) will ensure fair carbon pricing for imports.
- **Skills & Quality Jobs**
 - The Union of Skills will train workers in clean tech and digitalization.
 - Erasmus+ (€90 million) will address skills shortages.
 - Additional efforts will cut red tape, strengthen the Single Market, and improve EU-national policy coordination.

Some key takeaways for the biomanufacturing sector

Funding Opportunities: The EU’s commitment to financing green industries could provide grants or investment for biomanufacturing R&D and production.

Circular Economy Push: The emphasis on sustainable materials aligns with biomanufacturing industry’s goals, particularly in bio-based and recyclable alternatives.

Regulatory Changes: Stricter emissions policies and carbon pricing might impact conventional plastics while favouring bioplastics.

Market Growth Potential: The EU’s trade and industrial policies could foster greater demand for bioplastics in packaging, agriculture, and manufacturing.

It shouldn’t be forgotten that this is only a non-legislative Communication with no tangible outcome for now. Nevertheless, the Clean Industrial Deal will provide hooks in the future to advocate for the biomanufacturing sector in the framework of legislative instruments rolling out of the Clean Industrial Deal (such as for example the Circular Economy Act).

In this sense the announcement marks a real step-change in support for biobased materials. Possibly this is the first time such an evident statement of support has been made in a major European policy statement. Whilst those active in certain bioeconomy sectors, using biotechnologies to develop new materials and processes, will continue to lament the lack of market pull and incentives to scale up, the Clean Industrial Deal shows that at last the European policy makers have understood the size of the challenge and potential industrial opportunity. This offers hope to industrial and agricultural actors in the bioeconomy sector.



First Omnibus simplification package

Also on February 26th, 2025, the European Commission adopted new proposals to cut red tape and simplify EU rules for citizens and business¹⁰. The first two so-called Omnibus Packages of simplification measures aim to achieve this. The measures focus on the sustainability reporting obligations on the largest companies which are more likely to have the biggest impacts on people and the environment, and make sure they do not burden smaller companies.

The Omnibus Package proposes various amendments to the Corporate Sustainability Reporting Directive (CSRD), the Corporate Sustainability Due Diligence Directive (CSDDD), the EU Taxonomy and the Carbon Border Adjustment Mechanism (CBAM).

On 3 April 2025, the European Parliament voted in favour of the “Stop the Clock” Directive (COM/2025/80) postponing the commencement – but not the substantive content – of Corporate Sustainability Reporting Directive (CSRD) for companies due to come within its scope in 2025 and 2026 and extending the transposition deadline of the Corporate Sustainability Due Diligence Directive (CSDDD).

On 14 April 2025, the Council broadly shared the Polish presidency’s sense of urgency and, in that view, supported the Commission’s proposal to postpone:

by **two years** the entry into application of the Corporate Sustainability Reporting Directive (CSRD) requirements for large companies that have not yet started reporting, as well as listed SMEs,

and

by **one year** the transposition deadline and the first phase of the application (covering the largest companies) of the Corporate Sustainability Due Diligence Directive (CSDDD).

Consequently, on April 16th, 2025, the EU Parliament and the Council of the EU adopted the first “Stop the Clock” Omnibus (Directive) in the EU Official Journal. This adopted first Omnibus merely adjusts the timeline for the application of the CSRD with two years (with the second wave now set for 2028 over the 2027 financial year) and postpones the

¹⁰ https://commission.europa.eu/news/commission-proposes-cut-red-tape-and-simplify-business-environment-2025-02-26_en

transposition deadline of the CSDDD with one year (from July 26th, 2026 to July 26th, 2027).

The Omnibus Package has been met with concerns from various civil society actors and NGOs (including, for instance, the European Coalition for Corporate Justice, a coalition of more than 480 NGOs, trade unions and academic institutions throughout Europe) that the proposed reforms go too far in reducing companies' obligations and stymie efforts to meaningfully address issues relating to the environment, climate change and human rights.

Whilst this policy responds to the concerns of corporations over their reporting obligations, the policy has less significance for most bioeconomy actors in that the scale of most companies is still too small to require such a level of reporting.

Second Omnibus Simplification Package

As part of the second Omnibus Simplification Package, the Commission proposes increasing the InvestEU financial guarantee by €2.5 billion, bringing the total guarantee to €28.7 billion. This enhancement is expected to mobilize at least €50 billion in additional public and private investments – fuelling clean technology, industrial competitiveness, digital transformation, and SME growth.

Main expected outcomes:

More Firepower for Investments: The additional €2.5 billion guarantee will unlock new financing opportunities, particularly for high-risk, high-impact projects aligned with EU priorities.

Better Synergies Between Investment Programs: InvestEU resources will now be combined with other EU financial instruments —such as the European Fund for Strategic Investments (EFSI), Connecting Europe Facility (CEF), InnovFin, and the programme for the Competitiveness of Enterprises and Small and Medium-sized Enterprises (SMEs) known as COSME—ensuring more efficient allocation and impact.

Simplified Reporting & Reduced Administrative Burden: A major focus of the Omnibus Simplification Package is cutting red tape. SMEs with turnovers below €100,000 will benefit from lighter reporting obligations, and publication requirements for funding recipients will apply only to grants exceeding €1 million. These measures alone are expected to save businesses €200 million per year.

Stronger Support for Member States: Countries will now have more flexibility in using EU funds, including the option to contribute directly to financial instruments under InvestEU, expanding the impact of national and EU-level financing.

On April 23rd, the European Parliament BUDG and ECON Committees held a public hearing on InvestEU as they are working on their draft report on the simplification of the InvestEU Programme Regulation.

According to the European Investment Bank (EIB) InvestEU is a decisive tool in meeting the EU's objectives on climate and environment. As the EU climate bank, it has the expertise and financial tools to significantly contribute to the targets for climate and environment. Over 81% of EIB Group financing supports climate objectives and, for the sustainable infrastructure window, over 92% supports climate and environment. The Omnibus will reduce red tape and improve time to market, which is very important, particularly in the SME sector. This includes reducing the scope of data points to be provided, notably for SMEs, cutting the overall reporting burden as well as other administrative simplification.

The next step is for the Council to further scrutinize and formally adopt its position on the second Omnibus proposal, however no date has yet been fixed for the formal adoption of the Council's position. In parallel, the European Parliament is also currently examining the proposal and working on its position. According to the current timetable, a first draft of the Parliament's position is expected to be published in June and adopted by the Parliament in October 2025. After both institutions have finalised their positions, the so-called "trilogue" informal negotiations between the EU co-legislators will commence, with end of 2025 as the earliest possible adoption date.

This move from the Commission and Europarliament is of interest to many smaller companies in the bioeconomy sector, especially those seeking to access European grants and finance.

Public Consultation on the revision of the EU Bioeconomy Strategy

Following the publication of the Clean Industrial Deal, the public consultation¹¹ launched on March 31st, 2025 on the upcoming EU Bioeconomy strategy marks a significant step forward in harnessing the opportunities of the bioeconomy to support European businesses and drive progress towards the EU's environmental, climate and competitiveness objectives.

¹¹ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14555-Towards-a-circular-regenerative-and-competitive-bioeconomy_en

The new Bioeconomy Strategy, due for adoption by the end of 2025, aims to advance innovation and maintain the EU's leadership in the bioeconomy. It will propose actions to unlock the potential of bioeconomy innovations, so that they can reach the market, generating green jobs and growth. The strategy will also focus on reinforcing circularity and sustainability, while contributing to the decarbonisation of the EU economy. It will set the framework conditions to enable bioeconomy startups, entrepreneurs and new business models to thrive.

All stakeholders are encouraged to participate in the online consultation using the Have Your Say portal. The feedback period is open for 12 weeks until June 23rd.

As the first BRILIAN policy paper illustrated, there are many roadblocks to developing new businesses in the bioeconomy sector, where the use of biological feedstocks to produce materials and chemicals struggles to find a marketplace. We outline again in this paper below what those roadblocks are for the most relevant policies and the consultation gives all BRILIAN partners, as well as like minded entities, the opportunity to share their views and vision for the future bioeconomy in Europe.

In this context the policies laid out in the first policy bulletin of September 2024 will mostly now feed into the consultation on the Bioeconomy Strategy.

These were:

- 1) Building the future with nature: Boosting Biotechnology and Biomanufacturing in the EU- COM(2024) 137 of March 2024

As was pointed out in the first BRILIAN policy bulletin, there is still a lack of a comprehensive regulatory policy approach. Coherent, clear, and consistent policy tools are needed to create a long-term pull and leverage for biobased products. The current policies and legislative frameworks support bioenergy, but not biobased materials and products (*see below on the Biomass Strategy*). For example, the BIP¹² target of 35bm³ of biomethane by 2030 is a clear target with consequential policies, investments and incentives. Such a target for biobased products is missing.

¹² <https://bip-europe.eu/>

The EU should implement the principle of cascading use of all sources of biomass if it is certified as sustainable, fixing a “prioritisation” for the use of biomass and balance between bioenergy and biobased products. The incentives should account for the benefits that building biorefineries can bring to rural areas, as well as their capability to valorise side streams from agricultural and forestry biomass.

An actionable EU Bioeconomy Strategy, supporting a strong industrial base for biobased products, should be among the most important policy elements of the upcoming initiative on biomanufacturing to continue the path of a just and equitable ecological transition.

2) Strategy on Use of Biomass

Within the context of the Bioeconomy Strategy consultation it will be necessary again to raise the issue of biomass usage and the need, perhaps, for a separate biomass strategy, as outlined in the first policy bulletin. As was illustrated there, according to the Commission biomass burning provides some 60% of EU’s renewable energy resources, an astonishing amount¹³ because in the debate about renewable energy it tends to go unnoticed – the focus is always on wind and solar or even nuclear power. Wood is the most important single source of energy from renewables in many Member States. Latvia (29%), Finland (24%), Sweden (20%), Lithuania (17%) and Denmark (15%) had the largest share of wood and wood products in gross inland consumption of energy (Eurostat 2018). Biomass burning is often heavily subsidised by the taxpayer, an amount estimated in 2022 to be €7bn a year¹⁴; in 2022 the European institutions agreed to reduce the subsidies to zero by 2030 where the burning of whole trees is concerned but there are few signs of progress to date.

Yet as was pointed out in the first policy bulleting, no incentives are available to using biomass or biomass waste to produce innovative materials.

¹³<https://op.europa.eu/en/publication-detail/-/publication/7931acc2-1ec5-11e9-8d04-01aa75ed71a1/language-en/format-PDF/source-228478685>

¹⁴ <https://www.landclimate.org/the-problem-of-bioenergy-in-the-eu/>



4. CURRENT LEGISLATIVE FRAMEWORK

In this section of the first policy bulletin the report looked at individual pieces of European legislation that have been (or were being) adopted and how they impact the development of the Bioeconomy, in the context of using bio-based feedstocks for material production.

In this second edition of the policy bulletin, a review of the state of the art of those pieces of legislation will be made, discussing only those most relevant to the Bioeconomy for which there are updates relative to September 2024.

a) Packaging and Packaging Waste Regulation

The final version of the regulation was published on April 24th of 2024¹⁵ and the regulation entered into force on February 11th 2025. There are no changes to the analysis of the legislation as outlined in the first policy bulletin.

b) Waste Framework Directive (food waste)¹⁶

The targeted revision of the WFD (from its current text dating from 2018) has been finally agreed on March 10th 2025 and will enter into force sometime later this year. As a Directive, member states will have to transcribe the legislation into national laws for the new revision to be effective across the EU-27.

As was illustrated in the first policy bulletin, text impacts the bioeconomy only relatively, in the sense that it focuses upon two main areas: textiles and food waste.

With the amended Waste Framework Directive, each Member State will set up its own Extended Producer Responsibility (EPR) scheme for textile and footwear products. Under such schemes, textile producers will contribute to the management of used and waste textiles. By being responsible for the end of lifetime of the products they sell, producers will be encouraged to design longer-lasting textile products that are easier to be reused, repaired and to recycle. This contribution will also foster investment in separate collection, sorting, reuse and recycling capacities. **This will help contribute to the creation of a circular economy for textiles.**

¹⁵ https://www.europarl.europa.eu/doceo/document/TA-9-2024-0318_EN.html

¹⁶ [ENVIRONMENT - Targeted revision of the Waste Framework Directive](#)



The new rules tackle illegal textile waste exports. By clearly defining what constitutes “waste” versus “reusable” textiles, sorting will take place before used textiles are shipped. This measure complements the new, which ensures textile waste is only exported when it can be managed in an environmentally sustainable manner.

The second pillar of the WFD is food waste, a critical component of the bioeconomy both in terms of impacts from food waste and as a feedstock for bioeconomy industries (bioenergy, composting, chemicals).

The agreement addresses food waste, demonstrating Member States' commitment to fight food waste along production and supply chains, including households. The Directive will accelerate the EU's ambition to achieving the Sustainable Development Goal target 12.3 to halve per capita global food waste and reduce food losses along production and supply chains by 2030. To bolster this work, Member States shall reduce, by 2030, food waste by 10% in processing and manufacturing. They should also reduce food waste by 30% (*per capita*) jointly at retail and consumption, which includes restaurants, food services and households.

The Commission will support Member States in achieving the targets by sharing best practices and learning through the EU Platform on Food Losses and Food Waste. It will also finance research and provide action grants.

No targets were adopted nor were any methodologies adopted on the separate collection of food waste, despite prior advocacy from various stakeholders, including EBB. Without collection targets, the EU will have a food waste reduction target and a food waste collection obligation, but without targets, making it meaningless.

Nevertheless, for the rural bioeconomy the implication of the food waste reduction target may mean less by-products and less food waste produced along the supply chain; at the same time, it might mean less feedstocks for certain industries such as biogas, composting, animal feeds, chemicals.

Industries which use food waste or food industry by-products are advised to review organic waste feedstock planning taking this reduction into account over the years.

The Directive makes no attempt to clarify the issues around end of waste criteria for food waste. This is a question which directly relates to bioeconomy industries – **when is a material a waste, a by-product, or a product?** The answer determines in part which materials can be used by certain industries – if a material is a waste, it cannot be used in certain applications due to laws determining waste management; if the same material



is a by-product, it can be freely used as it no longer has waste status. **Clarity on this is missing.**

Further the Directive makes no attempt to classify biobased and biodegradable materials that do not have specific waste (CER) codes. This creates difficulty in identifying them for statistical terms but also in authorisations required by waste plants to treat them. This is a gap in legislation worth highlighting.

c) Renewable Energy Directive II¹⁷

There are no further developments or legislative changes to note since the first policy bulletin.

d) Soil Monitoring Law

A new legislative proposal in July 2023 was made by the Commission to create a soil policy¹⁸. It failed to pass through the legislative process before the elections in June 2024. At the present time of writing there is no news as to whether a specific legislative proposal will be put forward in this next period.

e) Nature Restoration Law

Following a final vote in June 2024 at the Environmental Council, the EU adopted its new European Restoration Regulation¹⁹ and it came into effect on August 18th 2024.

The text below relating to this legislation is from the first policy bulletin but is repeated here for the relevance this has to bioeconomy actors, especially farmers.

The law will be the first to set legally binding restoration targets for the long-term recovery of nature in Europe. Its overarching objective is to restore 20% of EU's degraded ecosystems by 2030 and all by 2050, also adding time-bound targets for specific ecosystems, biodiversity, habitats, and species.

¹⁷ https://energy.ec.europa.eu/topics/renewable-energy/renewable-energy-directive-targets-and-rules/renewable-energy-directive_en

¹⁸ [Soil health - European Commission](#)

¹⁹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1991&qid=1722240349976>

The EU Nature Restoration Law (NRL) builds upon current EU environmental policies, including the Birds and Habitats Directives, and actively encourages synergies with EU climate policies. Restoring our nature will also contribute to the EU's climate commitments, enhance food security, promote ecosystem services, and meet the Union's international commitments.

It aims to restore 30% of terrestrial, coastal, freshwater, and marine ecosystems to good condition by 2030. In forest and agricultural areas, Member States are required to put in place restoration measures to enhance several biodiversity indicators, and to restore and partially rewet 30% of drained agricultural peatlands, rewetting at least a quarter, by 2030. The EU NRL also includes targets an obligation to improve urban green spaces, contribute to free-flowing rivers by removing artificial barriers, increase pollinator populations and contribute to the target of 3 billion additional trees throughout the EU.

Finally, **the law lays out specific targets for agricultural areas**. These include, on the one side, goals to increase the population of grassland butterflies, farmland birds or the stock of organic carbon in cropland mineral soils. On the other side, the law also envisages increasing the share of agricultural land with high-diversity landscape features and restoring drained peatlands for agricultural use. Restoring natural habitats is essential to safeguard ecosystems' capacity to store and sequester carbon while reducing land-based emissions, and to enhance resilience to floods, droughts, extreme heat and erosion.

The Regulation foresees the need for Member States to prepare Nature Restoration Plans, which will outline how Member States plan to deliver on the targets of obligations, taking their national context into account. While drafting these Nature Restoration Plans, Member States also need to consider socio-economic impacts and benefits and estimate the financial needs for its implementation. Indeed, the NRL will also provide benefits and opportunities for landowners and managers who implement restoration measures, offering a framework to support their efforts and compensate them financially²⁰.

²⁰ For more details see here [The EU #NatureRestoration Law](#)



f) Carbon farming

The European regulation 2024/3012 on carbon removals, carbon storage and carbon certification, known as CRCF, came into force in December 2024. A full appraisal of the new regulation can be found here [Carbon Removals and Carbon Farming - European Commission](#) and the analysis which was laid out in the first BRILIAN policy bulletin requires no revision here.

The law sets out to create the first EU-wide **voluntary** framework for certifying carbon removals, carbon farming and carbon storage in products across Europe. By establishing EU quality criteria and laying down monitoring and reporting processes, the CRCF Regulation will facilitate investment in innovative carbon removal technologies, as well as sustainable carbon farming solutions, while addressing greenwashing.

g) Green Claims

Another landmark piece of legislation approved by the European Parliament regards the use of claims on products sold into the EU. The legislation attempts to frame what is and what is not acceptable as a “green” claims in order to avoid greenwashing.

Following the June 2024 elections a final text has yet to be published and enter into law as a Directive. The analysis in the first BRILIAN policy bulletin will require updating once the final Directive is published.

h) Urban Wastewater Treatment Directive- relation to the rural economy

The updating of the 1991 Directive on wastewater (eg. sewage) treatment was long overdue and a proposal was launched after lengthy consultation in 2022. **Whilst 90% of wastewater is treated effectively in line with the 1991 Directive, still 10 million Europeans have no wastewater treatment, especially in rural areas.**

The revised Directive 2024/3019 entered into law on January 1st 2025²¹. Member States will now have to transcribe the Directive into national law to implement its rules.

The essential ingredients of the law are to

²¹ [Directive - EU - 2024/3019 - EN - EUR-Lex](#)

Improve water quality through **stricter water treatment** and the inclusion of new pollutants;

Strengthen the EU's **polluter-pays principle** by ensuring that those responsible for pollution bear the costs of remediating it;

Advance circularity through water reuse and the recovery of valuable resources from wastewater;

Address climate change through GHG emission reduction of treatment plants and urban adaptation to heavy rainfall;

Ensure **access to sanitation** for all, particularly the most vulnerable and marginalised.

The analysis provided in the first BRILIAN policy bulletin remains valid.

5. OPEN CONSULTATIONS

Finally, we look at any open consultations which may impact the rural bioeconomy.

At present there is one consultation of relevance:

[Consultation on the European Bioeconomy Strategy.](#)

This initiative aims to offer solutions for a circular and climate neutral economy, boosting the EU's prosperity and competitiveness within planetary boundaries. It will help citizens, regions and key economic sectors (including agriculture, forestry, fisheries, biomanufacturing and biotechnologies industries and services) make the best and most sustainable use of biomass. This will keep material and products in the economy for as long as possible, reconciling planet, people and prosperity.

The call for evidence and public consultation will ensure that the Commission takes into account the perspectives of stakeholders, especially young people, SMEs (including start-ups), non-governmental organisations, trade unions, and primary producers. To this effect, the Commission will transparently gather their views, arguments and underlying information and analysis on the bioeconomy and the future EU bioeconomy strategy, in particular on the questions in the section 'Problem the initiative aims to tackle'.

The feedback period is **open for 12 weeks until June 23rd, 2025.**

As part of BRILIAN's ongoing commitment to advancing policy dialogues, the BRILIAN partners will be meeting in Brussels on **June 5th, 2025 in their second policy workshop.** The workshop will focus on the upcoming Bioeconomy Strategy, coinciding with the ongoing public consultation. This timing presents a crucial opportunity to discuss the Strategy's objectives, exchange insights with policymakers, and influence the shaping of bioeconomy-related policy ambitions.

The event was strategically scheduled during EU Green Week. This timely conference offers a platform to discuss the policies and transformations needed to reduce reliance on fossil-based materials, in light of recent EU policy developments. The event will bring together a diverse array of stakeholders from across the bioeconomy value chain. A high level panel of speakers has been invited to present their views on what the future bioeconomy strategy should look like and to debate with BRILIAN partners how these legislative strategies could impact rural economies and the research in course.

The programme for the event can be found on [Eventbrite](#).

6. CONCLUSIONS

From June to December 2024 European policy development in issues which regard the bioeconomy came to a halt as the Commission went through the process of establishing a new Commission.

Once this began work, a series of important policy statements have been made with generally favourable scenarios for the bioeconomy. The launching of the Bioeconomy Strategy consultation is a signal that this is a sector of the European economy which the Commission believes can contribute to sustainable growth and that is worth investing in. As such, practitioners of bioeconomy activities should welcome this progress in the hope that the Commission has listened to, and read, policy proposals sent to them by organisations such as Biobased Industries Consortium, the European Bioeconomy Alliance, the EBB, partners of the BRILIAN project and many, many others. This second policy bulletin intends to give a contribution to this debate on the future of the European economy.

It is worth remembering that the European Bioeconomy Strategy does not exist in a vacuum. There are national bioeconomy strategies in several countries that have existed and are being implemented or are being elaborated now, and which will help influence overall policy at a European level.

These national strategies exist in Austria, Estonia, France, Germany, Ireland, Italy, Latvia, The Netherlands, Portugal, Spain and Sweden.²²

The von der Leyen II Commission has established regulatory and administrative simplification as a cornerstone of its approach, pushing implementation considerations earlier in the policymaking cycle and making stakeholder consultation central to policy development. The "Competitiveness Compass" represents the Commission's response to the Draghi report, which highlighted how the EU has lost competitiveness with the USA and Asia. This economic framework aims to simplify legislation, pool investments in key technologies, and mitigate foreign dependencies to unleash EU innovation, with up to 47 proposals planned by the end of 2026.

²² [Bioeconomy strategies - World Bioeconomy Association](#)

The "Vision for Agriculture and Food" addresses the paradox of the agricultural sector, which despite absorbing approximately 31% of the EU budget (€386.6 billion out of €1.21 trillion for 2021-2027), fails to ensure adequate income levels for farmers. This ambitious roadmap includes reviewing unfair trading practices, proposing a fairer CAP, enhancing the EU Agri-food Chain Observatory, and developing a Bioeconomy Strategy.

The "Clean Industrial Deal" marks a significant step-change in support for bio-based materials, perhaps the first time such clear support has been expressed in a major European policy statement. The Deal includes measures for affordable energy, boosting demand for clean products, financing the transition (€100 billion to support clean manufacturing), promoting circularity, diversifying global trade chains, and addressing skills shortages.

The First and Second Omnibus simplification packages aim to cut red tape and simplify EU rules for citizens and businesses. The first package adjusts the timeline for the application of sustainability reporting directives, while the second increases the InvestEU financial guarantee by €2.5 billion to mobilize at least €50 billion in additional investments, particularly benefiting smaller companies in the bioeconomy sector.

Despite these positive developments, a comprehensive regulatory policy approach for the bioeconomy is still lacking. While clear incentives and targets exist for bioenergy, similar support mechanisms for bio-based materials and products are missing. Additionally, there is a contradiction in EU policies on biomass use: biomass combustion receives substantial subsidies, while comparable incentives for using biomass in innovative materials production are absent.

The public consultation on the revision of the EU Bioeconomy Strategy launched in March 2025 represents a significant opportunity for all stakeholders to address these gaps and share their vision for the future of the European bioeconomy.

7. ANNEX I - SUMMARY OF POLICY RECOMMENDATIONS

The following table summarizes the gaps, proposed solutions, and policy recommendations in the context of EU Bioeconomy policies identified until the date of submission of the present policy bulletin. The table will be updated together with the next versions of the report, and will help to contribute to the KPIs & Impact questionnaire prepared every beginning of the year for the CBE-JU.

Name of Regulation/ Directive/ Strategy	Problems/ Gaps identified	Proposed solution	EC Public Consultations or other ways of transferring the problem to policy makers	Any positive or negative evolution in addressing the problem since reported to policy makers?
Common Agricultural Policy (CAP)	The CAP imposes significant ecological and management burdens on farmers, which can be difficult to meet without sufficient support. There is also criticism of the lack of perceived benefits despite substantial financial support.	As mentioned above, the report on the Strategic Review of Future of EU Agriculture delivered on September 4 th 2024 to the President of the Commission by an independent panel involving associations, industry and NGOs made 14 recommendations to	Review issued 4 th September 2024 addresses many of the issues signalled.	Many changes are recommended to the CAP by the review. Several of those 14 (6) are relevant to the bioeconomy. The CAP revision will begin towards the end of 2025 so that the new programme can be implemented from 2027.

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Name of Regulation/ Directive/ Strategy	Problems/ Gaps identified	Proposed solution	EC Public Consultations or other ways of transferring the problem to policy makers	Any positive or negative evolution in addressing the problem since reported to policy makers?
		change the CAP when it comes for renegotiation before implementation in 2027.		
Biotech and Biomanufacturing Roadmap	There is a lack of market pull and slow regulatory processes that hinder the upscaling and commercialization of biotech innovations. The current framework does not provide immediate incentives for investors.	Streamline the regulatory framework, work towards an EU Biotech Act, and create a Biotech Hub to simplify commercialization processes and overcome market barriers.	Not open: Roadmap announced on March 20 th , 2024, following consultations with stakeholders including BIC and 16 other organizations.	The roadmap provides a pathway for development, but the impact will be long-term and the immediate effects on market dynamics are limited. It will likely be incorporated into the Bioeconomy Strategy

Name of Regulation/ Directive/ Strategy	Problems/ Gaps identified	Proposed solution	EC Public Consultations or other ways of transferring the problem to policy makers	Any positive or negative evolution in addressing the problem since reported to policy makers?
Bioeconomy Strategy	The 2018 Bioeconomy Strategy is outdated and lacks a comprehensive regulatory policy approach that effectively supports biobased materials and products. There is a clear absence of targets and incentives for biobased product development.	Implement an updated Bioeconomy Strategy with clear targets for biobased products, harmonize regulations, and support research and development to stimulate market opportunities.	The revision of the strategy is planned for end 2025, with opportunities for stakeholders, including BRILIAN partners, to provide input.	Pending; the revision process is ongoing, with a potential for stronger support mechanisms in the new strategy. The consultation has been opened and by June 23 rd 2025 all parties should lodge their views.
Nature Restoration Law	The law faces challenges in implementation, particularly regarding the restoration of peatlands and agricultural areas.	Develop detailed Nature Restoration Plans for member states, including financial support for landowners and managers implementing restoration measures.	The Law was voted in June 2024 and entered into force in August 2024.	Positive steps with the adoption of the law, but challenges in execution remain.

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Name of Regulation/ Directive/ Strategy	Problems/ Gaps identified	Proposed solution	EC Public Consultations or other ways of transferring the problem to policy makers	Any positive or negative evolution in addressing the problem since reported to policy makers?
Carbon Farming (CRCF)	The voluntary nature of the carbon farming certification framework may limit its impact, and full implementation is years away	Encourage early adoption of carbon farming practices and explore new business models that could be supported by the framework.	Adopted into law January 1 st 2025	The framework is still in its early stages, with potential for long-term positive impact.

ANNEX 2 – REFERENCES

- [1] **European Commission.** College of Commissioners. [Link.](#)
- [2] **Zero Waste Europe.** Bio-waste generation in the EU: Current capture levels and future potential – Second edition. [Link.](#)
- [3] **European Commission.** Commission Work Programme 2025. [Link.](#)
- [4] **European Commission.** Press release - January 29, 2025: "An EU Compass to regain competitiveness and secure sustainable prosperity." [Link.](#)
- [5] **European Commission.** The Draghi Report on EU Competitiveness. [Link.](#)
- [6] **European Parliament.** Financing of the CAP: Facts and Figures. Fact Sheets on the European Union. [Link.](#)
- [7] **Eurostat.** Farmers and the agricultural labour force - statistics. Statistics Explained. [Link.](#)
- [8] **European Commission.** Strategic dialogue on the future of EU agriculture. [Link.](#)
- [9] **European Commission.** Statement - February 26, 2025: Remarks by Executive Vice-Presidents Ribera and Séjourné and Commissioner Hoekstra at the press conference on the Clean Industrial Deal. [Link.](#)
- [10] **European Commission.** News article – February 26, 2025: Commission proposes to cut red tape and simplify business environment. [Link.](#)
- [11] **European Commission.** Have your say - Public Consultations - Towards a circular, regenerative and competitive bioeconomy. [Link.](#)
- [12] **BIP Europe.** [Link.](#)
- [13] **European Commission.** Brief on biomass for energy in the European Union. [Link.](#)
- [14] **European Environment Agency.** The scientific case against burning forest biomass for energy. [Link.](#)

- [15] **European Commission.** Packaging and packaging waste. [Link.](#)
- [16] **European Commission.** ENVIRONMENT - Targeted revision of the Waste Framework Directive. [Link.](#)
- [17] **European Commission.** Renewable Energy Directive. [Link.](#)
- [18] **European Commission.** Soil health. [Link.](#)
- [19] **European Commission.** Nature Restoration Regulation. [Link.](#)
- [20] **European Commission.** The EU #NatureRestoration Law. [Link.](#)
- [21] **European Union.** Directive - EU - 2024/3019 - EN - EUR-Lex. [Link.](#)
- [22] [Bioeconomy strategies - World Bioeconomy Association](#)