

Comments on House Bill Nos. 315, 2479, and 4142 (Circular Economy Act: Providing for a Framework for Circular Economy to Promote Sustainable Production and Consumption, and National Economic Security)

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The state's desire to promote economic transformation and sustainable development via the circular economy (CE) model is very much welcome. The Philippines continues to face a mounting waste management crisis driven by rapid urbanization and population growth, unsustainable production and consumption practices, and other development-related issues. House Bills 315, 2479, 4142 espouse a progressive approach that fosters circularity, decarbonization, resource use efficiency, waste and pollution minimization, behavior modification, and ecological footprint reduction. Below are some comments on the House Bills:

- 1)** The country needs a Philippine-specific CE model and definition, grounded on the production-consumption-waste management continuum within domestic commodity systems and value chains. By situating CE within a localized framework, the model becomes both actionable and contextually relevant, offering a pathway for inclusive and sustainable implementation. It will also help inform appropriate behavior of Filipinos and guide practices from sustainable production and consumption to material recovery, reuse, and recycling. The adoption of a localized framing and definition of CE will recognize a Philippine-appropriate concept of circularity and CE highlighting relevance to local economies, industries and households. Global models and definition of CE provide important reference points, but they do not fully capture the unique socio-economic, cultural and institutional conditions of the Philippines. The same definitions do not provide the needed tangibility and focus for proper policy framing and action plan formulation. The definition below is suggested:

“CE is an economic model that espouses a locally appropriate approach to optimal resource utilization within the production-consumption-waste management continuum of commodity systems and value chains, designed

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to minimize residual waste and sustain the longevity and usability of materials from production, consumption, recovery, reuse and recycling.”²

- 2) The drive towards CE in the Philippines is inherently complex, but it will also create opportunities toward addressing local sustainability challenges and global environmental commitments. By reducing resource wastes, promoting ecological integrity, and addressing multiple environmental issues, CE serves as a platform for sustainability and long-term resilience. The success of this transition also rests largely on broad-based collaboration toward shared responsibility, engaging all consumers and producers, including households and other waste generators. Central to this shift is the institution of coherent policy and locally-appropriate action; prioritization of resource use efficiency and greater circulation; institutional strengthening and resource provision; behavioral reorientation among producers and consumers; and clear targeting within commodity systems and value chains.
- 3) National and subnational, and sectoral and industry level action plans or CE pathways must be anchored on commodity systems and value chains to ensure tangibility in stakeholder accountability and input/output/outcome delivery. The crafting of local circular economy action plans by all provinces, cities and municipalities is needed, but these must be supported by circular industry and value chain plans to be prepared by NGAs (DA, DTI, DENR, DILG, DPWH, DOST, DepEd, CCC, PSA and DEPDev, among others) in collaboration with other government agencies, CSOs and industry stakeholders.
- 4) The CE policy and framework must consolidate fragmented initiatives into a nationally coherent strategy, supported by clear provisions, regulations and institutional mandates. This includes strengthening the grounding and enforcement of existing policies including the Ecological Solid Waste Management Act (RA 9003), the Extended Producers Responsibility Act (RA 11898), and Philippine Action Plan for Sustainable Consumption and Production (PAP4SCP), among others. Tangible action is required in the short term, while fostering public and private sector trust and participation via capacitated and empowered institutions and stakeholders.
- 5) Mainstreaming CE requires the commitment and participation of NGAs, LGUs and private sector stakeholders. The main weakness of the Ecological Solid Waste Management Act (RA 9003) was that LGUs were left to fend for themselves. The same mistake must not be repeated, albeit the key role LGUs play in the scheme of things cannot be contested.

² From the PIDS Policy Note titled, “Pushing for a Philippine-Appropriate Circular Economy Framework and Definition.”

- 6) The establishment of a circular economy implementation fund is necessary and should complement the abovementioned CE plans. Medium and long-term development and investment programs for CE must be developed, enjoining public and private sector investment on locally appropriate CE technologies, including state of the art CE/waste management infrastructure. Targets and milestones must be made tangible by estimating and appropriating the required investment.
- 7) The inclusion of enforcement mechanisms and detailed penalties, such as administrative sanctions and fines for violations strengthens deterrence against non-compliance and allows for stronger legal action. This will also facilitate the grounding of CE policy and aid in the performance of government oversight functions.