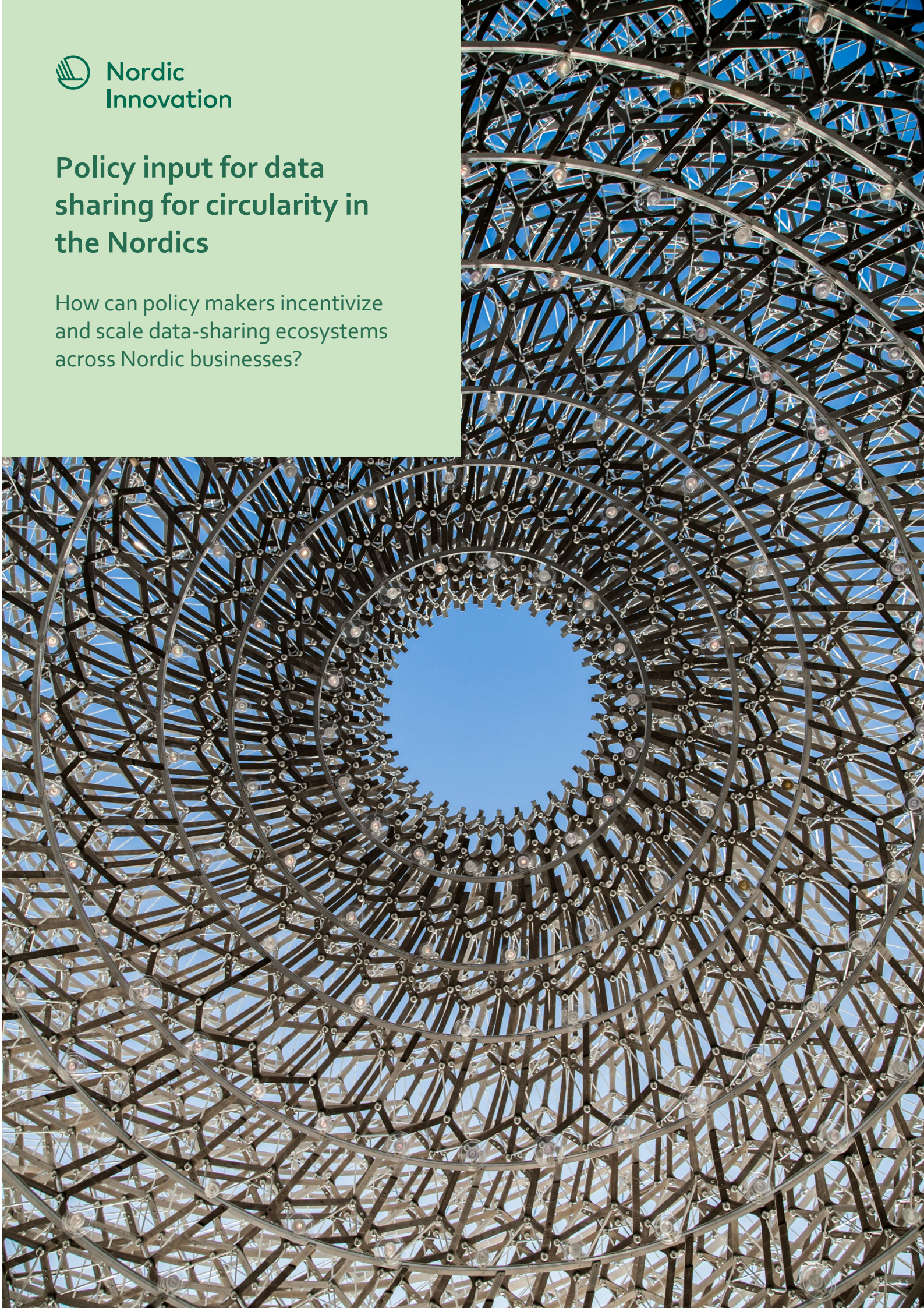


Policy input for data sharing for circularity in the Nordics

How can policy makers incentivize and scale data-sharing ecosystems across Nordic businesses?



Acknowledgements

Thank you to the program participants, Reference Group members, and subject matter advisors of the Nordic Circular Accelerator¹ for having shared their insights in the making of this report.

Disclaimer

This publication is an outcome of the program Nordic Circular Accelerator by Nordic Innovation. Accenture is responsible for summarizing its content.

The findings and recommendations are based on learnings and examples shared by Nordic companies participating in the Program. They represent various industries, company sizes, and levels of data sharing maturity. This report aims to depict the experiences of Nordic businesses setting up and scaling their data sharing practices, rather than providing a comprehensive context of data sharing for circularity. The policy input is based on company input shared during plenum discussions, an online survey, and input from subject matter advisors.

While the primary audience of this report is policy makers, some policy input addresses a broader group of public sector actors that can help Nordic companies to facilitate data sharing for circularity practices. Such may be public entities, business associations, knowledge partners (e.g., Nordic universities and science parks), and consumer organizations.

About Nordic Innovation

Nordic Innovation is an organization under the Nordic Council of Ministers. Nordic Innovation aims to make the Nordics a pioneering region for sustainable growth and works to promote entrepreneurship, innovation and competitiveness in Nordic businesses.

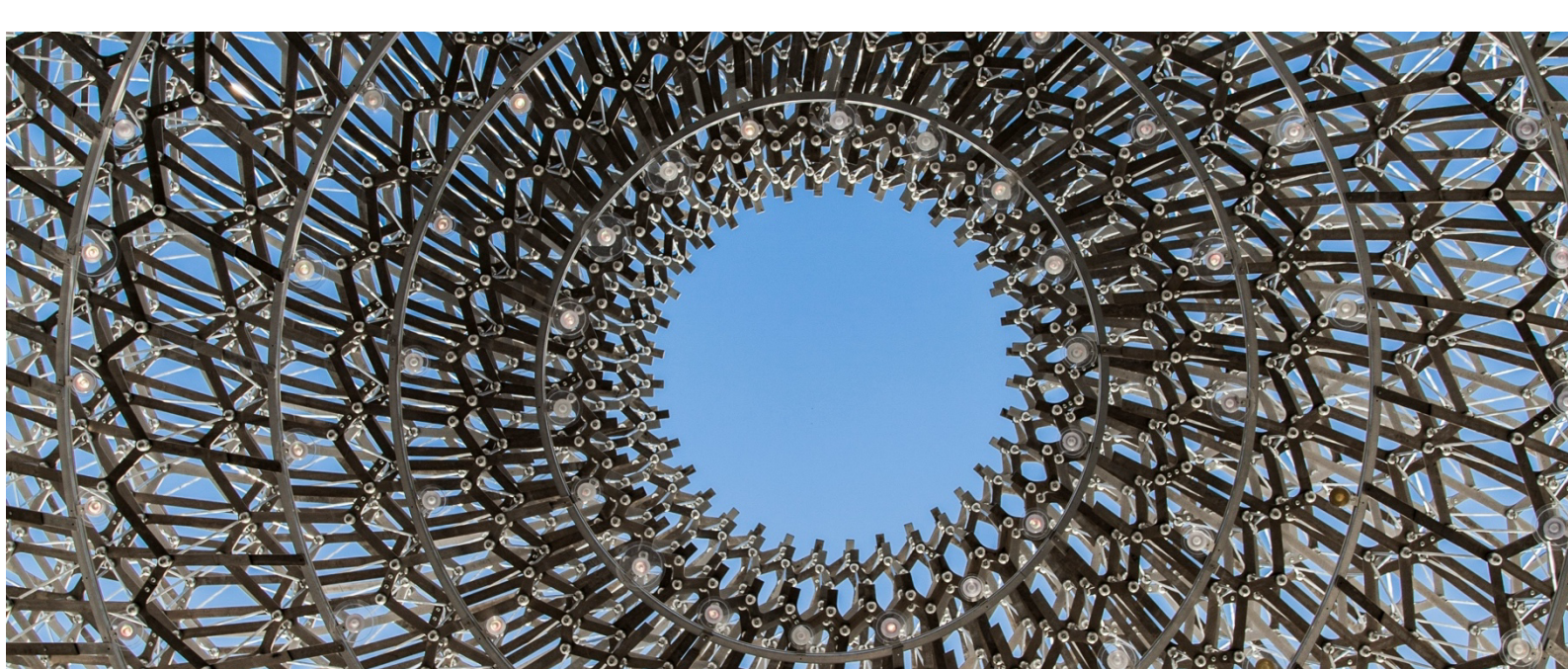
About Accenture

Accenture is a leading global professional services company, providing a broad range of services and solutions in strategy, consulting, digital, technology and operations. Combining experience and specialized skills across more than 40 industries and all business functions, underpinned by the world's largest delivery network, Accenture works at the intersection of business and technology to help clients shape the future of their organizations and create sustainable value for their stakeholders. Serving clients in more than 120 countries, Accenture drives innovation to improve the way the world works and lives. Through their sustainability services and strategy work, Accenture help businesses leverage sustainability as a competitive advantage for a new era of business.

¹ See full list of program participants, Reference Group members, and subject matter advisors in the Appendix

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Executive summary

The world's natural resources are under significant pressure – without strategies to reduce the amount of material being used and products being consumed, the UN has warned of ‘total societal collapse’². The circular economy offers a solution by using 70% of current materials, redefining waste as a resource³, and providing environmental and financial benefits, including unlocking up to \$140 billion in the Nordics alone by 2030⁴.

To realize this potential, businesses need a deeper understanding of their value chains. This requires collaborative data efforts, as no single company can see the entire lifecycle of materials and products. While companies can optimize their operations individually, only systemic data sharing can scale circular solutions and realize their full value⁴.

Businesses across value chains – from Small and Medium-sized Enterprises (SMEs) to large corporations – face major roadblocks in sharing circular data. Companies struggle with unclear business incentives, complex, overlapping legislations, unclear compliance requirements, and inconsistent data standards. SMEs, in particular, lack the resources to meet new sustainability reporting demands, while global value chains require harmonization across regulations.

To overcome the barriers, the consulted companies and strategic advisors of the Nordic Circular Accelerator Program⁵ propose policy makers to address three strategic objectives – each with a subsets of concrete interventions that (1) incentivize and enable circular data sharing, (2) harmonize and scale the efforts, and (3) support and strengthen businesses throughout (see picture 1).

Picture 1: Suggested strategic objectives and interventions

INCENTIVIZE & ENABLE	HARMONIZE & SCALE	SUPPORT & STRENGTHEN
Reduce the entry barriers that prevent businesses, especially SMEs, from engaging in circular data sharing	Harmonize data-sharing practices to enable seamless and scalable data exchange across value chains	Provide support and tools needed for companies to share circular data and comply with circularity regulations
Introduce financial incentives, especially for SMEs, such as tax benefits, grants, and subsidies to support circular data sharing	Appoint standard-setting bodies to promote open and universal data-sharing frameworks, ensuring alignment with EU technical standards	Accelerate European work on data spaces and public testbeds to establish shared infrastructure and environments for testing data sharing
Educate companies on the instrumental role of data sharing in the transition to circular economy through position papers and awareness raising activities	Define core datasets and data frameworks that are publicly accessible, interoperable with private sector data-sharing efforts, and industry specific where needed	Develop handbooks to clarify circularity regulations (e.g., CSRD, ESPR, DPP), how they overlap and what minimum viable data points are needed for reporting
Define minimum compliance thresholds, allowing businesses to start with high-impact data-sharing efforts before scaling as capabilities improve	Harmonize sustainability metrics such as lifecycle assessments (LCA) and circularity rates, ensuring comparability across industries	Establish support mechanisms, such as digital tools, reporting templates, and Nordic knowledge sharing forums – especially targeting SMEs

² UNDP, (2023) What is circular economy and why does it matter?

³ Circle Economy, (2023) The Circularity Gap Report 2023

⁴ P. Lacy et al., (2020) The Circular Economy Handbook

⁵ See full list of program participants, Reference Group members, and subject matter advisors in the Appendix

Introduction to circular economy and data sharing

The circular economy

The world's natural resources are under increasing pressure⁶. The ways we extract, move and use raw materials are responsible for 70% of global greenhouse gas emissions and by 2050, material extraction and use are expected to double relative to 2015 levels. Without strategies to reduce the amount of material being used and products being consumed, the UN has warned of 'total societal collapse'⁷.

But this does not have to be this way. A circular economy can meet human needs using just 70% of the materials currently consumed⁸ – staying within the planet's safe environmental limits, while limiting global temperature rise and improving biodiversity. The circular economy is about turning inefficiencies in linear value chains into business value⁹. Unlike the traditional linear model – where products are produced, used, and discarded, the circular economy redefines waste as a valuable resource¹⁰.

In this model, products are designed to last longer and be repaired, upgraded, and reused whenever possible. When products cannot be reused, the waste can be recycled and used as raw materials in new production. This way, the same resources can be utilized multiple times and as little as possible is lost¹⁰. Beyond environmental benefits, the circular economy also drives financial value. If implemented at scale, it's estimated that up to \$140 billion could be unlocked in the Nordics alone by 2030¹⁰.

Data sharing for circularity

To realize this potential, businesses need a deeper understanding of their value chains. This requires collaboration on data, as no single company has full visibility across the lifecycle of materials, products, and impacts. While individual companies can optimize their own operations, only a more systemic approach, enabled by data sharing, can scale circular solutions and unlock their full value⁹.

By sharing data on material flows, product performance, and emissions, value chain partners can drive systemic progress together – enhancing resource efficiency, reducing operational waste, and enabling more responsible sourcing, production, use, and recovery.

In this context, data sharing means exchanging and using information across the product lifecycle – from sourcing to end-of-life. This includes *product data* such as material origin and composition, sourcing information, recyclability, or manufacturing information, as well as *product use and performance data* like maintenance records, usage patterns, and diagnostics and guidelines for repair or recycling.

The visual below (picture 1) illustrates how data sharing supports circularity across the entire value chain.

- Design & Sourcing – Sharing data on material origin, environmental impact, and supplier certifications enables smarter product design, better material choices, and improved sustainability performance
- Manufacturing & Distribution – Data on material composition, specifications, emissions, and logistics can be used to optimize production efficiency and packaging, while addressing inconsistencies across production sites.

⁶ Miljødirektoratet NO, (2023) Sirkulær økonomi

⁷ UNDP, (2023) What is circular economy and why does it matter?

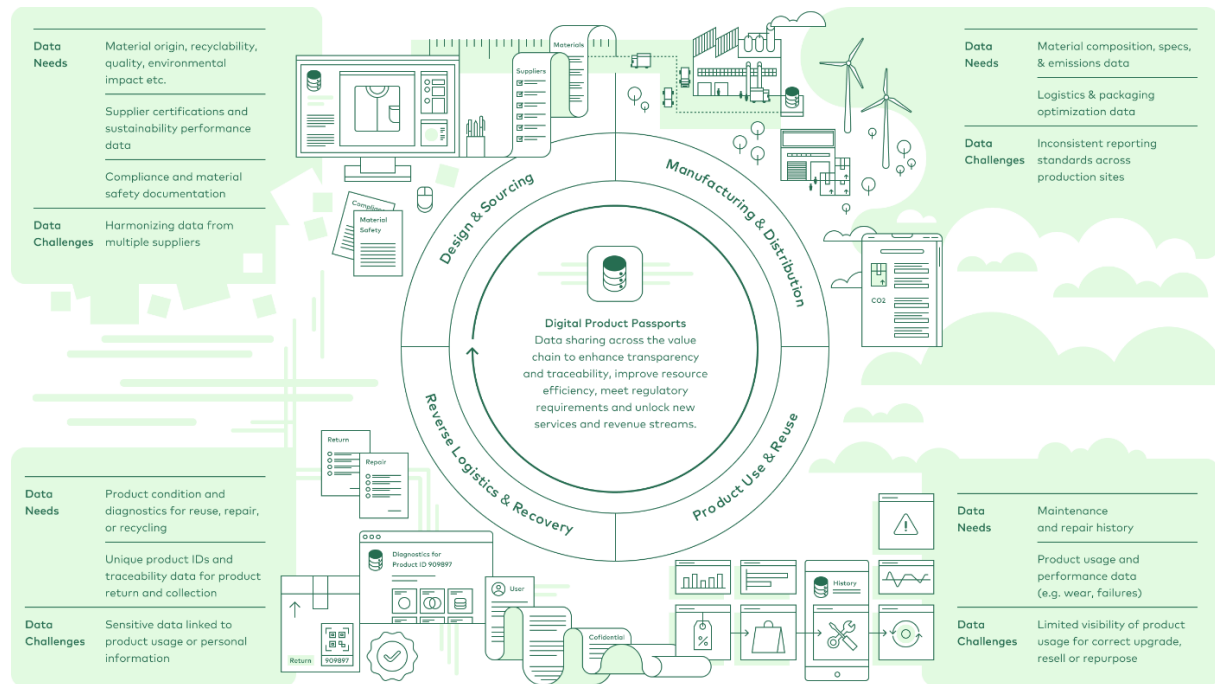
⁸ Circle Economy, (2023) The Circularity Gap Report 2023

⁹ Nordic Innovation, (2021) Nordic Circular Economy Playbook

¹⁰ P. Lacy et al., (2020) The Circular Economy Handbook

- **Product Use & Extension** – Use-phase data, including maintenance and performance history, supports product lifetime extension through repair, upgrades, and resale, as well as circular business models like Product-as-a-Service
- **Resource Efficiency & Recovery** – Data on product condition, diagnostics, and material composition helps recover value at end-of-life through reuse, remanufacturing, and recycling

Picture 2: Illustrative data needs and challenges across the circular value chain



However, the current maturity level of data sharing for circularity in the Nordics is low¹¹. Most data sharing is limited to internal operations or a few trusted value chain partners¹¹. Maturity is defined not only by the amount and type of data made available, but also by how it is shared, by whom and how it is ultimately used. To advance the circular economy and increase impact, it is necessary to transition towards large-scale data sharing, where product and performance data flow within multi-stakeholder ecosystems.

Digital tools such as IoT, AI, and Digital Product Passports are vital in enabling this shift – enhancing transparency, traceability, and circular decision-making. However, to unlock their full potential, companies must overcome challenges like unclear value propositions, lack of trust, fragmented standards, and regulatory uncertainty¹². Addressing these is key to unlocking the full potential of circular data strategies.

Current legislative landscape in the EU

The EU aims to transition from a linear to a circular economy through the Circular Economy Action Plan and create a single market for data through the European Data Strategy⁶. This shift is supported by legislation that dictates *what* circularity data to share and *how* to share data responsibly. Key regulations include but is not limited to the Corporate Sustainability Reporting Directive (CSRD), the Eco-design for Sustainable Products Regulation (ESPR) with the Digital Product Passport (DPP) initiative, and the EU Battery Regulation. For data

¹¹Nordic Innovation, (2021) Data Sharing for a Circular Economy in the Nordics

¹² DTU et al., (2025) Transition of the Danish Industry towards a Circular and Resilient Economy

sharing, relevant laws include but are not limited to the Data Governance Act and the Data Act¹³. See table 1 for a non-exhaustive overview of EU legislations relevant for circularity data sharing.

Table 1: Non-exhaustive overview of EU legislations relevant for circularity data sharing¹⁴

Legislation	Description	Timeline	Circular data sharing implications
Corporate Sustainability Reporting Directive (CSRD)	The CSRD is the most comprehensive EU legislation with reporting requirements for non-financial reporting. To comply with CSRD, companies must adhere to the European Sustainability Reporting Standards (ESRS).	From FY25, all EU large companies must report according to the CSRD. Stock-listed small and medium-sized enterprises (SMEs) should follow from FY26.	ESRS E5 is on <i>Resource Use and Circular Economy</i> , imposing reporting requirements on resource flows and circularity practices at a corporate level.
Eco-design for Sustainable Products Regulation (ESPR) incl. Digital Product Passport (DPP)	The aim of ESPR is to enhance product circularity and energy performance, and it is integrating with CSRD's ESRS E5 disclosure requirements. Where CSRD is relevant at the corporate level, ESPR poses requirements on product level.	The regulation entered into force in July 2024, and the European Commission is expected to define priority products in the first half of 2025.	The ESPR imposes requirements on product-related data sharing and introduces the <i>Digital Product Passport (DPP)</i> – a digital identity card for products, components, and materials, which will store relevant information to support products' sustainability, promote their circularity. The DPP will be the carrier of sustainability information at a product-level and to guide new standards e.g., requirements on lifecycle assessments (LCAs).
The Batteries Regulation	The regulation aims to make batteries sustainable throughout their entire life cycle – from the sourcing of materials to their collection, recycling, and repurposing.	The regulation entered into force in 2023, with declaration requirements expected on selected batteries from 2025, and mandatory battery passports expected from 2027.	Targeted specifically at batteries, the regulation imposes requirements on data sharing for selected electronic products and components.
Green Claims Directive (GDC)	The directive aims to ensure consumers receive reliable and comparable environmental information on products.	Implementation into national law is expected during FY25.	The directive is expected to require claims about climate impacts to be backed by LCAs and detailed product lifecycle information.
The Data Governance Act	The Data Governance Act, a key part of Europe's Data Strategy, aims to drive trust in data sharing, enhance data availability, and address technical barriers to data reuse.	The Data Governance Act entered into force in 2022 and has been applicable since September 2023.	A key provision of the act is to enable the reuse of data between organisations through commercial services (e.g., data intermediation services) or non-commercial services (e.g., data altruism). It established the European Data Innovation Board (EDIB) to develop best practices and standards for European data sharing.
The Data Act	The Data Act seeks to enhance EU's data economy and foster a competitive data market. It clarifies <i>who</i> can use <i>what</i> data and under <i>which</i> conditions.	The Data Act entered into force on in January 2024 and will become applicable in September 2025.	The act aims to introduce measures for data related to smart/connected products, ease transitions between data processors (e.g., cloud services), and establish harmonised rules for data documentation in data spaces.

¹³ Public entity directives like the Open Data Directive are excluded from this report as it focuses on enabling private company data sharing

¹⁴ Sources: Internal Accenture perspectives; European Commission, Ecodesign for Sustainable Products Regulation; European Commission, Corporate Sustainability Reporting; European Commission (2023), Circular economy: New law on more sustainable, circular and safe batteries enters into force; European Commission, Green Claims; European Commission, Data Governance Act; European Commission, Data Act Explained

The role of policy makers and other enablers in promoting data sharing ecosystems

Policy makers play a crucial role in creating enabling legislation, deploying data spaces, and mobilize funding to incentivize and scale data-sharing ecosystems for circular economy practices¹⁵. Yet, the policy landscape presents an unexploited potential as an enabler¹⁶. Through regulatory, financial, and technical initiatives policy makers can help companies overcome the perceived barriers and create the right conditions for efficient data sharing. By shaping a supportive policy framework, investing in digital infrastructure, and collaborating closely with companies, policy makers enable the scaling of data-sharing initiatives⁹.

Policy makers and enablers involved in circularity data sharing include, but are not limited to:

- **EU regulators** e.g., European Commission, DG Environment, DG GROW, DG CONNECT
- **Nordic national regulators** e.g., Ministries of Climate & Environment, Industry & Trade, Digitalization
- **Business support and innovation agencies** e.g., Nordic Innovation, Innovasjon Norge, Business Finland, Business Sweden, Danish Board for Business Development, SA Confederation of Icelandic Enterprise, local business hubs, research and technology organizations, and other funding schemes
- **Standardization and regulatory bodies** e.g., European Committee for Standardization (CEN), Nordic Standardization Organizations, national data protection authorities
- **Industry and business associations** e.g., Confederation of Danish Industry (DI), Svenskt Näringsliv, Finnish Business Federation



¹⁵ European Commission, (2020) The European Strategy for Data

¹⁶ Nordic Innovation, (2021) Data Sharing for a Circular Economy in the Nordics

Perceived barriers for data sharing in the circular economy

The consulted companies¹⁷ state different barriers hindering them in scaling data sharing across their ecosystems for the purpose of circularity. Those barriers can be summarized into (5) five core challenges:

1. The business incentive for data sharing is yet to be clearly articulated
2. Companies struggle to understand the legislative landscape
3. Universal data definitions, standards, or technical protocols are not immediately available
4. Data sharing capabilities remain immature – particularly for SMEs
5. Cross-value chain collaboration is difficult, but important for scaling

1. The business incentive for data sharing is yet to be clearly articulated

While ESG regulations and sustainability goals motivates businesses to share circularity data, finding intrinsic business incentives remains challenging. Data sharing is considered time consuming, requiring new capabilities, and the business value is unclear - especially for circularity where profitability is low. Companies express a skepticism in how data will be used, and if the investments in data sharing capabilities will pay off – and for whom. Not everyone in the value chain will immediately benefit from increased transparency, mainly the customer facing actors, as transparency is increasingly considered a customer requirement. The small supplier struggling to meet documentation requirements or the manufacturer with propriety techniques may not see the need for increased transparency, whereas the retailer can turn transparency into supporting claims for premium pricing. Businesses ask that the financial incentives (e.g., revenue uptake, cost reduction, risk mitigation) are further strengthened by policy makers, aligning the incentives for data sharing with business value.

2. Companies struggle to understand the legislative landscape

With an increasing number of European ESG legislations (e.g., CSRD, ESPR, DPP), the legislative landscape is found to be overly complex, making it difficult for companies to understand what data to collect and share – and how. Businesses struggle to understand the regulatory requirements, leading to multiple interpretations. While some complexity is driven by regulatory demands, a lack of clear templates and guidance on how to adhere to the regulations intensifies the problem. With no legal framework to harmonize reporting, companies find it time consuming to address the necessary data sharing. Businesses further struggle to understand how the different legislations overlap and interplay, meaning that data collection and reporting is conducted in silos, oftentimes manually, leading to duplication of efforts and large administrative burdens.

¹⁷See full list of company participants of the Nordic Circular Accelerator in the Appendix

3. Universal data definitions, standards, or technical protocols are not immediately available

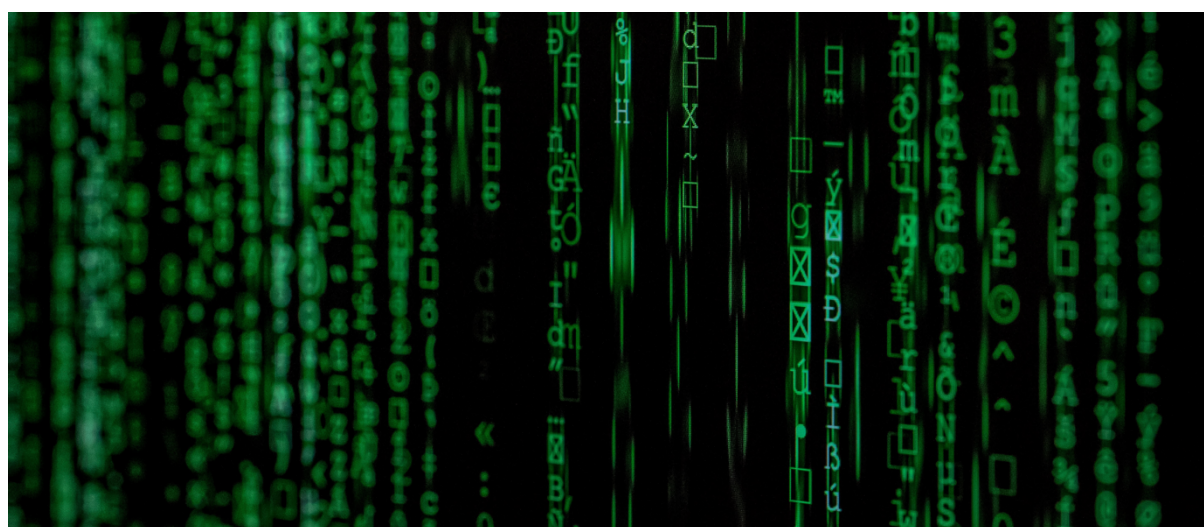
Businesses lack a common language for data sharing and emphasize the importance of harmonized sustainability metrics (e.g., lifecycle assessments (LCAs) and product carbon footprint), data definitions, and calculation methodologies to ensure comparability and transparency across sectors – while allowing flexibility for contextual differences. Businesses recognize the importance of shared standards, but implementation remains a significant barrier. They advocate for policy makers to streamline and endorse proven and open standards to ensure wide adoptability. The priority is not to create more standards, but for policy makers to specify universal standards. Businesses too find that there are no universal systems or technical protocols for sharing data and highlight the need for flexible and interoperable data-sharing architectures that accommodate varied digital maturity levels across companies (e.g., APIs).

4. Data sharing capabilities remain immature – particularly for SMEs

Data sharing capabilities are immature for most businesses, as they fight to establish the necessary skills, processes, and tools for effective data exchange across the value chain. Dataspaces are in early development, and sector-specific data solutions are often not easily transferable to other industries. Particularly SMEs, integral actors in larger value chains, lack capabilities and resources to enable data sharing initiatives, thereby hindering the progress of larger companies. Even participating in policy shaping forums can be too resource consuming, creating a bad spiral of little influence and SME tailoring. Consequently, businesses ask policy makers to have patience and allow for gradual progress – and with tailored demands and support for SMEs.

5. Cross-value chain collaboration is difficult, but important for scaling

Achieving efficient data sharing for circularity necessitates collaboration among all participants in the value chain. However, companies face challenges in establishing comprehensive and effective data-sharing ecosystems. They struggle to engage global suppliers for the needs of Nordic businesses, and advocate for public data structures and funding mechanisms that allow for global value chains. Additionally, scaling data sharing requires even competitors to come together in collaboration and for this, businesses seek help to address competition barriers and security concerns.



Policy input and suggested interventions for circular value creation

To overcome the challenges identified by the companies participating in the Nordic Circular Accelerator, a series of interventions are suggested for policy makers to consider as policy input.

The policy input can be divided into three strategic objectives with suggested interventions:

OBJECTIVES	1	2	3
	INCENTIVIZE & ENABLE	HARMONIZE & SCALE	SUPPORT & STRENGTHEN
	Reduce the entry barriers that prevent businesses, especially SMEs, from engaging in circular data sharing	Harmonize data-sharing practices to enable seamless and scalable data exchange across value chains	Provide support and tools needed for companies to share circular data and comply with circularity regulations
INTERVENTIONS	Introduce financial incentives, especially for SMEs, such as tax benefits, grants, and subsidies to support circular data sharing	Appoint standard-setting bodies to promote open and universal data-sharing frameworks, ensuring alignment with EU technical standards	Accelerate European work on data spaces and public testbeds to establish shared infrastructure and environments for testing data sharing
	Educate companies on the instrumental role of data sharing in the transition to circular economy through position papers and awareness raising activities	Define core datasets and data frameworks that are publicly accessible, interoperable with private sector data-sharing efforts, and industry specific where needed	Develop handbooks to clarify circularity regulations (e.g., CSRD, ESR, DPP), how they overlap and what minimum viable data points are needed for reporting
	Define minimum compliance thresholds, allowing businesses to start with high-impact data-sharing efforts before scaling as capabilities improve	Harmonize sustainability metrics such as lifecycle assessments (LCA) and circularity rates, ensuring comparability across industries	Establish support mechanisms, such as digital tools, reporting templates, and Nordic knowledge sharing forums – especially targeting SMEs

1. Incentivize & enable

Reduce the entry barriers that prevent businesses, especially SMEs, from engaging in circular data sharing

By creating financial incentives, such as tax benefits for circularity services and targeted grants for data platform development, policy makers can shift the financial narrative, reduce risk, and lower entry barriers for private entities, particularly SMEs. Through awareness raising activities, policy makers can upskill companies on the role of data sharing in circularity (and the business benefits) – and thereby drive business incentive. Furthermore, the encouragement of iterative improvement, enables companies to start small and gradually enhance their data practices.

2. Harmonize & scale

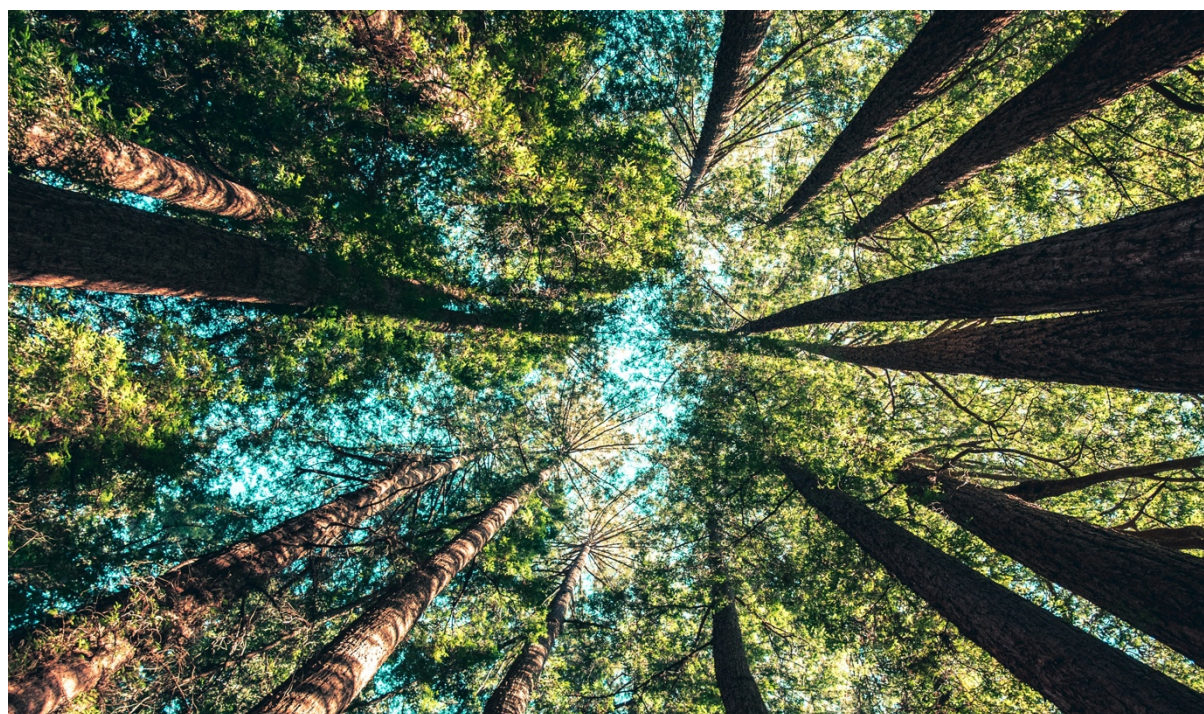
Harmonize data-sharing practices to enable seamless and scalable data exchange across value chains

As businesses find the lack of streamlined data-sharing practices impede circularity efforts, policy makers should support through standardization. While many technical standards already exist, companies struggle to find the common denominators, thereby posing an opportunity for policy makers to appoint standard-setting bodies that can determine universal standards. Defining core data sets and making them publicly available can further create harmonized data sharing at scale. Here, streamlining sustainability metrics and definitions is also crucial, ensuring standardization of key data points (e.g., circularity rates) as well as providing guidance on calculation methodologies and assumptions to drive comparability across sectors. Particularly, LCA is a fundamental methodology for obtaining product-level information, and important to streamline.

3. Support & strengthen

Provide support and tools needed for companies to share circular data and comply with circularity regulations

Many companies are seeking help to establish a solid technology foundation for circular data sharing due to immature data sharing capabilities. By accelerating the European work on data spaces and establishing shared test beds, policy makers can support and strengthen the technology infrastructure. Further, policy makers can support businesses in understanding regulatory requirements through initiatives that demystify the legislative language. While companies work to report in line with the CSRD and any related guidance is beneficial, collaboration across the value chain is driven by data at the product level. Therefore, it is recommended to emphasize ESPR and DPP when focusing on circularity. Policy makers should promote digital tools and templates, and create educational initiatives, such as webinars and training programs, to guide companies through the complexities of compliance. There should be a focus on SMEs, which are often in the early stages of their data sharing journey, and who would especially benefit from supportive measures tailored to their business context.



Conclusions

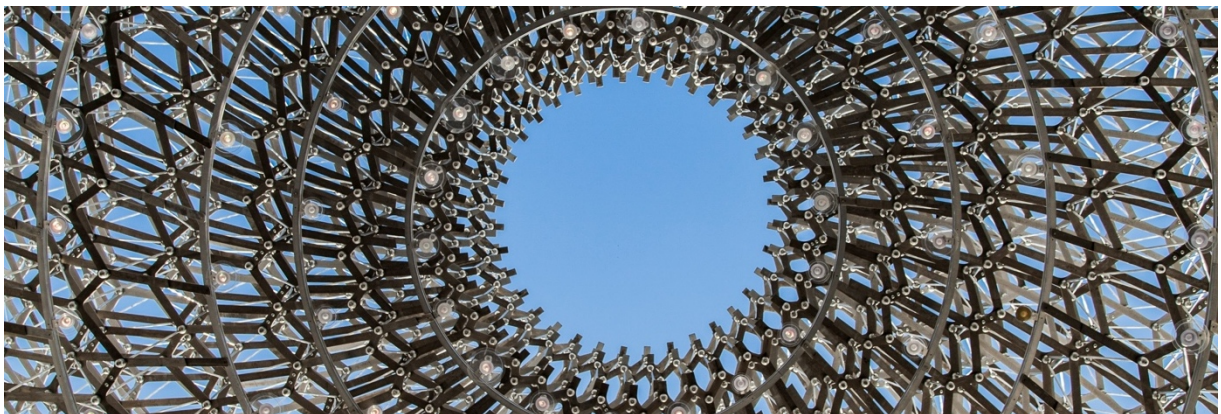
To realize the potential of a circular economy, businesses need a deep understanding of their value chains. This requires collaborative data efforts, as no single company can see the entire lifecycle of materials and products. While companies can optimize their operations individually, only systemic data sharing can scale circular solutions and realize their full value.

This report indicates that while Nordic businesses begin their data sharing journey, many face challenges in succeeding and scaling their efforts. The perceived barriers include challenges such as lack of clear business incentives, complex legislative landscapes, absence of universal data standards, immature data-sharing capabilities, and difficulties in cross-value chain collaboration.

Based on the input of the consulted companies and strategic advisors of the Nordic Circular Accelerator Program¹⁸, (3) three strategic objectives are suggested for policy makers to address:

1. **Incentivize & enable:** Reduce the entry barriers that prevent businesses, especially SMEs, from engaging in circular data sharing
2. **Harmonize & scale:** Harmonize data-sharing practices to enable seamless and scalable data exchange across value chains
3. **Support & strengthen:** Provide support and tools needed for companies to share circular data and comply with circularity regulations

These actions are informed by practical experiences from Nordic businesses and their pilot initiatives, thereby offering significant value to policy makers. In the report, the policy input is further detailed with suggested interventions such as public funding mechanisms, harmonized calculation methodologies, and European test beds. These measures enable policy makers to implement tangible changes that address the needs of practical business realities. When considering the input, policy makers should prioritize to provide financial incentives, streamline compliance processes, and facilitate the implementation of standardized data-sharing practices. By adopting these measures, policy makers can create a supportive and streamlined data sharing environment, thereby incentivizing and scaling data-sharing ecosystems within Nordic businesses and paving the way for a more sustainable and interconnected future.



¹⁸ See full list of program participants, Reference Group members, and subject matter advisors in the Appendix

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Appendix

Company collaborations in the Nordic Circular Accelerator

- **Collaboration 1:** Axfoundation, Filippa K, GS1
- **Collaboration 2:** Grundfos & Danfoss
- **Collaboration 3:** CGI, Fujitsu, Cisco Systems, Thales Group, Netapp, Lenovo, 3stepIT
- **Collaboration 4:** IOXIO, SIX Mobile Work Machines cluster, Sandvik, Kalmar
- **Collaboration 5:** Telia, Eltel, Transtema, Ericsson Connected Recycling, Boliden
- **Collaboration 6:** Mirka, Kierto, Suomen Erityisjäte
- **Collaboration 7:** SKF AB, Sandvik Coromant, Wolfram
- **Collaboration 8:** Sogn Biohub (Sogn Næring, Sogn Utvikling, ViteMeir, Simas, Lerum, Sogn Grønt, Sogndal kommune, Luster kommune, Vik Kommune, Are Treindustrier etc.)
- **Collaboration 9:** Region Uppsala, Vattenfall, KTC, Uppsalahem, Akademiska hus
- **Collaboration 10:** FREYR Battery, Cognite

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- Louise Bünemann, Confederation of Danish Industry
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- Staffan Olsson, GS1
- Conny Svensson, AI Sweden
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- Heikki Aura, Sitra International
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