

Response to Roadmap

Brussels, January 2020

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Eurima response to the Circular Economy Action Plan Roadmap

Eurima welcomes the Commission's intention to adopt a new Circular Economy Action Plan in which actions in high-impact sectors, such as construction, will be identified. The European Insulation Manufacturers Association (Eurima) is strongly committed to, and supports, the transition to a circular economy. This is still a challenge for the construction sector, which uses about half of the resources extracted around the world. Overcoming the barriers to circularity in the construction and building sector is particularly important in light of the upcoming 'renovation wave' which will lead to an increase in renovation activities in the coming years.

Eurima has identified 5 actions to be tackled by the New Circular Economy Action Plan so that building and renovating is done in a resource efficient way:

Firstly, the re-use/renovation of existing buildings needs to be prioritized. If this is not possible, buildings need to be dismantled, rather than demolished to avoid that construction waste is mixed and valuable construction materials end up in landfills. The sorting of construction waste from deconstruction/demolition sites will need to become mandatory and (non-weight) targets for the recycling of construction products should be set.

Secondly, reuse and recycling must become more (financially) attractive than landfilling. Currently, construction materials still end up in landfills, as landfilling is often cheaper than recycling these materials. A ban on landfilling for all products that can be recycled, and/or a tax on landfilling can help overcome this. Requirements for durability, recycled content and recyclability, combined with clear and consistent terminology (reuse, recycling, recyclability) through standardisation, can also help promote circularity.

Thirdly, EU waste legislation needs to facilitate, instead of hamper, the reuse and recycling of construction products. We expect an increase in renovation activity and therefore more non-performing construction systems being replaced by systems with better energy performance. When these 'old' systems become waste, some components are sometimes by default classified as hazardous under the Waste Framework Directive and subject to strict provisions. These provisions hamper the recycling of this waste as a secondary raw material to produce materials that no longer contain any substances of concern. A dedicated legal framework should be created to foster recycling of hazardous waste streams into non-hazardous products.

Fourth, in order to facilitate circularity in the building and construction sector in the long-term, a harmonised way to provide transparency on the content of buildings and construction products and their end-of-life routes (guidelines for correct disassembly, re-use possibilities etc.) will be required. An EU-wide standard for information on the content of construction products can encourage the use of non-toxic and recyclable materials. The information should be included in building passports and still be accessible when the building and/or products reach their end-of-life (after around 50 years for construction products), through developments in digitalisation (e.g. BIM), in order to facilitate dismantling, reuse and recycling at that time. Eurima is working on a voluntary content declaration for the industry as a first step towards a harmonised approach.

Finally, a proper regulatory framework needs to be accompanied with (EU and national) investments prioritizing circularity in the construction sector inter alia by supporting research and development of new recycling technologies.

Eurima looks forward to work with the European Commission and other policymakers & stakeholders on the development of the New Circular Economy Action Plan.