

# Consultation Response



Brussels, August 2015

## Public Consultation of the European Commission on Circular Economy.

In August 2015 Eurima provided input to the Public Consultation of the European Commission on *Circular Economy*.

The construction sector is generally recognised as one of the sectors most concerned by resource efficiency. This reality was not enough reflected in the public consultation with only a limited number of questions related to construction products and no questions at all covering the building level. In fact, the biggest potential for increasing resource efficiency in the construction sector can be found at building-level.

Eurima is in favour of putting more focus on the Circular Economy and Resource Efficiency. The paradigm-shift towards a circular economy should be facilitated by soft measures such as harmonisation of standards, improved databases, readily available information for consumers ...etc. It will be necessary to frame this within a coherent, consistent and well-balanced legislative framework including landfill bans for recyclable products, improved interface between waste and chemical legislation, ..., while environmental benefits should always be quantified/qualified through Life Cycle Analysis.

In the document attached you will find the Eurima answers to this Public Consultation.

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# Public Consultation on the Circular Economy

Fields marked with \* are mandatory.

**Frequently Asked Questions on the Consultation on Circular Economy-** the file is available for download here:

[FAQs Circular Economy.pdf](#)

## 1 Introduction

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Global competition for resources is increasing. Supply concentration of resources, particularly critical raw materials outside the European Union, makes European industry and society dependent on imports and increasingly vulnerable to high prices, market volatility, and the political situation in supplying countries. At the same time, natural resources are often used unsustainably across the globe, causing additional pressure on raw materials, environmental degradation and threats to ecosystems. This trend will increase with changes in world population and patterns of economic growth.

A 'circular economy' aims to maintain the value of the materials and energy used in products in the value chain for the optimal duration, thus minimising waste and resource use. By preventing losses of value from materials flows, it creates economic opportunities and competitive advantages on a sustainable basis.

Moving towards a more circular economy can promote competitiveness and innovation, a high level of protection for humans and the environment, and bring major economic benefits, thus contributing to job creation and growth. A circular economy fosters sustainable development in which environmental, economic and social dimensions go hand in hand. It can also provide consumers with longer-lasting and innovative products that save them money and improve their quality of life.

A successful transition towards a circular economy requires action at all stages in the value chain: from the extraction and transportation of raw materials, through material and product design, production, distribution and consumption of goods, repair, remanufacturing and reuse schemes, to waste management and recycling.

In December 2014, the Commission announced the withdrawal of its legislative proposal for the review of waste legislation, to be replaced by a new, more ambitious, initiative for the promotion of the circular economy by the end of 2015.

This initiative aims at promoting the transition to the circular economy through a comprehensive, coherent approach that fully reflects interactions and interdependence along the whole value chain, rather than focusing exclusively on one part of the economic cycle. It will comprise a revised legislative proposal on waste and a Communication setting out an action plan on the circular economy for the rest of this Commission's term of office. The action plan will cover the whole value chain, and focus on concrete measures with clear EU added value, aiming at 'closing the loop' of the circular economy. The circular economy initiative will also contribute to wider EU objectives such as the Energy Union, the climate objectives and resource efficiency.

Input from stakeholders and the public will be a key factor in the preparation of this work. The objective of this public consultation is to help the Commission to pinpoint and define the main barriers to the development of a more circular economy and to gather views regarding which measures could be taken at EU level to overcome such barriers.

Public consultations on the review of EU waste targets and on the sustainability of the food system took place in 2013 [The results of these public consultations [can be found here](#)]. This consultation therefore focuses on other points relating to the transition to a circular economy, broadening the scope of inquiry to other parts of the economic cycle (e.g. the production and consumption phases) and general enabling framework conditions (e.g. innovation and investment). Please note that a separate public consultation on waste market distortions will be launched shortly. Stakeholders interested in waste markets may wish to respond to that consultation as well.

## 2 General information about respondents

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### \*2.1. In what capacity are you completing this questionnaire?

- |   |  |
|---|--|
| <input type="radio"/> As an individual / private person | <input type="radio"/> Public authority                     |
| <input type="radio"/> Academic/research institution     | <input type="radio"/> International organisation           |
| <input type="radio"/> Civil society organisation        | <input checked="" type="radio"/> Professional organisation |
| <input type="radio"/> Private enterprise                | <input type="radio"/> Other                                |

Does your company/organization make use of any of the following?

- EU eco-label
- EMAS
- Another environmental labelling or management scheme
- No environmental labelling or management scheme
- I don't know

Please indicate the sectors your organisation represents

- Construction
- Energy
- Chemicals
- Information and communication technologies
- Furniture
- Food and drink
- Hotel and catering industry
- Repair services
- Transport
- Manufacturing
- Electrical and electronic goods
- Textiles and clothing
- Agriculture and fishery
- Distribution (logistics, wholesale, retail)
- Recycling and other waste management
- Other: please indicate

Where are your member companies located?

- EU MS/ EEA
- Non-EU MS/ EEA

Please specify EU Member States/EEA countries of your member companies:

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Italy
- Latvia
- Liechtenstein
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Norway
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- Switzerland
- United Kingdom

If your organisation is not registered, [you can register now](#)

## 2.2. Please give your country of residence/establishment

- EU MS/ EEA
- Non-EU MS/ EEA

Please specify the EU MS/EEA country of your establishment:

- |                                      |   |                                   |                                      |                                  |   |
|--------------------------------------|---|-----------------------------------|--------------------------------------|----------------------------------|---|
| <input type="checkbox"/> Austria     | <input checked="" type="checkbox"/> Belgium | <input type="checkbox"/> Bulgaria | <input type="checkbox"/> Croatia     | <input type="checkbox"/> Cyprus  | <input type="checkbox"/> Czech Republic |
| <input type="checkbox"/> Denmark     | <input type="checkbox"/> Estonia            | <input type="checkbox"/> Finland  | <input type="checkbox"/> France      | <input type="checkbox"/> Germany | <input type="checkbox"/> Greece         |
| <input type="checkbox"/> Hungary     | <input type="checkbox"/> Iceland            | <input type="checkbox"/> Ireland  | <input type="checkbox"/> Italy       | <input type="checkbox"/> Latvia  | <input type="checkbox"/> Liechtenstein  |
| <input type="checkbox"/> Lithuania   | <input type="checkbox"/> Luxembourg         | <input type="checkbox"/> Malta    | <input type="checkbox"/> Netherlands | <input type="checkbox"/> Norway  | <input type="checkbox"/> Poland         |
| <input type="checkbox"/> Portugal    | <input type="checkbox"/> Romania            | <input type="checkbox"/> Slovakia | <input type="checkbox"/> Slovenia    | <input type="checkbox"/> Spain   | <input type="checkbox"/> Sweden         |
| <input type="checkbox"/> Switzerland | <input type="checkbox"/> United Kingdom     |                                   |                                      |                                  |   |

**2.3. Please indicate your preference for the publication of your response on the Commission's website:**

- Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
- Anonymously: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
- Not at all — please keep my contribution confidential (it will not be published, but will be used internally within the Commission)

**2.4. How well informed are you about the circular economy initiative?**

- Very well informed
- Fairly well informed
- Not very well informed
- Not informed at all

**2.5. Please give your name if replying as an individual/private person, otherwise give the name of your organisation**

*200 character(s) maximum*

If your organisation is registered in the Transparency Register, please give your Register ID number.

*200 character(s) maximum*

**2.6. Please provide your email address if you would like to be informed of the outcome of this consultation**

*200 character(s) maximum*

## 3 Production phase

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The design of a material or product can facilitate recycling, extend its lifetime through reuse, refurbishment or repair and reduce its environmental impact by reducing its energy, waste generation or water consumption over its life cycle.

This section seeks your views on actions that you think the EU should take to promote the circular economy in the production stage, including product design, production and sourcing of materials.

### 3.1. How would you assess the importance of the following measures to promote circular economy principles in product design at EU level?

	very important	important	not very important	not important	no opinion
Establish binding rules on product design (e.g. minimum requirements on 'durability' under Ecodesign Directive 2009/125/EC)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage industry-led initiatives (i.e. self-regulation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Develop standards for voluntary use	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote and/or enable the use of economic incentives for eco-innovation and sustainable product design (e.g. via rules on Extended Producer Responsibility schemes)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review rules on legal and commercial guarantees	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage the consumption of green products (see section 4)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other — please specify below	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

#### Glossary:

**Legal guarantees:** Tangible goods have a minimum two-year legal guarantee under EU consumer legislation (Directive 99/44/EC). This guarantee makes the seller liable to the consumer for any lack of conformity with the sales contract which exists at the time of delivery of the good and becomes apparent within two years from delivery of the goods.

**Commercial guarantees:** Guarantees provided by traders to consumers on a voluntary basis, by which the trader undertakes to reimburse the price paid or to replace, repair or handle consumer goods in any way if they do not meet the specifications set out in the guarantee statement or in the relevant advertising.

If you think that additional options not listed above should be considered, please specify:

*200 character(s) maximum*

Mandatory sust. assessment at building level, based on existing standards, to improve sustainability of buildings, supported by EPD on product level. EPR for long life time products will not function.

**3.2. In order to facilitate the transition to a more circular economy, how would you assess the importance of the following product features?**

	very important	important	not very important	not important	no opinion
Durability	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reparability: Availability of information on product repair (e.g. repair manuals)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reparability: Product design facilitating maintenance and repair activities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reparability: Availability of spare parts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Upgradability and modularity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reusability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biodegradability and compostability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Resource use in the use phase (e.g. water efficiency)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recyclability (e.g. dismantling, separation of components, information on chemical content)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased content of reused parts or recycled materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased content of renewable materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Minimising lifecycle environmental impacts	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other- please specify below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**3.3. How would you assess the importance of the following additional considerations when applying circular economy principles to products at EU level?**

	very important	important	not very important	not important	no opinion
Impact on production cost and affordability of the product	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on production processes and value chain	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on consumers (e.g. through durability and reparability)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Functionality of the product	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enabling innovation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Respecting technology neutrality	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on EU imports and exports	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other — please specify below	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that other considerations not listed above should be taken into account, please specify:

*200 character(s) maximum*

The functionality of the building, related to wellbeing, creates a better performance for the consumer and a longer life time of the building.

**3.4. From a circular economy perspective, in your view which product categories should be given priority in the next few years and why?**

*at most 3 choice(s)*

- White goods (e.g. dishwashers, refrigerators)
- Small domestic appliances (e.g. microwave ovens, food processors)
- Office equipment (e.g. computers, printers)
- Small electronics (e.g. smartphones, cameras)
- Packaging materials
- Heating equipment (e.g. boilers, water heaters)
- Air-conditioning and ventilation systems
- Lighting products
- Motors and pumps
- Industrial equipment
- Clothing and textiles
- Furniture
- Cars
- Construction products (e.g. windows, insulation materials)
- General measures (concerning a broad range of products) should be taken
- Others

If you think that other product categories not listed above should be taken into account, please specify:

*200 character(s) maximum*

Buildings
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Please give reasons for your choice: others

Buildings are considered as one of the three main sectors for resource efficiency (together with transport and agriculture). The significance of the resource use linked to the sector is highlighted by the Roadmap to a Resource Efficient Europe: "Construction and use of our buildings in the EU influence 42% of our final energy consumption, about 35% of our greenhouse gas emissions, more than 50% of all extracted materials and 30% of our water consumption". The sector further gives rise to about 35% of total generated waste.

Buildings should be a top priority as they are the main consumers of resources. They are part of the problem and part of the solution. The long life cycle of the building makes it necessary to act as soon as possible to obtain the necessary benefits in the future. The construction industry has one of the most difficult value chains to transform as it is composed of a large number of different expertise and a lot of SMEs. This creates a situation where a lot of entities need to be convinced to achieve the necessary paradigm shift.

Building performance will not be solved by focusing exclusively on the construction products. Building performance will be improved through the optimization of systems (walls, roofs ...) which implies the right combination of products (building design).

**3.5. Which of the actions listed below should be given priority at EU level to promote circular economy solutions in production processes?**

	very important	important	not very important	not important	no opinion
Promote cooperation across value chains (e.g. through encouraging new managerial modes)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Address potential regulatory obstacles in EU legislation - please specify	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Address potential regulatory gaps in EU legislation – please specify	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support the development of innovative business models (e.g. leasing)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Improve the interface between chemicals and waste legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote collaboration between and among private and public sectors, including end-users	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support the development of digital solutions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Identify and promote exchange of best practice	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Identify minimum standards for increasing resource-efficient processes (e.g. Best Available Techniques)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure availability of reliable data on material flows across value chains	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide access to finance for high-risk projects	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other — please specify below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify which regulatory obstacles you are referring to

*200 character(s) maximum*

Please specify which regulatory gaps you are referring to

*300 character(s) maximum*

Lack of regulation concerning the resource efficiency/sustainability of buildings. Lack of regulation and guidance concerning renovation of the existing building stock. The current waste classification (non-consistency waste and chemical legislation) for mineral wool is hampering the recycling of it

**3.6. How effective do you think each of the actions at EU level listed below would be in promoting sustainable production and sourcing of raw materials?**

	very effective	effective	neutral	not effective	no opinion
Establishing a legally binding framework at EU level (e.g. sustainability criteria)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing and promoting voluntary compliance schemes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing the issue through trade policy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing the issue through the promotion of targeted global initiatives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting the exchange of best practice among businesses	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other — please specify below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**3.7. Do you have any other comments about the production phase?**

*500 character(s) maximum*

## 4 Consumption Phase

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The consumers' perspective is an essential part of the circular economy. On the one hand, consumers make choices about the products they purchase and use; on the other hand these choices are affected by a range of factors, including the behaviour of other people, the way consumers receive information or advice, the availability of repair and maintenance services, and the perceived costs and benefits of their choices.

This section seeks your views on the best way to promote the circular economy in the consumption phase.

**4.1. How would you assess the importance of the following measures to promote circular economy principles in the consumption phase at EU level?**

	very important	important	not very important	not important	no opinion
Provide more information relevant to the circular economy to consumers, for example on expected lifetime of products or availability of spare parts	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure the clarity, credibility and relevance of consumer information related to the circular economy (e.g. via labels, advertising, marketing etc.) and protect consumers from false and misleading information in this respect	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Organise EU-wide awareness campaigns to promote the circular economy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improve/clarify rules and practices affecting consumer protection (e.g. relating to legal and commercial guarantees)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Take action on product and material design (see section 3)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage financial incentives to consumers at national level (e.g. by differentiated taxation levels depending on products' resource efficiency)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Take measures targeting public procurement (e.g. through criteria for Green Public Procurement)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Encourage new modes of consumption such as shared ownership (e.g. car sharing), collaborative consumption, leasing and the use of internet-based solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promote the development of repair and maintenance services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage waste prevention (e.g. minimising food waste)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other — please specify below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

#### 4.2. Which products should be a priority for EU action to promote more sustainable consumption patterns and why?

*at most 3 choice(s)*

- White goods (e.g. dishwashers, refrigerators)
- Electronics
- Food and beverages
- Packaging materials
- Clothing and textiles
- Furniture
- Cars
- Construction products
- General measures (concerning all consumer products) should be taken
- Other — please specify below

If you think that further options not listed above should be considered, please specify:

*200 character(s) maximum*

Buildings

Please give reasons for your choice: construction products

*200 character(s) maximum*

Construction products should be tackled indirectly, as elements integrated in buildings ( the largest consumers of resources). --> see below

Please give reasons for your choice: general measures

*200 character(s) maximum*

A circular economy will only be reached through a holistic approach. In parallel to the focus on certain products a transversal approach will be necessary.

Please give reasons for your choice: others

*200 character(s) maximum*

Consumers should have information to make well-informed choices about the building they buy or rent.

**4.3. Do you have any other comments about the consumption phase?**

*500 character(s) maximum*

## 5 Markets for secondary raw materials

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Secondary raw materials are waste materials which are to be sold and used for recycling in manufacturing. At present, they still account for a very small portion of the material used in the EU. The quality and supply of secondary raw materials depends greatly on waste management practices and the degree of separation of material streams at source. However, other barriers to the development of markets for secondary raw materials can be identified. Some of these barriers may be of a horizontal nature, while others may only be relevant to specific types of material.

### 5.1. In your view, what are the main obstacles to the development of markets for secondary raw materials in the EU?

In the list below, for each material, indicate the obstacle(s) that you consider significant by ticking the corresponding cell(s)

	Significant for all materials	Bio-nutrients	Construction aggregates	Critical raw materials	Glass	Met
Lack of EU-wide quality standards for recycled materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poor quality of recycled materials (e.g. containing unwanted substances/high contamination)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of information or misinformation about the quality of recycled materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>				
Poor availability of waste/material to be recycled	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poor reliability of supply for recycled materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Low demand for recycled materials (e.g. on the EU market)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cost differential between primary and secondary raw materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>				
Organisational cost of switching from primary to secondary raw materials in industrial processes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Regulatory obstacles at national/regional/local level	<input type="checkbox"/>								
Regulatory obstacles at EU level	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regulatory gaps at EU level	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regulatory gaps at national/regional/local level	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Insufficient cooperation/exchange of information along the value chain (e.g. between producers, recyclers and authorities responsible for waste management)	<input type="checkbox"/>								
Lack of reliable data on secondary raw material flows	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No opinion	<input checked="" type="checkbox"/>								
Other- please specify below	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you think that other obstacles not listed above are relevant, please specify:

*200 character(s) maximum*

Buildings and construction products are missing in the list. we cannot judge other materials as a specific association. Elements of the list may be important for buildings (and products) too.

### **Glossary:**

**Bio-nutrients-** Recovered material such as nitrogen, or phosphorus and organic matter (from e.g. sewage sludge and farm organic matter residues), for use as fertiliser.

**Construction aggregates-** Coarse particulate material used in construction, including sand, gravel, crushed stone or slag.

**Critical raw materials-** Critical raw materials are raw materials of great economic importance to the EU, with a high risk of disruption of supply. The European Commission has listed them here: [http://ec.europa.eu/enterprise/policies/raw-materials/critical/index\\_en.htm](http://ec.europa.eu/enterprise/policies/raw-materials/critical/index_en.htm)

### **5.2. In your view, what are the most relevant actions to take at EU level to remove the obstacles you have identified as significant? Please be specific**

Lack of information or misinformation about the quality of recycled materials

*500 character(s) maximum*

A pre-demolition inventory would provide the necessary information throughout the building chain to optimally recycle the construction products.

A building passport containing information on the products used in the building would provide the information to correctly prepare for the selective deconstruction of the building.

Cost differential between primary and secondary raw materials

*500 character(s) maximum*

The true valuation of the secondary raw materials (for example based on life cycle costing) in comparison with that of the raw materials would facilitate the uptake of secondary raw materials.

Regulatory obstacles at EU level

*500 character(s) maximum*

The transboundary transport of waste to be recycled is burdensome. Waste streams which can be hazardous or non hazardous have no strong framework to function in.

Regulatory gaps at EU level

*500 character(s) maximum*

A landfill ban for recyclable products would create an incentive to create recycling routes. Industry needs long-term perspectives to make the necessary investments.

Incineration should be limited as much as possible. Incineration is still too much seen as an easy and cheap solution to avoid recycling. Also here long-term perspectives are needed.

### Regulatory gaps at national/regional/local level

*500 character(s) maximum*

A pre-demolition inventory would provide the necessary information throughout the building chain to optimally recycle the construction products.

A building passport containing information on the products used in the building would provide the information to correctly prepare for the selective deconstruction of the building.

### Lack of reliable data on secondary raw material flows

*500 character(s) maximum*

For construction products there is as well a lack concerning the available information on amounts of secondary raw materials as an uncertainty concerning the way the recycled content has been calculated for different products.

### 5.3. Which secondary raw materials markets should the EU target first to improve the way they work?

*at most 3 choice(s)*

- Bio-nutrients (e.g. nitrogen, phosphorus and organic matter from e.g. sewage sludge and farm organic matter residues) for fertiliser use
- Construction aggregates (i.e. coarse particulate material used in construction, including sand, gravel, crushed stone, slag)
- Critical raw materials such as rare earth elements or certain precious metals
- Glass
- Metals
- Paper
- Plastics
- Wood/Biomass
- Other — please specify below

If you think that other approaches not listed above should be considered, please specify:

*500 character(s) maximum*

For construction products, there is currently no focus on lightweight material, but which can be voluminous, so it could be valuable to

include them. The target for construction and demolition waste is a mass-based target. This incentivizes only the recycling of the more heavy materials.

Please give reasons for your choice: Other

#### 5.4. Do you have any other comments about the development of markets for secondary raw materials?

*500 character(s) maximum*

## 6 Sectoral measures

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Certain sectors may require a tailored approach in order to 'close the loop' of the circular economy, and some could be made strategic priorities in order to accelerate the transition.

This section seeks your views on which sector(s) should be considered a priority for EU action, and which relevant measures or actions should be taken.

#### 6.1. In your view, which sectors should be a priority for specific EU action on the circular economy and why?

*at most 3 choice(s)*

- Agriculture
- Bio-nutrients (e.g. from sewage sludge or farm organic matter residues) for use in fertilisers
- Chemical industry and process manufacturing
- Construction/demolition and buildings
- Electrical and electronic goods
- Energy
- Fisheries/ aquaculture
- Food and drinks, including reduction of food waste
- Forest-based and other bio-based products
- Furniture
- Information and communication technologies
- Mining and quarrying
- Plastics
- Retailing
- Services
- Textiles
- Transport
- Water sector/sewage treatment
- Other- please specify below

**6.2. For the sectors that you have selected, what measure(s) would be needed at EU level?**

Construction/demolition and buildings

*500 character(s) maximum*

Building passport (see above)  
 Pre-demolition audit (see above)  
 Sustainability assessment of buildings (based on lifecycle thinking and performance based approach). Full building assessments make it possible to avoid burden shifting between the different life cycle stages of the building. An assessment method as this gives the opportunity of optimizing the building in fuction of local specificities.  
 Ban landfilling of recyclable materials. (see above)

## 7 Enabling factors for the circular economy, including innovation and investment

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Enabling factors are essential to support the development of the circular economy could include supporting the development, dissemination and uptake of innovative solutions, investing in technology and infrastructure, supporting SMEs and developing the required skills and qualifications.

This section seeks your views on the role of these enabling factors in the development of the circular economy.

**7.1. How important are the following enabling factors in promoting the circular economy at EU level?**

	very important	important	not very important	not important	no opinion
Financing innovative projects or technologies relevant to the circular economy (from EU funds, e.g. Horizon 2020)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public incentives (e.g. financial guarantees) for private investors to finance projects conducive to the circular economy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for the development of circular economy projects (e.g. technical assistance)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Support for innovative systemic approaches and cross-sectoral cooperation (e.g. industrial symbiosis and cascading use of resources)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Partnerships with public authorities to help innovative businesses overcome potential legal obstacles to innovation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promotion of innovative business models for the circular economy (e.g. leasing and sharing)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specific measures to encourage the uptake of the circular economy among SMEs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exchange and promotion of best practice	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting the development of skills/qualifications relevant to the circular economy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for capacity-building in public administrations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for market penetration of innovative projects through labelling, certification and standards, public procurement for innovation, etc.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better monitoring the implementation and impact of policies contributing towards the circular economy agenda	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increasing the knowledge base by collecting and					

providing information and data e.g. on material flows, technologies and consumption patterns	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other- please specify below	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that other measures not listed above should be considered, please specify:

*200 character(s) maximum*

A larger/ better deployment of LCC that takes into account externalities.

**7.2. Do you have any other comments about enabling factors to promote the circular economy?**

*500 character(s) maximum*

## 8

### Upload documents

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**If your organization prepared a dedicated position paper or wants to share any other related materials with the Commission, please use the upload function:**

- [15719f56-d033-48b6-ba6d-b27fbb85d240/Eurima\\_Waste\\_storyline.pdf](#)
- [5be9ef3f-3c21-4428-a471-fc9e29d1424b/Eurima\\_PositionPaper\\_SustainableBuildings\\_story.pdf](#)

### Contact

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