

## Response to the Action Plan

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For more information please contact:  
Eurima - +32 2 626 20 90

### Eurima welcomes the EU Circular Economy Action Plan

In the past months the European Commission presented the EU Green Deal and its Industrial Strategy for Europe. The European Mineral Wool Insulation industry fully subscribes to the objectives and initiatives as set out by this new European growth strategy, even more so now the COVID-19 pandemic, social lockdown and economic downturn will require a massive effort to put the EU back on a path of sustainable, inclusive growth.

The Circular Economy Action Plan is one of the pillars of the EU Green Deal and is largely in line with priority subjects, challenges and opportunities as identified by our industry. Following the regular and constructive exchanges that we have had on EU Green Deal related subjects with your services over the past year, please allow us, at this stage, to draw your attention to some general principles that we think are essential in this context and touch upon specific subjects of interest.

Many of the objectives of the EU Green Deal and the Circular Economy Package will require tapping the full potential of the building and construction sector. Making renovation happen through the Renovation Wave and building and renovating sustainably guided by the Energy Efficiency First principle will be instrumental.

It is of great importance, especially for the continuity in the construction products industry that priority actions currently identified are **built on the regulatory acquis related to building and construction**.

In line with our earlier feedback to the Circular Economy Action Plan Roadmap consultation and as a follow-up to earlier exchange, we would like to highlight the following:

- The importance of making **Sustainability Performance** an integrated part of the EU building's policy;
- The need to address the impact of buildings across their **Full Life Cycle** accounting for embodied and operational carbon together;
- The essence of reflecting **LEVEL(s) for new and renovated buildings** in EU Green Public Procurement and the Sustainable Finance Framework starting with carbon and energy;
- The use of the **Construction Product Regulation (CPR)** to deliver information on product performance necessary for building level assessments. With regards to environmental information, efforts from the very comprehensive work done in the EN15804+A2 standard shall be taken into account to achieve harmonized declarations of construction products in Europe;
- The need to **boost the recycling of building materials** from renovation and deconstruction projects. 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. The 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;
- The importance of **a conducive EU waste legislation that would act as a facilitator of the reuse and recycling of construction products**. Today, when a renovation takes place some components

are sometimes by default classified as hazardous under the Waste Framework Directive and subject to strict provisions. These create bottlenecks in the chain towards recycling of this waste as secondary raw materials into new materials. Therefore, a dedicated legal framework to foster the recycling of hazardous substances into non-hazardous products should be put in place;

- The parallel importance of developing an **EU-wide open standard for information on the content of construction products** (in a form of material passports) to 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. Eurima has initiated work on a voluntary EU construction product approach to promote such principles.

Building on these views and principles in the context of the Circular Economy Action Plan, Eurima looks forward to further understanding and exchanging with the European Commission on specific points such as:

- Targets for recycled content, packaging and C&D waste strategy,
- Harmonized separate waste collection systems,
- Product Passport, Logbooks and Digitalization integration in the construction sector,
- Product Transparency - a common system for construction products,
- The future plan on the European GPP criteria and their implementation on national level,
- Criteria of the Circular Economy into Industrial Emissions Directive,

It goes without saying that we will continue our deeper analysis of the Green Deal and the Circular Economy Action Plan to better define our contribution and specify our commitment towards the points mentioned above. We look forward to our continued exchange and remain at your disposal for further questions.