

# 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 checked="" type="radio"/> Civil society organisation | <input type="radio"/> Professional organisation  |
| <input type="radio"/> Private enterprise                    | <input type="radio"/> Other                      |

Please indicate your main area of focus (environment, consumers, etc.)

- ☒ Environment  
☐ Consumers  
☐ Other

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*

ECOS, the European Environmental Citizens' Organisation for  
Standardisation (<http://ecostandard.org/>)

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

*200 character(s) maximum*

96668093651-33

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

*200 character(s) maximum*

info@ecostandard.org

### 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage industry-led initiatives (i.e. self-regulation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Develop standards for voluntary use	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review rules on legal and commercial guarantees	<input checked="" type="radio"/>	<input 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*

Establish horizontal and product-specific criteria combined with measurement and testing methods to increase material efficiency of products;provide benchmarks for increased durability,re-use,repair

**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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reparability: Product design facilitating maintenance and repair activities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reparability: Availability of spare parts	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Upgradability and modularity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reusability	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biodegradability and compostability	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased content of renewable materials	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

*200 character(s) maximum*

Enable the prolongation of minimum lifespan of products, phase out single-use products and create conditions for re-use (access to spare parts, VAT reduction on repair activities, assistance services)

### 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Functionality of the product	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enabling innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Respecting technology neutrality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Impact on EU imports and exports	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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*

Impacts on natural feedstock, including on their availability.



**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

Please give reasons for your choice: small electronics

In contemporary consumer lifestyles, electronic components are increasingly used in a wide range of devices and appliances which are highly energy-consuming and often not re-usable nor recyclable. This in turn means that imports of rare earth materials is increasing significantly, and so is the considerable environmental footprint implied by sustaining such production and consumption patterns. This is why improving the product design of small electronics, increasing their energy efficiency, enabling their repair and re-use, and as last resort ensuring their safe waste management is essential in the context of a circular economy.

Please give reasons for your choice: clothing and textiles

Clothing and textiles as a product category suffers significantly from the consequences of fashion and energy-intensive life cycles. It appears that 30% of garments in our wardrobes are not worn for a year and both durability and re-use of clothing is very limited. Moreover, producing one pair of jeans requires around 8,000 liters of water, a resource that is more and more scarce. Each step of the production process in clothing production requires water, from growing cotton on irrigated land where water is often limited, to the manufacturing process during which hazardous chemicals, including nanomaterials, may be released. We need to promote on the contrary non-toxic material cycles to limit such impacts on health and environment and to extend the durability and recyclability of clothing.

Please give reasons for your choice: construction products

The construction sector is one of the biggest producers of waste, with considerable amounts of raw material being used. Improving building design and energy efficiency of buildings is thus of utmost importance. Construction products and services linked to building and demolition should also be tackled, including buildings designed to be modular, alterable or used in a non-destructive way for re-use at end-of-life stage. Recycling construction waste is of great importance in a resource-scarce world. Material efficiency should in addition be improved and environmental impacts reduced. Insulation materials and the hazardous nature of other used materials should also be addressed.

**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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Address potential regulatory gaps in EU legislation – please specify	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support the development of innovative business models (e.g. leasing)	<input checked="" type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support the development of digital solutions	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure availability of reliable data on material flows across value chains	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other — please specify below	<input checked="" 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*

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

*200 character(s) maximum*

Traceability of materials with thorough environmental information should be available and guaranteed throughout the supply chain, especially for chemicals and nanomaterials (via a VAT-based register)

Please specify which regulatory gaps you are referring to

*300 character(s) maximum*

Ecodesign regulations for non-energy related products, including material efficiency, re-usability and end-of-life requirements; legal requirements for the traceability of materials and products.

**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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Addressing the issue through trade policy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Addressing the issue through the promotion of targeted global initiatives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promoting the exchange of best practice among businesses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 further options not listed above should be considered, please specify:

*200 character(s) maximum*

Develop ambitious and binding regulatory measures to raise products' durability, reusability, recyclability and material efficiency, supported by harmonised standards.

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

*500 character(s) maximum*

EU policy should be consistent so as to lay down concrete conditions and binding requirements to close the loop between production and end-of-life processes. Ambitious legislative efforts should be supported by strong political will to increase the visibility and credibility of circular economy, placing the EU in the driver's seat. Regulatory measures should be combined with other measures (e.g. labeling, fiscal, voluntary agreements) and mostly clear harmonised standards in support of EU policy.

## 4 Consumption Phase

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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the development of repair and maintenance services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage waste prevention (e.g. minimising food waste)	<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"/>

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

*200 character(s) maximum*

Ensure traceability of materials and their components to enable re-manufacturing, recycling, repair, re-use; minimise environmental impacts, especially due to hazardous chemicals and certain nanomaterials

#### 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

Please give reasons for your choice: electronics

*200 character(s) maximum*

Electronics are essential to address and should be tackled under the Ecodesign policy framework, while the other selected products are so far not regulated with regard to their environmental impacts.

Please give reasons for your choice: food and beverages

*200 character(s) maximum*

Consumers should opt for greener supply chains and renewable materials/packaging. EU policy-measures are needed to reduce food and packaging waste as these contribute to GHG, littering, waste generation

Please give reasons for your choice: packaging materials

*200 character(s) maximum*

Product packaging and packaging waste should be reduced and more sustainable; standards for packaging recoverable through home and industrial composting and biodegradation should be improved

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

*500 character(s) maximum*

There is a clear need to address the consumption phase by using a mix of instruments (product regulation, mandatory labelling, fiscal incentives, market-based instruments and especially harmonised standards). Related EU policies (consumer protection, trade and environmental policies) also need to tackle circularity in a cross-cutting and consistent way.

## 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poor quality of recycled materials (e.g. containing unwanted substances/high contamination)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of information or misinformation about the quality of recycled materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Poor availability of waste/material to be recycled	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cost differential between primary and secondary raw materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Regulatory obstacles at EU level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Regulatory gaps at EU level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Regulatory gaps at national/regional/local level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" 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"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" 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 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"/>
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*

There is a significant lack of harmonised quality standards, especially to improve material efficiency of products, biodegradability and recyclability of materials and recycled content in products

### **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 EU-wide quality standards for recycled materials

*500 character(s) maximum*

Harmonised standards should be developed to improve criteria for biodegradability of packaging materials and to ensure high quality home composting and subsequently for recycling as fertilizer.

Poor quality of recycled materials

*500 character(s) maximum*

Differentiate recycled materials according to standards and quality ratings in order to guarantee minimum quality of recycled materials including after numerous recycling loops and to avoid toxic legacies through contaminated materials.

Lack of information or misinformation about the quality of recycled materials

*500 character(s) maximum*

Harmonised standards could help providing complete and accurate information on the quality of recyclable and biodegradable materials.

Poor availability of waste/material to be recycled

*500 character(s) maximum*

Fully implemented landfill ban for recyclable materials and mandatory sorting schemes across the EU.

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## Poor reliability of supply for recycled materials

*500 character(s) maximum*

Incentivise new markets for re-use and recycled materials and products via (green) public procurement scheme and the social economy.

## Low demand for recycled materials

*500 character(s) maximum*

Establish financial incentives to encourage the use of recycled materials, e.g through extended producer responsibility schemes, tax rebates etc.

## Cost differential between primary and secondary raw materials

*500 character(s) maximum*

Environmental externalities of raw materials should be integrated in their pricing.

## Regulatory obstacles at national/regional/local level

*500 character(s) maximum*

Promote the development of secondary raw material markets, along with repair and re-use; facilitate activities of repair through tax relief or sponsorship; the issue of the liability of repaired products should not be considered at the same level/ in the same way as for new products.

## Regulatory obstacles at EU level

*500 character(s) maximum*

Lack of regulatory framework addressing both energy and material efficiency for product policy at EU level whilst preserving high standards for air quality and water use.

## Regulatory gaps at EU level

*500 character(s) maximum*

Integration of material efficiency and durability targets in EU product and waste policies.

## Regulatory gaps at national/regional/local level

*500 character(s) maximum*

Integration of material efficiency and durability targets in national product and waste policies, including specific bans on non-reusable packaging whenever alternatives are available.

#### Insufficient cooperation/exchange of information along the value chain

*500 character(s) maximum*

Need to establish a traceability system to monitor material flows and their sustainability.

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

*500 character(s) maximum*

Need to establish a traceability system to monitor material flows and their sustainability.

### 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

#### Please give reasons for your choice: Construction aggregates

Construction materials represent a very high portion of total waste and are highly resource-intensive. The raw material consumption of the construction sector is high whilst their recycling and re-use rate is low. This is essential to consider taking the proportion of old buildings into account and their need for renovation. We are also concerned by the emerging use of nanomaterials in this sector, including nano cellulose and nano coated materials and the difficulty to recycle and manage them in their waste stream.

#### Please give reasons for your choice: Plastics

Ambitious and strict criteria to determine the biodegradability of packaging in general and plastic in particular need to be established in harmonised standards. The use of bioplastic should also be closely

accompanied by awareness-raising activities at local level on the advantages of bioplastic.

Please give reasons for your choice: Wood/Biomass

Priority should be given to set legally enshrined criteria for sustainable wood and biomass and for bio-based products (including solvents).

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

*500 character(s) maximum*

A special attention should be given to phosphorous and rare earth recovery

## 6 Sectoral measures

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?

### Bio-nutrients for use in fertilisers

*500 character(s) maximum*

Good practices as regards high quality sewage sludge utilisation should be more encouraged. Indeed, despite sewage sludge being a valuable source of nutrients, organic matter and energy; economic and technical limitations seem to impede its use, though sewage sludge-based fertilizers are available. Standardisation has a considerable role to play in the definition and measurement of sewage sludge quality.

### Forest-based and other bio-based products

*500 character(s) maximum*

Cascading of use for forestry and bio-based products needs to be closely considered.

### Plastics

*500 character(s) maximum*

Ambitious criteria to determine the full biodegradability of plastic materials should be incorporated in harmonised standards.

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

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)					
Public incentives (e.g. financial guarantees) for private investors to finance projects conducive to the circular economy					
Support for the development of circular economy projects (e.g. technical assistance)					
Support for innovative systemic approaches and cross-sectoral cooperation (e.g. industrial symbiosis and cascading use of resources)					
Partnerships with public authorities to help innovative businesses overcome potential legal obstacles to innovation					
Promotion of innovative business models for the circular economy (e.g. leasing and sharing)					
Specific measures to encourage the uptake of the circular economy among SMEs					
Exchange and promotion of best practice					
Promoting the development of skills/qualifications relevant to the circular economy					
Support for capacity-building in public administrations					



Support for market penetration of innovative projects through labelling, certification and standards, public procurement for innovation, etc.					
Better monitoring the implementation and impact of policies contributing towards the circular economy agenda					
Increasing the knowledge base by collecting and providing information and data e.g. on material flows, technologies and consumption patterns					
Other- please specify below					

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

*200 character(s) maximum*

Safety datasheets for products should include information about raw materials as well as durability, repairability, re-usability, recyclability of product components.

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

*500 character(s) maximum*

Standards for material and resource efficiency of products should be developed and monitoring of material flows at EU level done systematically, notably through market surveillance activities.

## 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:

- 29504db7-5d16-47a1-8e1d-c8dadafc119c/1- Joint Mission Statement on Repair and Durability of Products.pdf

- [94c4d563-5268-4faa-8d2b-5518c31e7632/2- Circular Economy and REACH an essential partnership.pdf](#)
- [b192b705-6ae5-4979-9910-aeeb02556daf/3- Joint statement from NGOs on CE consultation.pdf](#)
- [5ee913fd-8dfc-49ed-b610-a42b7f3c5c2b/4- ING Financing-the-Circular-Economy.pdf](#)

## Contact

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