

# 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

- |   |  |
|---|--|
| <input type="checkbox"/> Construction                               | <input type="checkbox"/> Transport                                       |
| <input type="checkbox"/> Energy                                     | <input type="checkbox"/> Manufacturing                                   |
| <input type="checkbox"/> Chemicals                                  | <input type="checkbox"/> Electrical and electronic goods                 |
| <input type="checkbox"/> Information and communication technologies | <input type="checkbox"/> Textiles and clothing                           |
| <input type="checkbox"/> Furniture                                  | <input type="checkbox"/> Agriculture and fishery                         |
| <input type="checkbox"/> Food and drink                             | <input type="checkbox"/> Distribution (logistics, wholesale, retail)     |
| <input type="checkbox"/> Hotel and catering industry                | <input checked="" type="checkbox"/> Recycling and other waste management |
| <input type="checkbox"/> Repair services                            | <input type="checkbox"/> 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:

- |                                      |  |                                   |                                      |                                  |   |
|--------------------------------------|--|-----------------------------------|--------------------------------------|----------------------------------|---|
| <input type="checkbox"/> Austria     | <input 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 checked="" type="checkbox"/> 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 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 checked="" 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*

Resource Association

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*

Ray.Georgeson@resourceassociation.com

### 3 Production phase

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 type="radio"/>	<input type="radio"/>	<input checked="" 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 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 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.

**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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Resource use in the use phase (e.g. water efficiency)	<input type="radio"/>	<input checked="" 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 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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enabling innovation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Respecting technology neutrality	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



**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*

very difficult to prioritise different categories of products against each other as all have specific impacts on the environment and notion of circular economy should touch all sectors

**Please give reasons for your choice: packaging materials**

Packaging materials constitute a large portion of municipal solid waste. Increasingly, for example, plastics are used but recycling rates are extremely low in comparison to other materials. Plastics must be designed in such a way to facilitate ease of re-use and recycling.

**Please give reasons for your choice: general measures**

The concept of material efficiency and design for re-use, repair and recycling must be embedded in all products from the design stage in order to move towards a circular economy and support businesses who use these aspects to their advantage

Please give reasons for your choice:

others

very difficult to prioritise different categories of products against each other as all have specific impacts on the environment and notion of circular economy should touch all sectors

### 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 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improve the interface between chemicals and waste legislation	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 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*

Better implementation of green public procurement needed as well as implementation and enforcement of waste shipment regulations.

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

*200 character(s) maximum*

no appropriate legislation to set design requirements for non-energy related products; no criteria for implementing EPR; mandatory separate collection of recyclables and biowaste needed

Please specify which regulatory gaps you are referring to

*300 character(s) maximum*

Long term legal certainty needed in order to drive investment into recycling infrastructure

**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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing the issue through the promotion of targeted global initiatives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting the exchange of best practice among businesses	<input type="radio"/>	<input type="radio"/>	<input checked="" 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*

Demand side measures are needed such as stronger enforcement of Green Public Procurement. Quality recycled products must have competitive advantages over virgin equivalents

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

*500 character(s) maximum*

EU energy/biomass policies must align with circular economy objectives. For example increased use of waste to energy in the Commission's Energy Union Package poses a threat to increase incineration capacity and undermine the waste hierarchy. Legislation needed to promote quality recycling i.e. achieving a product, material or substance with similar properties to equivalent virgin raw material. UK voluntary measures such as the Dairy Roadmap have been ineffective in supporting the recycling industry

## 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 checked="" type="radio"/>	<input 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 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 type="radio"/>	<input checked="" 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*

Promote transparency to consumers at national/regional level about what happens with waste they discard and where it goes. See the Resource Association's End Destination of Recycling Charter

#### 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: packaging materials

*200 character(s) maximum*

targeted info needed for consumers to encourage source separation of packaging as well as harmonised systems of collection. National level measures needed to reduce amount of packaging consumers use

Please give reasons for your choice: general measures

*200 character(s) maximum*

EU consumers must be taught that less is more. Targeted campaigns at local/national level needed to prevent waste in the first place and reduce the amount of throughput into the system.

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

*500 character(s) maximum*

EU level is not effective to promote educational campaigns to citizens or mere encouragement of national measures but should focus on actions with a real difference to the rules for the single market: product design, consumer information, guarantees, etc. Before developing new schemes binding rules for Green Public Procurement and consistency across different EU product policy instruments should be reinforced. Fiscal measures e.g. differentiated VAT rates according to the waste hierarchy welcome

## 5 Markets for secondary raw materials

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 checked="" 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 checked="" 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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poor availability of waste/material to be recycled	<input checked="" 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 checked="" 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 checked="" 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"/>	<input type="checkbox"/>	<input 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 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 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 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"/>
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 are no market incentives for better uptake of secondary raw material in place, although recycling saves on greenhouse gas emissions compared to using virgin materials or burning waste

### **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*

Whilst recycling standards exist at EU level for some materials such as paper, there are a number of materials which are not covered by a standard. The Resource Association would welcome EU wide standards for recycled materials that could be considered equivalent with virgin materials.

Poor quality of recycled materials

*500 character(s) maximum*

Poor sorting at many UK Material Recovery Facilities (MRFs) are a factor in high contamination of materials destined for recycling, costing the UK recycling industry over 50 million pounds annually. Whilst it is acknowledged that a number of MRFs do produce high quality materials for recycling, mandatory separate collection of biowaste together with more emphasis on setting up systems for paper, plastics, metals+glass will help reduce contamination and improve the quality of secondary raw materials

Lack of information or misinformation about the quality of recycled materials

*500 character(s) maximum*

Explore certificates to acknowledge quality of recycled material via 3rd party verification. Support material recyclers to run info campaigns for recognition of the state of the art+future progress to be made, aiming to revert a sometimes misleading perception of poorer quality as the manufacturers may not risk incorporating recycled material if badly perceived by end user/consumers. See Resource Association's REQIP tool for ref. values of max. acceptable contaminant level for quality recycling

#### **Poor availability of waste/material to be recycled**

*500 character(s) maximum*

Significant amount of recyclable material is exported outside of UK+Europe to facilities that often do not operate to same standards. We are in favour of increased checks/controls on export loads+greater transparency and implementation of quality standards. We support better enforcement of waste shipment rules + possible mandatory certification of waste treatment facilities outside of EU which would help tackle waste crime. The latter should only be looked after the former has been tackled

#### **Poor reliability of supply for recycled materials**

*500 character(s) maximum*

The key issue for reprocessors in terms of reliability of supply of recycled materials remains consistency of quality of feedstock through the supply chain. We state again that a whole supply chain approach is needed, from householder to manufacturer with collection and sorting systems being integral to success. The Commission can take leadership role and working with Member States to set correct regulatory+ market signals that will drive quality from the start of the materials collection process

#### **Low demand for recycled materials**

*500 character(s) maximum*

Stronger use of GPP needed that requires business to design products for easy re-use/recycling. Financial rewards e.g. reduced VAT on quality secondary raw materials+shift of taxation onto virgin equivalents are other routes to be explored. Differentiate producer responsibility fees by rewarding companies that make packaging with high recycled content and possible measures for mandatory recycled content e.g. for plastics, in order to overcome market failures

## Cost differential between primary and secondary raw materials

*500 character(s) maximum*

Demand pull measures would help overcome cost differential issues between primary and secondary raw materials. Voluntary efforts e.g. UK's dairy roadmap have proven ineffective in supporting producers of secondary raw materials where virgin equivalents compete on price (in this case due to oil price dropping+virgin polymer became cheaper). Incentives as mentioned previously are needed in absence of pricing mechanisms that integrate environmental externalities into the price of virgin materials.

## Regulatory obstacles at national/regional/local level

*500 character(s) maximum*

UK policies do not incentivise quality recycling enough. Today, Local Authorities calculate recycling rates based on weight of materials collected at kerbside, regardless of what truly happens with this material, or how much contaminant it contains. Even bales of sorted material destined for recycling abroad contain high contaminant and are unsuitable for recycling, but still counted as recycled. UK is more lenient on quality controls of exports than its standards on what is recycled in the UK.

## Regulatory obstacles at EU level

*500 character(s) maximum*

Implementation of EU waste and waste shipment regulation as well as Green Public procurement.

## Regulatory gaps at EU level

*500 character(s) maximum*

In general there are a lack of regulatory incentives to stimulate demand for secondary raw materials. These should include possible mandatory recycled content in products such as plastics in order to overcome market failure; stronger implementation of GPP; differentiated EPR fees according to recycled content; differentiated VAT levels according to the waste hierarchy

## Regulatory gaps at national/regional/local level

*500 character(s) maximum*

Same as previous question. In general there are a lack of regulatory incentives to stimulate demand for secondary raw materials. These should include possible mandatory recycled content in products such as plastics in order to overcome market failure; stronger implementation of GPP; differentiated EPR fees according to recycled content; differentiated VAT levels according to the waste hierarchy

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

*500 character(s) maximum*

More emphasis needed on research about where markets lie and improved information dissemination to manufacturers that many quality secondary raw materials are not 'inferior in quality' than the virgin equivalents. Ensure that financial support is given to secondary raw materials during periods where virgin material is cheaper than the secondary equivalent to avoid destroying the recycling sector

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

*500 character(s) maximum*

More publically available data and transparency needed throughout the waste and resources chain. To encourage better source separation of recyclables, there must be more transparency to citizens about what happens to waste once it has left the household. A YouGov survey showed that 70% of respondents wanted more info about what happens to recycled materials and 32% would be more likely to source separate their recyclables if they did know. See RA's "End Destinations of Recycling Charter"

### 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*

All options mentioned could possibly be improved with relevant and specific approaches and it is very difficult to make trade-offs between the different materials.

Please give reasons for your choice:

Paper

EU-wide end-of-waste criteria for paper would improve the functioning of the recycled paper market in the EU

Please give reasons for your choice:

Plastics

Plastics are used in many different forms, and in many different products. In many cases plastics can be difficult to recycle e.g. through the use of laminates. The use of recycled plastic has greatly increased in recent years, but there is still substantial room for improvement, through developing product standards and developing technology to incorporate recyclates. Mandatory recycled content in plastic products could help advance this and overcome market failure

Please give reasons for your choice:

Other

All options mentioned could possibly be improved with relevant and specific approaches and it is very difficult to make trade-offs between the different materials.

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

*500 character(s) maximum*

More emphasis needed on research about where markets lie and improved information dissemination to manufacturers that many quality secondary raw materials are not 'inferior in quality' than the virgin equivalents. Ensure that financial support is given to secondary raw materials during periods where virgin material is cheaper than the secondary equivalent to avoid destroying the recycling sector

## **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

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

All options mentioned could possibly be improved with relevant and specific approaches and it is very difficult to make trade-offs between the different materials/products/sectors

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

Food and drinks, including reduction of food waste

*500 character(s) maximum*

Separate collection of biowaste needed as well as a mandatory food waste reduction target



## Plastics

500 character(s) maximum

More demand pull measures needed to protect plastics recycling industry from competition with virgin polymers

## Others

500 character(s) maximum

All options mentioned could possibly be improved with relevant and specific approaches and it is very difficult to make trade-offs between the different materials/products/sectors














































## 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)	<input type="radio"/>	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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)					
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	<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"/>

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

*500 character(s) maximum*

Introduce a set of indicators on resource consumption, including imports and exports, measuring at least their material, land, water and carbon footprints at the level of the EU, Member States and industrial sectors. Full implementation and proper enforcement of existing legislation on waste and resource management needed. EU funds must be invested in waste prevention, re-use and recycling rather than landfilling and thermal treatment.

## 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:

- ebab073e-0e67-4185-adf8-ed0b637e4772/RA Position CEP Position Aug 2015.pdf

### Contact

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