

Public Consultation on the Circular Economy

Fields marked with * are mandatory.

1 Introduction

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

*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

European Environmental Bureau (www.EEB.org)

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

200 character(s) maximum

EC register for interest representatives: Identification number
06798511314-27

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

200 character(s) maximum

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secretariat@eeb.org

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 checked="" 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 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other — please specify below	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

Enforce phase-out of problematic substances through EU chemicals and product legislation to create non-toxic material cycles and to avoid hazardous legacies for reuse, remanufacturing and recycling.

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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising lifecycle environmental impacts	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other- please specify below	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

200 character(s) maximum

Free access to any software tools and firmware updates needed to ensure the full functioning and serviceability of products over their entire lifetime, also in the cases of reuse or refurbishment

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 type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Functionality of the product	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enabling innovation	<input type="radio"/>	<input 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 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 availability, sustainable production and cascading use of biomass for materials, preventing extraction from ecosystems with high carbon stocks and high-biodiversity value

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

Electronic components are integrated into more and more of our everyday devices. Wireless connectivity and smart appliances are not only an energy time-bomb according the International Energy Agency. Smartphones and similar products are also vulnerable to squeezes of supply on rare material imports. Given shorter innovation and model cycles this product category poses important challenges to new business models within a circular economy that would require new design solutions to be investigated to facilitate repair, upgradeability, reuse and recovery of precious materials.

Please give reasons for your choice: clothing and textiles

Perceived obsolescence can be summarized in a single word - fashion. Each season there is a new trend and we all are tempted to change our wardrobe accordingly. Most often it is not about wear and tear. By its very nature, the fashion industry is built around consumer demand for new and different styles not the durability of individual garments. Fast fashion is the clothing equivalent of fast food. It encourages consumers to purchase and dispose un-needed clothes at rapid rate. In addition around 30% of garments in our wardrobes aren't worn for a year. Producing one pair of jeans takes about 8,000 litres of water. Every step from growing the cotton to the manufacturing process needs water. A report from WWF International shows that 73% of global cotton harvest comes from irrigated land. But in many regions water is scarce, yet essential for hydration and agriculture. Currently the annual cotton production in the world is about 28 million tons and covers 36 million hectares. Using recycled fabrics means less land and water is used. The impact of clothing and textiles sector on health and environment is tremendous. Clothes are worn daily by the public, in direct contact with skin. In Europe, their consumption keeps increasing, only children's wear market represents some 28 billion Euros. However the textile and clothing production involves the use of hazardous chemicals that are released to the environment in one way to the other. The avoidance of toxic chemicals in the material cycles is key.

Please give reasons for your choice: general measures

Our indicated choices for priority product categories are by no means comprehensive. Furthermore, we think there might be some misconception in asking what product group to prioritize. There are no tradeoffs to be made between different categories of products which have different value chains, different economic actors and industrial processes. The aim of the circular economy should be to develop relevant approaches suitable to each product group/sector. That is the reason why we also selected “general measures”. BUT BY GENERAL WE DO NOT UNDERSTAND abstract measures and mere good intentions, we rather understand that all product categories should be considered with their specific potentials and improvement possibilities.

In fact we would recommend to define clear criteria for the selection of the most relevant product categories to be prioritized within the new EU Circular Economy Package, such as economic scarcity and supply risks of the raw materials contained, destructive competition on exploiting natural resources including land and water, life-cycle environmental and health impacts, relevance for European businesses and sustainable consumption. Once the EU has defined such criteria, we recommend enforcing of the following instruments to tackle resource-related challenges regarding product design and disclosure of information across all priority product categories:

- 1) Make best use of the current Ecodesign-Directive for energy-related products, e.g. through the implementation of the next working plan 2015-2017, including horizontal provisions on durability/reparability, and specific design-for-recycling options, and any upcoming review of existing regulations or voluntary agreements;
- 2) Establish generic design requirements across different product categories in the Waste Framework Directive and strengthen the essential requirements in the Packaging and Packaging Waste Directive combined with economic incentives such as differentiation of EPR fees as part of the ongoing revision process;
- 3) Set legal provisions including defined criteria to identify key material streams and to investigate possible product-group specific design requirements, tackling e.g. construction materials, furniture and textiles;
- 4) Provide European wide project schemes to develop and test the methodology for setting information and design requirements on these product groups as part of the Commission’s action plan on circular economy, building on existing activities in EU member states and involving key stakeholders along the value chain;
- 5) Decide on the best legal framework where to embed the results from the project schemes until end of 2018: e.g. scope extension of the Ecodesign Directive, sectoral policies, or a new overarching EU product policy framework.

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 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support the development of digital solutions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Identify and promote exchange of best practice	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Identify minimum standards for increasing resource-efficient processes (e.g. Best Available Techniques)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure availability of reliable data on material flows across value chains	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Provide access to finance for high-risk projects	<input 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

Introduce mandatory Product Passports to standardize technical and environmental information on relevant properties to facilitate repair, reuse and recycling and make them available in an EU database

Please specify which regulatory gaps you are referring to

300 character(s) maximum

There is no appropriate legislation to set design requirements for non energy-related products and to improve traceability of priority materials, incl. hazardous and nano, along value chains, and to assess their environmental/health related impacts such as CO2, material, land, and water footprints.

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

Binding sustainability criteria for sustainable sourcing and production are needed to cover both abiotic and biotic resources, including impacts on biodiversity and ecosystems.

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

500 character(s) maximum

Many options in the questionnaire contain wishful intentions but no precise policy measures to reduce regulatory uncertainties for a CE at EU level, e.g. links to waste legislation. The EU energy and biomass policies need to be clearly aligned with the aim to increase resource efficiency and promote cascading use within a circular economy by eliminating distorting incentives for burning biomass and recyclable waste. Bio-based products should not be de facto declared as renewable and sustainable.

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

Encourage waste prevention (e.g. minimising food waste)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other — please specify below	<input 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

Avoid re-injection of hazardous substances that would undermine the acceptance for remanufactured products or recycled content. No authorizations without traceability/marketing of concerned material.

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

As one of the fastest growing sectors, electronics should become more durable, safe and affordable to repair or upgrade, and information to prevent early disposal made clearly available to consumers.

Please give reasons for your choice: food and beverages

200 character(s) maximum

The way many food (and beverage) products are grown, produced and packaged damages our environment. Everyday consumer choices can have a huge impact to establish greener supply chains.

Please give reasons for your choice: clothing and textile

200 character(s) maximum

Production and consumption rates of clothing and textiles are a substantial contributor to greenhouse gas emissions, solid waste, pollution, chemical toxicity, land and water use.

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

500 character(s) maximum

The 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. Existing tools like the multi-criteria EU Ecolabel for environmental excellence, binding rules for Green Public Procurement and consistency across different EU product policy instruments should be reinforced.

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 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 checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 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

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

Establish EU wide standards for recycled materials that could be considered equivalent with virgin materials. Converge progressively the legal achievements for recycling targets with those standards. End-of-waste criteria need to be set so as to ensure compliance with both chemicals legislation and tracing of substances of very high concern (SVHC) and the use of the substance or object should not lead to overall adverse environmental or human health impacts.

Poor quality of recycled materials

500 character(s) maximum

Enable and recognize a differentiation among recycled materials which exceed EU minimum standards in order to pull the market. Drive innovation towards materials, notably polymers, which would preserve their quality as virgin even after several recycling loops. If waste is to re-enter the economy, it needs to be ensured that it has been processed in such a way as to create a safe product. Limits on the recyclability of contaminated material are justified to avoid endless toxic legacies.

Lack of information or misinformation about the quality of recycled materials

500 character(s) maximum

Explore certificates for acknowledging the quality of recycled material through third party verification. Recyclers and manufacturers need to agree on respective criteria. Support material recyclers to run information campaigns for the recognition of the state of the art and 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.

Poor availability of waste/material to be recycled

500 character(s) maximum

Poor reliability of supply for recycled materials

500 character(s) maximum

Low demand for recycled materials

500 character(s) maximum

Create incentives through crediting products containing recycled materials (e.g. as bonus in terms of savings on embedded CO2 emissions, in product regulations, Extended Producer Responsibility schemes). Important to note: Additional tax rebates and economic incentives are necessary but not necessarily to be defined at EU level as they are a matter of national competency.

Cost differential between primary and secondary raw materials

500 character(s) maximum

Accept to balance - where needed (e.g. plastics, CRM, bio-nutrients) - the still too high cost of the secondary raw material through market incentives/ tax rebates. Those incentives should last as long as there are no proper integration of externalities in pricing of the respective virgin raw materials.

Regulatory obstacles at national/regional/local level

500 character(s) maximum

Regulatory obstacles at EU level

500 character(s) maximum

Regulatory gaps at EU level

500 character(s) maximum

Regulatory gaps at national/regional/local level

500 character(s) maximum

Insufficient cooperation/exchange of information along the value chain

500 character(s) maximum

Lack of reliable data on secondary raw material flows

500 character(s) maximum

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

Once more, we regret the approach considered here and based on sole prioritization as if trade offs were to be made among different materials, not necessarily interfering in terms of economic actors and value chains. All options mentioned could possibly be improved with relevant and specific approaches. In particular we would like to add textiles to the list above.

Please give reasons for your choice: Construction aggregates

Construction materials are extremely resource intensive, and represent a comparatively large waste stream, meaning they account for a large portion of total waste. The raw material consumption of the construction sector is over 1.5 billion tonnes. The Ellen MacArthur foundation estimates that only 20-30% of all construction waste is recycled or reused.

Please give reasons for your choice: Plastics

Plastics are used in many different forms, and in many different products. 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. Regulating for a mandatory recycled content in plastic products would help advance this.

Please give reasons for your choice: Other

Textiles are found in municipal solid waste mainly as discarded clothing, although other sources include furniture, carpets, tires, footwear, and nondurable goods such as sheets and towels.

Critical raw materials should be targeted because they are very important for a wide range of products, vital for the European economy. It is estimated that 90% of critical raw materials are imported from outside EU countries, and as such, fostering a market for secondary critical raw materials within the EU is crucial.

Nano-materials should only be placed on the EU market if they are proven to be safe and compatible with usage in a circular economy.

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

500 character(s) maximum

There is an urgent need to avoid or phase out any extra premiums paid for energy recovery from waste compared to recycling of materials contained as this causes serious distortions for the development of markets for secondary raw materials. Authorities should help with industrial symbiosis (supporting collection and exchange of data, investments and innovation) and use of public procurement to support secondary raw material markets.

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?

Forest-based and other bio-based products

500 character(s) maximum

There is a cascading of use for forestry and bio-based products that requires more investigation, in order to privilege material usage and high added value prior to burning. As raw materials for these products are limited and competing on land, sustainable sourcing and increasing recyclability must be ensured before the sector can contribute to a resource-efficient circular economy. Nonetheless innovative solutions could help substituting some more hazardous material (glue, coatings ...).

Information and communication technologies

500 character(s) maximum

The ICT sector is highly innovative and of growing presence in our daily life. A specific approach could be considered to harness the potentials for energy and resource efficiency of related products and service systems, while preventing counter performances and rebound effects with regard to resource use and energy consumption of the supporting infrastructure.

Retailing

500 character(s) maximum

Retailers are the main interface between consumers and producers. They can play a crucial role in moving towards circular economy patterns, but so far the retail forum initiative was based on mere voluntary commitments. In our view retailers did not perform effectively on European level in order to compensate effectively for the race towards the bottom price in this highly competitive sector. New rules issued by the EC e.g. on choice editing could help unleash the potential.

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)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Partnerships with public authorities to help innovative businesses overcome potential legal obstacles to innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promotion of innovative business models for the circular economy (e.g. leasing and sharing)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specific measures to encourage the uptake of the circular economy among SMEs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exchange and promotion of best practice	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting the development of skills/qualifications relevant to the circular economy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for capacity-building in public administrations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for market penetration of innovative projects through labelling, certification and standards, public procurement for innovation, etc.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better monitoring the implementation and impact					

of policies contributing towards the circular economy agenda	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increasing the knowledge base by collecting and providing information and data e.g. on material flows, technologies and consumption patterns	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other- please specify below	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

200 character(s) maximum

Define an exemption in the EU VAT Directive for value preservation activities such as refurbishment or repair services. Provide support to companies, especially SMEs, on clean production & recycling.

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

500 character(s) maximum

The EU will fail to make significant progress towards and harvesting competitive advantages from achieving a more resource efficient circular economy, unless it measures and reduces the quantities of natural resources it consumes. As part of the circular economy package the EU must 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.

8

Upload documents

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

- 7bd96ff9-d67c-49b8-b873-95ab23c107da/1_Joint statement from NGOs on CE consultation.pdf
- f90ae628-db13-4035-8e66-730f52c0e235/2_Walking the circle.pdf
- 0967e733-da31-47aa-aafe-bbd06089e240/3_Circular Economy and REACH.pdf
- d76f644c-3521-41fe-87e9-4ca498c0bb37/4_Mission Statement on Repair and Durability of Products.pdf
- 4f01adc6-91fd-4972-802a-90e371857e96/5_ING_Financing-the-Circular-Economy.pdf

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