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To:

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Joint letter: Recycling industry, cities and civil society call for urgent measures to tackle the construction sector's waste problem

Construction materials, such as concrete or insulation, still capture half of all raw materials used and generate a third of overall waste every year in the EU. Reuse and high-quality recycling are unfortunately still far from being the norm¹.

Transitioning to a circular economy is crucial to ensure a competitive and decarbonised EU construction sector, no longer dependent on the unsustainable use of natural resources. Yet, existing EU policies targeting the sector have failed to get us there. In particular, the Waste Framework Directive is falling behind on delivering meaningful change in the construction sector, with outdated provisions acting as a barrier to further progress.

With a new industrial strategy for Europe taking shape, it is essential that **effective measures enable and prioritise circularity in the construction sector** – shifting thinking from how to deal with the huge volumes of the sector's waste to how to efficiently use resources. This is especially relevant for the cement and concrete sector, for which secondary materials are key to decrease clinker content, the main culprit of CO₂ emissions and natural resource depletion². **In the lead up to a new Circular Economy Act, we call on the Commission to deliver measures tailored at creating a robust legal infrastructure boosting circularity in the construction industry**, whilst keeping materials in our economy and reducing our external dependencies.

1. Tackle outdated provisions and gaps in the Waste Framework Directive (WFD):

- **Cut down on waste generation**, through mandatory waste prevention measures, such as pre-demolition audits. These allow for proper separation and identification of materials for reuse or recycling before renovation or demolition, preventing waste generation, while ensuring targeted separation at source.
- **No further delays in setting effective and specific reuse and recycling targets for key waste streams, calculated through a common methodology. This means acting – without further delays – on the evaluation clause in art. 11(6).** A recent report by the JRC has found that existing catch-all recovery targets incentivise recovery operations in the lower half of the waste hierarchy allowing Member States to report all sorts of treatments, including backfilling, to easily reach the objectives. As a

¹ Construction and demolition waste: challenges and opportunities in a circular economy — European Environment Agency (europa.eu)

² Shah, I.H., Miller, S.A., Jiang, D. et al. Cement substitution with secondary materials can reduce annual global CO₂ emissions by up to 1.3 gigatons. Nat Commun 13, 5758 (2022). <https://doi.org/10.1038/s41467-022-33289-7>

result, reuse and recycling remain of low priority. To further aggravate the situation, Member States calculate these targets with different methodologies³.

- **Disincentivise backfilling**, a practice that adds limited value to a circular economy. Member States make extensive use of backfilling to easily reach the existing recovery target. While often brought on the same level of recycling, it should be reported separately and ultimately disincentivised, as the Do No Significant Harm criteria under the Social Climate Fund are proposing⁴. Backfilling operations should therefore only be carried out when no higher option exists in the waste hierarchy. Ambitious Green Public Procurement measures are essential to ensuring this prioritization by stimulating demand for recycled materials.
2. **Leverage on existing and upcoming sectoral legislation to create a competitive and efficient market for secondary materials for the construction sector – targeting cement and steel first.** This should be done by:
- **Delivering product requirements, such as recycle content targets, for key construction materials** (i.e. steel and cement), ensuring coherence with the new Construction Product Regulation and the Ecodesign for Sustainable Products Regulation.
 - **Setting ambitious Green Public Procurement criteria**, to pull in large-scale demand for products with higher shares of recycled content.

Working towards a more circular construction sector will support Europe's decarbonisation, whilst strengthening its competitive edge. Our organisations remain available to further discuss this vision.

Cordially,

Environmental Coalition on Standards (ECOS)
EuRIC
Deutsche Umwelthilfe (DUH)
Carbon Neutral Cities Alliance (CNCA)
European Environmental Bureau (EBB)

For more information, please contact: federica.pozzi@ecostandard.org

³ Cristóbal García, J., Caro, D., Foster, G., Pristerà, G., Gallo, F., Tonini, D. Techno-economic and environmental assessment of construction and demolition waste management in the European Union, Publications Office of the European Union, Luxembourg, 2024, doi:10.2760/721895, JRC135470.

⁴ For more information: https://climate.ec.europa.eu/eu-action/eu-emissions-trading-system-eu-ets/social-climate-fund/consultation-application-dnsh-principle-under-social-climate-fund_en