

Response of PU Europe to the Public Consultation of the European Commission on the Circular Economy

Production phase

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)					
Encourage industry-led initiatives (i.e. self-regulation)					
Develop standards for voluntary use					
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)					
Review rules on legal and commercial guarantees					
Encourage the consumption of green products (see section 4)			*		
Other — please specify below	**				

PU Europe comments:

- * *As long as "green products" are poorly defined and not assessed through an objective life cycle approach and multiple criteria based on the three pillars of sustainability, their consumption should not be promoted per se.*
- ** *Promote a life cycle approach to ensure a holistic view on product performance.*

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					
Reparability: Availability of information on product repair (e.g. repair manuals)					

Reparability: Product design facilitating maintenance and repair activities					
Reparability: Availability of spare parts					
Upgradability and modularity					
Reusability					
Biodegradability and compostability					
Resource use in the use phase (e.g. water efficiency)					
Recyclability (e.g. dismantling, separation of components, information on chemical content)					
Increased content of reused parts or recycled materials					
Increased content of renewable materials					
Minimising lifecycle environmental impacts					

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					
Impact on production processes and value chain					
Impact on consumers (e.g. through durability and reparability)					
Functionality of the product					
Enabling innovation					
Respecting technology neutrality					
Impact on EU imports and exports					
Other — please specify below	*				

PU Europe comments:

* *The circular economy initiative should be performance-based and not prescriptive. It should bridge different sectors of activity. For example, open-loop recycling could have similar benefits as closed-loop recycling and recycles could bring more value if fed into a different sector. Overall criteria should not fix minimum recycled content but overall lower resource use (both primary and secondary over the whole life cycle).*

4. From a circular economy perspective, in your view which product categories should be given priority in the next few years and why?

- X Office equipment (e.g. computers, printers)
- X Small electronics (e.g. smartphones, cameras)
- X Packaging materials

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)					
Address potential regulatory obstacles in EU legislation	*				
Address potential regulatory gaps in EU legislation – specify					
Support the development of innovative business models (e.g. leasing)					
Improve the interface between chemicals and waste legislation					
Promote collaboration between and among private and public sectors, including end-users					
Support the development of digital solutions					
Identify and promote exchange of best practice					
Identify minimum standards for increasing resource-efficient processes (e.g. Best Available Techniques)					
Ensure availability of reliable data on material flows across value chains					
Provide access to finance for high-risk projects					
Other — please specify below	**				

PU Europe comments:

* *Merge all sustainability initiatives and methods into one scheme, at least within the construction sector (TC350, Ecodesign, Ecolabel, Energy label, GPP, new building assessment tool, Product Environmental Footprint, Environmental Technology Verification scheme etc.)*

** *Ensure that a risk-based approach is applied when assessing the recyclability of waste materials containing legacy substances. In the absence of exposure risks, recyclability should be considered.*

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)				*	
Developing and promoting voluntary compliance schemes					
Addressing the issue through trade policy					
Addressing the issue through the promotion of targeted global initiatives					
Promoting the exchange of best practice among businesses					
Other — please specify below					

PU Europe comments:

* *The terms need clarification. Sustainability is not limited to environmental performance but includes social, environmental and economic aspects. The indicators could be defined at EU level, but not the criteria.*

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

PU Europe comments:

An LCA approach must be ensured. The production phase cannot be separated from the other life cycle phases. A product may have a high resource use when produced, but lead to higher use-phase benefits than competitive products with lower production impacts.

Consumption Phase

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					
Ensure the clarity, credibility and relevance of consumer information related to the circular economy (labels, advertising, marketing) and protect consumers from false and misleading information in this respect					
Organise EU-wide awareness campaigns to promote the circular economy					
Improve/clarify rules and practices affecting consumer protection (e.g. relating to legal and commercial guarantees)					
Take action on product and material design					
Encourage financial incentives to consumers at national level (e.g. by differentiated taxation levels depending on products' resource efficiency)					
Take measures targeting public procurement (e.g. through criteria for Green Public Procurement)					
Encourage new modes of consumption such as shared ownership, collaborative consumption, leasing & the use of internet-based solutions					
Promote the development of repair and maintenance services					
Encourage waste prevention (food waste)					
Other — please specify below	*				

PU Europe comments:

* *Buildings: work towards a single European sustainable building assessment scheme based on a wide range of quantifiable indicators and using the CEN/TC 350 standards.*

2. Which products should be a priority for EU action to promote more sustainable consumption patterns and why?

- Food and beverages
- Packaging materials
- Cars

PU Europe comments:

- **Food and beverages:** Too much food is still wasted along the supply chain. This can be reduced through better cold chains and consumer awareness. Food packaging is often excessive.
- **Packaging:** Packaging for certain products is excessive and has a very short life time. Its composition is well known.
- **Cars:** Eco-driving can lead to significant fuel savings.

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

PU Europe comments:

Burdens and benefits in the use phase must be taken into account when assessing burdens from production. A holistic LCA view is needed.

Markets for secondary raw materials

1. What are the main obstacles to the development of markets for secondary raw materials in the EU?

	Significant for all materials	Bio-nutrients	Construction aggregates	Critical raw materials	Glass	Metals	Paper	Plastic	Wood/Bio-mass
Lack of EU-wide quality standards for recycled materials									
Poor quality of recycled materials (e.g. containing unwanted substances/high contamination)									
Lack of information or misinformation about the quality of recycled materials									
Poor availability of waste/material									
Poor reliability of supply for recycled materials									
Low demand for recycled materials									
Cost differential between primary and secondary raw materials									
Organisational cost of switching from primary to secondary raw materials in industrial processes									
Regulatory obstacles at national / regional / local level									
Regulatory obstacles at EU level									

Regulatory gaps at EU level									
Regulatory gaps at national/regional/local level									
Insufficient cooperation/exchange of information along the value chain (e.g. between producers, recyclers and authorities responsible for waste management)									
Lack of reliable data on secondary raw material flows									
No opinion									
Other- please specify below								*	

PU Europe comments:

Poor availability of waste/material to be recycled: Many waste materials are exported to third countries and hence lost for the EU. Measures should be taken to reduce these exports.

Poor reliability of supply for recycled materials: This is difficult to address through regulation. By definition, building demolition sites are scattered across countries. It is hence difficult to know when and where and how much waste materials will become available.

Low demand for recycled materials (e.g. on the EU market): In the case of construction products, fitness for use in a given end-use application is and will remain the first selection criterion, quickly followed by the price. Recycled content is not considered important, as the life time of many construction products exceeds 50 years and other impacts (durability) have priority.

Cost differential between primary and secondary raw materials: This is difficult to address through regulation. Economies of scale are necessary to bring costs down. As prices of primary raw materials are increasing, secondary raw materials become more competitive. Hence, the cost differential should diminish over time.

Regulatory obstacles at EU level: Risk-based assessment of waste construction products containing certain legacy substances with a view to enabling recycling when risks can be excluded.

* **Economies of scale:** Due their light weight, wide dispersion, long life time and wide range of properties and performances, it is quite difficult to obtain the required economies of scale for a constant flow of wastes that is required to achieve self-sufficiency of recycling operations for certain plastic materials (outside of the packaging area). Many pilot projects have been abandoned because there was no sufficient and stable waste flow to sustain the process.

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

PU Europe comments:

Risk-based assessment of waste construction products containing certain legacy substances with a view to enabling recycling when exposure risks can be excluded.

3. Which secondary raw materials markets should the EU target first to improve the way they work?

- X Bio-nutrients (e.g. nitrogen, phosphorus and organic matter from e.g. sewage sludge and farm organic matter residues) for fertiliser use
- X Paper
- X Wood/Biomass

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

PU Europe comments:

An LCA approach should be applied. The use of secondary raw materials is only sensible if the overall environmental burdens along the full life cycle are lower compared to the use of virgin materials. For example, the environmental impacts of collecting small waste quantities from remote demolition / renovation sites and turning it into secondary raw materials can be very high. A flexible approach is therefore needed.

Sectoral measures

1. In your view, which sectors should be a priority for specific EU action on the circular economy and why?

- Bio-nutrients (e.g. from sewage sludge or farm organic matter residues) for use in fertilisers
- Electrical and electronic goods
- Food and drinks, including reduction of food waste

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

PU Europe comments:

Bio-nutrients: The potential is substantial and relatively easy to realise.

Electrical and electronic goods: Too much end-of-life goods are still exported to third-world countries. The raw materials they contain should be re-used in the EU. The technologies are available.

Food and drinks, including reduction of food waste: Too much food is wasted today and solutions (such as efficient cold chain, changes on "best before" rules, use waste food as feed etc.) are available.

Enabling factors for the circular economy, incl. innovation and investment

1. How important are the following enabling factors in promoting the circular economy at EU level?

	very important	important	not very important	not important	no opinion
Financing innovative projects or technologies relevant to the circular economy (from EU funds, e.g. Horizon 2020)					
Public incentives (e.g. financial guarantees) for private investors to finance projects conducive to the circular economy					
Support for the development of circular economy projects (e.g. technical assistance)					
Support for innovative systemic approaches and cross-sectoral cooperation (e.g. industrial symbiosis and cascading use of resources)					
Partnerships with public authorities to help innovative businesses overcome potential legal obstacles to innovation					
Promotion of innovative business models for the circular economy (e.g. leasing and sharing)					
Specific measures to encourage the uptake of the circular economy among SMEs					
Exchange and promotion of best practice					
Promoting the development of skills/qualifications relevant to the circular economy					

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

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

PU Europe comments:

As the circular economy should reduce environmental burdens, it must be LCA-based. A simple label that a product is the result of recycling is no guarantee for a better life cycle performance.

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