

## **PU Europe Comments on Communication COM(2015)614fin "Closing the loop - An EU action plan for the circular economy"**

### **General:**

- PU Europe welcomes this Communication which provides a holistic view on product life cycles as a prerequisite to moving towards a more circular economy. Given the extreme diversity of materials, products and use patterns, this is the only realistic approach.
- Resource use optimisation must be the goal of the Circular Economy package. Limiting product performance to one aspect, i.e. recycled content, cannot deliver this transition. A wide range of environmental indicators is necessary to assess the resource efficiency of products, including the most appropriate end-of-life solutions, and allow for informed choices by consumers and policy makers. As a matter of example, choices may have to be made between better recyclability and higher performance / longer service life, or between a lower global warming potential and a higher land use / eutrophication potential.
- The construction industry already publishes detailed product-to-gate and end-of-life environmental data through environmental product declarations (EPD) according to EN15804. These datasets take account of recycled and renewable raw materials and different end-of-life options including recycling. Following a revision of the Commission mandate M/350, the relevant standards will be aligned with the Product Environmental Footprint method as developed by DG Environment. When applied at the building level, this system can provide a holistic view on the life cycle performance. It will stimulate the use of recycled / renewable content and of end-of-life recycling in all cases where this leads to overall increased resource efficiency. It will also demonstrate cases where the environmental burdens of recycling may exceed its benefits. Although still not fully mature, the system takes account of the service life and repair / maintenance needs of construction products and buildings. PU Europe strongly recommends that this system be used for construction products.

### **Comments on chapter 3. Waste management**

- PU Europe strongly supports the proposed waste-to-energy (WtE) initiative. Policy must strike the right balance between the contribution of WtE as a domestic source of energy (which reduces energy supply dependence) and the need to boost reuse and recycling.
- Well designed policies will first of all divert organic waste streams from landfill. Experience has shown that this cannot be fully achieved without energy recovery. By setting the right incentives, WtE will not go to the detriment of recycling / reuse. On the contrary, many Member States demonstrate that high WtE rates can be combined with high recycling rates allowing for a complete landfill ban for organic waste.
- There will be no one-size-fits-all solution even for the same product. The economic and environmental viability of circular economy goals depends on waste quantities and the recycling infrastructure in a given region (including transport distances).

## **Comments on chapter 4. From waste to resources: boosting the market for secondary raw materials and water use**

- PU Europe can largely support the analysis of barriers to turning waste into resources. However, two barriers need to be added: the stability of waste streams and price fluctuations of virgin raw materials.
- PU Europe welcomes the clarification of "end-of-waste rules including quality standards for secondary plastic raw materials".
- The Commission rightly intends to examine the interface between chemicals, products and waste legislation. The analysis should not be limited to content or traceability but focus on exposure risks to hazardous substances.

## **Comments on chapter 5.1. Plastics**

- PU Europe fully agrees that plastics are too valuable to be landfilled. To avoid this, Member States must put in place strong incentives to develop economically and environmentally sound reuse and recycling solutions combined with high efficiency WtE capacities.
- The Commission proposal to develop a strategy on plastics is therefore supported. As regards hazardous substances, the focus should be placed on exposure risks and exposure levels.
- The strategy must take into account the specific characteristics of both thermoplastic and thermo-set materials and cover the full life cycle.

## **Comments on chapter 5.4. Construction**

- The proposals made in this chapter can largely be supported.
- The sorting of demolition waste into at least mineral and organic waste fractions is a prerequisite to avoiding landfill. This should become a legal requirement in all Member States.
- PU Europe cannot accept the development of a new set of indicators to assess the environmental performance throughout the life cycle of a building. It seems that this new system will not be compatible with the comprehensive system developed in CEN/TC350 and mandated by the Commission. Construction product manufacturers invested many millions of euros to provide environmental product data for use at the building level. In parallel, the Commission develops the Product Environmental Footprint method which is slightly different from TC350 standards. PU Europe welcomes the draft revised mandate M/350 which invites CEN to align the TC350 standards and the PEF method. The future building assessment scheme proposed in this action plan must be fully compatible with the aligned TC350/PEF method.

## **Comments on chapter 5.5. Biomass and bio-based products**

- The competition for / availability of biomass (and cultivable land) may become major stumbling blocks to the further uptake of bio-based ingredients in construction products.
- The Commission's Heating and Cooling strategy calls for the increased use of biomass in decarbonised energy supply. At the same time, regulators promote the use of wood-based construction products and the chemical industry is encouraged to source more bio-based raw materials.
- The Commission should present a detailed analysis of projected / desired biomass use for the decades to come including sources of supply and their impact on sustainability.

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