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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?**

- As an individual / private person Public authority
 Academic/research institution International organisation
 Civil society organisation Professional organisation
 Private enterprise Other

Please specify:

200 character(s) maximum

Sustainable Business Association

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:

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Italy
- Latvia
- Liechtenstein
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Norway
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- Switzerland
- 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

De Groene Zaak

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

200 character(s) maximum

705206416750-63

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

200 character(s) maximum

arthur.ten.wolde@degroenezaak.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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Develop standards for voluntary use	<input type="radio"/>	<input checked="" type="radio"/>	<input 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 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"/>

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

Green public procurement; targets for the whole circle; steer on indicators for circularity; programmes for circular frontrunners, sectors, regions and cities; a circular economy institute

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Resource use in the use phase (e.g. water efficiency)	<input checked="" type="radio"/>	<input 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 checked="" 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 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

The use of circular business models (e.g. product-as-a-service), cascading, and re-purpose

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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Respecting technology neutrality	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on EU imports and exports	<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 other considerations not listed above should be taken into account, please specify:

200 character(s) maximum

Positive impact on new jobs, EU GDP and market position of front runners and early adopters of circular products and services; waste reduction; private investments in circular economy

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

- (a) built environment
- (b) food
- (c) Local economies (cities and regions)

Please give reasons for your choice: general measures

Mainstreaming the CE requires economic incentives for ALL markets using green public procurement, a tax shift, VAT differentiation, EPR and a circular design directive

Please give reasons for your choice: others

Buildings: Buildings are main consumers of resources and main waste producers in EU. Extending the life span, e.g. by renovation and re-use, is an essential part of the CE. For this purpose, buildings should be more resilient, durable and flexible than today, with focus on well-being of people. Building performance will not be solved by focusing on the construction products.
 Food: food waste is a real issue
 Circular cities: enormous potential - do not focus on sectors only. The economy will be transformed on every level

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

Support the development of ALL circular business models: Performance based contracting, Pay per use, repair, waste reduction, sharing platforms, take back management, next life sales, 3D printing etc.

Please specify which regulatory gaps you are referring to

300 character(s) maximum

- (a) A circular design directive
- (b) A flexible competition policy that creates and fosters a framework for cooperative innovation and co-creation

- (c) Enforcing existing waste regulations throughout the EU
- (d) Regulation concerning resource efficiency of buildings and guidance for renovation

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

Establishing strong economic incentives for producers and consumers to implement circular sourcing and production methods would be very effective and leave sufficient room for innovation

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

500 character(s) maximum

Companies respond the strongest to market signals (demand and price) and regulation. Regulation should however be not too prescriptive since that leaves companies insufficient room to develop the most effective and efficient circular solutions for their products and markets. Therefore we prefer economic instruments above regulation where possible. Finally, production is also strongly influenced by the business model; the economic instruments should favour circular business models

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"/>

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

200 character(s) maximum

Encourage performance based contracting, progressive purchase of circular products, next life sales, refurbish&resell, upcycling, collaborative production, cradle-to-cradle, produce-on-order

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

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

200 character(s) maximum

See question 3.4

Please give reasons for your choice: general measures

200 character(s) maximum

See question 3.4

Please give reasons for your choice: others

200 character(s) maximum

See question 3.4

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

500 character(s) maximum

(1) Economic incentives for consumers are crucial since the emphasis shifts from producer to user. Examples are

- (a) lower VAT for circular products and services
- (b) general tax shift from labour to resources which translates in price signals for consumers
- (c) EPR
- (d) financial incentives promoting takeback management behaviour

(2) Transparency is crucial. We advocate a Materials Information System that could in time make ecolables redundant and provide input for EPR and VAT

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	Metals	Paper	Plastic	Wood/Biomass
Lack of EU-wide quality standards for recycled materials	<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"/>
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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Organisational cost of switching from primary to secondary raw materials in industrial processes	<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 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"/>

If you think that other obstacles not listed above are relevant, please specify:

200 character(s) maximum

Lack of price signals for producers and consumers that are sufficient to make them shift to buying (products from) recycled and/or biobased materials. This could be accomplished by VAT, tax or EPR

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

The current mismatch between supply and demand of high quality recycled materials can be decreased by implementing standards and by investing in separation technologies. The increased volume of recycled materials is expected to go hand in hand with a maturation of the European recycling market.

Poor quality of recycled materials

500 character(s) maximum

See above

Lack of information or misinformation about the quality of recycled materials

500 character(s) maximum

We work with the Dutch government on developing a product-related "Materials Information System" in a project supported by industry. Ultimate goal of this system will be to keep materials in the loop as long as possible at the highest possible value (see attached Manifesto). We currently wait for EU funding. For buildings, a building passport could be developed to enhance recognition of recyclable materials at end-of-life. The Dutch Green Deal Circular Buildings is developing such a passport.

Poor availability of waste/material to be recycled

500 character(s) maximum

See above

Poor reliability of supply for recycled materials

500 character(s) maximum

See above

Low demand for recycled materials

500 character(s) maximum

See above

Cost differential between primary and secondary raw materials

500 character(s) maximum

See above: use VAT, a tax shift from labour to resources and EPR to increase the cost difference between primary and secondary raw materials. N.B. keep in mind that using a biobased primary material in general requires a proper waste collection, separation and cascading/recycling system in place to make it more circular throughout the chain

Organisational cost of switching from primary to secondary raw materials in industrial processes

500 character(s) maximum

It is also a lack of price signals to counter the organisational cost. Subsidising organisational costs does not seem the way to move forward on this obstacle; a company's real motivation is demand driven

Regulatory obstacles at national/regional/local level

500 character(s) maximum

The obstacles at all levels have been extensively documented by Acceleratio (2015). Besides the obstacles, a local and regional approach offers enormous opportunities for green public procurement, spatial planning, waste reduction and creating a local circular economy

Regulatory obstacles at EU level

500 character(s) maximum

The obstacles at all levels have been extensively documented by Acceleratio (2015). The main ones are lack of awareness, linear lock-ins, material complexity and geographical dispersion of chains

Regulatory gaps at EU level

500 character(s) maximum

- Lack of implementation of green public procurement
- Economic incentives
- Circular design directive
- An EU-wide, effectively enforced landfill ban for waste (products, parts, materials) that can be reused, upcycled, recycled, repurposed, cascaded etc.
- Legislation discouraging incineration of waste (including biomass)

See also question 3.5

Regulatory gaps at national/regional/local level

500 character(s) maximum

Lack of implementation of green public procurement and economic incentives
See also question 3.5

Insufficient cooperation/exchange of information along the value chain

500 character(s) maximum

Lack of a product-based materials information system (Pro-MIS, see above)

Lack of reliable data on secondary raw material flows

500 character(s) maximum

Lack of a product-based materials information system (Pro-MIS, see above)

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

Please give reasons for your choice: Bio-nutrients for fertiliser use

Crucial for long-term food production. Half of the added value of closing chains in the Netherlands is expected for the biotic cycle

Please give reasons for your choice: Construction aggregates

Lots of value to be recovered

Please give reasons for your choice: Plastics

Lots of value to be recovered and plastic soup to be avoided

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

500 character(s) maximum

1. The focus in this survey seems to be on abiotic materials. The biotic cycle with cascades of biomass is of equal importance and deserves an equally detailed analysis.
2. We recommend generic economic instruments BUT to implement these requires determining the nature and height of the price signals, which requires a detailed analysis of products, chains and sectors. In other words one-size-fits all instruments are fully feasible, as long as they leave room for tailor-made implementation

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

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

Circular Frontrunners Programme for research, development and demonstration aimed at front running companies in all sectors, including producers, designers, waste contractors, repair industry and thrift shops. The goal of this programme should be to work together on facilitating circular business. In our experience, many of the obstacles that our partners encounter are independent of sector and company size. In addition, we would support sectoral and cross-sectoral programmes or Green Deals to tackle more specific issues and mainstream circular business, targeting chains, cities, regional clusters / provinces and cross-sector partnerships as the primary approaches.

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

Construction/demolition and buildings

500 character(s) maximum

Building passport
Pre-demolition audit
Sustainability assessment of buildings (based on lifecycle thinking and performance based approach)
Landfill ban for recyclable construction waste materials.

Others

500 character(s) maximum

General measures + tailored implementations

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 checked="" type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Support for the development of circular economy projects (e.g. technical assistance)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Support for innovative systemic approaches and cross-sectoral cooperation (e.g. industrial symbiosis and cascading use of resources)	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promotion of innovative business models for the circular economy (e.g. leasing and sharing)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specific measures to encourage the uptake of the circular economy among SMEs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Exchange and promotion of best practice	<input type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for capacity-building in public administrations	<input type="radio"/>	<input 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 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 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 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"/>

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

200 character(s) maximum

See our Manifesto "More prosperity, new jobs", e.g.: found a European Circular Economy Institute for economic research into system change by economic mechanism design (= developing smart incentives)

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

500 character(s) maximum

Not mentioned in our Manifesto is the importance of underlying values. System thinking at the level of governments and company strategy means designing policies that motivate people and actors to change their BAU behaviour. This implies

- (1) connect to existing values, such as the importance of jobs and economic growth
- (2) launch a massive government campaign connecting to everyday life explaining to EU citizens why circular economy is such a good idea and important for all of us

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:

Contact

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