

# Public Consultation on the Circular Economy

Fields marked with \* are mandatory.

**Frequently Asked Questions on the Consultation on Circular Economy-** the file is available for download here:

[FAQs Circular Economy.pdf](#)

## 1 Introduction

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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

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### \*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 type="radio"/> Civil society organisation        | <input checked="" type="radio"/> Professional organisation |
| <input type="radio"/> Private enterprise                | <input type="radio"/> Other                                |

Does your company/organization make use of any of the following?

- EU eco-label
- EMAS
- Another environmental labelling or management scheme
- No environmental labelling or management scheme
- I don't know

Please specify:

European Quality Assurance Scheme for Compost and Digestate - ECN-QAS

Please indicate the sectors your organisation represents

- Construction
- Energy
- Chemicals
- Information and communication technologies
- Furniture
- Food and drink
- Hotel and catering industry
- Repair services
- Transport
- Manufacturing
- Electrical and electronic goods
- Textiles and clothing
- Agriculture and fishery
- Distribution (logistics, wholesale, retail)
- Recycling and other waste management
- Other: please indicate

Where are your member companies located?

- EU MS/ EEA
- Non-EU MS/ EEA

Please specify EU Member States/EEA countries of your member companies:

- 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

Please specify the non-EU Member States/EEA countries of your member companies:

Canada, Malaysia, Australia, Chile

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 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 checked="" 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 Compost Network

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

*200 character(s) maximum*

ID 26513411360-51

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

*200 character(s) maximum*

info@compostnetwork.info

### 3 Production phase

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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 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review rules on legal and commercial guarantees	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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.

**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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased content of renewable materials	<input checked="" type="radio"/>	<input type="radio"/>	<input 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*

Efficient execution of existing regulations e.g. EEE-equipment (batteries: they must have to be able to replaced easily. More and more products do not fulfil this requirement, but it is not executed)

**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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Functionality of the product	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on EU imports and exports	<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 checked="" type="radio"/>

**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

used in high quantity, at daily Basis by everybody

Please give reasons for your choice: air-conditioning and ventilation systems

More and more air conditioners are installed. They have a very high energy demand! Intelligent building with good air flow and heating systems should be massively supported and encouraged.

Please give reasons for your choice: cars

Individual traffic is increasing above all forecasts; besides public transport, car sharing etc. resource efficient car production and fuel from more and mor renewable and recycled sources is key.

**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
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Promote cooperation across value chains (e.g. through encouraging new managerial modes)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Address potential regulatory obstacles in EU legislation - please specify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Address potential regulatory gaps in EU legislation – please specify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide access to finance for high-risk projects	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>

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

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

*500 character(s) maximum*

## 4 Consumption Phase

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

#### 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*

big sector, everybody is depending on it; high growth rates, continuously decreasing life cycles

Please give reasons for your choice: food and beverages

*200 character(s) maximum*

sustainable production of food (beverages) is important, huge amount of food is wasted; Food (beverages) are products of daily use, covers half the consumer spendings

Please give reasons for your choice: packaging materials

*200 character(s) maximum*

a lot of pakaging waste is produced, could be drastically reduced or even avoided; encourage smart non packaging or reusable/multi-use packaging schemes

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

*500 character(s) maximum*

## 5 Markets for secondary raw materials

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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 type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poor availability of waste/material to be recycled	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Low demand for recycled materials (e.g. on the EU market)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Lack of reliable data on secondary raw material flows	<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"/>
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 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"/>

## 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](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*

Establishing EU-wide end of waste criteria for recycled materials, especially for compost and digestate, taking the proposed end-of waste criteria and methodology prepared by JRC/IPTS into account; The lack of EU wide standards hinders transborder trade!

### Poor quality of recycled materials

*500 character(s) maximum*

Only bio-nutrients based on defined input materials (separate collection of waste streams such as organic residues from households as well as commercial entities is needed), third party quality assurance and labelling is needed in order to guarantee a constant and common quality level for recycled products.

### Lack of information or misinformation about the quality of recycled materials

*500 character(s) maximum*

Quality labelling with application recommendations is needed - otherwise: uncertainty of the quality hinders the use and acceptance on the market

### Poor availability of waste/material to be recycled

*500 character(s) maximum*

An obligation for MSs to implement separate collection schemes for biowaste has to be introduced in combination with biowaste recycling targets via composting and anaerobic digestion

### Low demand for recycled materials

*500 character(s) maximum*

Markets have to be developed by means of awareness raising campaigns. Consumer/customer confidence is achieved and maintained through quality labelling and external quality certification which should be an obligatory element for recycling products.

### Cost differential between primary and secondary raw materials

*500 character(s) maximum*

Secondary raw materials do often not reach the market prices of primary products, though of comparable quality.

### Regulatory obstacles at national/regional/local level

*500 character(s) maximum*

The consistent implementation of separate collection and recycling for bio-waste needs legal/regulatory drivers (i.e. obligation and targets on national or regional level). Where this is missing, also the diversion targets for biodegradable waste from landfills as well as the recycling targets are not met yet! . In contrast to the renewable energy sector, no or very little funding and support is available for biological treatment. This distorts the recycling strategies.

### Regulatory obstacles at EU level

*500 character(s) maximum*

Commission Decision 2011/753/EU offers 4 confusing calculation methods for accounting on recycling pursuant Art. 11 WFD. Only one method (recycled municipal waste/total municipal waste) should be established. Biowaste composted in private gardens (home composting) should be excluded from the waste regime and not accounted for recycling. Conflict between definition of biomass of DIR 2009/28/EC and Biowaste for recycling following the WFD/Roadmap Resource Efficient Europe [COM(2011) 571 final].

### Regulatory gaps at EU level

*500 character(s) maximum*

No binding Recycling Targets for biowaste (based on separate collection)  
No existing obligation to introduce separate collection of biowaste in member states  
No end of waste criteria for compost and digestate under Art.6 WFD  
No dedicated funding scheme for also small scale, local separate collection and recycling schemes  
No obligation to adopt landfill and incineration taxes for non hazardous municipal and similar waste

## Regulatory gaps at national/regional/local level

*500 character(s) maximum*

Implementing waste legislation, separate collection of biowaste, landfill taxes, pay as you throw schemes

## 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*

Missing: Standardised European methodology to investigate and report on biowaste generated from private, public and commercial sources and treated for recycling and energy recovery.

## 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

Only 1/3 of the potential amount of biowaste is collected separately and treated biologically in composting and digestion plants, The biggest amount of biowaste ends up in landfills, causing environmental damages. Compost produced from biowaste is a very effective organic soil improver. 45% of European soils are already short of organic matter, something which is likely to worsen if no additional measures are taken. In addition, the biobased economy will put additional demand on the production function of soils, making the recycling of high quality organic matter even more critical for maintaining soil health and quality;  
For certain feedstock, compost production can go hand in hand with

production of biogas via anaerobic digestion. This, if well designed and under properly set economic framework conditions, may increase the economic value generated per tonne of biowaste.

Besides the substantial effect on the reduction of greenhouse gas emissions from landfills, input of stabilised organic matter to soils will result in C-sequestration - another important effect as regards the mitigation of GHG emissions.

Compost and digestate also recovers plant nutrients like NPK substituting energy consuming and non-renewable conventional sources of mineral fertilisers.

In addition, compost used as constituent in growing media substitutes the exploitation of peat bogs.

See also the conclusion of COM(2010)235 final "Communication on future steps in biowaste management in the European Union"

Please give reasons for your choice: Critical raw materials such as rare earth elements or certain precious metals

Because of very high ecologic influences at exploration and high dependence of delivery from outside EU

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

*500 character(s) maximum*

## 6 Sectoral measures

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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?**

Bio-nutrients for use in fertilisers

*500 character(s) maximum*

Please find attached our more detailed response and Position Paper on EU Circular Economy

Electrical and electronic goods

*500 character(s) maximum*

Because here we find very high growing rates and decreasing life cycles

Food and drinks, including reduction of food waste

*500 character(s) maximum*

Please find attached our more detailed response and Position Paper on EU Circular Economy

## 7 Enabling factors for the circular economy, including innovation and investment

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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?**

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

Support for capacity-building in public administrations	<input checked="" 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 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

*500 character(s) maximum*

## 8

### Upload documents

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

- [2f3fed76-750b-47ec-a79c-c60231fe50f7/150819\\_\\_ECN Submission on Circular Economy\\_final.pdf](#)

## Contact

