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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

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 com	pleting	this	questionna	ire?
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- As an individual / private person
 Public authority
- Academic/research institution
 International organisation
- Civil society organisation
- Private enterprise

- Professional organisation
 - Other

Please specify:					
200 character(s) m	naximum				
Internationa	al network of ci	ties and req	gions		
If your organisat	ion is not registered	d, you can regis	ster now		
2.2. Please give you EU MS/ EEA Non-EU MS/	1	dence/establi	shment		
Please specify the B	EU MS/EEA country	y of your estab	lishment:		
Austria	Belgium	Bulgaria	Croatia	Cyprus	Czech Republic
DenmarkHungaryLithuaniaPortugalSwitzerland	EstoniaIcelandLuxembourgRomaniaUnitedKingdom	FinlandIrelandMaltaSlovakia	FranceItalyNetherlandsSlovenia	GermanyLatviaNorwaySpain	Greece Liechtenstei Poland Sweden
2.3. Please indicat Commission's w		for the public	ation of your res	ponse on the	
declare that n Anonymously that none of it Not at all	ame given: I conser- none of it is subject y: I consent to publ t is subject to copyr please keep my con y within the Commi	to copyright restication of all infight restrictions on the confiduation confiduati	strictions that previous that previous that prevent public	ent publication ntribution and I ication	declare
2.4. How well infor	med are you abou	ıt the circular	economy initiativ	re?	
Very well info					
Fairly well in					
Not very well					
Not informed	i at ali				
2.5. Please give you name of your org	ganisation	ng as an indivi	dual/private pers	on, otherwise (give the
200 character(s) m	naximum				

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

200 character(s) maximum

302141215278-05

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@acrplus.org

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)	•	0	0	0	0
Encourage industry-led initiatives (i.e. self-regulation)	0	•	•	•	0
Develop standards for voluntary use	0	•	0	0	0
Promote and/or enable the use of economic incentives for eco-innovation and sustainable product design (e.g. via rules on Extended Producer Responsibility schemes)	•	•	•	•	•
Review rules on legal and commercial guarantees	•	0	0	0	0
Encourage the consumption of green products (see section 4)	•	0	0	0	0
Other — please specify below	0	0	0	0	•

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	•	0	0	0	0
Reparability: Availability of information on product repair (e.g. repair manuals)	•	0	0	0	0
Reparability: Product design facilitating maintenance and repair activities	•	0	0	0	0
Reparability: Availability of spare parts	•	0	0	0	0
Upgradability and modularity	0	0	0	0	•
Reusability	0	0	0	0	•
Biodegradability and compostability	0	0	0	0	•
Resource use in the use phase (e.g. water efficiency)	0	•	0	0	0
Recyclability (e.g. dismantling, separation of components, information on chemical content)	•	0	0	0	0
Increased content of reused parts or recycled materials	0	•	0	0	0
Increased content of renewable materials	•	0	0	0	0
Minimising lifecycle environmental impacts	•	0	0	0	0
Other- please specify below	0	0	0	0	•

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	0	•	0	0	0
Impact on production processes and value chain	0	•	0	0	0
Impact on consumers (e.g. through durability and reparability)	0	•	0	0	0
Functionality of the product	0	•	0	0	0
Enabling innovation	0	0	•	0	0
Respecting technology neutrality	0	0	•	0	0
Impact on EU imports and exports	0	0	0	0	•
Other — please specify below	0	0	0	0	•

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

Furniture

Clothing and textiles

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

For this product category selected, existing "best practices" show that more sustainable consumption and production models already exist. It is now time to put the appropriate framework to make the transition from niche to norm.

Please give reasons for your choice: construction products

For this product category selected, existing "best practices" show that more sustainable consumption and production models already exist. It is now time to put the appropriate framework to make the transition from niche to norm.

Please give reasons for your choice: general measures

There is an urgent need to settle requirements on incorporating circular design principles to increase the resource efficiency of products using the ecodesign framework, otherwise there is a risk to narrow circular economy to a "cost efficiency" without enough consideration for a true Resource efficiency. A strong framework for product design is needed, including, at least the following general objectives: extending the longevity of the products (upgradability, durability, reparability, availability of spare parts, countering planned obsolescence), increasing the reuse, refurbishment and remanufacturing and increase the recovery of key components and materials to facilitate reuse, remanufacturing and refurbishment. To incentivise sustainable investments in reuse and recycling it is important to incorporate external costs into the economic system.

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)	•	0	0	0	0
Address potential regulatory obstacles in EU legislation - please specify	0	0	0	0	•
Address potential regulatory gaps in EU legislation – please specify	0	•	0	0	•
Support the development of innovative business models (e.g. leasing)	•	0	0	0	0
Improve the interface between chemicals and waste legislation	0	0	0	0	•
Promote collaboration between and among private and public sectors, including end-users	0	•	0	0	0

Support the development of digital solutions	0	•	0	0	0
Identify and promote exchange of best practice	•	0	0	0	0
Identify minimum standards for increasing resource-efficient processes (e.g. Best Available Techniques)	•	•	•	•	•
Ensure availability of reliable data on material flows across value chains	0	0	•	•	•
Provide access to finance for high-risk projects	0	0	0	0	•
Other — please specify below	0	0	0	0	•

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)	•	0	0	0	0
Developing and promoting voluntary compliance schemes	0	0	•	0	0
Addressing the issue through trade policy	0	•	0	0	0
Addressing the issue through the promotion of targeted global initiatives	0	•	0	0	•
Promoting the exchange of best practice among businesses	0	•	0	0	0
Other — please specify below	0	0	0	0	•

500 character(s) maximum		

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

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	©	•	©	©	©
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	•	•	•	•	•
Organise EU-wide awareness campaigns to promote the circular economy	•	•	•	•	•

Improve/clarify rules and practices affecting consumer protection (e.g. relating to legal and commercial guarantees)	0	•	©	©	0
Take action on product and material design (see section 3)	•	©	©	•	0
Encourage financial incentives to consumers at national level (e.g. by differentiated taxation levels depending on products' resource efficiency)	•	•	•	•	•
Take measures targeting public procurement (e.g. through criteria for Green Public Procurement)	•	0	©	0	0
Encourage new modes of consumption such as shared ownership (e.g. car sharing), collaborative consumption, leasing and the use of internet-based solutions	•	•	©	•	•
Promote the development of repair and maintenance services	•	0	0	0	0
Encourage waste prevention (e.g. minimising food waste)	•	0	0	0	0
Other — please specify below	0	0	0	0	•

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

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
Existing "best practices" show that more sustainable consumption and production models already exist. It is now time to put the appropriate framework to make the transition from niche to norm
Please give reasons for your choice: food and beverages 200 character(s) maximum
Same reason as above and in addition, the most important quantity of household waste produced is linked to food and packaging
Please give reasons for your choice: packaging materials
200 character(s) maximum
Same answer as above
4.3. Do you have any other comments about the consumption phase? 500 character(s) maximum

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	Met
Lack of EU-wide quality standards for recycled materials	V					
Poor quality of recycled materials (e.g. containing unwanted substances/high contamination)			▽			
Lack of information or misinformation about the quality of recycled materials	V					E
Poor availability of waste/material to be recycled	V					
Poor reliability of supply for recycled materials						
Low demand for recycled materials (e.g. on the EU market)			▽	▽		E
Cost differential between primary and secondary raw materials	V					E
Organisational cost of switching from primary to secondary raw materials in industrial processes	▽					

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

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
Poor quality of recycled materials
500 character(s) maximum
Lack of information or misinformation about the quality of recycled materials 500 character(s) maximum
Poor availability of waste/material to be recycled 500 character(s) maximum
Low demand for recycled materials
500 character(s) maximum
Cost differential between primary and secondary raw materials
500 character(s) maximum
This is a very important issue, espacially for plastic due to the

current low prices of primary raw materials.

Organisational cost of switching from primary to secondary raw materials in industrial processes
500 character(s) maximum
Regulatory obstacles at national/regional/local level
500 character(s) maximum
Regulatory obstacles at EU level
500 character(s) maximum
Regulatory gaps at EU level
500 character(s) maximum
Regulatory gaps at national/regional/local level
500 character(s) maximum
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
5.3. Which secondary raw materials markets should the EU target first to improve the wa
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

Paper
—
Plastics
── Wood/Biomass
Other — please specify below
Please give reasons for your choice: Construction aggregates
There is an easy and important margin of improvement
Please give reasons for your choice: Critical raw materials such as rare earth elements or certain precious metals
Please give reasons for your choice: Plastics
The price of primary raw material is currently very low and therefore doesn't help to have a middle/long term policy which take into account the scarcity of our resources
500 character(s) maximum
6 Sectoral measures
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.
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	Forest-based and other bio-based products
	Furniture
	Information and communication technologies
	Mining and quarrying
√	Plastics
	Retailing
1	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?

Food and drinks, including reduction of food waste

500 character(s) maximum

Binding target on food wastage prevention (see our position paper annexed)

Plastics

500 character(s) maximum

A higher binding recycling target in order to boost the secondary raw material market

Services

500 character(s) maximum

Promoting services and the economy of functionality will help to produce and to put on the market more sustainable products with a better durability; furthermore, it should create jobs

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)	•	•	•	•	•
Public incentives (e.g. financial guarantees) for private investors to finance projects conducive to the circular economy	•	•	•	•	•
Support for the development of circular economy projects (e.g. technical assistance)	0	•	•	0	0
Support for innovative systemic approaches and cross-sectoral cooperation (e.g. industrial symbiosis and cascading use of resources)	•	•	•	•	•
Partnerships with public authorities to help innovative businesses overcome potential legal obstacles to innovation	•	•	•	•	0
Promotion of innovative business models for the circular economy (e.g. leasing and sharing)	•	0	0	0	0
Specific measures to encourage the uptake of the circular economy among SMEs	•	•	•	0	0
Exchange and promotion of best practice	•	0	0	0	©

Promoting the development of skills/qualifications relevant to the circular economy	©	•	•	•	•
Support for capacity-building in public administrations	0	•	0	0	0
Support for market penetration of innovative projects through labelling, certification and standards, public procurement for innovation, etc.	•	•	•	•	•
Better monitoring the implementation and impact of policies contributing towards the circular economy agenda	•	•	•	•	•
Increasing the knowledge base by collecting and providing information and data e.g. on material flows, technologies and consumption patterns	©	©	•	©	•
Other- please specify below	0	0	0	0	0

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

500 character(s) maximum	

8

Upload documents

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

• 71ebfd03-58b3-447d-bbdb-a2cab0702826/ACR+ position paper on the Circular Economy Package docx.pdf

Contact

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