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 completing this questionnaire?**

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

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

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

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)
- [x] Recycling and other waste management
- [ ] Other: please indicate

Where are your member companies located?

- [x] 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
- [ ] Liechtenstei
- [ ] Lithuania
- [ ] Luxembourg
- [ ] Malta
- [ ] Netherlands
- [ ] Norway
- [ ] Poland
- [ ] Portugal
- [ ] Romania
- [ ] Slovakia
- [ ] Slovenia
- [ ] Spain
- [ ] Sweden
- [ ] Switzerland
- [x] United Kingdom

If your organisation is not registered, you can register now

2.2. Please give your country of residence/establishment

- [x] 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	☐ Liechtenstei
☐ 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

Chartered Institution of Wastes Management (CIWM)

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

200 character(s) maximum

05829149535-55

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

200 character(s) maximum

tina.benfield@ciwm.co.uk

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

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

Durability is not only the criteria for some product categories, design for disassembly/upgrade/repair/remanufacture is also a priority, as is the free availability of technical product information

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

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

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)
- [x] 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
- [x] Clothing and textiles
- [ ] Furniture
- [ ] Cars
- [ ] Construction products (e.g. windows, insulation materials)
- [x] General measures (concerning a broad range of products) should be taken
- [ ] Others

Please give reasons for your choice: small electronics

Although the WEEE Directive covers small electronics this is where the most leakage occurs - perhaps because these items can be easily discarded in the household bin. Small electronics also contain some of the critical/rare raw materials and so at the point of design, modularity and upgradability should be a priority and take-back obligations under EPR need to be increased.

Please give reasons for your choice: clothing and textiles

Clothing and textiles have a large environmental footprint in relation to water, land use, carbon and energy. There are multiple barriers here that require high level intervention to overcome; most notably that clothing production takes place primarily outside the EU, making intervention at the producer stage more difficult. The trend towards low cost, short life-time fashion clothing increases the environmental impact, so reusing clothing is a priority to reduce this impact. Intervention targeted at the retail supply chain is the most likely option.

Please give reasons for your choice: general measures

This covers a broad range of products and some of the options, like durability apply across a wide range of products.

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)	○	◉	○	○	○
Address potential regulatory obstacles in EU legislation - please specify	◉	○	○	○	○
Address potential regulatory gaps in EU legislation – please specify	◉	○	○	○	○
Support the development of innovative business models (e.g. leasing)	◉	○	○	○	○
Improve the interface between chemicals and waste legislation	◉	○	○	○	○
Promote collaboration between and among private and public sectors, including end-users	○	◉	○	○	○
Support the development of digital solutions	○	◉	○	○	○
Identify and promote exchange of best practice	○	◉	○	○	○

Identify minimum standards for increasing resource-efficient processes (e.g. Best Available Techniques)	◉	○	○	○	○
Ensure availability of reliable data on material flows across value chains	◉	○	○	○	○
Provide access to finance for high-risk projects	○	○	◉	○	○
Other — please specify below	○	◉	○	○	○

Please specify which regulatory obstacles you are referring to

200 character(s) maximum

Competition law. End of Waste. Current products/materials tax structure. REACH Directive. Trade agreements that circumvent/weaken environmental standards/requirements

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

200 character(s) maximum

Variable taxation on materials to encourage the uptake of secondary raw materials at a competitive price and ensure healthy and stable markets to underpin the recycling supply chain

Please specify which regulatory gaps you are referring to

300 character(s) maximum

More EPR for e.g. tyres, disposable nappies, mattresses. Absence of any meaningful EU framework for biowaste, soils and critical/rare raw materials. Standards for refuse derived fuel

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

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

500 character(s) maximum

Voluntary schemes have a role to play but have been shown to fail in adverse market conditions. Any legally binding frameworks have to be enforced. In question 3.5/3.6 CIWM believes that the EU is not always best placed to promote/support awareness and best practice; MS governments and other organisations are likely to be more effective. Manufacturers' guarantees and brand protection are currently seen as serious barriers to WEEE and furniture repair/re-use.

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)	◉	○	○	○	○
Take action on product and material design (see section 3)	◉	○	○	○	○
Encourage financial incentives to consumers at national level (e.g. by differentiated taxation levels depending on products' resource efficiency)	○	◉	○	○	○

Take measures targeting public procurement (e.g. through criteria for Green Public Procurement)	◉	○	○	○	○
Encourage new modes of consumption such as shared ownership (e.g. car sharing), collaborative consumption, leasing and the use of internet-based solutions	○	◉	○	○	○
Promote the development of repair and maintenance services	○	◉	○	○	○
Encourage waste prevention (e.g. minimising food waste)	○	◉	○	○	○
Other — please specify below	◉	○	○	○	○

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

200 character(s) maximum

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Variable taxation further up the supply chain, e.g. on materials.
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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

Mobile phones are regularly upgraded. People are encouraged to buy the latest model. Upgrading models or reuse of second-hand items to maximise lifetime of materials incorporated should be encouraged

Please give reasons for your choice: food and beverages

200 character(s) maximum

Food is wasted along its whole process chain, with significant embodied water/energy/carbon and land use impacts. Food needs to be valued and buying/consumption of food needs to be more sustainable.

Please give reasons for your choice: clothing and textile

200 character(s) maximum

Environmental footprint: water/land use/carbon/energy. Multiple barriers to intervention: production outside the EU; low cost, short life-time fashion trends; protecting existing charity re-use market

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

500 character(s) maximum

Is there a regulatory angle to the encourage and promote boxes in the table above; if yes, then action at EU level is important, if no then they may be better dealt with at MS level. Consumers need to be made aware of the environmental impact of the items they purchase - both in terms of product composition and usage. More robust requirements needed on labelling, point of sale and usage information. Takeback by brands predicated on constant new product models (mobile phones) should be encouraged

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

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

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

CIWM is aware that achieving EU wide standards is challenging. Standards or accepted market-based specifications for secondary raw materials are used in Member States, but the EU could assess whether there are any market failures/barriers, particularly for highly traded commodities such as metals, paper, and plastics, and identify if further action is required.

Poor quality of recycled materials

500 character(s) maximum

For the four key dry recyclable streams, there is little that the EU can do apart from monitoring the WFD requirement for separate collection of these materials in the interest of 'high quality' recycling. On bionutrients, the Commission should persevere with work to reach agreement on an overarching biowaste standard to facilitate trade of these materials and reduce contamination issues around materials applied to land. Biowaste recycling is a natural circular economy model and needs promoting.

Lack of information or misinformation about the quality of recycled materials

500 character(s) maximum

Misinformation on plastics in particular can impact on the perceived quality and actual recyclability. Research is needed to determine if having biodegradable/oxo-degradable/photo-degradable, etc plastics in recycling processes causes issues with the process itself and the new end products. Biowaste derived products applied as soil conditioners/fertilisers to land also suffer from lack of information

and poor reputation e.g food producers are often barred from using them by retailers and brands.

Poor availability of waste/material to be recycled

500 character(s) maximum

Capture of material is key to this issue – notably for post-consumer plastics, food waste and small WEEE; landfill bans/restrictions would drive these materials to recycling/recovery processes ensuring essential feedstock. There are diversion targets for wider biodegradable material streams but there needs to be a stronger driver. CIWM advocates EPR for WEEE and supports the proposed 2015 review and suggests specific targets for small WEEE collection/reuse.

Poor reliability of supply for recycled materials

500 character(s) maximum

See above. Plastics in the UK had such an issue with supply and contamination that some large users of plastic containers joined forces with a plastic processor and developed their own processing facility to get the quality and volume of material required.

Low demand for recycled materials

500 character(s) maximum

Demand is based on quality/cost/availability/reliability and secondary raw materials (SRMs) are not always able to/or are perceived to meet these criteria. The ‘waste’ label is also a barrier. Sustainable design drivers, a clearer End of Waste framework, incentives through EPR to use SRMs would all help to promote their flow back into the production loop. Taxation to support SRMs would also help to overcome low demand as a result of poor and fluctuating price differentials compared to virgin.

Cost differential between primary and secondary raw materials

500 character(s) maximum

There is little possible direct intervention; these are global commodity markets and without mechanisms to incentivise producers to use SRMs, price is the main criteria. Over the last 12-18 months, highly volatile and dropping SRM prices have challenged the recycling sector and there is the prospect of market failure in some cases. The EU should focus on

pull mechanisms to increase demand for/value of SRMs and help to stabilise prices and fluctuation, and a shift to resource taxation longer term

Regulatory obstacles at national/regional/local level

500 character(s) maximum

Variability across MS in schemes for EPR – the suggestions in the previous CE package set minimum criteria for MS EPR schemes and this should be encouraged and included in any forthcoming CE proposals. Non implementation of regulations and requirements should be enforced and monitored. EU should enforce harmonisation of environmental taxes such as landfill levy/tax to prevent waste tourism and crime.

Regulatory obstacles at EU level

500 character(s) maximum

REACH causes a number of issues with products being placed on the market from secondary raw materials. The EU could assess whether a secondary raw material needs to conform to REACH when the original material already complies. Linked to standards/market specifications, materials meeting these requirements could be excluded from REACH compliance.

Regulatory gaps at EU level

500 character(s) maximum

CIWM suggests the EU continues its work on the biowaste framework, this is a gap for the bionutrients sector, there has been some work on Phosphorus but this is due to water pollution and the need for new technologies and processes means there has been limited action. Stronger drivers from the EU to push bionutrients and critical raw materials into the circular economy are needed, such as targets of recovery for critical elements.

Regulatory gaps at national/regional/local level

500 character(s) maximum

The EU has set dates for requirements under Directives, etc. and there are some MS that have not delivered – approved waste prevention plans, waste management strategies. Dates have been set for implementation and review (waste management strategies) and MS expect these to be met.

Insufficient cooperation/exchange of information along the value chain

500 character(s) maximum

Transparency and information exchange is important to ensure secondary raw materials entering the market are fit for purpose, comply with all the relevant legislation and are compatible with market requirements. All links in the chain need to understand what has happened to the material. Stronger requirements for information on composition (bionutrients), material properties (plastics) and end destinations and uses for materials may help to promote greater market confidence

Lack of reliable data on secondary raw material flows

500 character(s) maximum

There is little data collected specifically on secondary raw materials and flows, especially on materials reused. CIWM acknowledges the PROsum project and asks if the knowledge and learning from this project can be applied to other sectors. The EU needs to have a system that records the reprocessing, movement and use of secondary raw materials like critical raw materials, metal, paper and plastics in the circular economy.

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

at most 3 choice(s)

- [x] 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)
- [x] Critical raw materials such as rare earth elements or certain precious metals
- [ ] Glass
- [ ] Metals
- [ ] Paper
- [x] Plastics
- [ ] Wood/Biomass
- [ ] Other — please specify below

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

There are many positive attributes to encourage the reuse of bio nutrients as well as by improving the sustainability of soil. Organic material already has a well established cycle but aspects of it are not fully developed, like the removal of phosphorus from sewage water.

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

These arise in small quantities in the products and to move them back in to the economy a lot of products have to be collected, current targets are based on weight and so favour heavy items, which might not have the critical raw materials within them in sufficient quantities.

Please give reasons for your choice:
Plastics

Hard and moulded plastics already have an active market, although they are competing on price with raw feedstock which needs addressing. Plastic films are difficult to collect efficiently and effectively. Laminated plastics are an issue and there is some research in this area to de-laminate and capture the materials separately.

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

500 character(s) maximum

Markets need to be developed to remove the volatility of pricing and pricing differentials between primary and secondary raw materials.

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
- [x] Electrical and electronic goods
- [ ] Energy
- [ ] Fisheries/ aquaculture
- [x] 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
- [x] 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?

Electrical and electronic goods

500 character(s) maximum

Small WEEE goods are not collected as well as large bulky white goods (for example). Such goods could benefit from specific targets – not just the weight based WEEE target, to pull small WEEE into the economy. Enhancing EPR. VAT/tax on materials at the manufacture level to encourage secondary material use. Landfill ban/restriction to encourage flow to reuse, recycling and recovery.There needs to be targets for items repaired for reuse instead of shredded and materials recycled.

Food and drinks, including reduction of food waste

500 character(s) maximum

Food waste along the production chain is known, banning food and organic material from landfill will drive more material into the organic recycling loop. Targets could be set for industry to reduce food wastage, along the whole chain, from manufacture, retail and hospitality. EU should emphasise the diversion of edible food from retailers.

Textiles

500 character(s) maximum

The EU should consider EPR at the manufacture level. Landfill ban/restriction would divert items to recycling or recovery. Labelling for life cycle costing.

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)	○	◉	○	○	○
Support for innovative systemic approaches and cross-sectoral cooperation (e.g. industrial symbiosis and cascading use of resources)	○	◉	○	○	○
Partnerships with public authorities to help innovative businesses overcome potential legal obstacles to innovation	○	◉	○	○	○
Promotion of innovative business models for the circular economy (e.g. leasing and sharing)	○	◉	○	○	○

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

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

500 character(s) maximum

Exchanging and promoting best practice as well as promoting skills and qualifications, CIWM feels that the EU is not best placed to determine this. These type of interventions are better coming from National, local level and through organisations that are specifically set up to do just that.

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:

- **cd23921c-ef2c-4d1a-bee9-a54d2e499cc8/CIWM Paper on the EU CE consultation 20.08.15.docx**
- **a4a2b944-0769-4623-9d5e-882c42353759/MS Consultation CIWM response 07 08 15.docx**

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