

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

Please specify:

*200 character(s) maximum*

European Federation

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 checked="" 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 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*

FEAD (European Federation of Waste Management and Environmental Services)

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

*200 character(s) maximum*

2157643512-49

**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@fead.be

### 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Develop standards for voluntary use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promote and/or enable the use of economic incentives for eco-innovation and sustainable product design (e.g. via rules on Extended Producer Responsibility schemes)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review rules on legal and commercial guarantees	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage the consumption of green products (see section 4)	<input 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"/>

**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*

European platform to intensify dialogue between the manufacturing and waste management sector. Better involvement of waste management industry in the development of product policy and eco-design rules

**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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reparability: Availability of information on product repair (e.g. repair manuals)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reparability: Product design facilitating maintenance and repair activities	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Resource use in the use phase (e.g. water efficiency)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recyclability (e.g. dismantling, separation of components, information on chemical content)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased content of reused parts or recycled materials	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased content of renewable materials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising lifecycle environmental impacts	<input 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*

FEAD answers seek to provide “quick wins” to facilitate the transition to a more circular economy.  
 Recyclability, increased use of recyclates and phasing out of hazardous chemicals is essential.

**3.3. How would you assess the importance of the following additional considerations when applying circular economy principles to products at EU level?**

	very important	important	not very important	not important	no opinion
Impact on production cost and affordability of the product	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on production processes and value chain	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on consumers (e.g. through durability and reparability)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Functionality of the product	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enabling innovation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Respecting technology neutrality	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other — please specify below	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that other considerations not listed above should be taken into account, please specify:

*200 character(s) maximum*

The costs and environmental footprint have to be measured taking across the entire value chain.

**3.4. From a circular economy perspective, in your view which product categories should be given priority in the next few years and why?**

*at most 3 choice(s)*

- White goods (e.g. dishwashers, refrigerators)
- Small domestic appliances (e.g. microwave ovens, food processors)
- Office equipment (e.g. computers, printers)
- Small electronics (e.g. smartphones, cameras)
- Packaging materials
- Heating equipment (e.g. boilers, water heaters)
- Air-conditioning and ventilation systems
- Lighting products
- Motors and pumps
- Industrial equipment
- Clothing and textiles
- Furniture
- Cars
- Construction products (e.g. windows, insulation materials)
- General measures (concerning a broad range of products) should be taken
- Others

If you think that other product categories not listed above should be taken into account, please specify:

*200 character(s) maximum*

Other products, such as food, should be given a priority. 30 to 40% of all food is currently wasted. Waste occurs at all stages of the food supply chain from production to consumption.

Please give reasons for your choice: packaging materials

Packaging is becoming increasingly complex and difficult to recycle, not least due to the shift towards more complex plastic packaging such as laminates.

Please give reasons for your choice: general measures

WEEE generally should be prioritised, not just individual subcategories. WEEE legislation currently applies more widely and should be looked at across the board.

Please give reasons for your choice: others

Other products, such as food, should be given a priority across the production phase.

**3.5. Which of the actions listed below should be given priority at EU level to promote circular economy solutions in production processes?**

	very important	important	not very important	not important	no opinion
Promote cooperation across value chains (e.g. through encouraging new managerial modes)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Address potential regulatory obstacles in EU legislation - please specify	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Address potential regulatory gaps in EU legislation – please specify	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support the development of innovative business models (e.g. leasing)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improve the interface between chemicals and waste legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote collaboration between and among private and public sectors, including end-users	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Support the development of digital solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Identify and promote exchange of best practice	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Identify minimum standards for increasing resource-efficient processes (e.g. Best Available Techniques)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure availability of reliable data on material flows across value chains	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Provide access to finance for high-risk projects	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other — please specify below	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

*200 character(s) maximum*

Need for legal measures rather than “soft” measures to drive and secure the necessary private sector investment. The EU need to provide legal certainty with fixed, long term targets.

Please specify which regulatory gaps you are referring to

*300 character(s) maximum*

Gaps may occur when moving from waste to end-of-waste status. E.g. the application of REACH is more difficult for producers of recovered materials because of legacy substances. Hazardous substances should be phased out in the production process so that they do not pose a problem for recycling.

**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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing the issue through trade policy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing the issue through the promotion of targeted global initiatives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

*200 character(s) maximum*

Demand side measures, such as public procurement.  
 Material strategy for EU. Recycled materials should have competitive advantages over virgin materials and not the other way around as it is today.

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

*500 character(s) maximum*

Design stage has the potential to revolutionise resource management. 80% of the whole-life environmental impact of a product is defined at this stage. By having binding rules, we can obtain the maximum benefit in terms of environmental footprint and savings in raw materials' use. Overall sustainability through lean, resource-efficient manufacturing will improve. It is needed to move away from materials that increase environmental burdens (e.g. toxic) or are not cost-effective to recycle.

## 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improve/clarify rules and practices affecting consumer protection (e.g. relating to legal and commercial guarantees)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promote the development of repair and maintenance services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Encourage waste prevention (e.g. minimising food waste)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other — please specify below	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

*200 character(s) maximum*

Communication and awareness raising measures are important but most effective at national/regional/local level.

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

*at most 3 choice(s)*

- White goods (e.g. dishwashers, refrigerators)
- Electronics
- Food and beverages
- Packaging materials
- Clothing and textiles
- Furniture
- Cars
- Construction products
- General measures (concerning all consumer products) should be taken
- Other — please specify below

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

*200 character(s) maximum*

WEEE generally should be prioritised, not just individual subcategories. WEEE legislation currently applies more widely and should be looked at across the board.

Please give reasons for your choice: food and beverages

*200 character(s) maximum*

Other products, such as food, should be given a priority. 30 to 40% of all food is currently wasted. Waste occurs at all stages of the food supply chain from production to consumption.

Please give reasons for your choice: packaging materials

*200 character(s) maximum*

Packaging is becoming increasingly complex and difficult to recycle, not least due to the shift towards more complex plastic packaging such as laminates.

Please give reasons for your choice: others

*200 character(s) maximum*

Due to size and complexity of WEEE and the fact that it contains some critical raw materials, it should generally be prioritised, not just individual subcategories.

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

*500 character(s) maximum*

The Commission shall harmonise and improve eco-labelling rules to enable consumers to choose recycled products, products with recycled content and recyclable products. Fiscal measures, such as zero or reduced VAT rate for second hand goods, products with recycled content, recyclable products and repair services, should be taken.

## 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 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 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poor availability of waste/material to be recycled	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poor reliability of supply for recycled materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Low demand for recycled materials (e.g. on the EU market)	<input checked="" type="checkbox"/>	<input type="checkbox"/>				
Cost differential between primary and secondary raw materials	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regulatory obstacles at EU level	<input 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"/>
Regulatory gaps at EU level	<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"/>
Regulatory gaps at national/regional/local level	<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"/>
Insufficient cooperation/exchange of information along the value chain (e.g. between producers, recyclers and authorities responsible for waste management)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>						
Lack of reliable data on secondary raw material flows	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>						

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

*200 character(s) maximum*

Lack of fair competition and fragmented markets: misuse of SGEI, cross-subsidisation, abuse of dominant position, abuse of Public Procurement, e.g. in-house, mi use of EU funds, unequal VAT treatment.

### **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*

If this question refers to end-of-waste, the end-of-waste criteria for paper and plastics have to be adopted at EU level.

Low demand for recycled materials

*500 character(s) maximum*

EU is a net exporter of secondary raw materials (SRMs). We need to include measures to incentivise the whole supply chain, and crucially to strike a balance between the supply and demand for SRMs, e.g. minimum recycled content, green public procurement, eco-labelling, lower or zero rate of VAT on second hand goods and products with recycled content.

Cost differential between primary and secondary raw materials

*500 character(s) maximum*

In some respects, e.g. homogeneity, SRMs are at disadvantage to primary raw materials. Challenges relate also to the application of REACH. The economic and environmental advantages of SRMs are not always reflected in price. Falling prices for oil and other commodities are already having a negative effect on the sector. Virgin plastic is cheaper than recycled. Other macro-economic trends create difficulties for recycling, e.g. falling demand for recycled paper due to the growth in digital media.

## Regulatory obstacles at EU level

*500 character(s) maximum*

See below.

## Regulatory gaps at EU level

*500 character(s) maximum*

Waste and chemicals legislation should be better aligned:  
Adopt EU EoW for priority waste streams (paper, plastics)  
Make sure recyclers do not face stricter standards than producers of virgin materials  
Phase out hazardous substances at the design stage  
Ensure information is available about hazardous substances in products  
Streamline the evaluation of substances under REACH  
Facilitate authorisation for recycling companies  
Consider the exemption of EoW materials from REACH authorisation

## Insufficient cooperation/exchange of information along the value chain

*500 character(s) maximum*

European platform to intensify dialogue between the manufacturing and waste management sectors is needed.

## Lack of reliable data on secondary raw material flows

*500 character(s) maximum*

Effective EU policy-making is hampered by poor data on raw and SRMs flows, partly due to unclear definitions. The EC shall improve statistics, which implies tightening and harmonisation of definitions and calculation methodologies so as to limit inconsistencies. A single set of EU models for the evaluation of the environmental burdens associated with primary resource extraction, procurement and conversion to allow for fair competition between primary and SRMs, should also be developed.

### 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: Critical raw materials such as rare earth elements or certain precious metals

Recovery of critical materials and precious metals from WEEE is of huge importance. WEEE generally should be prioritised, not just individual subcategories. WEEE legislation currently applies more widely and should be looked at across the board.

Please give reasons for your choice: Paper

EU-wide end-of-waste criteria for paper would improve the functioning of the recycled paper market in the EU.

Please give reasons for your choice: Plastics

Plastic is difficult and expensive to recycle, not least due to the shift towards more complex plastic such as laminates. Prices of recycled plastics are vulnerable due to changing oil prices.

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

*500 character(s) maximum*

We need credible and effective measures to help build resilient markets for SRM by boosting demand and creating the conditions for price stability: the EU's reindustrialisation strategy should boost markets for SRM; the Ecodesign Directive should go beyond energy efficiency; eco-labelling rules should be amended; collaboration between all actors in the value chain should be encouraged; need for wider spread of Green Public Procurement practices; EPR schemes should operate in a transparent way.

## 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?**

Electrical and electronic goods

*500 character(s) maximum*

WEEE - eco-design rules for reparability and recyclability.

Food and drinks, including reduction of food waste

*500 character(s) maximum*

Food - food waste reduction target and increase in food waste collections.

Plastics

*500 character(s) maximum*

Plastics - create more demand for SRM plastics in preference to virgin sources.

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

Enabling factors are essential to support the development of the circular economy could include supporting the development, dissemination and uptake of innovative solutions, investing in technology and infrastructure, supporting SMEs and developing the required skills and qualifications.

This section seeks your views on the role of these enabling factors in the development of the circular economy.

### 7.1. How important are the following enabling factors in promoting the circular economy at EU level?

	very important	important	not very important	not important	no opinion
Financing innovative projects or technologies relevant to the circular economy (from EU funds, e.g. Horizon 2020)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public incentives (e.g. financial guarantees) for private investors to finance projects conducive to the circular economy	<input 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting the development of skills/qualifications relevant to the circular economy	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other- please specify below	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

*200 character(s) maximum*

Open markets and fair competition stimulate customised services and solutions, and open up possibilities for innovation and investment. They also help small companies to enter the market.

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

*500 character(s) maximum*

Full implementation and proper enforcement of existing legislation on waste and resource management in all Member States.  
EU funds provided to Member States for investments in waste or resource management infrastructure must respect the waste hierarchy.  
Member States should shift their taxation from labour to incentivise the use of renewable resources.

## 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:**

- [f59f98bb-91c3-4778-ba15-77fb88f98e38/FEAD Opinion on the demand side.pdf](#)
- [ad5e800a-368b-4229-8819-8ad0aa9f64cb/FEAD Opinion piece on competition.pdf](#)
- [784201b8-71ee-4515-934c-32dd277445aa/FEAD Opinion piece on investments.pdf](#)
- [873aa189-8531-439d-8c94-0f5595abb16c/FEAD Opinion piece on markets.pdf](#)
- [e9f33c02-2866-4835-90f5-b65d0aa533a4/FEAD position paper on a new CE proposal FINAL.pdf](#)

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