

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?

- | | |
|---|---|
| <input type="radio"/> As an individual / private person | <input type="radio"/> Public authority |
| <input type="radio"/> Academic/research institution | <input checked="" type="radio"/> International organisation |
| <input type="radio"/> Civil society organisation | <input type="radio"/> Professional organisation |
| <input type="radio"/> Private enterprise | <input type="radio"/> Other |

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

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

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

EurEau, the European Federation of National Association of Water Services

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

200 character(s) maximum

39299129772-62

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

200 character(s) maximum

bertrand.vallet@eureau.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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Encourage industry-led initiatives (i.e. self-regulation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Develop standards for voluntary use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promote and/or enable the use of economic incentives for eco-innovation and sustainable product design (e.g. via rules on Extended Producer Responsibility schemes)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Review rules on legal and commercial guarantees	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Encourage the consumption of green products (see section 4)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other — please specify below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Glossary:

Legal guarantees: Tangible goods have a minimum two-year legal guarantee under EU consumer legislation (Directive 99/44/EC). This guarantee makes the seller liable to the consumer for any lack of conformity with the sales contract which exists at the time of delivery of the good and becomes apparent within two years from delivery of the goods.

Commercial guarantees: Guarantees provided by traders to consumers on a voluntary basis, by which the trader undertakes to reimburse the price paid or to replace, repair or handle consumer goods in any way if they do not meet the specifications set out in the guarantee statement or in the relevant advertising.

3.2. In order to facilitate the transition to a more circular economy, how would you assess the importance of the following product features?

	very important	important	not very important	not important	no opinion
Durability	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reparability: Availability of information on product repair (e.g. repair manuals)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reparability: Product design facilitating maintenance and repair activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reparability: Availability of spare parts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Upgradability and modularity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reusability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Biodegradability and compostability	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Resource use in the use phase (e.g. water efficiency)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Recyclability (e.g. dismantling, separation of components, information on chemical content)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increased content of reused parts or recycled materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increased content of renewable materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Minimising lifecycle environmental impacts	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other- please specify below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

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

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

at most 3 choice(s)

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

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

200 character(s) maximum

recovered nutrients, fertilisers produced with recovered nutrients

Please give reasons for your choice: others

Phosphorus has been placed on the list of critical raw materials because Europe is dependent on importation of mined phosphate rocks. The water industry, amongst others, can recover nutrients and other products from the sewage sludge produced in the wastewater treatment plants. Support a market for these products would help to make Europe less dependent on importations.

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

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

3.6. How effective do you think each of the actions at EU level listed below would be in promoting sustainable production and sourcing of raw materials?

	very effective	effective	neutral	not effective	no opinion
Establishing a legally binding framework at EU level (e.g. sustainability criteria)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing and promoting voluntary compliance schemes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Addressing the issue through trade policy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing the issue through the promotion of targeted global initiatives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting the exchange of best practice among businesses	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other — please specify below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

500 character(s) maximum

All emissions during production, use and waste phase of product matter. Many municipal wastewater pollutants originate from day-to-day household products and goods and accumulate in sewage sludge or appear in effluent. For future recycling control at source of pollutants should be supported by an efficient and safe design and production phase that should minimize impurities and pollutants in the original products. Strong chemical regulation is needed to guarantee sustainable circular economy.

4 Consumption Phase

The consumers' perspective is an essential part of the circular economy. On the one hand, consumers make choices about the products they purchase and use; on the other hand these choices are affected by a range of factors, including the behaviour of other people, the way consumers receive information or advice, the availability of repair and maintenance services, and the perceived costs and benefits of their choices.

This section seeks your views on the best way to promote the circular economy in the consumption phase.

4.1. How would you assess the importance of the following measures to promote circular economy principles in the consumption phase at EU level?

	very important	important	not very important	not important	no opinion
Provide more information relevant to the circular economy to consumers, for example on expected lifetime of products or availability of spare parts	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improve/clarify rules and practices affecting consumer protection (e.g. relating to legal and commercial guarantees)	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>
Promote the development of repair and maintenance services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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

Increase the confidence of end-users by developing standards according to the use at European Level for secondary use of products (Water reuse...)

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

Water and reclaimed water; use of biosolids and other sewage sludge products that can be used as nutrient sources (P,N,C) or cellulose, alginates, bioplastics and CO₂; potentiality of energy recovery

Please give reasons for your choice: food and beverages

200 character(s) maximum

Promote the use of fertilisers based on recovered materials in the food and beverage industry would support innovation and market for industries able to recover them (water industry, etc...)

Please give reasons for your choice: others

200 character(s) maximum

Defining EU-level quality standards for reclaimed water would increase user confidence in their safe application. Financial support for secondary raw materials would decrease EU dependence on imports.

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

500 character(s) maximum

Certain recycled products are not used, not because they are not good enough, but because the end-user does not have enough confidence in them (for ex: reclaimed water). If the political will is to promote water reuse, EU-level standards should define the product safety specifics and thus reinforce user confidence in the quality of the product provided. End-of-waste status for certain sludge-based products is also necessary.

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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poor quality of recycled materials (e.g. containing unwanted substances/high contamination)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of information or misinformation about the quality of recycled materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cost differential between primary and secondary raw materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Organisational cost of switching from primary to secondary raw materials in industrial processes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

Revision of EU Fertilisers Regulation to consider recovered P products from sewage sludge. Integration of circular economy (for nutrients, water reuse and sludge based products) into standards and BAT for water and waste management, incineration. Defining an “end-of-waste” (EoW) criteria for biosolids produced from good quality sludge and other sewage sludge based products. EoW criteria should focus on specification of final product quality rather than on prohibition of input materials as sludge

Poor quality of recycled materials

500 character(s) maximum

Technologies are already available for recovering P from wastewater or sewage sludge, resulting in various product qualities. Objective research to better establish risk-based quality criteria for possible contaminants in bio-nutrients as well as the fate of contaminants in different bio-nutrient recycling processes is needed. Quality of recycled materials is reflecting the pollutant content of the original products. Strong chemical regulation is needed to guarantee sustainable circular economy

Lack of information or misinformation about the quality of recycled materials

500 character(s) maximum

Collaborative actions involving different concerned stakeholders (farmers, supermarkets and food chain, consumers, regulators) to assess available information and define concerted policies on management of bio-nutrient contamination risks
Awareness and informative campaigns on recycled materials

Cost differential between primary and secondary raw materials

500 character(s) maximum

Primary nutrients prices, despite upward pressure and fluctuations, remain too low for bio-nutrients to be competitive, particularly as they benefit from bulk logistics and prices do not cover externalities. Policy mechanisms and economic tools are needed to develop bio-nutrient markets P recovered from sewage sludge, either “push” (e.g. landfill tax making reuse more attractive than disposal, feed-in tariff type incentives) or “pull” (e.g. use targets, CAP incentives, differential taxation ...)

Regulatory obstacles at national/regional/local level

500 character(s) maximum

Different interpretations of waste / by-product / End-of-Waste status for bio-nutrient products recovered from wastes. Difficulty in registration in one MS as “fertiliser” for recovered bio-nutrient products already recognised as “fertiliser” in other MS. These issues should be resolved through the modification of the EU Fertiliser Regulation, underway)
Different interpretations by MS of Art 2(7)d of REACH (recovered substances).

Regulatory obstacles at EU level

500 character(s) maximum

Interpretation of Art 2(7)d of REACH (recovered substances): it is important that this is applied to recovered bio-nutrients where the recovered product is not present in the waste stream as such but is generated in the recovery process (e.g. struvite). Clarification that digestates are exempted from REACH.

Insufficient cooperation/exchange of information along the value chain

500 character(s) maximum

Need to develop stakeholder platforms or networks bringing together industry, R&D, regulators and users/consumers (farmers, supermarkets - food chain, consumers, environmental NGOs) to enable dialogue about issues such as contaminants, value of organic matter in soils, nutrient farm BMPs (best management practices)
Submitted part of financing instrument depending on the implication of different actors in the value chain to enhance the dialogue.

Lack of reliable data on secondary raw material flows

500 character(s) maximum

Availability of appropriate and up-to-date data on nutrient flows (agriculture, waste & waste water, other industries, soils and environment) is necessary to support policy decision making (defining-following targets) and industry (investment-market decisions). Although data exist on different bio-nutrients (N, P, K, Mg) it's incomplete, not in an appropriate form, not accessible. Data needs to cover parameters relevant for nutrient management and circular economy (concentrations, contaminants)

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

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

500 character(s) maximum

Energy recovery and water reuse should be taken into account in bio-nutrients reuse, re-recovery and recycling

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

The circular economy for bio-nutrients offers opportunities for synergy between the following socio-tal objectives:

- addressing nutrient environmental impacts / planetary boundaries / water quality / eutrophication, climate change, Nitrates, Directive, Water Framework Directives, Urban Waste Water Treatment Directive, Groundwater Directive)
 - resource supply, reducing dependency on imported phosphorus or gas for nitrogen fertiliser production (phosphate rock is on EU Critical Raw Materials List)
 - creating geographically distributed, local jobs and developing secondary revenues for farmers
 - improving nutrient efficiency, so performance of agriculture
 - enable to maintain efficient livestock production by addressing nutrient management challenges
 - ensuring sustainable, safe, healthy food supply and diet
- Europe is a world leader in nutrient recovery and recycling, and the

sector offers significant innovation export potential in sectors such as waste water treatment, manure management, recycling technologies

Please give reasons for your choice: Other

Sewage sludge is a source of bio-nutrient but it can also be treated to produce biogas that can be used for heating or as biofuel. Reclaimed water, depending on the level of treatment, could also be used as a nutrient supply for crops.

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

500 character(s) maximum

Integration of recycled bio-nutrients into EU Fertiliser Regulation is a priority.
Market price of primary nutrients is not sufficient to enable the nutrient circular economy develop: policy or financial tools are necessary.
Need for standards to support quality claims, product identification, etc.

6 Sectoral measures

Certain sectors may require a tailored approach in order to 'close the loop' of the circular economy, and some could be made strategic priorities in order to accelerate the transition.

This section seeks your views on which sector(s) should be considered a priority for EU action, and which relevant measures or actions should be taken.

6.1. In your view, which sectors should be a priority for specific EU action on the circular economy and why?

at most 3 choice(s)

- Agriculture
- Bio-nutrients (e.g. from sewage sludge or farm organic matter residues) for use in fertilisers
- Chemical industry and process manufacturing
- Construction/demolition and buildings
- Electrical and electronic goods
- Energy
- Fisheries/ aquaculture
- Food and drinks, including reduction of food waste
- Forest-based and other bio-based products
- Furniture
- Information and communication technologies
- Mining and quarrying
- Plastics

- Retailing
- Services
- Textiles
- Transport
- Water sector/sewage treatment
- Other- please specify below

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

Agriculture

500 character(s) maximum

Synergy with environmental improvement measures

Bio-nutrients for use in fertilisers

500 character(s) maximum

Synergy with addressing eutrophication, with agricultural efficiency (cost savings)
 Significant potential volumes: approx.. 2 300 000 tonnes P/year in biowastes (manure, animal wastes, sewage sludge ...)
 Current strong interest of water, fertiliser, chemicals industry and of agriculture.
 EU frontrunner in technologies and societal approaches: possibilities for export of know-how.

Water sector/sewage treatment

500 character(s) maximum

Waste water treatment plants are ideal place to optimise recovery of energy, materials and to produce water that can be reused. Some of these techniques are currently developed but need to be optimised, business models need to be defined around these recovered products and partnership with local authorities would help for the implementation of the solutions. Incentives would foster these developments and accelerate the reansition towards a circular economy.

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 type="radio"/>				
Public incentives (e.g. financial guarantees) for private investors to finance projects conducive to the circular economy	<input type="radio"/>				
Support for the development of circular economy projects (e.g. technical assistance)	<input type="radio"/>				
Support for innovative systemic approaches and cross-sectoral cooperation (e.g. industrial symbiosis and cascading use of resources)	<input type="radio"/>				
Partnerships with public authorities to help innovative businesses overcome potential legal obstacles to innovation	<input type="radio"/>				
Promotion of innovative business models for the circular economy (e.g. leasing and sharing)	<input type="radio"/>				
Specific measures to encourage the uptake of the circular economy among SMEs	<input type="radio"/>				

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

All these tools are potentially helpful, and should be selected according to specific sectoral or regional contexts. Policy mechanisms and economic tools are needed, including fiscal/financial tools.

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

500 character(s) maximum

Coherent implementation measures in all EU policies is important: markets/GROW, environment, agriculture (CAP, RDF), research and innovation, regional structural funds, food and consumer (SANCO),

international (materials imports) and fiscal policy.

8

Upload documents

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

- 6f6aa9bd-dd66-478b-b189-a7736c9ff748/2015 04 09 Briefing on Water and Circular Economy.pdf

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