

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

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

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

Please indicate the sectors your organisation represents

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

Please specify other sectors your organization represents:

200 character(s) maximum

EuroCommerce represents the retail and wholesale sectors.

Where are your member companies located?

- ☒ EU MS/ EEA
- ☐ Non-EU MS/ EEA

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

- | | | | | | |
|--|--|--|---|---|--|
| <input checked="" type="checkbox"/> Austria | <input checked="" type="checkbox"/> Belgium | <input type="checkbox"/> Bulgaria | <input type="checkbox"/> Croatia | <input type="checkbox"/> Cyprus | <input checked="" type="checkbox"/> Czech Republic |
| <input checked="" type="checkbox"/> Denmark | <input checked="" type="checkbox"/> Estonia | <input checked="" type="checkbox"/> Finland | <input checked="" type="checkbox"/> France | <input checked="" type="checkbox"/> Germany | <input checked="" type="checkbox"/> Greece |
| <input checked="" type="checkbox"/> Hungary | <input checked="" type="checkbox"/> Iceland | <input checked="" type="checkbox"/> Ireland | <input checked="" type="checkbox"/> Italy | <input type="checkbox"/> Latvia | <input type="checkbox"/> Liechtenstein |
| <input type="checkbox"/> Lithuania | <input checked="" type="checkbox"/> Luxembourg | <input checked="" type="checkbox"/> Malta | <input checked="" type="checkbox"/> Netherlands | <input checked="" type="checkbox"/> Norway | <input checked="" type="checkbox"/> Poland |
| <input checked="" type="checkbox"/> Portugal | <input checked="" type="checkbox"/> Romania | <input checked="" type="checkbox"/> Slovakia | <input checked="" type="checkbox"/> Slovenia | <input checked="" type="checkbox"/> Spain | <input checked="" type="checkbox"/> Sweden |
| <input type="checkbox"/> Switzerland | <input checked="" type="checkbox"/> United Kingdom | | | | |

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

EuroCommerce

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

200 character(s) maximum

84973761187-60

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

200 character(s) maximum

davidson@eurocommerce.eu

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 checked="" type="radio"/>	<input type="radio"/>
Encourage industry-led initiatives (i.e. self-regulation)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Develop standards for voluntary use	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote and/or enable the use of economic incentives for eco-innovation and sustainable product design (e.g. via rules on Extended Producer Responsibility schemes)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review rules on legal and commercial guarantees	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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

Be careful about only EU level. Please see document attached.

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 type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>
Reparability: Product design facilitating maintenance and repair activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Reparability: Availability of spare parts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Upgradability and modularity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Reusability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Biodegradability and compostability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>
Recyclability (e.g. dismantling, separation of components, information on chemical content)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Increased content of reused parts or recycled materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Increased content of renewable materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Minimising lifecycle environmental impacts	<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 additional options not listed above should be considered, please specify:

200 character(s) maximum

Please see document attached.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enabling innovation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Respecting technology neutrality	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on EU imports and exports	<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 other considerations not listed above should be taken into account, please specify:

200 character(s) maximum

Need to consider that if secondary raw materials are not of a good quality, it can alter the safety of the product. The risk of altering the safety of products needs to be taken into consideration.

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

Please see answer below.

Please give reasons for your choice:
others

Rather than specifying different product categories, policy-makers should take a longer term perspective on providing systemic change as well as market benefits and job growth/creation. In working towards these, you need to address existing problems: a level playing field is needed in order to reduce the ability for free riders. Different systems and implementation of rules in different member states hinders the good functioning of the internal market. Once these problems have been fixed, there is scope for improvement in particular product categories and the potential for job creation.

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

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

200 character(s) maximum

The 'interface' between chemicals and waste legislation can be considered within REACH legislation.

Please specify which regulatory gaps you are referring to

300 character(s) maximum

Transparent EPR schemes are needed with clear roles and responsibilities for the various economic operators. There is a lack of harmonization meaning different rules in different member states. Lack of a level playing field in enforcement, particularly between online retail and instore retail.

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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Developing and promoting voluntary compliance schemes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing the issue through trade policy	<input type="radio"/>	<input checked="" 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 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 type="radio"/>

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

500 character(s) maximum

Establishing sustainability criteria would affect global level rather than just EU level. Need to think about trade offs from different objectives; throwing out old products or waiting until their end of life. Commission should be looking to promote good products rather than banning less good products. Promoting durability and energy efficiency would cause the replacement of products before the end of life, which can on some occasions prove counterproductive.

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

Take measures targeting public procurement (e.g. through criteria for Green Public Procurement)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 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 further options not listed above should be considered, please specify:

200 character(s) maximum

Clear roles and responsibilities for the different economic operators. Consumers in particular need to be responsible in their consumption and this has to be taken into consideration.

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

Please give reasons for your choice:
others

200 character(s) maximum

No preferential treatment should be given to different product categories in line with a more holistic approach and the principle of fair competition.

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

500 character(s) maximum

Improve existing requirements, Information provided should depend on the product. Educate consumers on what 'waste' is and what can be 'second hand'

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 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 checked="" 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 checked="" 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 checked="" 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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cost differential between primary and secondary raw materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Organisational cost of switching from primary to secondary raw materials in industrial processes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Regulatory obstacles at national/regional/local level	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regulatory obstacles at EU level	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regulatory gaps at EU level	<input checked="" 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 checked="" 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"/>	<input 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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No opinion	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" 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

Poor quality of recycled materials

500 character(s) maximum

Currently secondary materials are of poor quality, are more expensive and in low demand. The price of raw materials, which are cheaper, is a problem that needs to be addressed if a market for secondary raw materials is to be established. There is a lack of technical specification. Better enforcement and lower costs of secondary raw materials will provide incentives to producers.

Poor availability of waste/material to be recycled

500 character(s) maximum

Poor reliability of supply for recycled materials

500 character(s) maximum

Applying legislation to materials that could be reused contributes to lower volumes of available material on the market due to the administrative burden of complying with the legislation. Therefore, materials that could be reused should not have to abide by waste legislation.

Low demand for recycled materials

500 character(s) maximum

Cost differential between primary and secondary raw materials

500 character(s) maximum

Regulatory obstacles at national/regional/local level

500 character(s) maximum

Regulatory obstacles at EU level

500 character(s) maximum

Regulatory gaps at EU level

500 character(s) maximum

There is a lack of technical specification for recycling materials. It is currently mandatory to mark non-reusable packaging with a "green label" (this increases costs and doesn't add value to buyers, or to collection/recycling and systems).

Regulatory gaps at national/regional/local level

500 character(s) maximum

Great differences in what concerns the management of ecotaxes (mandatory symbols or labels; invoices for end-users; functioning of collecting systems; lack in addressing specific issues in waste collection - e.g., for food retailers).

Insufficient cooperation/exchange of information along the value chain

500 character(s) maximum

Lack of reliable data on secondary raw material flows

500 character(s) maximum

5.3. Which secondary raw materials markets should the EU target first to improve the 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

Please give reasons for your choice:

Other

Once again, in order to achieve a holistic approach no preferential treatment should be given to particular secondary raw materials markets. Addressing existing regulatory gaps and obstacles should be the first priority before contemplating which markets to improve.

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

500 character(s) maximum

1.Secondary raw materials need to be made more attractive by increasing the price gap between secondary and virgin materials. 2. The percentage of waste is not important, what is important is that waste is re-used and is then not considered waste any longer. 3. A mapping of all the barriers and implementation gaps is required before proposing new legislation. 4. Ensure that public money is not spent on issues relating to material re-use.

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

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

The same regulatory principles should apply regardless of the sector. Furthermore, regulators should refrain from using regulations as a means to push the market toward a particular structure that the regulators consider optimal.

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

Others

500 character(s) maximum

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"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Support for innovative systemic approaches and cross-sectoral cooperation (e.g. industrial symbiosis and cascading use of resources)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Partnerships with public authorities to help innovative businesses overcome potential legal obstacles to innovation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Promotion of innovative business models for the circular economy (e.g. leasing and sharing)	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting the development of skills/qualifications relevant to the circular economy	<input type="radio"/>	<input checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>
Better monitoring the implementation and impact of policies contributing towards the circular economy agenda	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increasing the knowledge base by collecting and providing information and data e.g. on material flows, technologies and consumption patterns	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other- please specify below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

500 character(s) maximum

1. Promotion of certain business models (leasing/sharing) should be left to the market. Extending the use of such models must be established on the basis of solid data which demonstrates their economic/environmental/social benefits. 2 Regulations should not be used to promote different sectors or technology this should be neutral. 3 Need to take SMEs into consideration when proposing new legislation. In this consultation SMEs are not considered, this goes against the think small first principle.

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:

- **b39eea01-1a80-4bfe-b4a7-81cbdc9ec9bc/EuroCommerce Additional Comments to the Consultation.docx**

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