

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

European Biogas Association

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

200 character(s) maximum

18191445640-83

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

200 character(s) maximum

delavega@european-biogas.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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage industry-led initiatives (i.e. self-regulation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Develop standards for voluntary use	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 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 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 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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" 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 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"/>

3.3. 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on production processes and value chain	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on consumers (e.g. through durability and reparability)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 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"/>

3.4. 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 give reasons for your choice: heating equipment

Taking into account that 47% of the EU's energy use goes to heating and cooling, energy efficiency combined with the large scale deployment of indigenous renewable fuels can strongly reduce the dependence on energy imports and eventually phase out fossil fuels altogether. Biomethane coming from anaerobic digestion and gasification can help Europe to make this transition, as it can replace a large share of the natural gas which is currently used in heaters and boilers. In our view, the EU has a big role to play in setting standards for energy efficient heating equipment, as well as in promoting renewable energy sources via projects, direct investment and better infrastructure.

Please give reasons for your choice: others

The agro-industrial sector that produces food and beverages accounts for millions of jobs across the EU and it has one of the largest turnovers among manufacturing sectors. Food and beverage production also requires vast amounts of resources which should be adequately used and recycled whenever this is possible, so as to reduce damage to the environment and to create new commercial opportunities for European companies. Incorporating anaerobic digestion plants to treat the organic waste of Europe's agroindustry is an excellent way: treat hazardous waste, avoid the concentration of minerals in one place that could lead to nitrate leaching, recycle nutrients in the form of organic fertilisers (i.e. digestate) and recover clean water. The EU should support the deployment of biogas plants and encourage the cooperation between the public sector and agroindustry.

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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improve the interface between chemicals and waste legislation	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Support the development of digital solutions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide access to finance for high-risk projects	<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"/>

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

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

500 character(s) maximum

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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the development of repair and maintenance services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

at most 3 choice(s)

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

Please give reasons for your choice: cars

200 character(s) maximum

Biomethane cars advantages over standard cars: low GHG, less hazardous particles and good prices. Call on EU to support sustainable fuels by revising Directive 2009/33/EC on clean public procurement.

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

500 character(s) maximum

It is essential that farmers have adequate information about organic fertilisers. It is necessary to create awareness through EU-wide campaigns of digestate's value for the economy and the environment, while also debunking old misconceptions about perceived dangers. The EU should also allow national financial incentives (such as tax reductions) to encourage consumers to buy digestate, so as to fully implement a circular economy.

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 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 checked="" 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 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 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 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 checked="" 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

EU legislation only covers industrial inorganic fertilisers, without EU quality standards for recycled organic material and thereby no product status for organic fertilisers. Therefore:

- there is virtually no trade of organic fertilisers between EU countries;
- national legislation and technical methods go further apart;
- in countries with inadequate/inexistent legislation farmers use organic fertilisers illegally;
- this is a wasted opportunity for the economy and environment.

Lack of information or misinformation about the quality of recycled materials

500 character(s) maximum

There is a serious lack of information about the merits of recycling nutrients. Most farmers are poorly informed (and misinformed) about the benefits of digestate and other organic fertilisers, often making them hesitant to use them. They believe that these are inefficient or even harmful. Public authorities should actively explain the advantages of digestate and the adequate management of local resources. Otherwise, the dominance of inorganic fertilisers (that farmers know best) will persist.

Regulatory obstacles at national/regional/local level

500 character(s) maximum

Due to the lack of regulation for organic fertilisers at EU level, diverging national legislation is developing in Europe. While this has created several good examples, as time passes and national systems consolidate it will become more difficult to converge into a common EU

system. Inadequate or incomplete national legislation can also lead to environmental risks and the use of fertilisers outside the law. Therefore, it is crucial to have clear and ambitious EU legislation.

Regulatory obstacles at EU level

500 character(s) maximum

The EU Nitrates Directive is crucial to protect EU's environment but the unclear and dated wording has led to misinterpretations in national legislation. The Commission should provide clearer guidelines on when digested and co-digested manure can be used as a fertiliser in Nitrate Sensitive Zones, considering that anaerobic digestion decreases the risk of nitrate leaching into water. Digestate should be exempt from REACH registration, in the same way that compost and biogas already were.

Regulatory gaps at EU level

500 character(s) maximum

The main gap is the omission of organic fertilisers from EU legislation. In order to develop to its full potential, the sector needs EU-wide end-of-waste criteria indicating the safety requirements to stop being waste material, followed by product specifications ensuring that a product's attributes (e.g. nutrient percentage) are consistent. This should be done by revising EU legislation on fertilisers as soon as possible, while Europe is still the world leader in this field.

Insufficient cooperation/exchange of information along the value chain

500 character(s) maximum

Decomposing organic matter is everywhere, but there is a missing link between waste production and waste management, resulting in unsustainable techniques such as landfilling, incineration, open storage. Anaerobic digestion has many advantages but often municipalities/companies handling biowaste, sewage sludge and agro-industrial waste are not aware. Explaining the importance of good waste treatment is key, as is an EU binding requirement to source-separate organic municipal waste in the WFD.

Lack of reliable data on secondary raw material flows

500 character(s) maximum

There is no reliable EU-wide data on the production and use of organic waste with a split among the main streams: waste water, organic municipal waste, agro-industrial waste and farm organic matter residues. EUROSTAT should gather and publish yearly EU information on this data as this would point at the deficiencies of our current system, but also at

the economic opportunities to create a competitive market for organic fertilisers.

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: Bio-nutrients for fertiliser use

The EU should focus on the bio-nutrients market as their first priority, as most other waste streams already have functioning markets, particularly for of glass and metal. The largest proportion of solid waste in Europe is in the form of organic material, most of it being disposed of inappropriately. This is also the case for much of the rest of the organic waste that we produce in the form of: sewage water, farm waste (straw and manure), food and beverage industry effluents and food waste from catering and supermarkets. This situation creates challenges and opportunities at the same time.

Organic waste challenges:

- Serious environmental problems arise from landfilling and open storage of organic material in its various forms, as it can spread diseases, pollute water and soil to toxic elements, and create a breeding ground for food and animal invasive diseases.
- High GHG emissions. For agriculture in particular, open storage of organic waste (such as manure) releases power GHG gasses including methane and nitrous oxide, which cause a sizeable share of the sector's total GHG emissions.
- A rise in the costs of waste management for local authorities. Many municipalities are struggling to maintain their facilities and services with high per capita waste levels. In addition, organic waste often has high water content, making it in most cases a bad waste stream for incineration facilities. As a result, many municipalities and regions in Europe struggle to deal with their organic waste adequately, failing to meet EU standards in the Waste Framework Directive.

Opportunities of digesting organic waste to produce fertilisers:

- Recycle vital nutrients for plant growth. Nutrients are a

crucial resource as they are directly linked to food production. Phosphorous reserves in particular are declining at an alarming rate. Under the right market conditions, organic fertilisers can provide a large share of the essential nutrients for plant growth (i.e. Nitrogen, phosphorus and potash). At the same time, nutrient recycling would significantly reduce the danger of nutrient concentration, particularly nitrogen pollution of rivers and ground water.

- High climate change mitigation effects. Anaerobic digestion avoids that harmful GHGs go into the atmosphere, which are instead transformed into biogas, which can produce renewable electricity, heat and biomethane (renewable equivalent to natural gas). In addition, using digestate (solid by-product of biogas) as an organic fertiliser replaces carbon intensive industrially manufactured mineral fertilisers which today take up to 5% of the world's natural gas production.
- Creation of jobs and economic opportunities. At the moment, the anaerobic digestion sector employs over 70.000 people and there is potential a lot more growth, considering that the majority of domestic and industrial waste organic waste is not adequately treated. In the case of municipalities and companies dealing with waste management, in addition to their fees for treating this material, they can increase their revenue by producing energy and fertilisers. Similarly, farmers treating their waste can either sell these products or use them for self-consumption.

In addition to digesting waste, under the right conditions energy crops can also provide significant benefits. This can be ensured by: cultivating degraded land not fit for food production, having a secondary harvest of crops which follows the main food crop and integrating energy crops and food crops within a sustainable rotation cycle. Moreover, producing valuable organic fertilisers reduces environmental impacts and provides additional revenue to farmers.

Creating a functioning market for bio-nutrients is a crucial element of a circular economy, as it brings strong benefits for Europe's environment and its economy. This can only be achieved with the help of European legislation in two key areas:

- A revision of the Fertilisers Regulation which sets clear end of waste criteria and product requirements for organic fertilisers
- A revision of the Waste Framework Directive with ambitious targets and a requirement to source-separate organic waste.

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

500 character(s) maximum

In today's world, it is unlikely that Europe will drive economic growth through energy-intensive activities or the extraction of resources with the help of low-skilled workers. Where the EU can really compete at the global stage is in becoming a world leader in green growth, thereby creating new jobs and innovation while reducing costly imports.

Recycling organic material via anaerobic digestion and gasification will play an essential part in attaining a truly circular economy.

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?

Bio-nutrients for use in fertilisers

500 character(s) maximum

As mentioned, including organic fertilisers in EU legislation is paramount as nutrient production is already under stress, what could have long term devastating effects on food security. It is also essential that the EU recognises anaerobic digestion as a recycling process, since 100% of the input material is used as energy and fertiliser.

When anaerobic digestion is not viable, the merits of gasification over incineration should be acknowledged in the waste hierarchy under waste to energy.

Energy

500 character(s) maximum

Energy production has a place in the circular economy but this should not leave the door open to increase incineration capacity in the EU at the detriment of better uses of organic waste. Landfilling and incinerating organic waste should be phased out from the EU for environmental and economic reasons. Instead anaerobic digestion and gasification should be treat organic waste in a complementary manner. Only the most efficient use of resources has a place in a circular economy.

Water sector/sewage treatment

500 character(s) maximum

Adequately treating sewage sludge is essential to protect the environment and also to enable these plants to further process this material in on-site biogas plants, and by doing so, making the best use of waste water. Their large scale and urban location makes waste water treatment plants ideal to produce sustainable energy and organic fertilisers (or nutrient recovery), thereby creating new sources of revenue. To promote this, favourable investment opportunities are needed to upgrade plants.

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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specific measures to encourage the uptake of the circular economy among SMEs	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" 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 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 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"/>

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

500 character(s) maximum

As the market for digestate strengthens and the carbon price increases for polluting industry, the profitability of anaerobic digestion and gasification technologies will be strengthened considerably. In the meantime, these sustainable techniques need support measures and investment in research, so as to guarantee the transition towards a circular economy. This support will pay off as Europe saves valuable resources and leads the way in technology development.

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:

- e36bcfef-4f1c-4055-bd5f-5b47c556e272/2015 08 19 circular economy paper_final.pdf
- 07b3bd7c-2122-4492-8403-f1e2f842f227/digestate paper final small.pdf

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