# Public Consultation on Circular Economy

# Final contribution of European Aluminium

4 August 2015

About European Aluminium

European Aluminium, founded in 1981, is the association that represents the whole value chain of the aluminium industry in Europe. We actively engage with decision-makers and the wider stakeholder community to promote the outstanding properties of aluminium, secure growth and optimise the contribution our metal can make to meeting Europe's sustainability challenges. Through environmental and technical expertise, economic and statistical analysis, scientific research, education and sharing of best practices, public affairs and communication activities, European Aluminium promotes the use of aluminium as a permanent material that is part of the solution to achieving sustainable goals, while maintaining and improving the image of the industry, of the material and of its applications among their stakeholders.

## 3. Production phase

The design of a material or product can facilitate recycling, extend its lifetime through reuse, refurbishment or repair and reduce its environmental impact by reducing its energy, waste generation or water consumption over its life cycle.

This section seeks your views on actions that you think the EU should take to promote the circular economy in the production stage, including product design, production and sourcing of materials.

**3.1. How would you assess the importance of the following measures to promote circular economy principles in product design at EU level?**

| | very important | important | not very important | not important | no opinion |
|---|---|---|---|---|---|
| Establish binding rules on product design (e.g. minimum requirements on 'durability' under Ecodesign Directive 2009/125/EC) | ○ | ○ | ○ | ○ | ◉ |
| Encourage industry-led initiatives (i.e. self-regulation) | ◉ | ○ | ○ | ○ | ○ |
| Develop standards for voluntary use | ○ | ◉ | ○ | ○ | ○ |
| Promote and/or enable the use of economic incentives for eco-innovation and sustainable product design (e.g. via rules on Extended Producer Responsibility schemes) | ○ | ○ | ○ | ○ | ◉ |
| Review rules on legal and commercial guarantees | ○ | ○ | ○ | ◉ | ○ |

| | | | | | |
|---|---|---|---|---|---|
| Encourage the consumption of green products (see section 4) | ○ | ○ | ○ | ○ | ◉ |
| Other — please specify below | ○ | ○ | ○ | ○ | ○ |

COMMENTS

In particular for packaging design, it relates to lifecycle approach. Extended producer responsibility is an end-of-life tool that does not take into account the life-cycle or the functionalities of packaging which are rightly addressed by the packaging and packaging waste directive's essential requirements. We believe that Extended producer responsibility (EPR) schemes for tackling specific waste streams are effective instruments in reaching for a circular economy. Common performance criteria and the exchange of best practices between the various schemes should be encouraged. Incentive driven schemes using the high scrap value of metals such as aluminium should be encouraged. However, these industry driven schemes cannot take the full cost burden, certainly not if they depend on existing publicly driven collection and sorting systems for household and packaging waste. In these situations transparent and fair cost-sharing is required as well as direct industry influence on how these systems are organized.

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

| | very important | important | not very important | not important | no opinion |
|---|---|---|---|---|---|
| Durability | ◉ | ○ | ○ | ○ | ○ |
| Reparability: Availability of information on product repair (e.g. repair manuals) | ○ | ◉ | ○ | ○ | ○ |
| Reparability: Product design facilitating maintenance and repair activities | ○ | ◉ | ○ | ○ | ○ |
| Reparability: Availability of spare parts | ○ | ◉ | ○ | ○ | ○ |
| Upgradability and modularity | ○ | ◉ | ○ | ○ | ○ |
| Reusability | ○ | ○ | ○ | ○ | ◉ |
| Biodegradability and compostability | ○ | ○ | ○ | ○ | ◉ |
| Resource use in the use phase (e.g. water efficiency) | ◉ | ○ | ○ | ○ | ○ |
| Recyclability (e.g. dismantling, separation of components, information on chemical content) | ◉ | ○ | ○ | ○ | ○ |
| Increased content of reused parts or recycled materials | ○ | ○ | ○ | ○ | ◉ |

| | | | | | |
|---|---|---|---|---|---|
| Increased content of renewable materials | ○ | ○ | ○ | ○ | ⊙ |
| Minimising lifecycle environmental impacts | ⊙ | ○ | ○ | ○ | ○ |
| Other- please specify below | ○ | ○ | ○ | ○ | ○ |

COMMENTS:

From a metals point of view priority should be given to recyclability, also in order to maintain a certain level playing field with other materials. Durability and Resource use are equally important.

Whilst it is important to promote reuse provided the product is properly recycled at the end of its life it should be stressed that products which can be endlessly recycled, such as aluminium beverage cans are at equal level with refillable products such as glass containers.

Recycled content is not the appropriate approach for aluminium and metals in general. Aluminium is endlessly recyclable without losing its properties. Recycling aluminium saves 95% of the energy needed for the primary production – it is one of the most energy saving metals to recycle. Because of its high-value, the demand for secondary raw material exists and there is no need to stimulate the demand with specific recycled content percentages. Aluminium is already efficiently recycled through optimized recycling routes in terms of environment and cost. Obviously the European aluminium industry is using as much as possible recycled material for the production of new aluminium products but from an ecological as well as economic point of view it makes little or no difference whether the material is used again for the same or for other valuable end-use applications.

The challenge is to ensure the availability of scrap in Europe so as to recover as much aluminium as economically and technically feasible. Hence Europe should increase the quantity as well as the quality of scrap and maximize the end of life recycling rate. Artificially increasing the use of recycled material by requiring specific level of recycled content in some products will disturb such balance and will divert scrap flow toward specific products making aluminium recycling routes more expensive and less optimal in term of environmental benefits (i.e. more complex logistics and processes).

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

| | very important | important | not very important | not important | no opinion |
|---|---|---|---|---|---|
| Impact on production cost and affordability of the product | ○ | ⊙ | ○ | ○ | ○ |
| Impact on production processes and value chain | ○ | ⊙ | ○ | ○ | ○ |
| Impact on consumers (e.g. through durability and reparability) | ○ | ⊙ | ○ | ○ | ○ |
| Functionality of the product | ⊙ | ○ | ○ | ○ | ○ |
| Enabling innovation | ○ | ⊙ | ○ | ○ | ○ |

| | | | | | |
|---|---|---|---|---|---|
| Respecting technology neutrality | ◉ | ○ | ○ | ○ | ○ |
| Impact on EU imports and exports | ◉ | ○ | ○ | ○ | ○ |
| Other — please specify below | ○ | ○ | ○ | ○ | ○ |

COMMENT

In general we should safeguard the internal market for packaging and packaged goods and consider the functional role of packaging in environmental assessments. We should also take into account global supply chains in EU policy.

**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

COMMENTS

Please give a reason for your choice: Others:

Prioritization should not depend on stakeholder's votes, but on a proper quantification of the various waste streams and their characterization. This should be done by each product sector.
Too many intermediate products are on the list (e.g. motors and pumps, construction products) while important final product sectors like building & constructions and cars are missing. Packaging materials

should not be isolated from the food and drinks sector. Food waste is an important issue with a potentially very high carbon footprint impact and this can be reduced by using proper packaging.

By prioritizing in a more rational way, we propose that priority should be put on e.g. "Automotive Shredder Residues" or "Developing design for deconstruction standards in buildings" or on "Developing recycling processes for certain construction materials".

Following a circular economy approach, priority should certainly be put on the sectors that have the biggest environmental impact.

**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 | ○ | ○ | ○ | ○ | ○ |

**COMMENTS**

Regulatory obstacles:
Priority should be given to better enforcement of existing EU waste legislation at Member State level, before tabling new and unrealistic targets. On top, Member States should remove unnecessary administrative barriers (e.g. transport permits, lack of harmonized definitions of by-products) for treating waste in nearby facilities in neighboring countries. A true 'Schengen for waste' could further boost the recycling business in Europe.
Eco-design criteria under the waste and packaging directives should – if and when needed - be defined at European level. This would avoid 28 different sets of criteria, potentially hampering the functioning of the Internal Market.
Due to their strong recycling characteristics, aluminium products and packaging are already actively contributing to Eco-design.
Eco-design also means taking into account the concept of 'resource efficiency', using as little material as possible for protecting valuable foodstuff and drinks. For example, laminated foil packaging uses less material but can still be recycled or recovered (energy recovery) with additional metal recovery from the incinerator bottom ashes.
The end-of-life recycling method is – instead of measuring 'recycled content' - the preferred way to calculate progress on aluminium recycling. This should also be recognized in EU methodologies including the future 'Product Environmental Footprint' (PEF) methodology.

The interface between chemicals legislation and waste legislation should be improved. It is important that REACH and CLP legislation do not create additional obstacles in the recycling activities (e.g. new REACH authorization for the waste recycling of SVHC). We suggest to follow a risk based approach instead of focusing on hazard.

Finally, the uneven level playing field between EPR schemes and the lack of accountability and enforcement of EPR implementation is another obstacle. There is today no clear definition of the national roles and responsibilities for each and all actors that apply the EPR scheme as an end of life tool to help meet EU recycling/recovery targets.

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

|  | very effective | effective | neutral | not effective | no opinion |
|---|---|---|---|---|---|
| Establishing a legally binding framework at EU level (e.g. sustainability criteria) | ○ | ● | ○ | ○ | ○ |
| Developing and promoting voluntary compliance schemes | ○ | ● | ○ | ○ | ○ |
| Addressing the issue through trade policy | ○ | ● | ○ | ○ | ○ |
| Addressing the issue through the promotion of targeted global initiatives | ○ | ● | ○ | ○ | ○ |
| Promoting the exchange of best practice among businesses | ● | ○ | ○ | ○ | ○ |
| Other — please specify below | ○ | ● | ○ | ○ | ○ |

COMMENT

Above all priority should be given to exchange of best practices among businesses, certainly from a world-wide perspective. Most raw materials are mined outside the European Union and several industries including the aluminium industry and its key customers already made voluntary commitments concerning sustainable sourcing.

Sectoral policy/regulatory approaches will be needed. Packaging has a separate, vertical directive which adopts a holistic life-cycle approach integrating both product and waste policy and this should be safeguarded. Packaging should be assessed as part of the product it protects. Addressing packaging materials in isolation from the product in a regulatory context could lead to disruptive measures and misguide attempts to achieve net environmental improvements across packaged product supply chains.

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

COMMENT
In the framework of international and bilateral negotiations, the European Commission should insist on the need to enforce trade-related environmental legislation and secure a level-playing-field for secondary materials. Recycling facilities in third countries should meet at least the same social, environmental, health and safety conditions as in Europe. In this respect certification and validation schemes should be considered.

Intelligent EU funding and other non-discriminatory fiscal incentives respecting the waste hierarchy should be used for stimulating the European Circular Economy. This should trigger further investment to drive resource efficiency at the product level, with a particular focus on prevention of food waste and on innovative sorting technologies and collection systems (including in advanced incinerator bottom ash treatment) and promote industrial symbiosis, thus generating direct waste management synergies at European level.

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## Consumption phase

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

|  | very important | important | not very important | not important | no opinion |
|---|:---:|:---:|:---:|:---:|:---:|
| Provide more information relevant to the circular economy to consumers, for example on expected lifetime of products or availability of spare parts | ● | ○ | ○ | ○ | ○ |
| Ensure the clarity, credibility and relevance of consumer information | ○ | ○ | ○ | ○ | ● |

related to the circular economy (e.g. via labels, advertising, marketing etc.) and protect consumers from false and misleading information in this respect

| | 1 | 2 | 3 | 4 | 5 |
|---|---|---|---|---|---|
| Organise EU-wide awareness campaigns to promote the circular economy | ○ | ○ | ○ | ○ | ◉ |
| Improve/clarify rules and practices affecting consumer protection (e.g. relating to legal and commercial guarantees) | ○ | ◉ | ○ | ○ | ○ |
| Take action on product and material design (see section 3) | ○ | ○ | ○ | ○ | ◉ |
| Encourage financial incentives to consumers at national level (e.g. by differentiated taxation levels depending on products' resource efficiency) | ○ | ○ | ○ | ◉ | ○ |
| Take measures targeting public procurement (e.g. through criteria for Green Public Procurement) | ○ | ○ | ○ | ◉ | ○ |
| Encourage new modes of consumption such as shared ownership (e.g. car sharing), collaborative consumption, leasing and the use of internet-based solutions | ○ | ○ | ○ | ○ | ◉ |
| Promote the development of repair and maintenance services | ○ | ◉ | ○ | ○ | ○ |
| Encourage waste prevention (e.g. minimising food waste) | ◉ | ○ | ○ | ○ | ○ |
| Other — please specify below | ○ | ◉ | ○ | ○ | ○ |

**COMMENT**

These are in general important but when it comes to specific measures it is important to assess whether these should be done at Member State level or at EU level. Europe-wide awareness campaigns are less helpful and should be left to the Member States. Other measures are perhaps not needed at all (e.g. extra labels) or should be left to the consumers themselves to decide (e.g. new modes of consumption). Waste prevention with a strong focus on avoiding food waste should be an important European circular economy principle.

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

European Aluminium – Final Answer to the public consultation on Circular Economy – 3 August 2015

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

**COMMENT**

Same comment as 3.4: Prioritization should not depend on stakeholder's votes, but on a proper quantification of the various waste streams and their characterization.

Too many intermediate products are on the list (e.g. motors and pumps, construction products) and important final product sectors such as buildings & construction, cars and food and drinks, are missing. By prioritizing in a more rational way, we may conclude that priority should be put on e.g. "Automotive Shredder Residues" or on "Developing design for deconstruction standards in buildings" or on "Developing recycling processes for certain construction materials".

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

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**COMMENT**
Key is also consumer engagement/responsibility and the need to meet customer needs and convenience (according to eg lifestyles, small or big households, different ages) which packaging has to take into account in its design and functionalities. Packaging is passive in the use/consumer phase but has a role in informing consumers on how to sort packaging and needs to be easy to handle.

## 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 | Metals | Paper | Plastic | Wood/Biomass |
|---|---|---|---|---|---|---|---|---|---|
| Lack of EU-wide quality standards for recycled materials | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| Poor quality of recycled materials (e.g. containing unwanted substances/high contamination) | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| Lack of information or misinformation about the quality of recycled materials | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| Poor availability of waste/material to be recycled | ☐ | ☐ | ☐ | ☐ | ☐ | ☑ | ☐ | ☐ | ☐ |
| Poor reliability of supply for recycled materials | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| Low demand for recycled materials (e.g. on the EU market) | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| Cost differential between primary and secondary raw materials | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| Organisational cost of switching | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |

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

**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**

**Regulatory obstacles**
Full implementation and enforcement is a pre-requisite to ensure conditions for viable secondary raw materials markets in the transition towards a sustainable and competitive circular economy. This is in particular true for the Waste Framework Directive and the Packaging and Packaging Waste Directive

and in those Member States faced with a relatively wide gap between existing and future recycling and recovery targets.

**Poor availability of waste/material to be recycled**

Aluminium is endlessly recyclable without losing its properties. Recycling aluminium saves 95% of the energy needed for the primary production – it is one of the most energy saving metals to recycle. Because of the high added value of aluminium recycling and the growing demand worldwide, Europe has become a net exporter of aluminium scrap. Aluminium scrap exports are dramatically increasing, with importers "capturing" from Europe a key resource, cheap embodied energy and further creating a risk of dependency. All aluminium scrap export should be considered as European electricity export without compensation, as it will cost Europe a lot of energy to produce or import the primary metal required to supply the European demand.

The post-consumer scrap collection has been increasing, still there has been little corresponding uplift in European production of recycled aluminium. Although estimates run at a healthy 3-4% growth a year in production of recycled aluminium, scrap exports are increasing at a higher rate, some 15% on average since 2004.

We have to make sure that aluminium stays in a recycling loop and so remains available to Europe's recycling industry, thus contributing to a more resource-efficient Europe.

**Lack of reliable data on secondary raw materials flows**

The leakage of valuable secondary raw materials (e.g. aluminium scrap, ELV's) to third countries should be addressed via a better monitoring of legal and illegal exports of those materials. Legal exports of 'end-of-waste' aluminium fractions should be better registered; today Eurostat only lists exports of 'aluminium waste and scrap'. Eurostat does not provide with information on exports of "end of waste". A respective trade code is missing. This is an obstacle to monitor the exports of high quality aluminium scrap defined as having the total amount of foreign materials shall be ≤ 5 % by weight or the metal yield shall be ≥ 90 % (according to Annex II of Regulation No 333/2011).

**Lack of information and misinformation about the quality of recycled materials**

Aluminium recycling industry operates according to high environmental, safety and social standards. This allows more efficient recycling treatment in the EU. The quality of recycled material recycled outside the European Union and originated from the EU is unknown. One of the reason is as explained above the need for better monitoring of illegal and legal exports. Recycling facilities in third countries should meet at least the same social, environmental, health and safety conditions as in Europe. In this respect certification and validation schemes should be considered.

**Chemical legislation**

Chemical legislation, like CLP and Reach, if not taking into account at early stage socio-economic aspect, might negatively influence the market for secondary raw materials and weaken its competitiveness. A risk based approach should be followed when assessing impact on environment and on human health.

**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

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

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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?**

Several initiatives or studies addressing the building sector have recently started, these initiatives address respectively
- DG Growth and DG Envi: "Resource efficiency in the building sector" study managed by JRC IPTS Seville study
- DG Envi: Study on "Resource Efficient Use of CDW" managed by Bio by Deloitte (http://ec.europa.eu/environment/waste/studies/mixed_waste.htm )
- DG Growth : development of a European CDW protocol

It will be essential that the outcomes of these 3 initiatives are consistently promoting a more circular economy for the building sector through consistent and adequate indicators, measures and tools to be used by the market.

In general we should safeguard the internal market for packaging and packaged goods and consider the functional role of packaging in environmental assessments. We should also take into account global supply chains in EU policy.

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

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

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

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

| | very important | important | not very important | not important | no opinion |
|---|:---:|:---:|:---:|:---:|:---:|
| Financing innovative projects or technologies relevant to the circular economy (from EU funds, e.g. Horizon 2020) | ◉ | ○ | ○ | ○ | ○ |
| Public incentives (e.g. financial guarantees) for private investors to finance projects conducive to the circular economy | ◉ | ○ | ○ | ○ | ○ |
| Support for the development of circular economy projects (e.g. technical assistance) | ◉ | ○ | ○ | ○ | ○ |
| Support for innovative systemic approaches and cross-sectoral cooperation (e.g. industrial symbiosis and cascading use of resources) | ◉ | ○ | ○ | ○ | ○ |
| Partnerships with public authorities to help innovative businesses overcome potential legal obstacles to innovation | ◉ | ○ | ○ | ○ | ○ |
| Promotion of innovative business models for the circular economy (e.g. leasing and sharing) | ◉ | ○ | ○ | ○ | ○ |
| Specific measures to encourage the uptake of the circular economy among SMEs | ◉ | ○ | ○ | ○ | ○ |
| Exchange and promotion of best practice | ◉ | ○ | ○ | ○ | ○ |
| Promoting the development of skills/qualifications relevant to the circular economy | ○ | ◉ | ○ | ○ | ○ |
| Support for capacity-building in public administrations | ○ | ○ | ○ | ○ | ◉ |
| Support for market penetration of innovative projects through labelling, certification and standards, public procurement for innovation, etc. | ○ | ○ | ○ | ○ | ◉ |
| Better monitoring the implementation and impact of policies contributing towards the circular economy agenda | ◉ | ○ | ○ | ○ | ○ |
| Increasing the knowledge base by collecting and providing information | ◉ | ○ | ○ | ○ | ○ |

and data e.g. on material flows,
technologies and consumption
patterns

Other- please specify below ⭘ ⭘ ⭘ ⭘ ⭘

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

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