

Guide to replying to the European Commission public consultation on the Circular Economy

This guide is to help you fill out the European Commission public consultation on the Circular Economy, which can be found [here](#). The guide provides information for you to respond to the consultation in your own words, leaving flexibility for you to address your particular area of interest.

The circular economy represents a great opportunity to reform our economy to work within natural limits, using natural resources sustainably and eliminating waste. It aims to transform our current linear economy model (take-make-dispose) into a system that ensures we get the most value out of the resources we use, and therefore that we use less.

Don't feel overwhelmed! You don't have to answer a question if you don't want to. Every contribution is useful, so it is better to answer a few questions, or just fill in the tick boxes, than not to respond at all.

Before addressing the consultation in detail, here are some general notes:

- Most written answers are limited to only a few hundred characters (between 200 and 500 characters) meaning responses can be only a few sentences. This guide will provide you with suggested points for these questions.
- Many of the points we think are important to include, can be included under various questions. As it can be useful for answers to not be exact duplicates of each other, feel free to move text around if you think it appropriate.
- Generally, the consultation is orientated towards technical aspects of the circular economy. This makes it all the more important for you to reiterate the environmental and social benefits of the circular economy.
- The consultation provides background information on each section, as well as defining certain words and terms in two glossaries, which may be useful. Please feel free to send any questions to which you can't find the answer in the consultation to gthurley@qcea.org

Below are specific recommendations for each section. Remember that you don't need to answer every question.

Section 1 - Introduction

This provides background information on the Circular Economy at the European level (from the perspective of the European Commission): motivations, benefits, the previous proposal, and the aims of the consultation.

You can find more background information about the circular economy in the email for this action alert, on [QCEA's blog here](#), in our newsletter [Around Europe here](#), and a [longer paper on the circular economy here](#).

See also further reading, below.

Section 2 - General respondent information

2.4 QCEA suggests selecting "Fairly well informed" or higher, in order to ensure that your contribution is valued

Section 3 - Production phase

3.1

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

	very important	important	not very important	not important	no opinion
Establish binding rules on product design (e.g. minimum requirements on 'durability' under Ecodesign Directive 2009/125/EC)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage industry-led initiatives (i.e. self-regulation)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Develop standards for voluntary use	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review rules on legal and commercial guarantees	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage the consumption of green products (see section 4)	<input type="radio"/>	<input 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"/>

Ticking any option between 'very important' and 'not important' for "Other" allows you to explain what else you think should be considered, in 200 characters. QCEA suggests mentioning the importance of the EU legislating for products to be designed to be easily repairable, reusable, and/or recyclable.

3.2

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



As above, selecting “Other”, allows you to write a 200 character explanation. QCEA advises emphasising that dangerous or toxic substances should be carefully controlled at the production stage to prevent harming the environment or people.

3.3

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on consumers (e.g. through durability and reparability)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Functionality of the product	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enabling innovation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Respecting technology neutrality	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on EU imports and exports	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other – please specify below	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

This question is intended to refer to the negative impacts of circular economy principles on these factors i.e. would these aspects be more important than applying circular economy principles.

If you select “Other”, QCEA suggests mentioning the positive impact of the circular economy in reducing the amount of materials Europeans use, and/or reducing our harmful environmental impact generally.

3.4 For this question, you are able to select a maximum of three product categories from the choices below that should be given priority. Selecting a product group allows you to explain your choice. **Below there are five suggested priorities**, with a few points to explain each choice.

- 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) **1**
- Packaging materials
- Heating equipment (e.g. boilers, water heaters)
- Air-conditioning and ventilation systems
- Lighting products
- Motors and pumps
- Industrial equipment
- Clothing and textiles **2**
- Furniture **3**
- Cars
- Construction products (e.g. windows, insulation materials) **4**
- General measures (concerning a broad range of products) should be taken **5**
- Others

1. Small electronics:

- These products are very common (phones, tablets etc.)
- Often, people dispose of these products before they stop working, to get the new model
- This means they don't last very long, and many are wasted.
- In the UK there is 1,400 million tonnes of electrical waste annually, and less than 10% is reused
- They also contain scarce materials like gold and other rare metals which are often mined in conflict areas beyond the EU, and thus

reducing our imports of these will reduce the EU's role in exacerbating instability abroad.

2. Clothing and textiles:

- Fashion means that people don't use perfectly useable clothes, getting rid of them after a short time and buying new clothes frequently.
- Textile production requires a lot of water and land - it takes more than 20,000 litres of water to produce 1 kg of cotton, often in areas with limited water.
- An estimated 50% of clothing ends up in landfill.
- On the other hand, increasing the average useful life of clothes by 3 months would reduce carbon, water, and waste footprints by 5-10%

3. Furniture:

- Furniture uses a lot of resources, albeit over a long lifetime.
- A large amount of furniture is discarded - in France, for example, an estimated 2.7 million tonnes a year of furniture is thrown out, much of which is reusable.

4. Construction products:

- The construction sector in the EU uses over 1.5 billion tonnes of materials annually.
- Only an estimated 20-30% of construction materials are reused.

5. General measures:

- European people and societies currently consumer far too many materials and have a disproportionate impact on the Earth
- If everyone on Earth consumed at the same rate as the average European (21 tonnes per capita per year), we would need 2.5 planets to sustain our material use.
- The circular economy must change the entire system of production and consumption in order to realise the maximum benefits, and be truly circular.

3.5

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Address potential regulatory gaps in EU legislation - please specify	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support the development of innovative business models (e.g. leasing)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improve the interface between chemicals and waste legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote collaboration between and among private and public sectors, including end-users	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure availability of reliable data on material flows across value chains	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide access to finance for high-risk projects	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other – please specify below	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you tick “Other”, QCEA suggests mentioning the benefits of requiring producers to provide information to citizens and businesses to enable repair, reuse and recycling.

Ticking any option between very important and not important for “address potential regulatory gaps” or “addressing potential regulatory obstacles” will allow you to specify. QCEA advises emphasising the need to make all EU policy coherent with circular principles - especially energy, economics and chemical policy.

3.6 QCEA has no suggestion for “other” on this question.

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

	very effective	effective	neutral	not effective	no opinion
Establishing a legally binding framework at EU level (e.g. sustainability criteria)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing and promoting voluntary compliance schemes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Addressing the issue through trade policy	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other – please specify below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

3.7 This is an open-ended question. Here are some ideas you might want to include in your answer (maximum 500 characters):

- Practical and binding legislation on product design requirements at the EU level is necessary, and the most effective way to develop a circular economy
- The EU can play a major role in reforming the economic framework to be more sustainable, by developing circular economy legislation.
- Preventing waste from being created in the first place should be the priority - and the design phase is when this is defined

Section 4 - Consumption phase

4.1

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure the clarity, credibility and relevance of consumer information related to the circular economy (e.g. via labels, advertising, marketing etc.) and protect consumers from false and misleading information in this respect	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Organise EU-wide awareness campaigns to promote the circular economy	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage financial incentives to consumers at national level (e.g. by differentiated taxation levels depending on products' resource efficiency)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Take measures targeting public procurement (e.g. through criteria for Green Public Procurement)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage new modes of consumption such as shared ownership (e.g. car sharing), collaborative consumption, leasing and the use of internet-based solutions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the development of repair and maintenance services	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you tick “Other”, QCEA advises highlighting obligations on manufacturers to provide diagnostic information free of charge, to ensure products are fully functioning for longer and can be repaired.

4.2 As with 3.4 (see above), for this question, you are able to select a maximum of three product categories that should be given priority at the consumption stage.

On the next page are four suggested priority product groups, with some suggested points to explain the choice - with a 200 character limit. If you have other particular interests please feel free to select these instead.

- White goods (e.g. dishwashers, refrigerators)
- Electronics ¹
- Food and beverages ²
- Packaging materials
- Clothing and textiles ³
- Furniture
- Cars
- Construction products
- General measures (concerning all consumer products) should be taken ⁴
- Other – please specify below



1. Electronics:

- Electronics are resource-intensive. Increased durability, repair and upgradability will help this.
- More information could prevent premature disposal.

2. Food and beverages:

- The manner in which food products are grown, produced and packaged damages our environment.
- Everyday consumer choices can have a large impact in this area.

3. Clothing and textiles:

- Unsustainable clothing use consumes a lot of water, land, and materials, and causes considerable carbon emissions.
- Consuming less, through developing reuse, redistribution and return schemes can reduce these impacts.

4. General measures:

- EU citizens consume more than their fair share globally - our consumption needs to fall across the board.
- If everyone consumed as much as the EU annual average, we would need 2.5 planets to sustain the demand.

4.3 This is an open-ended question about. Here are some ideas you might want to include in your answer (maximum 500 characters):

- The economic system will not be sustainable as long as it promotes growth through increased production. This production-based growth will only lead to increased consumption of resources, green or otherwise.
- The circular economy must aim for decreased total consumption of raw materials, as well as increased resource efficiency.
- Increased durability, reusability, repairability, and recyclability will help to decrease consumption.
- To foster more sustainable consumption, less resource-intensive products must be more economically accessible to consumers than more harmful products and materials.

Section 5 - Markets for secondary raw materials

5.1 This question presents a number of material groups (construction materials, glass, metals paper) in a table. For each type of material possible obstacles to recycling them are listed. Selecting a certain obstacle for any material allows you to explain in 5.2 why that obstacle is relevant.

	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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poor quality of recycled materials (e.g. containing unwanted substances/high contamination)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Lack of information or misinformation about the quality of recycled materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Poor availability of waste/material to be recycled	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



If you tick "other" as one of the impediments to the use of any material group, QCEA advises you to highlight that one obstacle is the lack of economic incentives to use secondary raw materials, despite the environmental benefits (reduced greenhouse gas emissions, more efficient resource use etc.)

5.2 Below are some possible answers for 5.2 describing the importance of the various impediments:

Lack of EU-wide quality standards for recycled materials

- Develop and implement EU-wide minimum standards for recycled materials
- Implement legislation to avoid the loss of value in products ("down-cycling")
- Standards for recycled materials should be harmonised with chemicals legislation to avoid negative impacts on human health and the environment

Poor quality of recycled materials

- Develop and implement EU-wide minimum standards for recycled materials
- Design a system to measure and categorise recycled materials to indicate the degree of quality above that minimum standard.
- Control use of hazardous materials at design stage to avoid negative impacts on human health and the environment

Lack of information or misinformation about the quality of recycled materials

- Develop and implement EU-wide standards for recycled materials to eliminate doubts about the quality of recycled materials
- Standards and labelling will also make it easier for manufacturers to compare different groups of materials.
- Support producers of recycled material in running information campaigns to help counter negative perceptions and misinformation and thereby promote consumer appreciation for recycled inputs.

Poor availability of waste/material to be recycled

- Improve collection of household and business waste
- Require separate collection of many common waste types (paper, cardboard, metals, glass, plastic, textiles, biowaste) across the EU by 2020
- Encourage retailers to collect used products (e.g. textiles, e-waste) to be reused or recycled

Poor reliability of supply for recycled materials

- Ban the incineration or landfilling of recyclable materials by 2020

Low demand for recycled materials

- Standardise the quality of recycled material, to be equivalent to virgin materials
- Incentivise the uptake of recycled materials and their use in new products.
- Encourage national governments to offer tax rebates for use of recycled materials

Cost differential between primary and secondary raw materials

- Tax rebates on a national level for secondary raw materials will encourage companies to use them
- A shift in tax from labour to resources will also encourage use of secondary/recycled materials, as using virgin raw materials consumes more materials.
- These incentives for secondary raw materials should be phased out if/when environmental and social externalities are integrated into the pricing of raw materials (which would make virgin raw materials more expensive than recycled ones)

Regulatory obstacles at national/regional/local level

- National trade barriers on remanufactured goods should be removed
- Recycling collection and processing should be consistent across the whole country

Regulatory obstacles at EU level

- Remove bonuses for incinerating recyclable or biodegradable waste, currently classified as "renewable energy", as these prevent recycling



- Chemicals and energy legislation must be reviewed to fit with circular economy principles

Regulatory gaps at EU level

- Design criteria for products, particularly designing for recycling, will enable more materials to be reuse and recycled

Regulatory gaps at national/regional/local level

- Tax reform - zero VAT rate for circular certified products, increased tax on single use products.
- A wider taxation shift from labour to resources should be implemented by national governments.

Insufficient cooperation/exchange of information along the value chain

- Help businesses to increase cooperation by introducing measures to increase the transparency of the process require product labels to include information on the content of the products, particularly regarding chemicals
- Shared databases at the EU level would also make information more accessible

Lack of reliable data on secondary raw material flows

- The EU should promote the use of a standardised methodology to understand how materials move within the economy.
- Eventually this system should be obligatory, and information should be made publicly available.
- This will make identifying and removing problems easier.

5.3 Similar to 3.4 and 4.2 (see above), for this question, you are able to select a maximum of three secondary raw materials that should be targeted.

- Bio-nutrients (e.g. nitrogen, phosphorus and organic matter from e.g. sewage fertiliser use
- Construction aggregates¹ (i.e. coarse particulate material used in construction,
- Critical raw materials such as rare earth elements or certain precious metals²
- Glass
- Metals
- Paper
- Plastics³
- Wood/Biomass
- Other – please specify below⁴

Below are four suggested priority materials, with some suggested points to explain the choice - with a 500 character limit. If you have other particular interests, feel free to select these instead.

1. Construction aggregates

- Construction is resource intensive; the material consumption of the

construction sector in Europe is over 1.5 billion tonnes annually.

- Only 20-30% of construction waste is reused or recycled

2. Critical raw materials

- These are important for a wide range of products
- 90% of critical raw materials are imported from outside the EU, so it is important to create a market for secondary critical materials within the EU
- Critical raw materials are often mined in conflict areas beyond the EU, and thus reducing our imports of these will reduce the EU's role in exacerbating instability abroad.

3. Plastics

- Plastics are used widely, and in many different forms.
- The use of recycled plastic has grown recently but there is still room for improvement
- Fixed product standards would assure people about the standard of product, and encourage the use of recycled plastic.
- Regulating for mandatory recycled content would also promote recycled plastics

4. Other

- An estimated 50% of clothing ends up in landfill when it, along with other textiles (carpets, sheets, towels)



could be recycled and reused.

- Often the quality of recycled textiles is very low. For example clothes store H&M can only use 20% recycled fibres without compromising quality.

5.4 This is an open-ended question. Here are some ideas you might want to include in your answer (500 characters):

- The European Commission should help develop markets for recycled materials by purchasing recycled goods and products for their own purposes (known as public procurement) and encourage national governments to do likewise.
- The EU should help to link industry and businesses together so that one business's waste can become another's treasure
- Any financial benefits given for incinerating waste (as renewable energy) should be phased out, as these distort recycled material markets, and prevent their development.
- Promotion and protection of recycled material markets should be included in other EU work, such as negotiations over TTIP and other free-trade agreements.

Section 6 Sectoral measures

6.1 & 6.2 Similar to 3.4, 4.2 and 5.3 (see above), for this question, you are able to select a maximum of three sectors to be given priority. You can explain these choices under 6.2

Below are four suggested priority materials, with some suggestions for what the EU should do - with a 500 character limit each. If you have other particular interests, feel free to select these instead.

- Agriculture
- Bio-nutrients (e.g. from sewage sludge or farm organic matter)
- Chemical industry and process manufacturing
- Construction/demolition and buildings 1
- 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 2
- Plastics
- Retailing 3
- Services
- Textiles 4
- Transport
- Water sector/sewage treatment
- Other- please specify below

1. Construction/demolition and buildings

- EU-wide design criteria for buildings to be possible to disassemble will help save materials.
- Deconstruction rather than demolition would prevent 76% of the rubble produced from going to landfill.

2. Mining & quarrying

- For the circular economy to be more resource-efficient, the rate of mining and quarrying of raw materials must decrease. The EU should coordinate the promotion of recycled and reused materials in lieu of quarried and mined inputs
- The EU must protect workers in this sector by supporting retraining schemes for mining workers
- The EU can also help mining companies transfer the focus of their business from extraction to the production of secondary raw materials.

3. Retailing

- Voluntary agreements are not sufficient to change practices - European Commission should issue rules to prevent the 'race to the bottom' on retail prices, which results in single-use resource-intensive products predominating
- These rules should control the range of choices available to consumers, orienting choice towards more resource-efficient and durable products

4. Textiles

- The EU should implement economic incentives (lower rates of tax, subsidies) to favour durable textiles, and encourage the use of recycled fabrics
- Supporting reuse and redistribution schemes with economic incentives will also help

- An EU target for the reuse of textiles will also encourage action

Section 7 Enabling factors

7.1

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for innovative systemic approaches and cross-sectoral cooperation (e.g. industrial symbiosis and cascading use of resources)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Partnerships with public authorities to help innovative businesses overcome potential legal obstacles to innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exchange and promotion of best practice	<input type="radio"/>	<input checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increasing the knowledge base by collecting and providing information and data e.g. on material flows, technologies and consumption patterns	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other- please specify below	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you tick “Other”, QCEA advises mentioning requiring businesses to account for their environmental impacts more closely, using standard measures, and working to achieve binding reduction targets. Alternatively you could recommend exempting refurbishment or repair services from the EU VAT regulations.



7.2 This is an open-ended question. Here are some points you might want to cover (500 characters):

- The EU will fail to make a circular economy without the appropriate economic framework.
- This requires VAT exemption for repair and refurbishment businesses, a shift in tax from labour to resources (especially virgin raw materials) and incineration and landfill taxes
- The circular economy will not be sustainable if resource consumption is not measured and reduced. This should include measuring consumption of materials, land, water and carbon, both within and beyond Europe's borders

8 Additional document upload.

If you would like to upload any documents you can do that here. If you feel moved to write something yourself, for example about your environmental convictions, and it would be collected and included in the Commission's analysis.

If you would like to upload any documents you can do that here. A paper on the essential elements of the circular economy, developed by QCEA and 11 other NGOs can be found [here](#).

Further reading

De Groene Zaak, MVO Nederland and Circle Economy, *More prosperity, new jobs. Manifesto on Circular Economy Policy in the EU*. May 2015.

Ellen MacArthur Foundation, *Towards the Circular Economy 1, 2 and 3*. 2012, 2013 and 2014.

Ellen MacArthur and Zero Waste Scotland, *Scotland and the Circular Economy. A preliminary examination of the opportunities for a circular economy in Scotland*. January 2015.

European Environmental Bureau (EEB), *Advancing resource efficiency in Europe*. March 2014.

European Environmental Bureau (EEB), *Delivering resource-efficient products*. March 2015

European Parliament, *Resource efficiency: moving towards a circular economy*. July 2015.

Joint statement from EEB, ChemTrust, Friends of the Earth Europe and Zero Waste Europe, *The Circular Economy and REACH - an essential partnership*. April 2015.

Friends of the Earth Europe, *The four footprints, Increasing our resource efficiency, reducing our social and environmental impacts*. March 2014.

Friends of the Earth Europe, *Preventing waste: recycling isn't enough for a circular economy*. February 2015.

WRAP, *Switched on to value*. December 2014.

Scottish Government, *Zero waste, Safeguarding Scotland's resources: blueprint for a more resource efficient and circular economy*. October 2013



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