

FIEC is the European Construction Industry Federation, representing via its 30 National Member Federations in 27 countries (24 EU & EFTA and Turkey) construction enterprises of all sizes, i.e. small and medium-sized enterprises as well as “global players”, carrying out all forms of building and civil engineering activities.



Press Contact: Sue Arundale

FIEC / Avenue Louise 225, BE-1050 Brussels

Tel. +32-2-514 55 35 / Fax +32-2-511 02 76 / e-mail: mailto:s.arundale@fiec.eu

FIEC position paper

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Circular Economy Action Plan ...

■ **FIEC strongly supports action that will stimulate demand**

Since the publication of the first communication on the circular economy in 2014, FIEC has always been supportive of this concept. However, for the circular economy to become a reality, there needs to be greater acceptance in the relevant markets and both the supply and demand side need to be addressed. In the construction industry, clients need to be willing to accept recycled and re-used materials in their new and renovated buildings and in their infrastructure. Currently, some clients still perceive that « new is best » and contractors are reluctant to offer « green solutions » to a market that is not ready. We believe the following issues from the new circular economy action plan published in December 2015 will help significantly to stimulate demand.

Recovered raw materials no longer treated as waste

FIEC welcomes the fact that the revised legislative proposals on waste will clarify existing rules on « end-of-waste ». We believe that this will lead to the acceptance, including in legal terms, of relevant recovered materials as secondary raw materials and not waste.

Quality of and standards for secondary raw materials

FIEC welcomes measures to improve, evaluate and acknowledge – or preferably guarantee – the quality of secondary raw materials. Current concerns about quality – shared by contractors and their clients alike - include whether such materials are fit for purpose and whether they contain toxic substances that present a health hazard. There remains also the perception that they are inferior to brand new materials.

Reliable and comparable data

FIEC strongly supports the proposal for reliable indicators to assess the effectiveness of EU and national action. These must be comparable and robust, but must not create a burden as a result of onerous collection and reporting processes. We believe that reliable data will build confidence in the market, assuming of course that they show that progress towards a more circular economy is being made. In turn, as the market gains confidence, we believe that demand will also grow.

■ **Caution on Ecodesign, Energy Labelling and Product Environmental Footprint**

FIEC has stated many times in relevant documents that new measures designed to improve the circular economy should not duplicate existing measures that already tackle construction products. Our starting point is that the Construction Products Regulation (CPR) and European standardisation already deal with all relevant characteristics of construction products, including their environmental properties. With this in mind, we would like to repeat our concerns about the following :

Ecodesign and Energy Labelling

[FIEC's position on the Ecodesign and Energy Labelling Directives](#)

FIEC - European Construction Industry Federation

Avenue Louise 225, BE-1050 Brussels / Tel. +32-2-514 55 35 / Fax +32-2-511 02 76 / e-mail: <mailto:info@fiec.eu> / www.fiec.eu

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[FIEC's position on the proposed regulation setting a framework for energy efficiency labelling](#)

Product Environmental Footprint (PEF)

PEF is being developed during an ongoing three-year pilot phase. The main objective is to create Product Environmental Footprint Category Rules (PEFCR), which will, amongst other things, enable the comparison of products within certain product groups. The main problem with this approach (as with the above approaches) is that construction products are not stand-alone products. They are installed in a building or in infrastructure and it is their performance after installation, as part of a complex system, that is relevant. With this in mind, comparing their performance as stand-alone products, before installation, is pointless. We believe that from the construction industry PEF is an expensive and unnecessary approach, the scope of which should exclude construction products.

■ **Prioritise critical raw materials and avoid counterproductive measures for others**

FIEC strongly agrees that the most critical raw materials should not be over-exploited and where possible, they should be recovered from products that have reached their end-of-life. This principle should apply to other raw materials, which can easily be recovered from construction, renovation, deconstruction and demolition projects. However, FIEC believes that abundant raw materials should not be targeted for recovery when there is a risk of action that :

- Increases costs
- Poses technical difficulties that make recovery counterproductive
- Involves long transportation of the recovered materials for treatment, thus producing emissions.

This comment also applies to the relevant statement in the pre-amble (23) in the proposal for amendments to the Waste Directive, which acknowledges the need for environmental benefits to be economically and technologically feasible.

■ **Innovate to facilitate deconstruction and resource efficiency**

BIM

BIM offers potentially huge benefits for the circular economy, including the following:

- When BIM is used every component/feature can be mapped and registered in detail
- Deconstruction and subsequent recycling is much easier
- Treatment of hazardous substances should be easier
- Renovation and maintenance is facilitated by BIM.

Horizon 2020 – include construction projects

The construction industry should be included in the initiative « Industry 2020 in the circular economy » and not only process industries and manufacturing as indicated in the circular economy action plan.

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■ Waste Directives

Progressive Landfill Restrictions

FIEC accepts the principle that landfilling should be progressively restricted, but stresses that there need to be viable alternative means to dispose of genuine waste.

Construction and Demolition Waste

FIEC strongly agrees that a definition of Construction and Demolition Waste is needed. Any such definition should be unambiguous and agreed following consultation with relevant stakeholders.

FIEC strongly agrees that Member States should promote sorting systems for Construction and Demolition Waste, wood, aggregates, metal, glass and plaster. (p.18 – (10b))

Definition of backfilling

State whether we are happy with the definition of backfilling (p.14 – 17b inserted, waste directive)

Extended Producer Responsibility (EPR)

Although this concept is explained, FIEC would like to know how the European Commission intends to implement EPR vis a vis building construction, renovation, demolition and deconstruction. For stand-alone products, which perhaps have a relatively short life cycle, identifying the manufacturer and who is liable should be straightforward in most cases. However, in the case of a construction, who will be bear Extended Producer Responsibility? Will it be the manufacturer of the materials contained in the construction, or will it be the contractor that has installed the product? FIEC believes that this is not clear in the proposed amendments to the Waste Directive. The extent of the scope of buildings included is not clear either.

FIEC calls on the European Commission to clarify how EPR will be handled in the construction industry.

Common and Comparable Indicators

FIEC strongly agrees that these are essential, for the credible measurement of results.

■ Conclusion

FIEC broadly supports the new circular economy action plan and the related documents on waste, including the proposals for amendments to existing legislation. We believe that the construction industry has a key role in making the circular economy a reality and we are ready to engage with the European institutions to ensure that the circular economy is achieved, without a detrimental impact on the economic health of contractors. The circular economy has been presented as an opportunity and FIEC calls on the EU institutions to work with us to turn the opportunity into new jobs and real growth in the EU.