

Circular Economy Action Plan

General points of interest for FIEC

- Potential for 700,000 new jobs
- +0.5% on EU GDP by 2030
- Move towards sharing economy
- Emphasis on digital technologies
- Zero waste from start
- Market for secondary materials
- 2030 Sustainable Development Goals
- Eliminating barriers to circularity

Construction-specific issues for FIEC

- Strategy for a Sustainable Built Environment by 2021
- Recycled content requirements in revised Construction Products Regulation
- Promoting Circular Economy Principles for Buildings Design and Digital Logbook
- Level(s) voluntary assessment framework for environmental performance of buildings to "integrate life cycle assessment in public procurement"
- Revision of material recovery targets
- Rehabilitation of brownfield sites and dealing with excavated soils
- No specific information on Renovation Wave

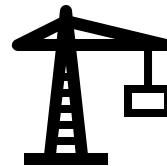
Some other issues to look at



Extension of Ecodesign Directive, use of Ecolabel – possible overlap with Construction Products Regulation (CPR)?



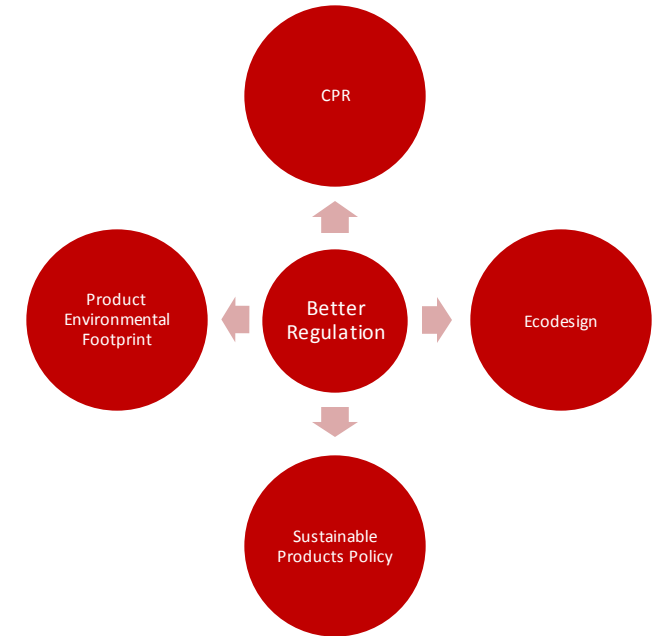
Use of research funding for relevant projects



"Product as a service" and move towards increased rental envisaged

Green Public Procurement

"Minimum mandatory GPP criteria and Targets in sectoral legislation"



Improve coherence with existing instruments

CO₂ Neutral

Linking carbon-neutrality, resource efficiency and circularity via a "sustainable product policy legislative Initiative" – link with CPR?

Immediate questions/starting points for FIEC position

As well as the things mentioned above, we could also consider some of the following points. These are for brainstorming purposes, to kick start the discussion in TEC-3 about our position.

- There must be no overlap between new measures and Construction Products Legislation. Will there really be the "coherence" foreseen in the document?
- Mandatory requirements for recycled plastic in construction products and targets for recovery of certain materials. We really need to know more about the specific proposals here. Also, for "recovery", who will be responsible – manufacturers or contractors?
- We still need to address the lack of adequate and conveniently located recycling facilities. This has not been solved since the last Circular Economy Action Plan.
- The problem of a lack of demand for secondary materials must be addressed. The document even acknowledges the risk of over-supply of secondary materials compared with the lack of corresponding demand.
- Standardisation is critical to successfully growing the market for secondary materials. This is not a time to attack CEN, as is being proposed by the Commission in its non-paper on the future of standardisation.
- Good to see "end of waste criteria" back on the agenda. Will construction materials be included?
- Extended producer responsibility schemes – will contractors be outside the scope of these? We need to address this in our position.
- An increase in enforcement at national level is foreseen. However market surveillance does not work effectively in many Member States, even before additional demands are placed on these authorities.
- Industrial symbiosis is a concept really worth exploring. There appears to be potential, but as yet not much exploitation.
- The Ecolabel has historically caused confusion. However, unless this covers construction products, we do not need to address this.
- European Resource Efficiency Knowledge Centre, to be run by Enterprise Europe Network. Yet another expensive layer of "support"? Waste of EU money?
- Commission wants to avoid "exporting" the waste problem to third countries and plans to introduce a "recycled in the EU" label/concept/benchmark. Do we want to comment on this?
- Good to see the issue of skills being tackled. How do we want to respond?
- "Just Transition Mechanism". How do we want to respond?
- EU Taxonomy – being handled by ECO. How do we address this in this new position?
- Digitalisation features as an important tool for implementing the Action Plan, by e.g. tracking and monitoring, modelling scenarios etc. This would support many things we have previously said about digitalisation so there is an opportunity to support the relevant statements in the document.