

## BIBM position on amending waste directives (COM (2014) 397)

The European Commission published the amending Waste Framework Directives (COM (2014) 397) which revise a series of waste related regulations.

The new proposal imposes a landfill ban of recyclable waste by 2025 and the elimination of landfilling from 2030. BIBM (European Federation for Precast Concrete) welcomes the propositions however warns that Members States' capacity to fulfill the targets varies in Europe.

Additionally, in the case of concrete industry, the extent of **use of recycled aggregates** in practice is directly influenced by **whether** the use of such materials is **cost effective**. While primary aggregates are abundantly available at a relatively low cost, **financial incentives** are needed to achieve high recycling targets.

Furthermore, BIBM would like to refer to the **waste hierarchy** in which waste **prevention** and minimization has a greater importance than recycling. While concrete can be 100% recycled at the end of life, BIBM calls for the **recognition of both closed-loop** (re-use in the same application) and **open-loop** (re-use in another application) recycling as beneficial in terms of resource efficiency, thus both reduces the extraction of virgin raw materials.

Referring to the possibility of development of **indicators for waste prevention** in the directive "Amending of Directive 2008/98/EC" Article 29 (4); BIBM would like to emphasis the importance of **Life Cycle Assessment**. When selecting waste management options, LCA will ensure that the options deliver the best environmental, social and economic outcome.

In relation to waste prevention measures such as **eco-design**, it must be also noted that **product comparison in the building material industry is nonsense**, hence building products are intermediary products and their assessment and comparison is appropriate only at the building level (as it is indicated in the work of CEN TC 350).

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BIBM (from the French acronym "Bureau International du Béton Manufacturé") is the Federation of the European Precast Concrete industry, established in 1954, represents the interest of precast concrete industry of 15 European countries with a combined industry turnover of 22 billion Euro, directly employing approximately 170,000 European citizens.