

The European Commission (EC) has announced its intention to review the EU waste policy. As policy and legislation play a key role in shaping the guiding conditions for the overall waste system performance, Construction Products Europe believes that the sector has a part to play in tackling the current waste challenge and thereby contribute towards a resource-efficient Europe. Therefore, we would like to put forward the following thoughts to the debate:

### **WASTE COLLECTION AND SEPARATION**

To integrate construction and demolition waste in the production of new goods, high quality recycled materials are required. Therefore, the dismantling of construction products from buildings and the sorting and collection of different waste streams have to precede any specific treatments to obtain recycled materials that are ready for use in a cost-efficient way.

This means that at any demolition or renovation work, construction products must be dismantled, sorted, collected and sent to a waste treatment plant. Well organised and systematic collection, sorting and separation of different types of waste could lead to an important increase of recycling rates.

In order to support collection and separation, the EC could provide an economic and current national policy framework analysis as a starting point. This action may also include the evaluation of the existing national obstacles.

### **INFRASTRUCTURE & TECHNOLOGY**

Recycling also relies on processing plants and infrastructures. The recycling of complex waste streams such as construction waste requires integrated technologies that have to deal with the recycling and/or treatment of a wide range of products and materials.

The EC could launch a study on the existing infrastructure and technologies to assess for possible improvement and employment potential.

### **A MARKET FOR SECONDARY MATERIALS**

In order to establish a market for secondary materials and by-products, three conditions must be met: reliable supply, affordable price and suitable quality. As part of a developing and efficient secondary material market, facilitating waste transfer within the EU may help meet market demand.

However, the potential lifting of the waste status in some Member States and not others raises questions on the control and acceptance procedures undertaken for the trans-boundary shipment of materials which are no longer waste both within and outside EU Member States.

Overall, it seems clear that new, collaborative business models need to be developed that involve the different actors of the construction chain and the recycling industry.

## REVIEW OF THE EXISTING TARGETS

Whilst some Member States are struggling to meet the C&D waste target, others are well ahead. Therefore, when reviewing the existing waste targets, the EC may consider setting reuse, recycling and recovery targets based on the improvement potential of the Member States. This pragmatic approach may deliver incremental improvements.

We also welcome the provision of improvements that would enable Member States to report accurate and consistent data such as clearer and more precise definitions of recycling and recovery. Today, there is no common understanding between the Member States of what can be considered as recycled material and this leads to various product types and quality levels. Clarifying both of these concepts will clearly help drive the development of a European secondary materials market. It is also important to harmonize calculations methods, data collection and validation. Indeed, reliable reporting will allow for the assessment of progress at national level and help establish meaningful targets.

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We agree that landfilling of useful resources should be avoided. However, some Member States do not have the required infrastructure to reach this objective in the short-term. So, increased waste collection and separation and improved infrastructure are essential.

Increased producer responsibility would not deliver the best results for building materials. Indeed, our products have a long life time and are in contact with others products and substances.

## LIFE CYCLE APPROACH

It is our opinion that a simplified approach to recycling will not support the drive towards resource efficiency. Indeed, a linear, one-dimensional approach would not be able to deal with the waste streams of the construction industry. More so, it must be emphasized that recycling and recovery are industrial processes which impact is not zero.

Therefore, when selecting waste management options, a life-cycle approach should be used to ensure that the options deliver the best overall environmental, social and economic outcome . The European authorities should support recycling initiatives on the basis of a cost-benefit analysis to maximise the benefits of their policies.

## A COHERENT WASTE POLICY

As a cyclical industry, the construction industry requires long-term investments and therefore long-term strategy and regulatory predictability.

It was mentioned previously that one of the characteristics of construction products is a long life-time. Therefore, new C&D waste policy and recycling targets will be applied to materials that were produced in the last century. Construction products manufactured today may only enter their recycling stream in more than fifty years' time from now.

It is crucial that the EC looks at the coherence of European policies. The effect of the existing waste policies is dependent on the results of other regulations such as REACH, dangerous substances regulations, and standards as well as other policies on resource-efficiency and on raw materials. Furthermore, in some Member States, building codes contain limits or even prohibit the presence of recycled materials in building elements for safety reasons.

The removal of these barriers on the basis of the technical knowledge is crucial to enhance the use of recycled materials.

## SUMMARY

Construction products manufacturers:

- ▶ Are committed in playing their part in reaching Europe's objective for construction and demolition waste;
- ▶ Support the development of a EU cost-efficient waste market for quality recycled materials;
- ▶ Acknowledge major differences in national waste management schemes
- ▶ Underline the need for enhanced collection, sorting, and recycling schemes and infrastructures;
- ▶ Recommend life-cycle, and cost-benefit approaches in the decision making process;
- ▶ Stress the need for a coherent regulatory approach, and recommend that the EC look at existing technical barriers to the use of recycled materials.

Founded in 1988, Construction Products Europe is a Brussels-based international non-profit making association. The association is made up of national and European associations that represent Small and Medium-size Enterprises and world-leading companies. Construction Products Europe aims to promote the European construction industry, to share information on EU legislation and standardisation and to provide input in all European construction-related initiatives.