

Open Public Consultation on the Roadmap for the New Circular Economy Action Plan

Recommendations of German Advisory Council on the Environment (SRU – Sachverständigenrat für Umweltfragen)

https://www.umweltrat.de/EN/home/home_node.html

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The SRU welcomes the ambitions of the Roadmap “New Circular Economy Action Plan” (CEAP) to further develop and implement Circular Economy (CE) as a pillar of the European Green Deal. Concepts laid down in the 2015 CEAP have to come from rhetoric into practice urgently, since the consumption of raw materials (RM) and the generation of waste are continuously high in most of EU Member States (MS). Further, the European lifestyle is not globally scalable. Thus, it is necessary to rethink the waste hierarchy in terms of bridging the current gap between consumption, product and waste policies as well as the environmental alignment of CE measures and expand existing waste hierarchy by including:

- 1) Reduction of total RM input for products, infrastructure and services;
- 2) Production of “CE-compatible” goods (durable, pollutant-free, material-efficient, repairable, recyclable etc.);
- 3) Definition of binding targets for waste prevention and preparation for reuse;
- 4) Formulation of recycling targets and measures based on secondary raw material quality and safe removal of pollutants.

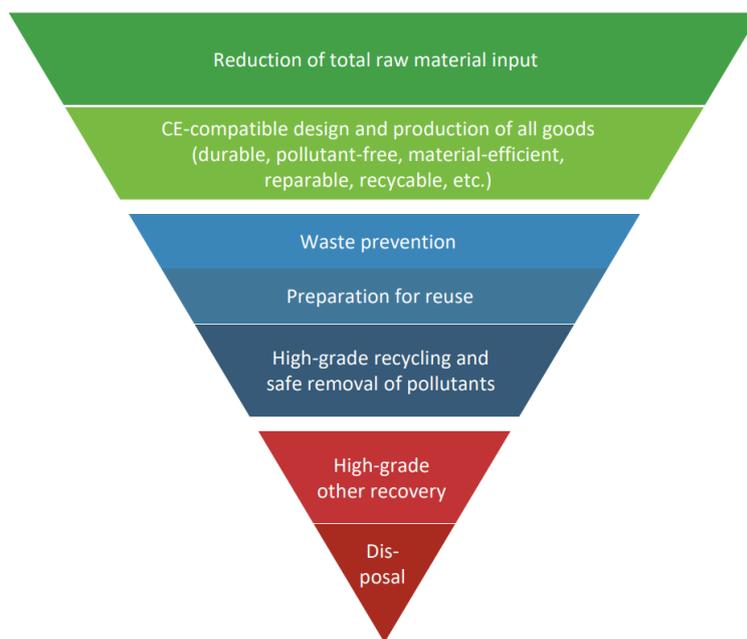


Figure 1: New extended CE Hierarchy proposed by SRU

To adopt this extended “CE hierarchy” as guiding principle in the new CEAP the SRU suggests the following:

a) CE as integral part of environmental policies

Acknowledging the planetary boundary concept and the limited availability of resources it is evident that present consumption patterns in many EU MS do not follow sustainable pathways. The new CEAP must strongly address this in its objectives, metrics and measures. The overall reduction of material flows should be set as a main aim in policy strategies. Further, the CEAP should support the EU MS in implementing economic instruments (e.g. reduction of CE-hindering subsidies, RM taxation, or instruments that support internalisation of external costs). Extended Producer Responsibility (EPR) for new product groups will contribute to CE by allocating disposal and recycling costs into the product price supporting consumer decisions.

To better link CE with other environmental policies, the environmental benefit of CE should be assessed in more detail, e.g. different impacts of standard and high-grade recycling, measures for waste prevention in contrast to recycling measures. CE measures should be based on environmental assessments considering future conditions, esp. a decarbonised economy.

To get more useful and reliable data, Eurostat should, together with national statistical offices, revise current statistics, e.g. to provide data for systems such as RMIS.

b) Extension and specification of ecodesign

Ecodesign is crucial for a sustainable products policy. Hence, the scope of the Ecodesign Directive is to be extended to products of high environmental relevance, e.g. vehicles, textiles, and furniture. To achieve product-specific specifications, push and pull instruments for lifetime extension should be implemented (e.g. declaration of planned service life-time (SLT), specifications on minimum SLT, obligation to document technical information and provide tools and spare parts relevant to repair). The work under the EU COM mandate M/543 should be brought to practice instantaneously. To conclude, the design of products influences waste prevention as well as recycling and is crucial for CE policy.

c) Definition of recycling/ high-grade recycling

The definition of recycling should consequently exclude backfilling in all concerned Directives (i.e. also ELV-Directive). Further, the current rate for material recovery for construction and demolition waste should be split in subsequent targets for recycling and backfilling. To enable high-grade recycling, which is mentioned but not specified in the Waste Framework Directive, it should be a priority to define which type of recycling is meant to be high-grade recycling for the different waste streams. Based on environmental assessment, recycling targets should be specified concerning the type of recycling, i.e. the share of “standard” and “high-grade” recycling.