

Public Consultation on the Circular Economy

ORGALIME RESPONSE, 03.08.2015

Please note: Orgalime answers are marked in yellow – not marked text is original wording of COM questionnaire

Fields marked with * are mandatory.

1 Introduction

Global competition for resources is increasing. Supply concentration of resources, particularly critical raw materials outside the European Union, makes European industry and society dependent on imports and increasingly vulnerable to high prices, market volatility, and the political situation in supplying countries. At the same time, natural resources are often used unsustainably across the globe, causing additional pressure on raw materials, environmental degradation and threats to ecosystems. This trend will increase with changes in world population and patterns of economic growth.

A 'circular economy' aims to maintain the value of the materials and energy used in products in the value chain for the optimal duration, thus minimising waste and resource use. By preventing losses of value from materials flows, it creates economic opportunities and competitive advantages on a sustainable basis.

Moving towards a more circular economy can promote competitiveness and innovation, a high level of protection for humans and the environment, and bring major economic benefits, thus contributing to job creation and growth. A circular economy fosters sustainable development in which environmental, economic and social dimensions go hand in hand. It can also provide consumers with longer-lasting and innovative products that save them money and improve their quality of life.

A successful transition towards a circular economy requires action at all stages in the value chain: from the extraction and transportation of raw materials, through material and product design, production, distribution and consumption of goods, repair, remanufacturing and reuse schemes, to waste management and recycling.

In December 2014, the Commission announced the withdrawal of its legislative proposal for the review of waste legislation, to be replaced by a new, more ambitious, initiative for the promotion of the circular economy by the end of 2015.

This initiative aims at promoting the transition to the circular economy through a comprehensive, coherent approach that fully reflects interactions and interdependence along the whole value chain, rather than focusing exclusively on one part of the economic cycle. It will comprise a revised legislative proposal on waste and a Communication setting out an action plan on the circular economy for the rest of this Commission's term of office. The action plan will cover the whole value chain, and focus on concrete measures with clear EU added value, aiming at 'closing the loop' of the circular economy. The circular economy initiative will also contribute to wider EU objectives such as the Energy Union, the climate objectives and resource efficiency.

Input from stakeholders and the public will be a key factor in the preparation of this work. The objective of this public consultation is to help the Commission to pinpoint and define the main barriers to the development of a more circular economy and to gather views regarding which measures could be taken at EU level to overcome such barriers.

Public consultations on the review of EU waste targets and on the sustainability of the food system took place in 2013 [The results of these public consultations [can be found here](#)]. This consultation therefore focuses on other points relating to the transition to a circular economy, broadening the scope of inquiry to other parts of the economic cycle (e.g. the production and consumption phases) and general enabling framework conditions (e.g. innovation and investment). Please note that a separate public consultation on waste market distortions will be launched shortly. Stakeholders interested in waste markets may wish to respond to that consultation as well.

General information about respondents

*2.1. In what capacity are you completing this questionnaire?

As an individual / private person	Public authority
Academic/research institution	International organization
Civil society organisation	Professional organisation
Private enterprise	Other

Please specify:

ORGALIME – The European Engineering Industries Association

Please specify your business sector

Construction	Transport
Energy	Manufacturing
Chemicals	Electrical and electronic goods
Information and communication technologies	Textiles and clothing
Furniture	Agriculture and fishery
Food and drink	Distribution (logistics, wholesale, retail)
Hotel and catering industry	Recycling and other waste management
Repair services	Other: please indicate

Please specify your business sector:

Orgalime, the European Engineering Industries Association, speaks for 43 trade federations representing some 130,000 companies in the mechanical, electrical, electronic, metalworking & metal articles industries of 24 European countries. The industry employs some 10.3 million people in the EU and in 2014 accounted for more than €1,825 billion of annual output. The industry accounts for over a quarter of manufacturing output and a third of the manufactured exports of the European Union.

Is your company an SME? *if in doubt, please consult SME definition*

Yes — medium-sized enterprise

Yes — small enterprise

Yes — micro enterprise

X No

I don't know

Does your company/organization make use of any of the following?

EU eco-label

EMAS

Another environmental labelling or management scheme

No environmental labelling or management scheme

I don't know

Please specify:

International Environment Management Schemes ISO/IEC; EU Energy Label

Please indicate the sectors your organisation represents

Construction	Transport
Energy	Manufacturing
Chemicals	Electrical and electronic goods
Information and communication technologies	Textiles and clothing
Furniture	Agriculture and fishery
Food and drink	Distribution (logistics, wholesale, retail)
Hotel and catering industry	Recycling and other waste management
Repair services	Other: please indicate

Please specify other sectors your organization represents: 200 character(s) maximum

European mechanical engineering, machinery and metalware industries

Where are your member companies located?

EU MS/ EEA

Non-EU MS/ EEA

Please specify EU Member States/EEA countries of your member companies:

Austria	Belgium	Bulgaria	Croatia	Cyprus	Czech Republic
Denmark	Estonia	Finland	France	Germany	Greece
Hungary	Iceland	Ireland	Italy	Latvia	Liechtenstein
Lithuania	Luxembourg	Malta	Netherlands	Norway	Poland
Portugal	Romania	Slovakia	Slovenia	Spain	Sweden
Switzerland	United Kingdom				

Please specify the non-EU Member States/EEA countries of your member companies:

Turkey

Please indicate your main area of focus (environment, consumers, etc.)

Environment

Consumers

Other

Please specify your other area of focus: 200 character(s) maximum

European Trade Association, Industry, Manufacturing

2.2. Please give your country of residence/establishment

EU MS/ EEA

Non-EU MS/ EEA

Please specify the EU MS/EEA country of your establishment:

Austria	Belgium	Bulgaria	Croatia	Cyprus	Czech Republic
Denmark	Estonia	Finland	France	Germany	Greece
Hungary	Iceland	Ireland	Italy	Latvia	Liechtenstein
Lithuania	Luxembourg	Malta	Netherlands	Norway	Poland
Portugal	Romania	Slovakia	Slovenia	Spain	Sweden
Switzerland	United Kingdom				

Please specify the non-EU MS/ EEA country of your establishment:

2.3. Please indicate your preference for the publication of your response on the Commission's website:

Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication

Anonymously: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication

Not at all — please keep my contribution confidential (it will not be published, but will be used internally within the Commission)

2.4. How well informed are you about the circular economy initiative?

Very well informed

Fairly well informed

Not very well informed

Not informed at all

2.5. Please give your name if replying as an individual/private person, otherwise give the name of your organisation 200 character(s) maximum

ORGALIME – the European Engineering Industries Association, <http://www.orgalime.org>

If your organisation is registered in the Transparency Register, please give your Register ID number.

Orgalime is registered under the European Union 'Transparency Register' - **ID number: 20210641335-88**

2.6. Please provide your email address if you would like to be informed of the outcome of this consultation

sigrid.linher@orgalime.org

3 Production phase

The design of a material or product can facilitate recycling, extend its lifetime through reuse, refurbishment or repair and reduce its environmental impact by reducing its energy, waste generation or water consumption over its life cycle. This section seeks your views on actions that you think the EU should take to promote the circular economy in the production stage, including product design, production and sourcing of materials.

3.1. How would you assess the importance of the following measures to promote circular economy principles in product design at EU level?

	very important	important	not very important	not important	no opinion
Establish binding rules on product design (e.g. minimum requirements on 'durability' under Ecodesign Directive 2009/125/EC)				X	
Encourage industry-led initiatives (i.e. self-regulation)		X			
Develop standards for voluntary use		X			
Promote and/or enable the use of economic incentives for eco-innovation and sustainable product design (e.g. via rules on Extended Producer Responsibility schemes)				X	
Review rules on legal and commercial guarantees				X	
Encourage the consumption of green products (see section 4)		X			
Other — please specify below	X				

Glossary:

Legal guarantees: Tangible goods have a minimum two-year legal guarantee under EU consumer legislation (Directive 99/44/EC). This guarantee makes the seller liable to the consumer for any lack of

conformity with the sales contract which exists at the time of delivery of the good and becomes apparent within two years from delivery of the goods.

Commercial guarantees: Guarantees provided by traders to consumers on a voluntary basis, by which the trader undertakes to reimburse the price paid or to replace, repair or handle consumer goods in any way if they do not meet the specifications set out in the guarantee statement or in the relevant advertising.

If you think that additional options not listed above should be considered, please specify: (200 characters max.)

Exploit opportunities of increased use of ICT in manufacturing; Strict landfill and waste shipment policy; Energy Efficiency First through EED & EPBD reviews; Use IED for technology uptake; see Position Paper

3.2. In order to facilitate the transition to a more circular economy, how would you assess the importance of the following product features?

	very important	important	not very important	not important	no opinion
Durability					
Reparability: Availability of information on product repair (e.g. repair manuals)					
Reparability: Product design facilitating maintenance and repair activities					
Reparability: Availability of spare parts					
Upgradability and modularity					
Reusability					
Biodegradability and compostability					
Resource use in the use phase (e.g. water efficiency)					
Recyclability (e.g. dismantling, separation of components, information on chemical content)					
Increased content of reused parts or recycled materials					

Increased content of renewable materials					
Minimising lifecycle environmental impacts	<input checked="" type="checkbox"/>				
Other- please specify below	<input checked="" type="checkbox"/>				

If you think that additional options not listed above should be considered, please specify:

Case by case decision; more R&I; cost efficiency; safety; functionality; affordability; no environmental burden shifting to other product life cycle phases; significant environmental benefit; digitalisation; see Position Paper

3.3. How would you assess the importance of the following additional considerations when applying circular economy principles to products at EU level?

	very important	important	not very important	not important	no opinion
Impact on production cost and affordability of the product	<input checked="" type="checkbox"/>				
Impact on production processes and value chain	<input checked="" type="checkbox"/>				
Impact on consumers (e.g. through durability and reparability)	<input checked="" type="checkbox"/>				
Functionality of the product	<input checked="" type="checkbox"/>				
Enabling innovation	<input checked="" type="checkbox"/>				
Respecting technology neutrality	<input checked="" type="checkbox"/>				
Impact on EU imports and exports	<input checked="" type="checkbox"/>				
Other — please specify below	<input checked="" type="checkbox"/>				

If you think that other considerations not listed above should be taken into account, please specify:

Impact on consumers in terms of affordability; Safety; Reliability; all criteria of Ecodesign Directive, i.e.: significant environmental improvement potential without entailing excessive costs; measurability; enforceability

3.4. From a circular economy perspective, in your view which product categories should be given priority in the next few years and why?

At most 3 choice(s)

- White goods (e.g. dishwashers, refrigerators)
- Small domestic appliances (e.g. microwave ovens, food processors)
- Office equipment (e.g. computers, printers)
- Small electronics (e.g. smartphones, cameras)
- Packaging materials
- Heating equipment (e.g. boilers, water heaters)
- Air-conditioning and ventilation systems
- Lighting products
- Motors and pumps
- Industrial equipment
- Clothing and textiles
- Furniture
- Cars
- Construction products (e.g. windows, insulation materials)
- General measures (concerning a broad range of products) should be taken
- Others

If you think that other product categories not listed above should be taken into account, please specify:
Circular Economy requires a holistic, integrated, collaborative approach throughout the entire economy with consistent boundary limits set by policy makers. Sectors are interlinked and dependent on each other.
See Position Paper

Please give reasons for your choice: white goods

The overriding environmental impact phase for these products is their use phase, as confirmed by the ecodesign implementation process.

Please give reasons for your choice: small domestic appliances

The overriding environmental impact phase for these products is their use phase, as confirmed by the ecodesign implementation process.

Please give reasons for your choice: office equipment

The overriding environmental impact phase for these products is their use phase, as confirmed by the ecodesign implementation process.

Please give reasons for your choice: small electronics

The overriding environmental impact phase for these products is their use phase, as confirmed by the ecodesign implementation process.

Please give reasons for your choice: packaging materials

Please give reasons for your choice: heating equipment

The overriding environmental impact phase for these products is their use phase, as confirmed by the eco-design implementation process.

Please give reasons for your choice: air-conditioning and ventilation systems

The overriding environmental impact phase for these products is their use phase, as confirmed by the ecodesign implementation process.

Please give reasons for your choice: lighting products

The overriding environmental impact phase for these products is their use phase, as confirmed by the ecodesign implementation process.

Please give reasons for your choice: motors and pumps

The overriding environmental impact phase for these products is their use phase, as confirmed by the ecodesign implementation process.

Please give reasons for your choice: industrial equipment

The overriding environmental impact phase for these products is their use phase. Capital goods usually have a very long life span, ranging from 10, 15 up to 30 and 40 years, with high reliability, performance and quality requirements. Remanufacturing in many Business-to-Business relationships is a standing practice and end of life waste management subject to agreements and contracts by the affected industrial partners.

Please give reasons for your choice: clothing and textiles

Please give reasons for your choice: furniture

Please give reasons for your choice: cars

Please give reasons for your choice: construction products

Please give reasons for your choice: general measures

No one size fits all approach possible in this area

Please give reasons for your choice: others

Circular Economy needs to address the economy from an overall economic standpoint and holistic perspective. It cannot be realized by few, since economic activities of the different sectors are interlinked and depending on each other.

3.5. Which of the actions listed below should be given priority at EU level to promote circular economy solutions in production processes?

	very important	important	not very important	not important	no opinion
Promote cooperation across value chains (e.g. through encouraging new managerial modes)					
Address potential regulatory obstacles in EU legislation - please specify					
Address potential regulatory gaps in EU legislation – please specify					
Support the development of innovative business models (e.g. leasing)					
Improve the interface between chemicals and waste legislation					
Promote collaboration between and among private and public sectors, including end-users					
Support the development of digital solutions	X				

Identify and promote exchange of best practice					
Identify minimum standards for increasing resource-efficient processes (e.g. Best Available Techniques)					
Ensure availability of reliable data on material flows across value chains					
Provide access to finance for high-risk projects					
Other — please specify below	X				

If you think that further options not listed above should be considered, please specify:

Strict landfill and waste shipment policies, recycling and recovery targets; Energy Efficiency First (system savings through EED and EPBD); use of IED to boost innovation through technology

Please specify which regulatory gaps you are referring to (300 character(s) maximum)

3.6. How effective do you think each of the actions at EU level listed below would be in promoting sustainable production and sourcing of raw materials?

	very effective	effective	neutral	not effective	no opinion
Establishing a legally binding framework at EU level (e.g. sustainability criteria)				X	
Developing and promoting voluntary compliance schemes					
Addressing the issue through trade policy					
Addressing the issue through the promotion of targeted global initiatives	X				
Promoting the exchange of best practice among businesses					
Other — please specify below	X				

If you think that further options not listed above should be considered, please specify:

Enact and enforce strict landfill and waste shipment policies, recycling/recovery targets, minimum quality criteria for secondary raw materials and REACH compliance; bring EU treatment standards to international level (ISO, IEC)

3.7. Do you have any other comments about the production phase?

See Position Paper

4 Consumption Phase

The consumers' perspective is an essential part of the circular economy. On the one hand, consumers make choices about the products they purchase and use; on the other hand these choices are affected by a range of factors, including the behaviour of other people, the way consumers receive information or advice, the availability of repair and maintenance services, and the perceived costs and benefits of their choices. This section seeks your views on the best way to promote the circular economy in the consumption phase.

4.1. How would you assess the importance of the following measures to promote circular economy principles in the consumption phase at EU level?

	very important	important	not very important	not important	no opinion
Provide more information relevant to the circular economy to consumers, for example on expected lifetime of products or availability of spare parts					
Ensure the clarity, credibility and relevance of consumer information related to the circular economy (e.g. via labels, advertising, marketing etc.) and protect consumers from false and misleading information in this respect					
Organise EU-wide awareness campaigns to promote the circular economy					
Improve/clarify rules and practices affecting consumer protection (e.g. relating to legal and commercial guarantees)					
Take action on product and material design (see section 3)					
Encourage financial incentives to consumers at national level (e.g. by differentiated taxation levels depending on products' resource efficiency)					
Take measures targeting public procurement (e.g. through criteria for Green Public Procurement)	X				
Encourage new modes of consumption such as shared ownership (e.g. car sharing), collaborative consumption, leasing and the use of internet-based solutions					

Promote the development of repair and maintenance services					
Encourage waste prevention (e.g. minimising food waste)					
Other — please specify below	X				

If you think that further options not listed above should be considered, please specify:

No one-size fits all solution. Gather reliable data on impact of/on consumers, their expectations, behaviour; analyse areas of potential and how to improve use patterns and innovative consumer behaviour. Base GPP on Life Cycle Costing

4.2. Which products should be a priority for EU action to promote more sustainable consumption patterns and why?

At most 3 choice(s)

White goods (e.g. dishwashers, refrigerators)

Electronics

Food and beverages

Packaging materials

Clothing and textiles

Furniture

Cars

Construction products

General measures (concerning all consumer products) should be taken

Other - please specify below

If you think that further options not listed above should be considered, please specify:

Address the economy from an overall economic standpoint and holistic perspective; cannot be realized by few-economic activities of the different sectors are interlinked and depending on each other; no one-size fits all solution

Please give reasons for your choice: white goods

Please give reasons for your choice: electronics

Please give reasons for your choice: food and beverages

Please give reasons for your choice: packaging materials

Please give reasons for your choice: clothing and textile

Please give reasons for your choice: furniture

Please give reasons for your choice: cars

Please give reasons for your choice: construction products

Please give reasons for your choice: general measures

Please give reasons for your choice: others

Circular Economy requires a holistic, integrated, collaborative approach throughout the entire economy with consistent boundary limits set by policy makers. Sectors are interlinked and dependent on each other. See Position Paper

4.3. Do you have any other comments about the consumption phase?

Appropriate consumer behaviour, use and consumption patterns are essential for realising Circular Economy objectives. Actions regarding the consumption phase should be much more in the focus.

5 Markets for secondary raw materials

Secondary raw materials are waste materials which are to be sold and used for recycling in manufacturing. At present, they still account for a very small portion of the material used in the EU. The quality and supply of secondary raw materials depends greatly on waste management practices and the degree of separation of material streams at source. However, other barriers to the development of markets for secondary raw materials can be identified. Some of these barriers may be of a horizontal nature, while others may only be relevant to specific types of material. 5.1. In your view, what are the main obstacles to the development of markets for secondary raw materials in the EU?

In the list below, for each material, indicate the obstacle(s) that you consider significant by ticking the corresponding cell(s)

	Significant for all materials	Bio-nutrients	Construction aggregates	Critical raw materials	Glass	Metals
Lack of EU-wide quality standards for recycled materials	X					
Poor quality of recycled materials (e.g. containing unwanted substances/high	X					
Lack of information or misinformation about the quality of recycled materials	X					
Poor availability of waste/material to be recycled	X					
Poor reliability of supply for recycled materials	X					
Low demand for recycled materials (e.g. on the EU market)						
Cost differential between primary and secondary raw materials						
Organisational cost of switching from primary to secondary raw materials in industrial processes						

Regulatory obstacles at national/regional/local level							
Regulatory obstacles at EU level							
Regulatory gaps at EU level	X						
Regulatory gaps at national/regional/local level							
Insufficient cooperation/exchange of information along the value chain (e.g. between producers, recyclers and authorities responsible for waste management)							
Lack of reliable data on secondary raw material flows							
No opinion							
Other- please specify below	X						

If you think that other obstacles not listed above are relevant, please specify:

Landfilling and illegal waste shipments; lack of implementation EU waste policy; costs, safety, quality aspects, non-traceability of secondary raw materials; impossibility to verify recycled content; lack of data; see Position Paper

Glossary:

Bio-nutrients-Recovered material such as nitrogen, or phosphorus and organic matter (from e.g. sewage sludge and farm organic matter residues), for use as fertiliser.

Construction aggregates- Course particulate material used in construction, including sand, gravel, crushed stone or slag.

Critical raw materials- Critical raw materials are raw materials of great economic importance to the EU, with a high risk of disruption of supply. The European Commission has listed them here:

http://ec.europa.eu/enterprise/policies/raw-materials/critical/index_en.htm

5.2. In your view, what are the most relevant actions to take at EU level to remove the obstacles you have identified as significant? Please be specific

Set minimum quality standards for recycled materials and ensure REACH compliance; enacting and enforcing strict landfill and waste shipment policies, more innovation of waste treatment (ICT; IED BREFs)

Poor quality of recycled materials

Set minimum quality criteria for recycled materials and ensure REACH compliance; enacting and enforcing strict landfill and waste shipment policies, more innovation of waste treatment (ICT; IED BREFs)

Lack of information or misinformation about the quality of recycled materials

Set minimum quality criteria for recycled materials and ensure REACH compliance

Poor availability of waste/material to be recycled

Enact and enforce EU waste policy (landfill, shipments, recycling/recovery targets)

Poor reliability of supply for recycled materials

Set minimum quality criteria for recycled materials and ensure REACH compliance

Low demand for recycled materials

Cost differential between primary and secondary raw materials

Organisational cost of switching from primary to secondary raw materials in industrial processes

Regulatory obstacles at national/regional/local level

Regulatory obstacles at EU level

Regulatory gaps at EU level

Lack of minimum quality requirements for recycled materials to guarantee a level playing field; lack of end of waste criteria (especially for plastics), ensuring REACH compliance of recycled materials before being placed on the market

Regulatory gaps at national/regional/local level

Insufficient cooperation/exchange of information along the value chain

Lack of reliable data on secondary raw material flows

5.3. Which secondary raw materials markets should the EU target first to improve the way they work?

At most 3 choice(s)

Bio-nutrients (e.g. nitrogen, phosphorus and organic matter from e.g. sewage sludge and farm organic matter residues) for fertiliser use

Construction aggregates (i.e. coarse particulate material used in construction, including sand, gravel, crushed stone, slag)

Critical raw materials, such as rare earth elements or certain precious metals

Glass

Metals

Paper

Plastics

Wood/Biomass

Other — please specify below

If you think that other approaches not listed above should be considered, please specify:

Circular Economy requires a holistic, integrated approach across different materials.

Please give reasons for your choice: Bio-nutrients for fertiliser use

Please give reasons for your choice: Construction aggregates

Please give reasons for your choice: Critical raw materials such as rare earth elements or certain precious metals

Please give reasons for your choice: Glass

Please give reasons for your choice: Metals

Please give reasons for your choice: Paper

Please give reasons for your choice: Plastics

Please give reasons for your choice: Wood/Biomass

Please give reasons for your choice: Other

5.4. Do you have any other comments about the development of markets for secondary raw materials? Support the market driven development of competitive secondary raw materials through technology and process development and without discriminating between materials, industrial sectors or technologies.

6 Sectoral measures

Certain sectors may require a tailored approach in order to 'close the loop' of the circular economy, and some could be made strategic priorities in order to accelerate the transition.

This section seeks your views on which sector(s) should be considered a priority for EU action, and which relevant measures or actions should be taken.

6.1. In your view, which sectors should be a priority for specific EU action on the circular economy and why?

At most 3 choice(s)

Agriculture

Bio-nutrients (e.g. from sewage sludge or farm organic matter residues) for use in fertilisers

Chemical industry and process manufacturing

Construction/demolition and buildings

Electrical and electronic goods

Energy

Fisheries/ aquaculture

Food and drinks, including reduction of food waste

Forest-based and other bio-based products

Furniture

Information and communication technologies

Mining and quarrying

Plastics

Retailing

Services

Textiles

Transport

Water sector/sewage treatment

Other- please specify below

If you think that other sectors not listed above should be considered, please specify:

Circular Economy requires a holistic, integrated approach across the entire economy.

6.2. For the sectors that you have selected, what measure(s) would be needed at EU level?

No sectoral approach, but systemic approach across the economy setting boundary limits but leaving industry flexibility for implementation.

7. Enabling actors for the circular economy, including innovation and investment

Enabling factors are essential to support the development of the circular economy could include supporting the development, dissemination and uptake of innovative solutions, investing in technology and infrastructure, supporting SMEs and developing the required skills and qualifications. This section seeks your views on the role of these enabling factors in the development of the circular economy.

7.1. How important are the following enabling factors in promoting the circular economy at EU level?

	very important	important	not very important	not important	no opinion
Financing innovative projects or technologies relevant to the circular economy (from EU funds, e.g. Horizon 2020)	X				
Public incentives (e.g. financial guarantees) for private investors to finance projects conducive to the circular economy					
Support for the development of circular economy projects (e.g. technical assistance)					
Support for innovative systemic approaches and cross-sectoral cooperation (e.g. industrial symbiosis and cascading use of resources)	X				
Partnerships with public authorities to help innovative businesses overcome potential legal obstacles to innovation					
Promotion of innovative business models for the circular economy (e.g. leasing and sharing)					
Specific measures to encourage the uptake of the circular economy among SMEs					
Exchange and promotion of best practice					
Promoting the development of skills/qualifications relevant to the circular economy		X			
Support for capacity-building in public administrations					
Support for market penetration of innovative projects through labelling, certification and standards, public procurement for innovation, etc.					
Better monitoring the implementation and impact of policies contributing towards the circular economy agenda		X			

Increasing the knowledge base by collecting and providing information and data e.g. on material flows, technologies and consumption patterns		X			
Other- please specify below	X				

If you think that other measures not listed above should be considered, please specify:

Implementation and monitoring of EU waste policy acquis; R&I; Circular Economy risks drawbacks and environmental burden shifting in other areas, such as substances or safety, which should be avoided.

7.2. Do you have any other comments about enabling factors to promote the circular economy?

We believe that a more systemic approach is needed to achieve the Circular Economy. We propose an approach which clearly sets boundary limits, but leaves it up to industry to create the economic framework which is necessary for its success: we have suggested adopting strict landfill and waste shipment policies, realistically increased recycling and recovery targets, strict enforcement of waste policies or the setting of minimum quality criteria for secondary raw materials to ensure that substance policy objectives are not circumvented.

8 Upload documents

If your organization prepared a dedicated position paper or wants to share any other related materials with the Commission, please use the upload function:

Yes, Orgalime uploads its position paper.