



8 June 2020

FEAD feedback to A Renovation Wave initiative for public and private buildings

FEAD, the European Federation for Waste Management and Environmental Services, representing the private waste and resource management industry across Europe **welcomes** the Renovation Wave initiative for public and private buildings from a waste management perspective.

By improving the circular economy practices in the construction sector, we can achieve increased quality and quantity of recycling and reuse of construction and demolition materials. However, fully embracing the circular economy requires even more ambitious and sound waste management practices. The proposed Roadmap should encompass a full chapter on closing the loop and make the construction/renovation/demolition sector more circular, by using recycled construction products with the lowest carbon footprint.

Construction and demolition waste management is considered crucial as **GHG emissions** from raw material extraction, from products' manufacture, and from construction and renovation of buildings **need to be reduced and resource consumption needs to be minimised**. Proper construction and demolition waste management brings significant CO₂ emissions reduction. An inventory should be made on priority construction products, taking into consideration the avoided CO₂ emissions, the amount of the materials, and the recycling process for each material, to select the products/waste to be tackled first.

The construction and renovation of buildings require significant amounts of energy and raw materials, such as sand, gravel, cement, wood, glass, metals, gypsum and plastic, that is why the EU legislator should take strong measures to increase the efficiency in the use of these resources by improving the following factors:

1) Promotion of the use of recyclates

The nature of the waste produced, and therefore its quality, is closely related to the type of work: demolition, renovation or new construction. Other factors that play a role are geographical location, the age and type of demolished building, the materials from which it is made. These aspects should be known at the deconstruction/demolition phase.

From an ecological perspective, deconstruction is preferable to demolition, because it allows for significant reuse and recycling of building materials. Selective demolition is extremely important for obtaining high quality recyclates. It should be considered the first step in Construction and Demolition Waste treatment.

APOH, Slovakia
ARMD, Romania
ASEGRE, Spain

BDE, Germany
CAObH, Czech Republic
DWMA, Netherlands

ESA, UK
ECEIA, Estonia
FISE, Italy

FLEA, Luxembourg
FNADE, France
go4circle, Belgium

HRABRI ČISTAC, Serbia
IWMA, Ireland
LASUA, Latvia

NORSK INDUSTRI, Norway
PASEPPE, Greece
PIGO, Poland

SRI, Sweden
VOEB, Austria
YTP, Finland

In addition, **mandatory recycled content** in a number of construction products should be privileged, in particular for plastic pipes and inert materials.

Selective collection schemes should be broadly imposed and enforced. They exist in a few MS, but not in all. On the other hand, **ERP schemes** should not be considered the way forward, as they are not the best way to promote recycling and re-use of construction/demolition waste. Generally speaking, EPR has proven useful for household waste, whose flows are small, heterogeneous, and, thus, difficult to selectively collect, however, for waste resulting from economic operators in the construction and demolition sector, open markets and B-to-B contracts are economically more efficient and environmentally performant, offering sound collection, management, and recycling for competitive and quality results.

2) Better information on the materials

Higher **trust of the quality of recyclates** requires better information on the composition of materials used in existing buildings, standardization of secondary raw materials, and sharing of the information among all the relevant stakeholders.

3) Setting up integrated waste management strategies

The use of recyclates in a more systematic and closed-loop way for building construction or renovation should be promoted.

This could include “new manufacturing and construction techniques to reduce waste, better coordination along value chains for **circular product design** and end-of-life practices, new circular business models based on sharing and service provision; substitution with high-strength and low-CO₂ materials; and less over-use of materials in many large product categories. For example, many construction projects use 30–50% more cement and steel than would be necessary with an end-to-end optimisation.”¹

Circular economy principles and practices require also keeping materials in the economy as long as possible, maintaining their intrinsic value/quality as high as possible, and reducing hazardous substances in products and waste².

4) Overcoming uncompetitive pricing for recyclates

Any activities and use of materials with low-energy content, in particular secondary raw materials, should be positively treated in the EU market compared to those manufactured products with a much higher energy content.

¹ Industrial Transformation 2050 - Pathways to Net-Zero Emissions from EU Heavy Industry. (2019). Material Economics. Page 7. Available at: <https://materialeconomics.com/latest-updates/industrial-transformation-2050>.

² Construction and demolition waste: challenges and opportunities in a circular economy. (2020). EEA (Briefing). Available at: <https://www.eea.europa.eu/themes/waste/waste-management/construction-and-demolition-waste-challenges>.

5) Levies

Member States or regions may consider providing price incentives to use recycled materials if they bring the desired benefits to the environment.

6) Landfill reduction

Landfilling should be restricted to non-recyclable inert waste that cannot be disposed of in another way, as an accompanying measure to selective collection, recycling, and mandatory content in new construction products. A strict landfill ban is not applicable to some demolition waste for which it remains the only option.

7) Clear end-of-waste criteria

The definition of precise, clear, and harmonized end-of-waste criteria at EU level would encourage the production of secondary raw materials and would reward those who invest in high-quality recycled products.

8) Green Public Procurement

Authorities at all levels can provide incentives for promoting the use of construction and demolition recycled materials in public building renovation. The application of a Rating Systems that promote and recognize green purchasing strategies, based on the logic of the circular economy, should be used.

9) Energy-efficient renovation

A focus on the energy renovation of buildings in the EU is also significant. A scheme for minimum energy performance standards for existing buildings is needed, while the employment of renewable energy in the renovation process is crucial. This should allow for renewable energy investment also for the Waste-to-Energy sector.

Overall, the above-mentioned factors are suitable for all types of buildings both public and private. There is a real necessity to improve the circular economy in the construction sector as it represents a huge fraction of waste within the EU.