

19 August 2020

FEAD feedback to the Roadmap on the Review of the Construction Products Regulation

FEAD, the European Federation for Waste Management and Environmental Services, representing the private waste and resource management industry across Europe **welcomes** the European Commission's initiative to review the **Construction Products Regulation** (CPR). Private waste management companies are major operators in this service, operating in 60% of municipal waste markets in Europe, and in 75% of industrial and commercial waste.

FEAD deems **enhancing the CPR (option D)** of the Inception Impact Assessment of the Roadmap as the way forward to achieve coherence with other EU legislation, harmonisation of technical specifications, and better protection of health, safety and the environment, in line with the European Green Deal and the new Circular Economy Action Plan.

By improving the circular economy practices that are relevant to the construction products sector, we can achieve increased quality and quantity of recycling and reuse of materials required for construction products. However, fully embracing the circular economy needs even more ambitious and sound waste management practices. The reviewed CPR 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.

The construction works and products 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) Strengthening the construction – demolition - renovation waste management: The construction products need to be **designed, manufactured, and used** in a way that ensures the **sustainable use of natural resources** and reinforces the **recycling and/or reuse** of parts or materials, while taking into consideration the need to enhance **sustainability performance of construction products**. This chain is interlinked with the waste management activities.

The waste management sector's contribution to the field of construction products 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 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.

Selective collection schemes should be broadly imposed and enforced. They exist in a few MS, but not in all. On the other hand, **EPR schemes** should not be considered as the way forward, as

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 ARMD, Romania
 ASEGRE, Spain

BDE, Germany
 CAOBH, Czech Republic
 DWMA, Netherlands

ESA, UK
 ECEIA, Estonia
 FISE, Italy

FLEA, Luxembourg
 FNDAE, France
 go4circle, Belgium

HRABRI CISTAC, Serbia
 IWMA, Ireland
 LASUA, Latvia

NORSK INDUSTRI, Norway
 PASEPPE, Greece
 PIGO, Poland

SRI, Sweden
 VOEB, Austria
 YTP, Finland

they are not the best way to promote recycling and re-use of construction/demolition products and waste. Generally speaking, EPR has proven useful for household waste, whose flows are small, heterogeneous, and, thus, difficult to selectively collect. However, waste resulting from economic operators in the construction and demolition sector is by nature subject to changing waste collection locations. For these waste streams, 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, and should therefore be preferred to EPR schemes.

2) Promotion of the use of recyclates: In order to ensure the sustainable use of natural resources in the construction works and products sector, the **recyclability** and **durability** of the works, materials and parts, and the initial use of environmentally compatible raw and secondary materials in construction works are vital. **Mandatory recycled content** is a tool to intensify the use of recyclates, and especially, in a number of construction products, in particular for plastic pipes and inert materials, mandatory recycled content should be privileged. At the same time, due consideration should be taken of the special situations of the different types of construction sites and the according mandatory integration of recycled content. A categorization relating to the different types of constructions sites could provide more clarity on this topic.

3) Better information on the materials: Higher **trust of the quality of recyclates** requires better information on the composition of materials used in construction products, standardization of secondary raw materials, and sharing of the information among all the relevant stakeholders. Better information about the materials includes the manufacturers' access to **harmonized technical specifications** and the clarity of legal and quality criteria for harmonized technical specifications. With regards to **hazardous substances** in construction products, and the recycling and/or reuse requirements of parts or materials, a very high level of protection of the health and safety of workers using construction products and of users of construction works should be ensured, and certainly, fully completing the range of substances covered in the whole process is crucial. In order to ensure that the waste management sector is duly informed about the composition of construction materials, the responsibility to provide such information should lie on the building contractor.

4) Setting up integrated waste management strategies: The use of recyclates in construction products in a more **systematic** and **closed-loop** way 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.

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) 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.

6) Levies: Member States or regions may consider providing price incentives to use recycled materials for construction products if they bring the desired benefits to the environment.

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 construction products.

8) Green Public Procurement: Authorities at all levels can provide incentives for promoting the use of recycled materials for construction products used in public buildings. The application of Rating Systems that promote and recognize green purchasing strategies, based on the logic of the circular economy, should be used.

9) Isolation and filling material affecting the plastic waste stream: To respond to the higher insulation and energy efficiency standards currently imposed in the construction sector, a lot of manufacturers inject materials, such as wood or Polyurethane into roller shutters and profiles. The use of these **isolation** materials was cited by the recycling companies as an important barrier to recycling. This material cannot be removed or sorted and has a **disruptive effect on the final high-quality recycling of the plastic (PVC) raw material**. The use of **filling** materials during the installation of profiles constitutes another barrier to recycling. When assembling profiles, if a profile does not fit perfectly, filling material is used, usually Polyetherthane (PUR) or silicone. This is also done to meet isolation standards. These fillers can only be separated during the recycling process if their presence in the PVC waste stream remains limited. However, an excess presence of these materials leads to incineration or landfilling of the recyclate, rendering an entire batch unusable. This event is expected to increase further in the coming years as a result of the stricter insulation standards imposed in the construction sector. Thus, **eco-design principles** should not come at the expense of the energy/isolation requirements of construction products.

10) Energy-efficiency: A focus on the energy efficiency of construction products is also significant, through utilizing a scheme for minimum energy performance standards of the production process. This should allow for renewable energy investment also for the Waste-to-Energy sector.

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. FEAD is committed to the objectives of the Green Deal and considers the above-mentioned measures apt for providing the adequate stimuli both for addressing GHG and for the enhancement of the circular economy in Europe.