

CEMBUREAU's feedback to New Circular Economy Action Plan Roadmap

CEMBUREAU welcomes the New Circular Economy Action Plan and the ambitious vision of the European Green Deal.

The cement sector in Europe substitutes today an average 46% of its fossil fuel needs for cement manufacturing with alternative sources (e.g. non-recyclable waste or biomass) and has ambitions to reduce the use of fossil fuel further.

CEMBUREAU supports the review of EU waste policy to ensure greater circularity throughout EU economy:

- Landfilling should be either banned across the EU or highly taxed at Member States;
- An EU model for separate waste collection could simplify waste management, improve efficiency of resource flows and ensure better access to secondary materials for business;
- Export of waste outside the EU should stop. A review of the Waste Shipment Regulation should simplify waste movements within the EU and avoid unnecessary bureaucratic delays;
- When waste is used in the cement kiln to produce clinker (the intermediate product of cement) its organic component provides heat inside the kiln and the non-combustible elements become part of the clinker, thanks to what is called “co-processing”. The potential of co-processing should be enhanced further through legislative & regulatory measures that recognise this form of material recycling and its contribution towards EU recycling targets.

The CE action plan should boost circularity of construction materials, thus contributing towards a carbon-neutral built environment by ensuring appropriate use of resources to fulfil society's needs in the most efficient manner with the least environmental impact:

- Cement is mainly used to produce concrete. Thanks to its thermal mass, concrete lowers the need for heating & cooling of buildings – reducing both energy needs and peak power demand;
- Concrete also absorbs CO₂ from the atmosphere through a process called recarbonation, resulting in it being permanently bound;
- Concrete is 100% recyclable as aggregates. Concrete structures can be repurposed. Concrete elements in buildings can be reused in new buildings;
- Selective demolition from construction and renovation sites could improve quality and availability of recycled aggregates from Construction & Demolition Waste. However, it should be pointed out that recycled content does not always lead to the best outcome from an LCA perspective (ECRA study).
- Also, a mandatory recycled content would not work for concrete as the supply does not match the demand. If all concrete C&D waste in Europe were recycled, this could supply 10% of total demand for aggregates for all applications. It would also not be always technically & environmentally effective. Recycled aggregates are limited in reinforced concrete standards for performance reasons, whereas for non-structural concrete products a minimum recycled content could probably be more acceptable. CEMBUREAU recommends a performance-based policy for the use of recycled material from C&DW instead.
- The action should include a policy goal of ‘design for disassembly’ to maximise reusability of construction elements in new projects. Focus should be on maintenance, repair and reuse of structures;

- CEMBUREAU agrees with the vision *along the lifecycle of products*. To determine the full environmental impacts of construction products, these must be considered as part of a whole system, i.e. the building itself. The features of concrete described above can only be taken up entirely at the level of the construction work and over the whole life-cycle, as opposed to product level;
- CEMBUREAU advocates the use of CEN/TC350 standards which provide appropriate rules for LCA of buildings, through Environmental Product Declarations (both cement & concrete provide reliable sustainability features in EPDs);
- Any new initiative on construction, e.g. Level(s) framework, should be based on LCA;
- CEMBUREAU welcomes an open platform bringing together the buildings & construction sector, architects, engineers and local authorities.
