

## **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 CO<sub>2</sub> 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.

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