



## RESPONS TO THE CONSULTATION ON COMMISSION INITIATIVE REGARDING NON-ENERGY RAW MATERIALS

### 1. Introduction

F.I.R. is the representative of the European recycling industry of Construction & Demolition Waste. The aim of F.I.R. is to promote the recycling of this waste stream in Europe and to improve the quality of recycled products.

FIR wishes to respond to contribute to the consultation of the Commission on non-energy raw materials. Instead of filling in the questionnaire it wishes to respond by means of this paper.

### 2. General remarks

Recycled aggregates can provide for a significant amount of raw material. In several countries they replace up to 10% of primary materials, sometimes even more. Recycled aggregates are produced from Construction & Demolition Waste (C&DW). This happens in those Member States where waste management has been well developed and where (public) clients recognize their good quality. The use of recycled aggregates is proven to be sustainable. Several Life Cycle Analyses show the environmental benefits. Furthermore recycling industry employs thousands of people per Member State.

The production and sales of recycled aggregates has shown only to be possible when proper waste management is in place. The valuable raw material, in this case inert C&DW, is disposed of in illegal and legal landfills throughout Europe. As long as this is the case, the supply of sustainable recycled aggregates will never take place.

The view of FIR is that the strategy for sustainable non-energy raw materials must be closely related to other areas in the EU where policy and legislation is being developed or should be developed.

### 3. Requirements to increase the supply of raw materials on a sustainable basis

During the consultation process for the Waste Framework Directive, FIR has supplied the European Commission with information on the requirements for recycling. The main requirements are:

- landfilling of C&DW must be prohibited. Whenever this is possible, recycled aggregates will not be produced.
- Illegal dumping of C&DW must be traced and punished
- Selective demolition must be prescribed
- Recycled aggregates must be regarded as a product, not as a waste
- Public authorities must encourage the use of recycled aggregates, for instance by green procurement

The supply of recycled aggregates is frustrated by local and national practices, such as filling old quarries with C&DW or spreading C&DW for "land cultivation". C&DW should only be brought to recycling plants. By using high quality processes, recyclers are able to produce high quality recycled aggregates. These recycled aggregates meet all environmental and technical requirements. Only those recycled aggregates meeting the requirements as set out by CEN/TC154 should be allowed.

### 4. Relation of the Consultation with other areas

Many of the issues in the Consultation on non-energy raw materials are related to other EU areas and developments. This includes for instance:

- the revision of the Waste Framework Directive. Currently the second reading takes place. When the new Directive does not support recycling, the supply of sustainable recycled aggregates will seriously be in danger.
- Lead Market Initiative. In its Communication of 21.12.2008 the Commission identifies Recycling as a lead market which must strongly be promoted.

As for the Waste Framework Directive, the following issues need to be regulated in order for recycling to develop:

- recycling targets for C&DW
- no definition of byproducts
- maintaining the waste hierarchy as general rule

*Related with to the five main challenges identified, the opinion of Construction And Demolition Recyclers, is:*

- a) *Increase the supply of raw materials from European sources on a sustainable basis:*

*As for construction minerals the extraction activities costs should include all environmental costs*

- b) *Encourage greater efficiency in the use of resources:*

*Secondary raw material (recycled aggregates) must pro-actively be prescribed in public works.*