

Joint recommendations for unleashing the circular potential of inert Construction and Demolition Waste

Background

Construction and Demolition Waste (CDW) is the largest waste stream in the EU, accounting for over a third of all waste generated. As such, it plays a pivotal role in achieving the EU's circularity and decarbonisation objectives, and particularly the goal of doubling the circular material use rate by 2030, as outlined in the Clean Industrial Deal.

The circular potential of CDW remains largely untapped due to several structural barriers, including low market acceptance of recycled materials, continued and unfair competition from virgin materials and landfilling, the heterogeneous composition of material, insufficient traceability, and the level of contamination of waste streams suitable for recycling. Performance also varies significantly across the EU, with CDW recycling rates ranging from 10% to over 90% depending on the Member State. In some regions, illegal disposal and the landfilling of untreated CDW are still being observed.

At the same time, EU policies and legislative initiatives are more focused than ever on making the construction sector more sustainable, reducing supply chain dependencies on third countries, and promoting the reuse and recycling of raw materials. With regard to CDW, these priorities are reflected in several programmes and initiatives, including the new Construction Products Regulation (CPR) and the European Strategy for Housing Construction.

The signatories of this paper believe that upcoming legislative initiatives should incorporate concrete solutions that unlock the full circular potential of CDW across the EU. In particular, **the forthcoming Circular Economy Act (CEA) should introduce practical and proven measures that support CDW circularity** in close alignment with the Public Procurement Act and the Industrial Accelerator Act (IAA).

Experience from several Member States demonstrates that high-quality CDW recycling is both technically feasible and economically viable. This is particularly true for inert CDW, which accounts for approximately 85% of all CDW generated in the EU. When processed, inert CDW produces a range of recycled aggregates that comply with European product standards and are suitable for a wide variety of construction applications.

The experience and expertise developed in some Member States provide valuable guidance for identifying what is needed to develop effective circular management of CDW in other Member States. Building on more than 30 years of industry knowledge and expertise in CDW recycling, **this paper sets out practical recommendations from European associations representing the CDW waste management and recycling sector to help replicate these successes across the Union while respecting national market specificities.**

Key enablers of high-quality recycling

High recycling rates and high recycling quality are currently achieved in only a limited number of Member States. However, CDW recycling is also developing successfully in other Member States, often by building on the experience and best practices of those with more mature recycling systems. Where recycling is well established, certain common success can be identified:

1. **A well-coordinated national plan**, designed and agreed jointly by the government and industry on how to achieve the recycling targets set.
2. **An integrated set of measures**, including measures to divert waste to recycling facilities and ensure stable demand for recycled aggregates.
3. **A robust tracking and tracing system** to ensure that all CDW flows are identified and effectively monitored.
4. **Effective industry-led quality control and quality assurance** measures.

Together, these key measures are considered to form the foundation of a well functional recycling ecosystem. Their absence is often an early indication of underdeveloped CDW recycling. Conversely, where these measures are in place, we usually observe recycling rates of inert CDW exceeding 70%.

Our recommendations

While several waste streams are extensively addressed under the Waste Framework Directive (WFD), the **time has come to provide a dedicated framework for the EU's largest waste stream – Construction and Demolition Waste**. Existing requirements in the WFD are not sufficient to ensure the effective and proper management of CDW. The forthcoming CEA therefore provides the appropriate legislative vehicle to introduce a dedicated chapter specifically on CDW management, including the following:

- **Promote the use of recycled aggregates**, starting with public procurement.
- **Introduce a recycling target of 70% for inert CDW**, excluding backfilling.
- Require Member States to **develop and implement national CDW strategic plans** to achieve the 70% recycling target for inert CDW.
- **Require Member States to set up electronic registries to record and monitor information** on waste, disclosed by operators treating CDW based on the 'say-it-once' principle.

In parallel, the ongoing work under the Construction Products Regulation should focus on strengthening quality standards to increase user trust and acceptance, thereby facilitating the use of recycled aggregates. For instance, mandatory declaration of recycled content should be considered.

Promoting the use of recycled aggregates

Despite their significant potential, recycled aggregates remain underutilised due to insufficient market demand and the continued preference for virgin materials. Developing a stable market and

strengthening demand, particularly through public procurement, is essential to support the recycling industry and support circular construction.

Recyclers compete directly with manufacturers using virgin raw materials and therefore face strong market pressure, which is further affected by fluctuations in the prices of virgin materials, potentially making recycled materials less competitive. Additionally, recycling requires significant investments to ensure high-quality production that meets market demand and standards. Given the uncertainty of economic conditions and the substantial investments required, it is essential to ensure a stable and steady demand for recycled materials.

Our recommendation: Member States should be required to design an approach on how to develop a market for recycled aggregates as part of their national CDW strategic plans. At EU level, complementary market-pull measures should be promoted to stimulate demand.

As a priority, **the market for recycled aggregates must be effectively supported through targeted market-pull measures**, such as:

- **Promoting the use of recycled aggregates in public works** via the Public Procurement Act. To facilitate the implementation of new green public procurement criteria encouraging the use of recycled aggregates, proper training and awareness raising on the use of recycled aggregates should be provided to public authorities, contractors, and designers.
- **Leveraging the Industrial Accelerator Act to stimulate demand** for recycled aggregates in concrete and mortar.
- **Considering additional recycled content targets** as part of national CDW strategic plans to increase the uptake of recycled aggregates.
- **Introducing economic instruments to level the playing field with virgin materials**, such as reduced VAT for recycling activities.

It must be ensured that any End-Of-Waste criteria development would avoid overly administrative controls and burden to companies that could undermine the recovery and reuse of recycled aggregates.

Link to Public Procurement Act

Accounting for approximately 16% of the EU GDP - over €2.5 trillion annually - public procurement holds significant potential to shift production patterns and accelerate the uptake of recycled materials and circular products, thereby contributing to the EU's climate and circularity goals. Given that one-third of public works are financed by public authorities, Green Public Procurement (GPP) is a key instrument for driving the uptake of low-carbon and recycled materials while strengthening the European recycling industry - particularly by promoting circularity in the construction sector.

Drawing on the recommendations of the Letta and Draghi reports', European Commission President Ursula von der Leyen has highlighted the key role of public procurement in strengthening the Single Market, boosting competitiveness through the development of a 'Made in Europe' label and

supporting strategic autonomy and sustainability. The forthcoming Public Procurement Act, set for final adoption in Q4/2027, is a key opportunity to transform this vision into action.

Our recommendations:

- **Introduce mandatory requirements in public procurement for the use of recycled aggregates in public works.** Experience from Italy, through the *Criteri Ambientali Minimi*, demonstrates that such measures effectively stimulate demand and support the recycling industry.
- **Provide comprehensive training and capacity-building for procurement officers, alongside the exchange of good practices among public authorities.**

Link to Industrial Accelerator Act

The Industrial Accelerator Act is a key opportunity to boost the EU's industrial competitiveness by creating lead markets that stimulate demand for low-carbon products. Incentivising circularity and recycling is essential to achieving these goals, with public procurement serving as a powerful lever to support EU's decarbonisation and strategic autonomy. Therefore, it is essential to leverage the IAA to support the demand for recycled aggregates.

Our recommendations: Increase the low carbon target of concrete and mortar used in public procurement from 5% to 30%, with at least 15% of that target met through recycled aggregates. Construction standards and performance requirements should facilitate instead of restricting the uptake of recycled aggregates in concrete and mortar.

Recycling target and mandatory CDW strategic plan

Our recommendation: A European recycling target of 70% for inert CDW, excluding backfilling. As foreseen in the Waste Framework Directive Article 11.6, Commission shall assess the feasibility and the timeline to establish such a European recycling target for inert CDW, excluding backfilling. The Circular Economy Act should ensure that the obligations of the Commission under the Article 11.6 of WFD is timely executed.

While backfilling should be a permissible use, higher-value recycling and reuse must be encouraged. At the same time, it should be recognised that the transition towards higher-value applications will take time. Backfilling, as defined in the WFD, can provide a genuine market for recycled aggregates produced in accordance with the technical specifications for their intended use or for other fractions after the processing of inert CDW. In such cases, backfilling should be recognised as part of the recycling chain. However, **the use of untreated CDW should be prohibited under all circumstances.** As policies increasingly promote higher end-uses, markets for recycled aggregates are expected to evolve, gradually making backfilling becomes less interesting.

A national CDW plan should set out the actions required to achieve the 70% recycling target. These should include actions by public authorities, amongst others to divert CDW from landfill to recycling, while allowing Member States the flexibility to choose their own preferred measures for their national

circumstances, drawing on the successful practices implemented elsewhere in the EU. The plan should also define the role of industry in ensuring the production of high-quality recycled aggregates that comply with all applicable environmental and technical requirements. Key areas to be addressed include selective demolition, asbestos management, market development for recycled aggregates and technical requirements governing their application in construction.

CDW recording and Member States' electronic registry

Insufficient recording and reporting of CDW undermines circularity by preventing waste from being recognized and managed as a valuable resource. Without reliable data, stakeholders cannot effectively identify opportunities for reuse, optimize recycling processes, or track material flows, ultimately reducing resource efficiency.

Our recommendation: Operators treating CDW should be required to record and report the quantity of waste as well as the quantity of products and materials resulting from its treatment in aggregated numbers. Where operators are already required under other legislation to report similar information to the competent authorities, the system must be designed in such a way that a single report is sufficient so as to minimise unnecessary bureaucracy. This requirement should also apply to the on-site mobile treatment of CDW. Member States must set up an electronic registry to record these data while respecting commercially sensitive information. This will guarantee comprehensive monitoring of CDW flows and enable the collection of reliable proper statistics.

Link to the WFD

The WFD already requires waste management facilities to keep records of incoming waste. However, reporting this information to the authorities is not mandatory, except for hazardous waste, for which the setting up of an electronic system for registration is obligatory.

Our recommendation: A similar obligation should also be introduced for CDW to ensure reliable statistics and this needs to also apply to the mobile crushing of CDW on-site.

Link to other policies

According to the European Strategy for Housing Construction: *"Subject to an on-going impact assessment demonstrating sufficient benefits, the Commission may propose mandatory digitalised pre-demolition audits (by the third quarter of 2026, as part of the Circular Economy Act) and subsequently set up a Digital European Construction Resource Assessment platform, which will help to connect the national systems."* With respect to the last condition, the idea of the Commission to make pre-demolition audits (PDA) mandatory can further improve tracking and tracing of CDW.

Our recommendation: Pre-demolition audits should be followed by the logical selective demolition of fractions identified in the audit. Additionally, quantity and nature of all waste materials leaving the demolition site as well as their recovery destination must be recorded and registered in an electronic system provided by the member State. Finally, a harmonised and centralised digital register of

information on construction and building product materials would be a highly valuable tool to support audits and enhance CDW recovery.

Conclusion

Europe already has the knowledge, technologies and experience needed to unlock the full circular potential of Construction and Demolition Waste. Upcoming legislative initiatives should now build on this experience by introducing practical and targeted measures that accelerate high-quality recycling and create the conditions for recycled aggregates to compete on a level playing field.

About the signatories:



FEAD, the European Waste Management Association, represents the entire waste management value chain, from collection and sorting to recycling, energy recovery, and final disposal. It brings together the private waste and resource management industry across Europe through its 21 national member associations and associate members, which collectively represent over 3,000 companies. Together, the sector provides more than 500,000 local jobs and fuels €5 billion investments into the economy every year. For more information, please contact: info@fead.be



FIR, The Fédération Internationale du Recyclage, represents the European recycling industry of Construction & Demolition Waste (C&DW) and Incinerator Bottom Ash (IBA). FIR has as its aim to raise the level of recycling in Europe. Its members are national recycling associations and individual recycling companies. FIR has members in nine European countries and in Mexico. For more information, please contact: info@fir-recycling.com



Recycling Europe, (previously EuRIC), is the voice of Europe's recyclers including 84 national federations and companies across 24 EU & EFTA countries, plus the UK. From metals and paper to plastics, packaging, textiles, tyres, ships, construction & demolition waste, WEEE and ELVs, our members transform waste into resources, powering Europe's circular economy, ensuring resource autonomy, and boosting competitiveness and sustainable industrialisation across the continent.

Our Construction & Demolition branch (Recycling Europe Construction & Demolition) was established in 2023 following the Metabuilding project to support the growing market for recycled construction and demolition materials in Europe. *For press-related enquiries, please contact Zoi Didili, Recycling Europe's Senior Public Affairs & Communications Advisor, by email at zdidili@recyclingeurope.org or by phone at +32 (0) 489 09 46.*