

New Circular Economy Action Plan Cerame-Unie's feedback to the Roadmap

The European Ceramic Industry Association (Cerame-Unie) welcomes the foreseen Circular Economy Action Plan to be adopted by the European Commission to accelerate the transition towards a circular economy. Cerame-Unie stresses that the transition from a linear to a circular economy calls for new business models and encourages the development of innovative solutions in the industry. In this context, **the ceramic industry has developed solutions with the aim of minimising the raw material consumption and waste generation during the production process, and increase the reuse/recycling of its products.** This has been done through the reuse of internal production residues (e. g. mass residues, dry broken ware, etc.), the reuse of waste from other industrial processes, an optimized raw material selection or an optimisation of the product design, and supply chain cooperation in the case of recycling. However, the ceramic industry highlights that important regulatory barriers still prevent the increase of recycling and reuse of products in the EU:

- **Several challenges and untapped opportunities still remain to create a well-functioning market for secondary raw materials:** the quantity of secondary raw material has to be sufficient and manufacturers need affordable prices and high-quality materials. Trust in the quality, safety and performance of secondary raw materials must also be improved.
- **The definition of by-products and end-of-waste criteria is not harmonised in Europe:** Member States have developed their own criteria with regard to by-products and end-of-waste status. For example, a secondary raw material can have some value in one Member State but can be considered as waste in another. In some Member States it is also difficult to recognise production residue that is not waste as a by-product, in order to be allowed to use this by-product in the industrial process.
- **Collection, treatment and transport of waste are complex:** national regulations for collection and treatment of waste differ from each other. Transport of waste between different Member States is a complex process and leads to administrative overburden. Transportation costs of end-of-life products and of secondary raw materials limit uptake and competitive advantage of recycling material.
- **Difficulties are related to chemicals legislation:** with more and more substances being classified as hazardous, difficulties arise to use some residue or natural elements in the production process.

Thus, Cerame-Unie calls on the European Commission to lift these regulatory inconsistencies in order to increase and further develop circular practices in the European industry.