

AmCham EU's response to the public consultation on the circular economy (questionnaire)

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AmCham EU speaks for American companies committed to Europe on trade, investment and competitiveness issues. It aims to ensure a growth-orientated business and investment climate in Europe. AmCham EU facilitates the resolution of transatlantic issues that impact business and plays a role in creating better understanding of EU and US positions on business matters. Aggregate US investment in Europe totalled €2 trillion in 2014 and directly supports more than 4.3 million jobs in Europe.

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27 July 2015

3/ PRODUCTION PHASE

3.1. How would you assess the importance of the following measures to promote circular economy principles in product design at EU level?

	Very important	Important	Not very important	Not important	No opinion
Establish binding rules on product design (e.g. minimum requirements on 'durability' under Ecodesign Directive 2009/125/EC)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Encourage industry-led initiatives (i.e. self-regulation)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Develop standards for voluntary use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Promote and/or enable the use of economic incentives for eco-innovation and sustainable product design (e.g. via rules on Extended Producer Responsibility schemes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Review rules on legal and commercial guarantees	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Encourage the consumption of green products (see section 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other — please specify below	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments (200 characters max)

No answer or no opinion means no common view due to sector specific considerations. Development of standards/regulation should not hinder innovation. For product design, there is no one size fits all.

3.2. In order to facilitate the transition to a more circular economy, how would you assess the importance of the following product features?

	Very important	Important	Not very important	Not important	No opinion
Durability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

CONSULTATION RESPONSE

Reparability: Availability of information on product repair (e.g. repair manuals)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reparability: Product design facilitating maintenance and repair activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reparability: Availability of spare parts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Upgradability and modularity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reusability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Biodegradability and compostability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Resource use in the use phase (e.g. water efficiency)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Recyclability (e.g. dismantling, separation of components, information on chemical content)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Increased content of reused parts or recycled materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Increased content of renewable materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Minimising lifecycle environmental impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other- please specify below	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments (200 characters max)

Our members are committed to these principles, all relevant for the circular economy. Yet, these features should fully consider the specificities of each sector. Regulation shall be technology neutral.

3.3. How would you assess the importance of the following additional considerations when applying circular economy principles to products at EU level?

	Very important	Important	Not very important	Not important	No opinion
Impact on production cost and affordability of the product	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Impact on production processes and value chain	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

CONSULTATION RESPONSE

Impact on consumers (e.g. through durability and reparability)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Functionality of the product	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Enabling innovation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Respecting technology neutrality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Impact on EU imports and exports	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other — please specify below	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments (200 characters max)

Consumers: we believe they are an important actor of the circular economy but we don't think regulating features such as durability or reparability is desirable given the specificities of each sector.

3.4. From a circular economy perspective, in your view which product categories should be given priority in the next few years and why?

at most 3 choice(s)

- White goods (e.g. dishwashers, refrigerators)
- Small domestic appliances (e.g. microwave ovens, food processors)
- Office equipment (e.g. computers, printers)
- Small electronics (e.g. smartphones, cameras)
- Packaging materials
- Heating equipment (e.g. boilers, water heaters)
- Air-conditioning and ventilation systems
- Lighting products
- Motors and pumps
- Industrial equipment
- Clothing and textiles
- Furniture
- Cars
- Construction products (e.g. windows, insulation materials)
- General measures (concerning a broad range of products) should be taken
- Others

3.5. Which of the actions listed below should be given priority at EU level to promote circular economy solutions in production processes?

	Very important	Important	Not very important	Not important	No opinion
Promote cooperation across value chains (e.g. through encouraging new managerial modes)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

CONSULTATION RESPONSE

Address potential regulatory obstacles in EU legislation – please specify	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Address potential regulatory gaps in EU legislation – please specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support the development of innovative business models (e.g. leasing)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Improve the interface between chemicals and waste legislation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promote collaboration between and among private and public sectors, including end-users	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support the development of digital solutions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Identify and promote exchange of best practice	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Identify minimum standards for increasing resource efficient processes (e.g. Best Available Techniques)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensure availability of reliable data on material flows across value chains	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Provide access to finance for high-risk projects	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other- please specify below	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments (200 characters max)

AmCham EU believes that the EU should focus on implementation and tackling regulatory obstacles. For more details, please see our position paper attached.

3.6. How effective do you think each of the actions at EU level listed below would be in promoting sustainable production and sourcing of raw materials?

Very effective Effective Neutral Not effective No opinion

CONSULTATION RESPONSE

Establishing a legally binding framework at EU level (e.g. sustainability criteria)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Developing and promoting voluntary compliance schemes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Addressing the issue through trade policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Addressing the issue through the promotion of targeted global initiatives	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promoting the exchange of best practice among businesses	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other — please specify below	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments (200 characters max)

Any EU initiative should consider supply chains' global dimension and focus on implementation. Technology development of cost-effective materials recycling industry could be another effective action.

3.7. Do you have any other comments about the production phase?

500 character(s) maximum

AmCham EU wants to stress that there already is a strong basis with many sectoral legislation in place (e.g. ELV, Eco-design, WEEE, RoHS, Batteries Directive, Waste Directive, Packaging and Packaging Waste). More efforts should be put on implementation and support for those Member States where basic infrastructure is lacking. We are concerned about inconsistencies between chemical and waste legislations (e.g. REACH authorisation and 'repair as produced principle').

4/ CONSUMPTION PHASE

4.1. How would you assess the importance of the following measures to promote circular economy principles in the consumption phase at EU level?

	Very important	Important	Not very important	Not important	No opinion
Provide more information relevant to the circular economy to consumers, for example on expected lifetime of products or availability of spare parts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

CONSULTATION RESPONSE

Ensure the clarity, credibility and relevance of consumer information related to the circular economy (e.g. via labels, advertising, marketing etc.) and protect consumers from false and misleading information in this respect	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Organise EU-wide awareness campaigns to promote the circular economy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Improve/clarify rules and practices affecting consumer protection (e.g. relating to legal and commercial guarantees)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Take action on product and material design (see section 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Encourage financial incentives to consumers at national level (e.g. by differentiated taxation levels depending on products' resource efficiency)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Take measures targeting public procurement (e.g. through criteria for Green Public Procurement)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Encourage new modes of consumption such as shared ownership (e.g. car sharing), collaborative consumption, leasing and the use of internet-based solutions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Promote the development of repair and maintenance services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Encourage waste prevention (e.g. minimising food waste)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other- please specify below	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments (200 characters max)

Creating new labels wouldn't help achieve the circular economy goals since some sectors already have 50+ labels. Leveraging/harmonising existing labels within specific sectors will be most efficient.

4.2. Which products should be a priority for EU action to promote more sustainable consumption patterns and why?

at most 3 choice(s)

- White goods (e.g. dishwashers, refrigerators)
- Electronics
- Food and beverages
- Packaging materials
- Clothing and textiles
- Furniture
- Cars
- Construction products
- General measures (concerning all consumer products) should be taken
- Other — please specify below

5/ MARKETS FOR SECONDARY RAW MATERIALS

No answer to this section since questions are sector-specific

6/ SECTORAL MEASURES

No answer to this section since questions are sector-specific

7/ ENABLING FACTORS FOR THE CIRCULAR ECONOMY, INCLUDING INNOVATION AND INVESTMENT

7.1. How important are the following enabling factors in promoting the circular economy at EU level?

	Very important	Important	Not very important	Not important	No opinion
Financing innovative projects or technologies relevant to the circular economy (from EU funds, e.g. Horizon 2020)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public incentives (e.g. financial guarantees) for private investors to finance projects conducive to the circular economy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support for the development of circular economy projects (e.g. technical assistance)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

CONSULTATION RESPONSE

Support for innovative systemic approaches and cross-sectoral cooperation (e.g. industrial symbiosis and cascading use of resources)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Partnerships with public authorities to help innovative businesses overcome potential legal obstacles to innovation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promotion of innovative business models for the circular economy (e.g. leasing and sharing)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Specific measures to encourage the uptake of the circular economy among SMEs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Exchange and promotion of best practice	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promoting the development of skills/qualifications relevant to the circular economy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support for capacity-building in public administrations	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support for market penetration of innovative projects through labelling, certification and standards, public procurement for innovation, etc.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Better monitoring the implementation and impact of policies contributing towards the circular economy agenda	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Increasing the knowledge base by collecting and providing information and data e.g. on material flows, technologies and consumption patterns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other- please specify below	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7.2. Do you have any other comments about enabling factors to promote the circular economy?
500 character(s) maximum

8/ UPLOAD DOCUMENTS

AmCham EU position paper