Closing the loop: An EU Action Plan for the Circular Economy

CEI-Bois Position Paper

Introduction

CEI-Bois, the European Confederation of Woodworking Industries, welcomes the Circular Economy Package 2.0 issued by the European Commission on 2nd December 2015. The European woodworking and furniture industry is the EU’s fifth largest manufacturing industry. It contributes €218 billion to the economy and generates more than 2 million jobs. Europe’s Woodworking Industries already embrace the concept of the Circular Economy. Its core renewable and carbon neutral raw material is wood, a product that can be used, reused and recycled thereby maximizing its value. This fact should be better taken into account in the EU Action Plan, whose CEI-Bois greatly supports the further development.

The Woodworking Industries are tackling climate change by storing carbon in Harvested Wood Products and substituting other materials. Not only is the production and processing of wood highly energy-efficient giving wood products an ultra-low carbon footprint, but wood can often be used to substitute materials which require large amounts of energy to be produced and suffer higher carbon intensity. As part of the bio-economy, the Woodworking Industries contribute to the Circular Economy by providing renewable alternatives to fossil-based products and energy.

Product design & Production processes

The Woodworking Industries play a key role as we move to a low carbon economy. They are committed to source wood from sustainably managed forests and comply with the EU Timber Regulation. A set of criteria and indicators of Sustainable Forest Management (SFM) has been developed by Forest Europe and supplemented by Member States. Additionally, the Woodworking Industries are increasingly involved in global market-based forest certification schemes. Europe’s sustainably managed forests support the increase of growing stock and sequester 9% of European net greenhouse gas emissions. The long-term sequestration of CO₂ into forests and forests wood supply and thus mitigation of climate change can be greatly increased by:

- Afforestation and reforestation measures,
- Increasing the use of wood products,
- Developing pre-agreed "cascading use of wood" solutions.

Consumption

Whilst CEI-Bois welcomes the EC’s intention to harmonize information on product environmental performance, CEI-Bois, at the same time, underscores the need to first optimize the use of existing tools. Renewability should be considered the same way than recyclability in the Circular Economy.

Waste management

CEI-Bois approves the increased targets for reuse and recycling of municipal and packaging waste as well as the limitation of municipal waste landfill. Nevertheless, the calculation methods of these targets should be carefully analyzed and explained before final levels can be set. The contribution of the Woodworking Industries to the resource efficiency objective could be improved further by:

- An adequate collection and sorting system of used wood for reuse and recycling,
- A total ban on landfill.
Market for secondary raw material

The Woodworking Industries support the waste hierarchy and encourage Member States to enhance wood sorting and wood waste collection in line with the cascading principle of wood. The Woodworking Industries consider that optimized supply of quality secondary raw material should be ensured by:

- Taking measures for more material use of wood thereby increasing the carbon storage and the mitigation of climate change,
- Enhancing the application of the waste hierarchy,
- A level playing field between different uses of wood (no market distortions),
- A removal of legislative barriers to the use of by-products,
- Enhancing the collection of post-consumer wood.

Priority area – Construction & Demolition

Not only is the energy used in construction, including manufacturing, transporting and erecting buildings significantly lower for wood-based products and systems than for other building materials but wood in construction also offers one of the best opportunities to implement resource efficiency concepts. For instance, wood prefabricated buildings modules are creating a minimum of waste.

Innovation, investment and other horizontal measures

Innovation is crucial, especially for the development of bio-economy. CEI-Bois welcomes the proposals of the Circular Economy Package though it is waiting for more concrete information on the series of measures supporting innovation in bio-economy, which should be strongly supported by the Circular Economy implementation.

CEI-Bois also appreciates the attention and the support the Circular Economy Package recommends when referring to SMEs. CEI-Bois members, including SMEs, are particularly active in field of recycling, they should thus benefit from the business opportunities of increased resource efficiency.

Monitoring progresses

It is important to be able to measure and monitor the progress of the Circular Economy. Nevertheless, inventions aren’t necessary. Existing Eurostat data could be better presented taking into account the Circular Economy’s objectives. So standards such as CEN/TC 350 ‘Sustainability of construction works’ and standards for packaging could be referred to as well. An indicator on the adoption of bio-based products could be added in the monitoring framework.

Conclusion

As an example, a mere 4% increase in the output of Europe’s Woodworking Industries would create:

- 80,000 new jobs,
- €2.35 billion to the EU’s economy,
- 150 additional million tons of CO₂ stored, which are equivalent to 3% of European Greenhouse gas emissions.

Wood is renewable, sustainable and can be used, re-used and re-cycled. It is a model product for Europe’s transition towards a Circular Economy intended to boost global competitiveness, foster sustainable economic growth and generate new jobs. CEI-Bois looks forward to focused discussions with the European Institutions on how best to further develop and successfully implement the objectives of the Circular Economy Package 2.0.