

Concrete Europe

Making the Circular Economy Act work for the Construction Ecosystem

Concrete Europe response to the Commission's call for evidence for the upcoming Circular Economy Act.

As the voice of the European concrete industry, [Concrete Europe](#) fully supports the transition to a more circular, resilient, and resource-efficient economy. The Circular Economy Act represents a pivotal opportunity to accelerate this transformation.

Concrete is inherently local, durable, and 100% recyclable - qualities that make it a key enabler of circular construction across Europe:

- Its **durability** extends the life cycle of buildings and infrastructure.
- Its **recyclability** allows concrete to be crushed and reused as aggregate, reducing the demand for virgin materials.
- Its **local production** minimises transport emissions and supports regional economies.

The industry has already made considerable progress in embracing circular design principles, reusing structures, elements or materials and reducing waste. However, unlocking the full circular potential of concrete requires coherent, material-specific policies that are practical, innovation-friendly, and tailored to the realities of construction.

Why the Circular Economy Act matters for the concrete sector

- ✓ High material use and waste generation

Construction is one of the EU's largest consumers of raw materials and producers of waste. As the most widely used building material, concrete plays a critical role in driving circularity across the built environment.

- ✓ Significant circular potential

Concrete can be designed to minimise the need for resources, being both primary and secondary aggregates. The longevity of concrete structures and the easiness to repair maintain the material in the loop for a very long time. Full concrete structures can be kept in deep renovation projects; elements can be repurposed and are also fully recyclable at end of life. Concrete can also incorporate recycled aggregates and industrial by-products such as ground granulated blast-furnace slag (GGBS) and fly ash.

- ✓ Public procurement as a key driver

Circularity criteria in public contracts will strongly shape market uptake. These criteria must reflect technical feasibility, material performance, and align with existing standards such as EN 206, harmonised precast standards and the Level(s) framework.



Concrete Europe's key recommendations for the Circular Economy Act

One-size-fits-all measures risk penalising effective solutions and overburdening SMEs. Circularity should be assessed through lifecycle analysis and environmental performance, not through arbitrary recycled-content quotas. Fixed targets (e.g., "at least 30% recycled content") overlook the real environmental impact and structural functionality of products, while ignoring the limited availability of secondary raw materials. According to a report¹ by the European Commission's Joint Research Centre, concrete inflows currently exceed demolition outflows by a factor of ten, confirming estimates by the Circular Building Coalition on that only around 10% of total virgin material demand could realistically be replaced².

1. Promote performance-based, LCA-driven approaches

- ✓ Move away from prescriptive recycled content targets.
- ✓ Adopt LCA-based indicators in line with CEN/TC 350 and Level(s).
- ✓ Recognise durability, flexible and modular design and reusability of concrete as key markers of circularity.
- ✓ Avoid one-size-fits-all rules: circular policies must be material-sensitive and LCA-based, not rely on arbitrary content quotas that ignore environmental performance or structural functionality.

2. Support efficient and sustainable access to high-quality secondary raw materials

- ✓ Provide technical guidelines for the safe and effective use of secondary materials in concrete.
- ✓ Introduce regulatory and financial incentives to promote the use of certified secondary raw materials.
- ✓ Safeguard access to domestic primary raw materials and accelerate permitting procedures for quarrying and mining (e.g. limestone, gravel, sand, natural stone, clays), which will continue to play an essential role in the future raw material mix.
- ✓ Avoid blanket taxation of locally available virgin materials with low environmental impact.
- ✓ Support research and innovation to improve technologies and develop new circular materials and products.
- ✓ Enhance transparency through improved and harmonised public statistics on construction and demolition waste (CDW) flows to enable better tracking of secondary raw material use and recycling performance.
- ✓ Promote certification and labelling schemes for recycled construction materials to build market confidence and ensure traceability.

3. Harmonise end-of-waste (EoW) criteria across the EU

- ✓ Define clear, harmonised EU-wide EoW criteria for recycled aggregates and other construction materials, including recycled concrete fines.
- ✓ Prevent fragmented national rules that hinder cross-border trade and the development of a functioning secondary materials market.
- ✓ Complement harmonised EoW criteria with European standards that enable higher-quality use of recycled aggregates in fresh concrete and of recycled concrete fines in cement production.
- ✓ Ensure alignment with CEN technical committees to facilitate harmonised product standards supporting high-value recycling.

¹ [Environmental and socio-economic impacts of the circular economy transition in the EU cement and concrete sector - Publications Office of the EU](#) (page 33)

² https://drive.google.com/file/d/1MxLdUJJqCr2CIU-TwbN_PgVPo-drWSOR/view?usp=sharing (page 60)



- 4. Enable realistic and flexible circular public procurement**
 - ✓ Introduce mandatory but implementable circularity criteria in public procurement.
 - ✓ Ensure that tendering and procurement processes remain technology- and material-neutral, allowing fair competition between innovative low-carbon and circular solutions.
 - ✓ Accept the use of established standards (e.g. EN 206) and performance-based evidence.
- 5. Promote design for reuse without overlooking technical constraints**
 - ✓ Encourage design for disassembly and reuse of precast elements where technically feasible.
 - ✓ Support adaptive, flexible, and modular design strategies to enhance the sustainability of concrete.
 - ✓ Recognise structural, safety, and functional limitations, especially in load bearing, architectural, extreme environments and long-lifespan applications.
- 6. Streamline waste flows and support regional circularity hubs**
 - ✓ Facilitate the transport of construction and demolition waste (CDW) and secondary materials across borders.
 - ✓ Support the development of regional recycling hubs, reverse logistics, and infrastructure suitable for managing heavy construction materials.
 - ✓ Encourage selective demolition to boost recovery.
 - ✓ Promote selective demolition practices, advanced sorting, and technical processing facilities to improve the quality and availability of recycled materials.
 - ✓ Gradually reduce landfill disposal of mineral construction waste through regulatory disincentives (e.g. landfill taxes) to incentivise recycling and reuse.
- 7. Safeguard SMEs**
 - ✓ Ensure that new obligations – such as digital tracking, extended producer responsibility (EPR), or data reporting – are realistic and scalable for SMEs.
 - ✓ Offer practical compliance tools, access to EU funding, and capacity-building programmes to help small and medium-sized producers adapt.
- 8. Align circularity with decarbonisation**
 - ✓ Recognise the dual contribution of circularity and durability to climate objectives.
 - ✓ Account for natural and enhanced carbonation of concrete as a CO₂ sink, as well as its thermal mass, material longevity, and life cycle performance in carbon assessments.
 - ✓ Encourage the efficient use of cement, clinker, and concrete at the building level, maximising material efficiency and extending the lifespan of structures.

Concrete Europe strongly urges for a Circular Economy Act that is pragmatic, science-driven, and truly neutral when it comes to materials.

The concrete value chain contributes through local production, high recycling rates, and design for reuse. With the right policy framework, it can further support EU competitiveness, resource resilience, and Green Deal objectives.

We welcome continued dialogue to ensure the Act reflects the realities of construction and delivers lasting impact.
