

## **CERAME-UNIE POSITION PAPER ON SUSTAINABLE PRODUCTS INITIATIVE**

***Reference:*** *Response to the Public Consultation on the Sustainable Products Initiative launched by the European Commission*

Cerame-Unie, the European Ceramic Industry Association, welcomes the objectives of the European Commission for a climate neutral, resource efficient and circular economy and would like to thank the European Commission for the opportunity to partake in the public consultation and set out the industry's view in respect of the Sustainable Products Initiative (SPI).

In addition to the responses provided in the online questionnaire<sup>1</sup>, Cerame-Unie would like to further elaborate the industry's position in the sections below, in order to provide additional background.

### **1- Sustainable products in the ceramic industry**

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The ceramic industry fully supports the EU objectives for a more sustainable and circular economy. Made from clay, a broad available raw material, ceramic products are by nature sustainable and long-lasting products which require no or little maintenance or repair.

- Studies show that a brick house can have an average life span of more than 150 years, as do clay pipes, clay roof tiles and buildings containing expanded clay.
- Research also show that clay pavers can have a lifetime of 125 years.
- Sanitaryware appliances and ceramic tiles for flooring and walls can have a life span of up to 50 years, which is very high in comparison to alternative materials.
- Ceramic tableware, kitchenware and packaging is a durable and inert product that can be reused effortlessly for decades.

Cerame-Unie points out that **durability of products is a major driver of sustainability**, which can only be appreciated with a holistic approach that takes into account on the one hand the complete life cycle of the product and on the other hand all environmental impacts and not only global warming but also biodiversity, water, toxicity, resources etc when assessing the environmental impact. More attention however should be paid to life cycle costs (LCC) and not only focus on life cycle assessments (LCA) ; LCC and LCA should go hand in hand.

Given the inert nature of fired clay, ceramic products can be reused and recycled after the end-of-life stage. In addition to that, to minimise the raw material consumption and waste

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<sup>1</sup> Note: Cerame-Unie replied to the questionnaire with the perspective of ceramic products only.



generation during the production process as well as to increase the reuse or recycling of products and raw materials, the ceramic industry has developed innovative solutions and business models such as the reuse of internal production residues (e. g. mass residues, dry broken ware, etc.), the use of waste or by-products from other industrial processes, the reuse of water used in the manufacturing process, an optimized raw material selection or an optimisation of the product design, and supply chain cooperation in the case of recycling. As a best practice that can be highlighted, in the refractory industry, manufacturers can produce monolithic refractories and refractory bricks that contain between 20% and 80% of recycled material. Virgin refractory materials can be substituted by recycled material coming from various industries (e.g iron, steel, metallurgical industries, alumina, ceramic, cement).

## **2- Responsibility for information, including Digital Product Passport**

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With regard to the introduction of a Digital Product Passport, Cerame-Unie stresses that **minimising the costs and the administrative burdens for economic operators** (e.g. duplication of environmental/sustainability information on multiple documents) will be key to make such a passport effective. A particular attention should be also paid on the **management of the complexity of products and value chains**, as well as the **confidentiality** of product composition and **quantity of required data**.

In the case of ceramic ware products, the Digital Product Passport should include information about the intrinsic characteristics of the ceramic material which reinforce circularity aspects such as inertness, non-pollution, long-life span, high durability...

Cerame-Unie also draws the attention on the **specific situation of construction products. The environmental performance of construction products only makes sense in the context of the building or the construction works.** Ceramic construction products are CE marked according to Regulation (EU) 305/2011 (Construction Products Regulation) and the European Commission is currently discussing how environmental performance of products is going to be integrated in this product policy in the future. The Construction Products Regulation includes the obligation to deliver a Declaration of Performance together with the product, it can be digital and is harmonised, therefore it plays the role of a Digital Product Passport.

In addition to that, ceramic construction products manufacturers provide for many years the necessary environmental and sustainability product data via voluntary environmental product declarations (EPDs). A suitable regime and harmonised requirements for assessing the sustainability and environmental performance of construction products are developed within CEN/TC 350. Cerame-Unie is actively involved and supports the work of CEN/TC 350 and the alignment of EN15804 with PEF and vice versa. Considering the previous arguments, Cerame-Unie believes that there is **no need to widen the Ecodesign legal framework or create a Digital Product Passport scheme for construction products** since the CPR and the large use of EPDs by manufacturers offer enough and even more instruments to stimulate the sustainability of construction products.



### 3- Lifting regulatory barriers

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The ways in which economic actors operate strongly influence how products are produced and consumed. The shift to circular and sustainable economy calls on the development of new business models and regulatory incentives are necessary to encourage a more sustainable production. Cerame-Unie stresses that **regulatory barriers should be lifted to scaling up new circular business models.**

**Recycling should be properly addressed.** From an environmental perspective, recycling of products might have a higher ecological impact than the use of natural raw materials (e.g. in the ceramic industry, clay quarries are most of the time located very close by the plants). Moreover, the cleaning, grinding and preprocessing of ceramic construction waste is highly energy intensive. When recycling is the best option, Cerame-Unie highlights the need for a cost efficient system for collection, sorting and separation of waste. By doing this, the quality and quantity of materials available for recycling will improve drastically.

**A well-functioning European market for secondary raw materials is required.** For the uptake of recycled ceramic aggregates, manufacturers need affordable prices and high-quality materials which are not contaminated with construction and demolition waste (e.g. mortar, plastic, gypsum) or with detrimental industrial process materials (e.g. slags and fluxes).

**Member States have developed their own criteria with regard to by-products<sup>2</sup> and end-of-waste<sup>3</sup> (EoW) status.** As a consequence, a secondary raw material can have a certain value in one Member State and can be considered as waste in another. In addition to that, recognising production residue that is not waste as a by-product will allow their use in the industrial process. This ambiguity in current legislation involving waste and by-products creates a 'grey zone' which can lead to different interpretation between the manufacturers and local authorities. Companies have to start a long authorisation process to allow this waste to be transported and used in the production process. Thus, Cerame-Unie welcomes the ongoing work from the European Commission on the development of EoW criteria at EU level.

**Waste shipment should be simplified.** 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. The material sources and the manufacturers are not always close to each other. Cerame-Unie calls on the European Commission to ensure the proper functioning of the European internal market for secondary raw materials. This will allow a smooth exchange of waste for reuse and recycling. Waste destined to valorisation must benefit from the principle of free movement of goods within the EU. Provisions to further harmonise the implementation of certain procedures and to reduce unnecessary regulatory and administrative burdens are welcome.

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<sup>2</sup> A by-product is defined in article 5 of the Waste Framework Directive ([Directive 2008/98/EC](#))

<sup>3</sup> According to article 6 of the Waste Framework Directive, certain specified waste shall cease to be waste when it has undergone a recovery operation, including recycling, and complies with specific criteria.



In a nutshell, Cerame-Unie points out that a **sufficient regulatory framework is needed to ensure the legality and environmental compliance of actors engaging waste management and recycling activities**, and avoiding the export of hazardous waste outside the EU.

#### **4- Developing incentives for circularity**

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Lastly, Cerame-Unie underlines that **financial incentives** (e.g. incentive-based systems over binding obligation-based systems) will be an important support to deliver on sustainability and circularity. A specific approach to **SMEs specific situation** should be taken into account as new business models are more difficult to adopt due to initial investment cost.

*Cerame-Unie Aisbl (CU) is the European Ceramic Industry Association. The European ceramic industry covers a wide range of products including bricks & roof tiles, clay pipes, wall & floor tiles, refractories, sanitaryware, table- & ornamentalware, technical ceramics, expanded clay and flower pots.*