



**Comment on the EU Circular Economy Package
Closing the Loop – an EU action plan for the Circular Economy**

**Scottish Environment LINK Economics Group
April, 2016**

1. Scottish Environment LINK Economics Group welcomes the EU Circular Economy Package, and its interest in promoting the concept of the circular economy across the EU. We believe that there are potentially major benefits for the environment and wellbeing from a fully-developed circular economy, where this seeks to achieve substantial overall reductions in the volume of materials consumed.
2. The introduction to the Action Plan positions the Circular Economy primarily as a potential mechanism to boost competitive advantage. It also mentions that it would, *at the same time*, save energy and reduce environmental impact. LINK would like to see a clear upfront recognition that the EU has to achieve an overall reduction in consumption of raw materials as current rates are unsustainable and inequitable in global terms. We think it important and useful to state how a circular economy fits into the concept of Sustainable Development, highlighting that the economy should contribute to social wellbeing without over-exploiting the environment, which underpins both our economy and wellbeing.
3. As well as 'sustainable sourcing' of raw materials, the EU should be aspiring to reducing impact by using less raw materials. LINK would like to see headline targets and indicators on land, water, material and carbon footprints as well as resource efficiency.
4. LINK would like to see the prompt release of an ambitious Ecodesign Working Plan but also to see procedures established for product design requirements on reparability, reusability and recyclability for non-energy related products.
5. To support better informed consumption decisions, LINK would like to see product information requirements include specific information on durability, warranty times, availability of spare parts, repair service, and energy efficiency as well as an indication of its environmental impact.
6. As mentioned in the Action Plan, Green Public Procurement has considerable scope to play a key role. LINK would like to see more emphasis in making this the default option and to include targets.
7. The section on biomass and bio-based products should emphasise that returning nutrients to the soil is an important aspect of the circular economy through 'closed loop' farming. Maximum sustainable yields should also be an aspect of the circular economy, ensuring that terrestrial, marine and freshwater environments are not over-exploited.