

General comment for Circular Economy Public Consultation

JBCE supports the transition of the EU economy towards a Circular Economy. As a cross-sector association with member companies operating in different industries and stages in the supply chain, JBCE is willing to contribute to making Circular Economy a reality. To achieve the goal of bridging the gaps and closing the loop we wish to emphasize the importance of the following enabling factors.

KEY MESSAGES

- 1. A truly Circular Economy requires the involvement of actors in all stages of the ideal economic cycle and should be based on Life-Cycle Thinking.**
 - Better use of existing information and scientific evidence must be ensured.

- 2. Enabling legislation at EU level exists, but it requires better implementation, harmonisation and enforcement.**
 - Market surveillance projects such as *Atlete* and *Ecopliant* could work well to share best practices and check compliance across the Single Market
 - Avoid overlaps or contradictions between several pieces of legislation, e.g. GPP/Eco-label, chemicals restriction requirements and REACH SVHC Candidate List, ErP and PEF, refurbishment or recycling
 - Whenever new or revised regulatory inputs are proposed in the frame of the Circular Economy action plan, an effective enforcement scheme must be implemented to avoid unfair competition of free riders that would undermine the credibility of the new business models.

- 3. A better coordination between existing legislation and policies at EU level is necessary to overcome obstacles posed by diverging National Law interpretation.**
 - Consistent definitions of waste and end-of-waste criteria are needed.
 - Ensure free movement (within Europe or globally) of certain products still having a potential lifetime to be exploited e.g. electronic equipment for refurbishment or testing, carcasses for tyre re-treading etc.



4. Supply chains are global and a truly closed loop can only be achieved by regulatory harmonisation at the global level.
5. The development of Technical Standards in line with ISO standards are a way to achieve regulatory harmonisation at the global level and helps the industry to better implement the circular model in the supply chain whilst creating a level playing field for all actors on the market.

ABOUT JBCE

The Japan Business Council in Europe was established in 1999 and is a leading European organisation representing the interests of over 70 multinational companies of Japanese companies of Japanese parentage operating in the European Union.

Our members operate across a wide range of sectors, including electronics, wholesale trade, precision instruments, pharmaceutical, railway, textiles, glass, automotive, and chemical manufacturing. In 2014, our member companies had global sales of 1.4 trillion euros.

Building a new era of cooperation between the EU and Japan is the core of our activities. The key goal of JBCE is to contribute to EU public policy in a positive and constructive way by drawing on the expertise and experience of our member companies.

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