Position Paper

CEMENT EUROPE'S FEEDBACK TO EC CIRCULAR ECONOMY ACT PUBLIC CONSULTATON

Brussels, 05 November 2025

Cement Europe, the European Cement Association (www.cementeuropе.eu), welcomes the opportunity to comment on the EC's Circular Economy Act public consultation.

As a key material in constructing buildings, infrastructure, public transport and renewable energy equipment, cement and its end-product concrete are of key strategic importance for the green transition.

In October 2025, Cement Europe published its Cement Action Plan which addresses the dual challenge of competitiveness and transition and signals a strong sense of urgency for establishing a clear, credible regulatory framework which will enable a solid business case for the investments required for the cement industry to reach net carbon zero by 2050, with the potential for carbon-negative performance over the value chain.

Already today, the EU cement industry is a significant contributor to the waste management value chain by providing an end-of-life solution and valorising approximately 40 million tonnes of waste and by-product per year. In the EU in 2023, the sector substituted on average 56% of its fossil fuel consumption with non-recyclable waste derived fuels, 22% of which was bio-waste. In a cement kiln, pre-processed waste-derived alternative fuels are co-processed by harnessing their heat value to replace fossil fuels, while their mineral content partially substitutes raw materials—resulting in no residual waste.

In addition to providing sound solutions for waste streams and strengthening the circular economy, the use of biowaste in cement kilns is key for the cement industry to reduce its CO_2 emissions and support our vision for a carbon neutral Europe for 2050. The biowaste materials used in the cement industry originate from a variety of sources and include for instance the biogenic fraction of refuse derived fuels (RDF), end-of-life tyres, saw dust from related industries or processing, animal meals, agricultural waste or wood waste (please see Cement Europe's brochure for more information). These biogenic waste streams are contaminated and unsuitable for other uses.

The European cement industry has high ambitions to bring co-processing to new levels in the coming years. From 56% in 2023, the CEMBUREAU's Net Zero Roadmap update aims to reach 60% alternative fuels by 2030, and 95% by 2050, with more than half (50%) biomass waste. The study "*Status and prospects of co-processing of waste in EU cement plants*"[1] (Ecofys) recognises the potential to replace

[1] https://www.cembureau.eu/media/itbhzglc/xfull-report-_-2017-05-11_ecofys_publication_alternativefuels_report.pdf

nearly all conventional fuels with pre-treated waste – with no major technological impediment to achieve a 95% substitution rate. Certain kilns in the EU have already reached this target.

When it comes to the use of waste, the cement manufacturing process has fundamental differences compared to the incineration sector. First of all, the energy recovery is much more efficient because there is no energy transformation step and the energy efficiency in the cement kilns varies between 70% to 80% depending on the raw materials moisture content[2]. The temperatures are much higher (above 2000°C at the main burner), destroying all organic pollutants, including PFAS. The recycling of the mineral ash substitutes virgin raw materials, which has already been recognized by several Member States while the ISO 4349:2024 allows the exact measurement. Furthermore, the cement plants are already existing installations, unlike new incineration plants, which typically require public funding for construction. This makes cement kilns a more immediately available and cost-effective solution for waste recovery, warranting higher prioritization. Moreover, when considering the environmental impact, cement plants emit only to air and generate no waste products, whereas incineration plants produce emissions to air, solid waste and waste water. Additionally, cement kilns operate under the EU Emissions Trading System (EU ETS), with binding obligations to reduce greenhouse gas emissions and contribute to climate neutrality. In contrast, the incineration sector falls outside the scope of the EU ETS and is not subject to equivalent climate requirements.

The clear advantage of the cement industry compared to other routes, has been the conclusion of the recent scientific opinion by the European Food Safety Authority (EFSA)[3], in relation to the treatment of animal by-products, which came as a response to the respective request by the European Commission.

Policy is expected to play a decisive role in reaching the targets of the European cement industry. The EU's Circular Economy Action Plan provides an opportunity to support the review of EU waste policy to ensure greater circularity throughout the EU economy. Moreover, Cement Europe believes that:

- waste must be **diverted from landfilling** to other treatments with a higher added value such as the cement industry.
- Taxation on incineration should differentiate between co-processing and incineration (including WtE).
- the potential of co-processing should be enhanced further through legislative and regulatory measures that recognise this form of material recycling and its **contribution towards EU recycling targets** - Waste Framework Directive (WFD) article 11 (7).
- the key contribution of the biogenic fraction of the non-recyclable waste streams used as alternative fuels to reduce emissions from energy-intensive industries shall be recognised and unintended **Renewable Energy Directive (RED) certification** requirements for use of biowaste materials in cement kilns shall be avoided *(articles 29 (1) and 30(3))*.

In particular, Cement Europe firmly believes that the contribution of the cement sector to the waste management value chain through co-incineration/co-processing should be acknowledged in the Waste Framework Directive and taken into account in the recycling targets of the Member States. This acknowledgement should be based on a reliable methodology, following the existing provisions of Article 11 (7) of the EC Waste Framework Directive. Such methodology could be provided by the

[2] https://www.cembureau.eu/media/oyahklgk/12042-ecra-energy-performance-cement-kilns-2017-10-15.pdf
[3] https://www.efsa.europa.eu/en/efsajournal/pub/9435

standard ISO 4349:2024 which is entitled "*Determination of the Recycling Index for co-processing*"[4] and aims to define a commonly acceptable methodology at global level for the calculation of the part of Solid Recovered Fuels (SRF) which is recycled when used in cement kilns. This methodology can also be extended to other alternative fuels stemming from waste.

Many Member States have already proceeded with the recognition of the recycling aspects of cement co-processing:

- In **Spain**: Regulation 712/ 27.08.2025[5] on the material recycling for end-of-life tyres,
    - Article 5.2: The Royal Decree recognises that the inorganic components of ELT (steel and other mineral fractions) incorporated into clinker when used in cement kilns count as material recovery.
- In **Austria**: Regulation 118/ 13.05.2024[6] about the voluntary material recycling
    - Chapter 2.11 states that if the contribution of co-incineration plants to the material recycling of alternative fuels in context of the co-processing technology should be determined, ISO 4349:2024 must be used.
    - Chapter 2.12. allows to integrate the contribution of alternative fuels to material recycling due to the co-processing technology in the cement industry into the assessment certificates that accompany the delivery of waste.
- In **France**:
    - in 2018, the French Ministry of Ecological Transition informed ALIAPUR (the French ELT collective management system) that as from 2018, 23.75% could now be calculated as material recovery.
    - in 2022, ECOMAISON obtains recognition from the Ministry of Ecological Transition and Territorial Cohesion of a material recovery share of 3.5% for every ton of Solid Recovered Fuel (SRF) / Refused Derived Fuel (RDF) declared to have been recovered through the cement industry.
- In **Portugal**: according to the article 111 of the *Decreto-Lei 102-D/2020*[7] on the general waste-management system, the taxes are adjusted in accordance with the verified recycling of materials that come from co-processed waste.
- In **Belgium**: Article 30(3) / 08-03-2023 of the Degree referring to the circular nature of materials of the Wallon Region[8]:
    - to promote, enhance and sustain innovations in matters concerning recovery, especially all operations involving recovery where there is a simultaneous combination of recycling and retrieving energy from an inflow of waste in the process of heat treatment from the manufacture of products.

The impact of co-processing goes beyond the cement industry itself and affects a wide range of sectors including the wind, marine, construction, infrastructure, and industrial markets. In June 2023, Cement Europe, in collaboration with six other European associations, published a position paper highlighting the important role cement coprocessing can play in treating end-of-life composite materials[9]. The co-signed associations agree that cement co-processing offers a sustainable recycling solution. They call policymakers to recognize cement coprocessing as a recycling process, which in

[4] https://www.iso.org/standard/79886.html
[5] https://www.boe.es/buscar/act.php?id=BOE-A-2025-17186
[6] https://www.ris.bka.gv.at/Dokumente/BgblAuth/BGBLA_2024_II_118/BGBLA_2024_II_118.pdf
[7] https://www.pgdlisboa.pt/leis/lei_mostra_articulado.php?tabela=leis&artigo_id=&nid=3398&ficha=101&pagina=&nversao=&so_miolo=S
[8] https://nautilus.parlement-wallon.be/Archives/2022_2023/PARCHEMIN/1180.pdf
[9] https://cembureau.eu/media/kftpx2m5/230623-joint-position-co-processing-composites.pdf

turn will empower the EU to foster industrial growth and ensure a circular future for both the cement and composite material sectors.

In addition to the above and bearing in mind the energy supply crisis in Europe, the use of alternative fuels in the cement industry plays a vital role in enhancing Europe's energy independence. By relying on locally sourced waste and biomass residues, cement plants can reduce dependence on imported fossil fuels while advancing their decarbonisation objectives.

Cement is the essential intermediate for the production of concrete, a material that is inherently local, durable, and 100% recyclable - qualities that make it a key enabler of circular construction across Europe. The recycling of concrete can be realized in various steps of the value chain, i.e., in concrete, in cement or in clinker production. Cement Europe supports the definition of clear, harmonized EU-wide End-of-Waste criteria for recycled aggregates and other construction materials, including recycled concrete fines. With regard to the Recycled Aggregates Cement Europe firmly believes that the existing classification as "articles" under REACH shall remain as such. In our view, the possible classification of the Recycled Aggregates as "substances" is an overregulation which shall be avoided, because the environmental benefits are not justified and it will only create administrative burden to the recycling companies, hindering the circular economy.
Please also see Concrete Europe's input to the call for evidence and answers to the public consultation.

Cement Europe looks forward to being an active part of the discussions on the EU Circular Economy Action Plan.

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