



# CISUFLO

CIRCULAR SUSTAINABLE FLOOR COVERINGS



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## Policy brief – preliminary



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## Abbreviations

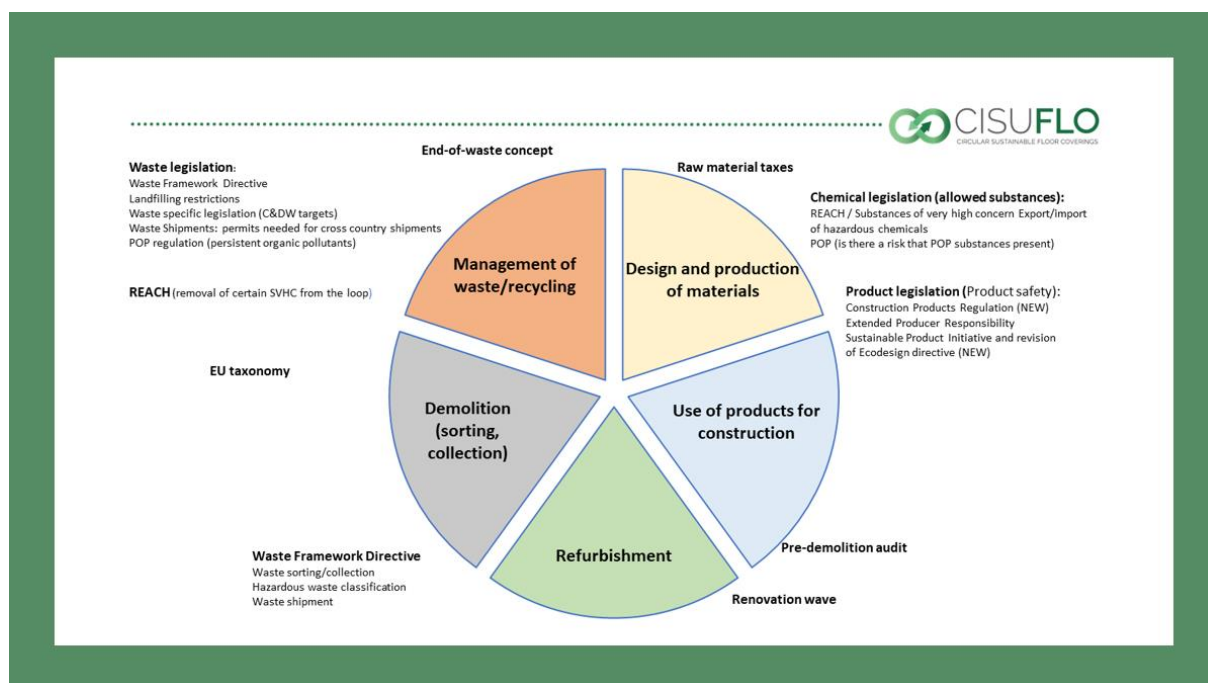
D	Deliverable
CEAP	European Commission's Circular Economy Action Plan
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
ESPR	Ecodesign for Sustainable Products Initiative
WFD	Waste Framework Directive
EoW	End-of-waste
CDW	Construction and Demolition Waste

## Introduction

The goal of this policy brief is to inform policymakers about insights from the CISUFLO project, which aims to support the flooring and related industries' transition to a circular economy. The brief provides knowledge on the factors that promote or impede this transition, also known as 'drivers' and 'barriers'. By highlighting these factors, this brief aims to facilitate the creation of more effective policies that can help foster a more sustainable and circular flooring sector in particular and the economy in general.

The primary objective of CISUFLO is to establish a systemic framework for sustainable and circular flooring in the EU, with the goal of reducing the overall environmental impact of the sector. The project mainly covers textile floor coverings or 'carpet', resilient floor coverings or 'vinyl', and laminates and parquet or 'wood'. The proposed framework aims to align all aspects of the value chain to maximize the retention of value for the entire system, taking into account technical feasibility and socio-economic factors. Additionally, it aims to define circular business models and transformation plans in order to promote circularity in the flooring industry.

The transition from a linear economy to a circular economy in Europe is gaining importance, particularly in light of the EU Green Deal launched in 2019. This comprehensive initiative aims to achieve climate neutrality by 2050 and decouple economic activity from the consumption of finite resources. As part of this transition, the traceability of recyclates through the supply chain has become increasingly important. In that context, the CISUFLO project aligns with the EU Green Deal by working towards a circular economy in the flooring industry. The key regulations for the floorcovering include recent proposals for the revised **Construction Products Regulation** and **Ecodesign Directive through the new Ecodesign for Sustainable Products Initiative (ESPR)**, as well as the **REACH** and the **Waste Framework Directive (WFD)**.



Source: VTT, 2023.

## Policy Considerations

Based on the preliminary analysis performed in CISUFLO, the following areas should be subject to consideration:

### Design for Circularity



One of the main goals of CISUFLO is designing and manufacturing new products, with a maximum percentage of recycled content and fully fit for the circular economy. The design and production phase of flooring determines the quality and quantity of feedstock for recycling. To that end, the different options for end-of-life scenarios should be envisioned by manufacturers during the design stage.

The European Commission's Circular Economy Action Plan (CEAP) also emphasizes the importance of considering end-of-life scenarios during the design stage of products. The plan calls for a "whole life-cycle approach" and promotes the development of eco-design guidelines and standards. Thus, **the scope of the standards, both at the European and international level, plays a vital role** in guiding manufacturers to design products that are more durable, repairable, reusable, and recyclable since it sets clear instructions for what is required in terms of product design and performance.

In addition, Extended Producer Responsibility (EPR) schemes for more waste streams could have a significant positive impact on the circularity chain. The EPR is an environmental policy approach that extends a producer's responsibility for a product to its post-consumer stage in the product's life cycle. EPR encourages producers to take into account environmental considerations when designing their products.<sup>1</sup> In the EU, *some* products are in *some* countries subject to EPR such as textiles, batteries, packaging, and chemicals in the context of Packaging Waste, Waste Electrical and Electronic Equipment Directives, and Batteries Directives. However, countries are free to add or remove different categories as they deem necessary, which makes the EPR implementation highly fragmented. Thus, it is very important to **harmonise and introduce streamlined EPR schemes at the EU level** in order not only to encourage circularity but also a level playing field.

### Increase Recycled Content



CISUFLO also aims to develop solutions to improve the recyclability of flooring products. Recycled content requirements are a key aspect of circular systems and the reuse of resources. Many initiatives currently under consideration by the EU focus on establishing recycled content targets. For example, the proposed revision of the Construction Products Regulations includes the obligation to declare mandatory sustainability characteristics, including minimum recycled content. At the same time, the WFD currently does not cover any specific targets for construction and demolition waste (CDW).

The EU should therefore pursue **promoting the use of recycled materials in the production of floor coverings** by setting a **minimum recycled content target in the respective legislation**. This can be done on a voluntary basis through ecolabels like EU Ecolabel, Nordic Swan and others.

For this, **consulting industry experts** is a crucial step in setting and defining these targets, since they can provide hands-on insights into the practicalities of using recycled materials in the production processes, including any technical limitations or challenges that need to be addressed.

<sup>1</sup> OECD, Extended Producer Responsibility (EPR). Retrieved from [Extended Producer Responsibility - OECD](#)

## Collection



The process of waste collection is a critical phase of circularity that helps to ensure that resources are used efficiently and sustainably.

The collection of waste for recycling is usually supported by recycling targets set in the EU legislation. However, the lack of mandatory waste collection for some waste streams negatively impacts the continuity of the supply, which has been reported as a significant barrier to the development of markets for some recyclable materials (McKinnon, 2018).<sup>2</sup> Moreover, **mandatory waste collection schemes** also play a crucial role in reducing the amount of waste that ends up in landfills or is illegally dumped. In addition, mandatory waste collection will lead to the collection of enough critical mass to make the recycling process economically viable (economy of scale). Where appropriate, **introducing landfill taxes** is another way to reduce the amount of waste sent to landfills and help level the playing field with other waste disposal methods.

## Sorting and Recycling



The sorting should take place prior to the demolition in order to separate and collect the recyclable materials more efficiently, making it easier to meet the requirements for collection and sorting by the recycler. Waste streams are cleaner when good sorting occurs, which enhances the quality of recovered materials. However, this process often means additional labor and equipment costs for the demolition company. For this reason, the **establishment of sorting systems should be incentivised and promoted** through legislative instruments. For example, the WFD requires that Member States promote selective demolitions in order to facilitate high-quality recycling by selective removal of materials

and ensure the establishment of sorting systems for construction and demolition waste but for now, only for wood, mineral fractions, metal, glass, plastic, and plaster are in scope. Moreover, the WFD outlines fundamental principles for managing waste and establishes **End-of-waste (EoW) criteria** that determine when waste is no longer waste and can be considered a product or secondary raw material. However, currently, only for three waste types (iron scrap, copper scrap and glass cullet) end-of-waste criteria have been established at the EU level, with textile and plastics to follow in the coming years. For a wider range of flooring products, the criteria remain decentralized and defined at the national/local level. This approach leads **to logistical challenges and causes administrative burdens**.

**Policy instruments and standards** can create opportunities by streamlining the classification of the material as waste or product redundant, which means products that are no longer needed by or useful for its holder but are suitable for re-use<sup>3</sup>. Introducing **standardized end-of-waste criteria for a broader range of waste** would provide legal certainty and reduce unnecessary administrative burdens, as well as encourage recycling efforts in the EU.

Also, this decentralized approach has a large negative impact on waste shipment within and transportation across the EU Member States. Having different guidelines to follow in different Member States makes the procedure and communication burdensome for the operators. The European Commission's proposal on the revision of the waste shipment regulation, towards alignment with the Basel Convention, to protect human health and the environment against the adverse effects of

<sup>2</sup> McKinnon, D., Bakas, J., Herczeg, M., Blikra Veia, E., Busch, N., Holm Christensen, L., Christensen, C., Damgaard, C.K., Milios, L., Tojo, N., Punkkinen, H. and Wahlström, M. 2018. Plastic Waste Markets - Overcoming barriers to better resource utilization. Report: <http://norden.diva-portal.org/smash/get/diva2:1210623/FULLTEXT01>

<sup>3</sup> Communication from the Commission – Approval of the content of a draft for a Commission Regulation amending Regulation (EU) No 651/2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty, [C\\_2021433EN.01000101.xml \(europa.eu\)](https://eur-lex.europa.eu/eli/reg/2021/433/20210423/EN)



hazardous wastes<sup>4</sup>, is a step in the right direction. However, it is important to maintain a “green-list<sup>5</sup>” of non-hazardous wastes of the European Commission – especially where there is no EoW established – to not disrupt the operations of many manufacturers.

## Digital Product passport



The digital product passports initiative was introduced by the European Commission as part of the proposed Ecodesign for Sustainable Products Regulation and one of the key actions under the CEAP.

As an example of good practice, CISUFLO also foresees an electronic product passport to make the link between the identification tag on the product and the product information required by the different stakeholders along the value chain. To that end, [ePRODIS](#), which is an integrated product information system, is being created for all flooring types (laminated, vinyl and carpet) as an extension to the existing [PRODIS](#) system which was developed for the carpet industry.

The product passport should be linked to a general standard by product group (defined by the scope of the corresponding CEN TC) defining the product passport as such, and then for each type of product (laminated, vinyl, carpet), specific product passports containing information (data) in accordance with the product specific standards. Also, it should be structured in a way that the conformity assessment procedures can be easily modified and adapted in order to keep up with product evolution and/or new requirements by the regulatory framework. The system should also allow new products which are under development and where *not* all standardisation work is finalised. In this case, there will also be mandatory data such as performance requirements. Moreover, it is important to take other digital passport initiatives on a global scale into account and foresee interoperability starting from the product level to the international level.

<sup>4</sup> Basel Convention, [Basel Convention > The Convention > Overview](#)

<sup>5</sup> Proposal for a Regulation of the European Parliament and of the Council on shipments of waste and amending Regulations (EU) No 1257/2013 and (EU) No 2020/1056, [EUR-Lex - 52021PC0709 - EN - EUR-Lex \(europa.eu\)](#)

## Outlook

The policy brief will be adjusted in M48 of the project (May 2025) based on the coming outcomes of the project.

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