

## Circular Economy Action Plan Roadmap – Comments

January 2020

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The European Remanufacturing Council welcomes the publication of the roadmap of the New Circular Economy Action Plan. In particular, because of the contribution it makes to EU climate ambitions, we support the proposal to prioritize reuse and repair of products before they are ultimately destroyed for material recycling and disposal. Evidence provided by UNEP in an international study led by Professor Nabil Nasr<sup>1</sup> indeed demonstrates that the CO<sub>2</sub> emissions from most product life cycles can be up to 98% lower when the product is designed to be returned for an industrial-scale value retention process such as remanufacturing, refurbishment, reconditioning, maintenance and overhaul. A white paper, “Better Than New”, developed in 2019 by the Council in collaboration with the Ellen MacArthur Foundation and setting out recommendations for CO<sub>2</sub> reduction is appended to this submission.

Rather than quickly becoming waste, remanufactured products are made to last and be maintained for many lives – not just one – while delivering performance. Many products, especially but not exclusively electrical and electronic products, contain very small quantities of highly functional raw materials, the economic value of which is so low that they are unrecoverable from the ferrous and non-ferrous material recycling processes at end of life. By contrast, extending the life of components and products will slow down the permanent loss of many functional raw materials.

Linking the plan with the forthcoming industrial strategy is welcome. Existing remanufacturing activities in the EU are valued at €30 billion, representing only 2% of the equivalent manufactured sales<sup>2</sup>. However, it is the potential for this activity to increase that makes it relevant to the industrial strategy. The EU is well positioned to be home to large-scale regional centres for industrial-scale remanufacturing because of the size of its regional market for used products. If such a development were accompanied by a review of the existing regulations in order to remove regulatory uncertainty and support the remanufacturing practices found in a wide range of sectors many more business and consumer products could see their working lives extended.

Today digital technologies offer a new gateway for the expansion of remanufacturing, boosting innovation in the sector at an unprecedented pace, allowing remanufacturers to know much more about the use-profile, locations and actual wear and tear, and eventually enabling them to maintain and upgrade products. Industry 4.0 technologies are being used to enable this improved product life cycle: “digital twin” techniques, additive engineering, robotic disassembly and in-use data monitoring are already in evidence amongst our membership companies.

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The circular economy will be an important element of a higher value, innovation-led growth economy for Europe in which net zero carbon emissions can be achieved. It will require an effective collaboration between the policy makers and stakeholders and we look forward to supporting and contributing to this dialogue in the coming months.

More information on the work of the Council, its publications and positions can be found [here](#).

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### European Remanufacturing Council Membership

The Council is bringing together businesses and business organisations that support the remanufacture and refurbishment of products. The Council represents three main categories of business: OEMs (Original Equipment Manufacturers), their approved third-party remanufacturing suppliers and the independent third parties that operate with and without OEM endorsement. The range of products represented so far includes industrial bearings, tyres, medical devices, automotive components, power generation, telecoms equipment, printer cartridges and logistics. We do not currently have representation in aviation, high-speed rail and the marine sectors, where product life extension practices are established and technically advanced. Approximately 90% of remanufacturing activity is in the B2B space (business to business). There is a need to extend the expertise in the B2B area to the B2C (Business to Consumer) area and the Council seeks to enable this where possible.

A full list of current members is available at [www.remancouncil.eu](http://www.remancouncil.eu)

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#### References:

1. IRP (2018). Re-defining Value – The Manufacturing Revolution. Remanufacturing, Refurbishment, Repair and Direct Reuse in the Circular Economy. Nabil Nasr, Jennifer Russell, Stefan Bringezu, Stefanie Hellweg, Brian Hilton, Cory Kreiss, and Nadia von Gries. A Report of the International Resource Panel. United Nations Environment Programme, Nairobi, Kenya.
2. See [www.remanufacturing.eu](http://www.remanufacturing.eu) (Horizon2020 funded project)

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#### About the Conseil Européen de Remanufacture:

The vision of the European Remanufacturing Council is to triple the value of Europe's remanufacturing sector to €100 billion by 2030. We will bring together businesses from every product sector to share knowledge, and seek changes to policy with the aim of making remanufacturing a normal part of the product life cycle.

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