

Circular Economy Act

Promotion of Circular Economy in Construction Projects

The Finnish Property Owners Rakli (Transparency Register id 727236253172-92) is association of Finland's most prominent owners of residential and commercial properties and infrastructure, property investors, largest cities in Finland, as well as construction clients. Our members include both private and public sector entities.

We wish to provide comments on the development of circular economy practices in construction, particularly from the standpoint of developers and clients responsible for initiating and managing construction projects.

Both new construction and renovation generate substantial quantities of materials and building components with reuse potential. To effectively support the transition toward a circular economy in the construction sector, we propose the following key measures:

1. Establishment of European Standards and Guidelines

Currently, liability for the use of circular materials and components is disproportionately placed on the project initiator, since the verification of suitability for reusable building components must be carried out on a site-specific basis. To address this, we advocate for the swift development of harmonized European standards and guidelines that define the conditions under which dismantled building components may be reclassified as reusable products, based on the new CPR.

Such measures would clarify responsibilities and reduce the burden on individual project initiators, thereby lowering the threshold for the use of reused materials and fostering the growth of secondary markets for building components.

Support measures should be targeted particularly at material-intensive sectors, where the environmental and economic benefits are most significant. Materials such as bricks, concrete elements, and glued laminated timber structures offer high circular potential due to their mass, carbon content, and prevalence in construction.

While materials like cladding and furniture are easier to recycle, their overall impact is lower. Nonetheless, their reuse should be encouraged where feasible, especially given the reduced safety and health concerns compared to structural components.

2. Support for Circular Construction and Process Development

Systemic change within the construction industry is most effectively achieved through the piloting of new operational models in real-world projects. At this stage, it is essential to facilitate the emergence of a functioning circular economy market rather than impose restrictive requirements.

In particular, it is crucial to strengthen the circular economy competence of professionals such as designers, builders, project managers, and regulatory authorities. The challenges also lie in fostering collaboration among stakeholders and developing shared processes.

We recommend that EU funding mechanisms be directed toward low-threshold pilot projects that accelerate circular economy practices in construction.

3. Consideration of National and Regional Conditions

The availability of reusable components and feasible structural solutions differs significantly between countries. Strict regulatory thresholds may result in disproportionate burdens. We therefore recommend the adoption of incentive-based policy instruments that encourage the development of regionally appropriate innovations and solutions.

A balanced approach that supports innovation, clarifies responsibilities, and respects national conditions will be essential in advancing circular economy objectives within the construction sector.

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