

Tematiske innspill til EUs kommende rammeprogram for forskning og innovasjon

Sirk Norge er en bransjeforening for virksomheter som jobber med gjenvinning og sirkulærøkonomi. Våre 200 medlemmer kommer fra hele landet, og representerer både offentlig og privat sektor. Blant våre medlemmer er IKSer / kommuner, private gjenvinningselskaper, returselskaper, tech-selskaper, utstyrsleverandører og rådgivere. Vi har i dette innspillet også samarbeidet med earthresQue, ett av Norges etablerte Senter for forskningsdrevet innovasjon (SFI).

Kunnskapsdepartementet har i forbindelse med EUs kommende rammeprogram for forskning og innovasjon bedt om innspill på følgende spørsmål, besvart på engelsk:

- 1. Hvilke tematiske områder er det spesielt viktig at vi samarbeider om på europeisk nivå i det kommende rammeprogrammet? Begrunn forslagene og forklar hvordan de vil bidra til europeisk merverdi.**

As a majority of the world's climate change and biodiversity loss can be attributed to resource consumption, the FP10 should focus attention heavily towards tools and policy instruments that are effective in transitioning rapidly towards a circular economy.

One of the largest and most difficult barriers against a successful circular transition, is the fact that virgin materials are more profitable and competitive than re-used and recycled alternatives. It would thus be highly beneficial to actively use R&D to develop, test, implement and scale up economic policies and policy instruments that could complement other regulations in order to level this playing field. The establishment of long term research centres with close links between research and stakeholders such as the Norwegian Research council's funding mechanism Centre for Research-based Innovation (SFI) with predefined scopes would be one way of setting this up.

This challenge is backed by the fact that National public inquiries keep coming up short of well documented cases of such circular policy instruments (as seen in both Norway and Sweden in recent years; [NOU 2022:20](#) and [SOU 2024:67](#)).

Using FP0 in such a targeted manner, would speed up the ability to gather relevant first hand experience and identify criteria for how to best adopt and implement such instruments. This effort should simultaneously focus on how Europe can redirect consumption and production material flows towards becoming more self-sufficient, while also directly boosting European competitiveness.

- 2. De europeiske partnerskapene og samfunnsoppdrag (missions) er virkemidler EU benytter i tillegg til regulære utlysninger. De brukes kun der regulære utlysninger ikke forventes å gi samme utbytte. I partnerskapene bidrar næringsliv og offentlig sektor aktivt, også med finansiering. I samfunnsoppdragene er målet å løse globale utfordringer. Begge de to virkemidlene legger vekt på at kunnskapen skal tas i bruk. På hvilke områder er det særlig viktig for Norge at disse virkemidlene benyttes? Begrunn forslagene.**

It would be of particular value to Norway to see partnerships and missions being deployed in a way that targets a reduction of material consumption rates, as well as an increased rate of circularity of material use.

Partnerships and missions could also be implemented in a more targeted manner towards developing a broad set of BAT / BREF case studies, best practice guidance for End-of-Waste solutions, successful templates for circular public procurement, and so forth. Preferably, such a targeted effort should seek to fully identify and document barriers against an effective circular transition, followed by calls directed towards reducing said barriers.

It would also be desirable to build a joint library / database listing both barriers, BAT / BREF and best practices (for instance according to the R10 regime, or using ISO 59000 terminology) in an organized and user friendly manner. Such a 'circular wikipedia' should be maintained by competent R&D organizations. This could ultimately become a go-to source of information to identify possible uses for any given by product or waste material. Until such a stage, one should prioritize the largest sectors and material flows where consumption and waste management represent the greatest environmental impacts, such as mineral mining and construction materials.

Justification for the reasoning above:

Norway is, as shown by most indicators, among the least circular economies in the world. Various methodologies show consumption per capita among the highest in the world, as well as several waste management performance indicators below national targets or benchmark averages.

Although the rate of circularity of material use in the EU has increased slightly over the past two decades, the continent is not transitioning quickly enough towards decoupling economic growth from resource use. Norway does not, unfortunately, provide statistics towards all relevant circularity indicators in Eurostat, but the world map illustrating the [UNSDG Goal 12](#) Responsible consumption and production, shows that all of Europe is performing according to the legend 'significant' or 'major challenges remain'.

As the ESA [Early Warning Reports](#) have shown, over the past couple of years: only 9 Member States are on track to meet both the 55 % target for preparing for re-use and recycling of municipal waste, and the 65 % target of recycling of all packaging waste by 2025. This trend also holds true across the EEA EFTA States. The European Environment Agency made an objective screening of the waste management systems of Iceland, Norway and Liechtenstein, and concluded that all three States are at risk of missing at least one of the 2025 targets.

3. Er det andre forhold det er viktig å få fram i et nasjonalt tematisk innspill?

- Business modeling aid eligibility

The [GBER](#) presents another well-known barrier against a circular transition, albeit rather on a company level. Article 25 and 29 defines strictly which objectives and eligible costs that can be granted aid.

Currently, Article 25 and 29 of this regulation restrict aid from being granted towards creating or adapting business models, even though business modeling within a circular value chain and economy in most cases need to be heavily redesigned from existing linear models. This is usually a very time consuming task, that also requires know-how beyond what can be expected in-house, particularly for SMEs. Restrictions apply both for individual companies as well as for networks of companies who wish to collaborate when applying for aid. As such, targeted circular transition efforts via the FP10 towards delivering business model redesign tools, would provide a highly valuable workaround for this challenge.

- Digital IT architecture and tools for circularity

Although digital innovation is already supported, the application of IT architecture that facilitates smoother data sharing (such as DPP data and metadata), as well as ways to promote the development of digital tools specifically for circular economy initiatives is not clearly outlined. Technology such as blockchain for supply chain transparency, AI-driven waste reduction models, IoT connectivity, as well as automated and standardized local / regional / national statistics services could play a crucial role in circular transitions. A range of such tools are needed to monitor resource flow, enhance material tracking, enhance LCA and other impact data availability, and support reuse and recycling innovation, business modeling and transition strategies. This is particularly relevant for waste management strategies that underpin new policy instruments towards “higher” or “more circular” treatment solutions in the waste hierarchy.

Med vennlig hilsen,

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