

Consultation on the Review of the European Waste Management Targets

Personal Details	
In what capacity are you responding to this consultation? -single choice reply-(compulsory)	As an industry, not-for-profit, or academic organisation (i.e. all other stakeholders)
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What type of organisation do you represent? -single choice reply-(compulsory)	Industry trade body/organisation
What is the name of your company or organisation? -open reply-(compulsory)	Extended Producer Responsibility Alliance (EXPRA)
In which country is your head office/organisation based? -single choice reply-(compulsory)	Belgium
<p>Your contribution will be published on the official website of the Targets Review Project and on Your Voice in Europe. Please use the dropdown list below to indicate if you want your contribution to remain anonymous.</p> <p>See Personal Data to view the Commission's guidelines regarding how your personal data is protected. Your data is subject to the following specific privacy statement:</p> <p><i>"Received contributions, together with the identity of the contributor, will be published on the Internet, unless the contributor objects to publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case the contribution may be published in anonymous form. Otherwise the contribution will not be published nor will, in principle, its content be taken into account."</i></p>	I give permission for my feedback to be published as it is
-single choice reply-(compulsory)	
Waste Framework Directive	
Do you want to respond to the questions on the Waste Framework Directive? If you select "No" you can move on to the next section of the consultation	Yes

which deals with the Landfill Directive. If you select “Yes” the questions relating to the Waste Framework Directive will open up below.

-single choice reply-(**compulsory**)

Are there any issues related to the targets in the Waste Framework Directive which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of waste management.

First issue: -open reply-(**optional**)

Separate collection: - The obligation to have separate collection from 2015 is not clearly defined. As such, it is interpreted differently by different Member States. For example, even the mixing of dry waste (including glass and paper) can be considered as separate collection. We therefore need a clear definition of separate collection.

Second issue: -open reply-(**optional**)

Target: Before any modification of the current 50% (by weight) reuse / recycling target for waste materials from households and certain other origins for 2020 is made, efforts need to focus on ensuring consistent and reliable reporting. The 2011 EC Decision on calculation methods leaves too much room for Member States to report about the fulfillment of the objectives in a non-harmonised manner. To achieve consistent reporting certain premises are needed, such as: a) Consistent and joint definitions to be used by all Member States. The same waste streams/materials have to be included in the numerator and denominator when calculating the fulfillment of objectives. b) It is necessary to increase the monitoring and implement control mechanisms to guarantee the accuracy and comparability of data. This requires efforts at both national and European level.

Third issue: -open reply-(**optional**)

Suggestions for Revision

1. Establish a single target and calculation method based only on the quantity of <i>municipal</i> waste collected. This would require that a consistent definition of municipal waste is used in all Member States. -single choice reply-(optional)	4
2. Extend the existing targets to include other specific waste streams beyond paper, metal, plastic and glass (for example, wood, food waste, textiles, and other materials in municipal waste). -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
3. Establish a single target and calculation method based only on the quantity of <i>household</i> waste collected. This would require that a consistent definition of household waste is used in all Member States. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
4. Adjust the targets so that biowaste is also included -single choice reply-(optional)	4
5. Set targets which reflect environmental weightings for materials (for example, through reference to greenhouse gas savings achieved through recycling). -single choice reply-(optional)	1 = poor idea, not worth consideration

6. Improve monitoring and validation of the reports submitted by Member States so that the consistency and reliability of data can be validated. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
7. Introduce requirements on businesses to sort a range of waste materials for recycling and composting / anaerobic digestion. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
8. The 70% recycling target should not include backfilling. -single choice reply-(optional)	4
9. Provide clear definitions of recycling and material recovery, and how these should be calculated for the C&D waste stream. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
10. Mandate sorting of wastes at C&D sites with a special attention to hazardous waste. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
11. Require facilities which sort 'mixed' C&D wastes to achieve a high level of recycling of the input materials. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration

Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.

First solution:

-open reply-(optional)

Second solution: -open reply-(optional)

Third solution: -open reply-(optional)

Landfill Directive

Do you want to respond to the questions on the Landfill Directive? If you select "No" you can move on to the next section of the consultation which deals with the Packaging and Packaging Waste Directive. If you select "Yes" the questions relating to the Landfill Directive will open up below.

-single choice reply-(compulsory)

Yes

Key Issues

Are there any issues related to the targets in the Landfill Directive which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of waste management.

First issue: -open reply-(optional)

Baseline years and deadlines to reach the targets should be the same for all Member States. The proper functioning of the internal market requires common rules and requirements to achieve a common level playing field. Therefore, prolonged deadlines for certain countries should end and it would be advisable to set up a feasible deadline for all Member States.

Second issue: -open reply-(optional)

Coherent and joint definitions are needed, which should be implemented by all Member States. This in order to ensure that past achievements are correctly reported, and that ambitious but realistic targets are set for the future.

Third issue: -open reply-(optional)

Zero landfill is not a realistic option as long as sufficient amounts of alternative treatments and infrastructure are not available . Nevertheless, all Member States have to focus efforts to minimize the quantity of waste going to landfill and apply the waste hierarchy as outlined in EU law. Additional efforts that could contribute to reduced landfilling include: -Increased surveillance and inspection over landfill sites. - Landfill taxes that reflect the true cost of this waste management option in order to enhance recycling and energy recovery.

Suggestions for Revision

1. Revise the targets so that they are set in such a way that they do not penalise countries whose economies are growing faster after starting from a lower base. -single choice reply-(optional)	2
2. Establish a legal obligation for reporting on 'municipal waste' and enforcing the use of a single definition of the term by all Member States. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
3. Standardise the approach to performance measurement and progress reporting. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
4. In Member States where no data exists for 1995, a more recent baseline year should be set with targets adjusted accordingly. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
5. Clarify when treated waste should be considered 'no longer biodegradable' from the perspective of the Landfill Directive. -single choice reply-(optional)	4
6. Further tighten existing targets (e.g. move progressively towards zero biodegradable municipal waste sent to landfill). -single choice reply-(optional)	2
7. Progressively include <u>all biodegradable</u> wastes (not just biodegradable wastes of municipal origin) within targets similar to the existing ones. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
8. Introduce targets for the progressive reduction in the quantity of residual waste irrespective of how it is subsequently managed	3 = moderately good idea, may be worth further consideration

(whether it is sent to incineration, MBT or landfill, or any other residual waste management method). -single choice reply-(optional)

9. Define 'pre-treatment' in an unambiguous manner so that the ban on landfilling waste that is not pre-treated is applied equally across all countries. -single choice reply-(optional)

5 = very good idea, definitely deserves further consideration

Are there any issues related to the targets in the Landfill Directive which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of waste management.

First solution:

-open reply-(optional)

Second solution: -open reply-(optional)

Third solution: -open reply-(optional)

Packaging and Packaging Waste Directive

Do you want to respond to the questions on the Packaging and Packaging Waste Directive? If you select "No" you can move on to the next section of the consultation which deals with the Roadmap to a Resource Efficient Europe. If you select "Yes" the questions relating to the Packaging and Packaging Waste Directive will open up below. -single choice reply-(compulsory)

Yes

Key Issues

Are there any issues related to the existing targets which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of, for example, markets for recycled packaging waste.

First issue: -open reply-(optional)

The Commission's 2012 study on The Use of Economic Instruments and Waste Management Performances found that a mix of economic instruments, including EPR, "prove to be the most effective tools in shifting waste streams to more sustainable paths". Making EPR mandatory in the PPWD could contribute to increasingly meeting the targets of the directive. EU guidelines on EPR with best practices would contribute to further improving the performances of EPR schemes. Among the key factors that EXPRA considers contribute to success are that EPR schemes: - Are non-for profit/profit-not for distribution - Are run by the obliged industry - Function in a transparent manner (including external and internal audits, controls etc.) - Ensure that ecodesign and waste prevention are promoted Questions such as whether anti-littering, food waste and packaging should be part of EPR should also be further considered.

Second issue: -open reply-(optional)

Significant efforts have been made by both public administrations and industry to improve and optimise packaging design and end of life management. It is important that any review of the Directive takes such efforts into consideration and ensures that the results achieved

are not undermined.

Third issue: -open reply-(optional)

It is important to work for further harmonisation regarding how to calculate the volume of packaging that enters the market across Member States, and ensure credible and sound data collection from all countries. Member States need to use harmonised and consistent definitions and calculation methods in order to ensure effective, sound and reliable reporting. Initiatives to contribute this could include: - Stricter rules and guidelines from the Commission on how to report - That the Commission or the European Environment Agency (EEA) further monitors compliance, and takes measures against Member States that fail to comply with set provisions.

Suggestions for Revision

<p>1. The methodology for calculating recycling rates should be standardised so that data (and hence performance levels) are comparable across Member States.</p> <p>-single choice reply-(optional)</p>	<p>5 = very good idea, definitely deserves further consideration</p>
<p>2. Remove from the Packaging Directive the target for packaging waste from municipal sources and include it into the Waste Framework Directive to ensure full consistency with the existing target on municipal waste recycling.</p> <p>-single choice reply-(optional)</p>	<p>1 = poor idea, not worth consideration</p>
<p>3. Bring the recycling targets for different materials closer together to ensure a more level playing field.</p> <p>-single choice reply-(optional)</p>	<p>3 = moderately good idea, may be worth further consideration</p>
<p>4. Incorporate “weightings” for materials recycled based on environmental benefits derived from recycling the material. -single choice reply-(optional)</p>	<p>2</p>
<p>5. The targets for some packaging materials could be subdivided into subcategories; for example, metals could be divided into non-ferrous and ferrous metals. The same could apply for plastic; for example, separate targets could be set for PET, LDPE, and HDPE. -single choice reply-(optional)</p>	<p>1 = poor idea, not worth consideration</p>
<p>6. Set specific targets for recycling of packaging waste from households to encourage further recycling of household packaging. -single choice reply-(optional)</p>	<p>3 = moderately good idea, may be worth further consideration</p>
<p>7. Remove from the Directive the maximum limit of 80% that stipulates how much packaging waste a Member State is allowed to recycle.</p> <p>-single choice reply-(optional)</p>	<p>3 = moderately good idea, may be worth further consideration</p>
<p>8. Introduce a target for prevention of packaging waste (the development of waste prevention targets is covered in a broader manner in a later section of this consultation). -single choice reply-(optional)</p>	<p>1 = poor idea, not worth consideration</p>

9. Adjust the definitions for reuse and recycling in the Packaging Directive to be consistent with those contained in the Waste Framework Directive. -single choice reply-(optional)	4
10. Expand the recycling target to include reuse, by allowing the reuse of packaging to be credited to the recycling target. -single choice reply-(optional)	2
11. Introduce targets for reuse for commercial transit packaging. -single choice reply-(optional)	2
12. Introduce targets for reuse for all packaging. -single choice reply-(optional)	1 = poor idea, not worth consideration
<p>Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.</p> <p>First solution: -open reply-(optional)</p>	
<p>EXPRA recommends that the Commission considers developing guidelines for infrastructure conditions that should be in place for the collection of household packaging.</p>	
<p>Second solution: -open reply-(optional)</p>	
<p>EXPRA would welcome further promotion of products with recycled content in the context of Green Public Procurement.</p>	
<p>Third solution: -open reply-(optional)</p>	
<p>EXPRA would be in favour of further assessing higher targets for packaging recycling given that before, the necessary conditions such as reliable statistics and data, harmonised and consistent definitions and calculation methods are fulfilled.</p>	
<p>The Commission is keen to encourage higher rates of recycling. It recognises, however, the need to maintain the quality of recycled material so that it can be used profitably and with losses kept to a minimum between the collection and recycling stages. Keeping in mind the need to maintain quality, please select from the dropdown lists below the highest level of recycling that you believe could reasonably be achieved for each of the materials. Below you will be asked the year by which you believe these targets could realistically be achieved (i.e. between 2020 and 2025).</p> <p>Paper and Cardboard: -single choice reply-(optional)</p>	
<p>Glass -single choice reply-(optional)</p>	
<p>Metals -single choice reply-(optional)</p>	
<p>Plastic: -single choice reply-(optional)</p>	
<p>Wood: -single choice reply-(optional)</p>	
<p>All Packaging -single choice reply-(optional)</p>	
<p>Other Material (please specify below) -single</p>	

choice reply-(optional)	
If you have entered a recycling rate for "Other Material" above, please state what material this is for: -open reply-(optional)	
Paper and Cardboard -single choice reply-(optional)	
Glass -single choice reply-(optional)	
Metals -single choice reply-(optional)	
Plastic -single choice reply-(optional)	
Wood -single choice reply-(optional)	
All Packaging -single choice reply-(optional)	
Other material (as defined above) -single choice reply-(optional)	

Consultation Regarding the Aspirations of the Roadmap to a Resource Efficient Europe

Waste Prevention

Do you agree with the principle that there should be targets for waste prevention? -single choice reply-(compulsory)	No
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Preparation for Reuse

Do you agree with the principle that there should be separate targets for preparation for reuse? -single choice reply-(compulsory)	No
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Recycling Rates

Do you agree with the view that recycling rates should be increased and/or be made to include more materials/waste streams? -single choice reply-(compulsory)	No
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Limiting Incineration of Waste Which Might Otherwise be Recycled

Do you agree with the view that a maximum level should be set for the amount of waste that can be incinerated for different waste streams (e.g. household waste and/or commercial waste)? -single choice reply-(compulsory)	No
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Landfill

1. Landfilling should be limited to residues from a specified range (to be determined) of waste treatment operations. -single choice reply-(optional)	4
2. Landfilling should be limited to a certain percentage of waste generated (for instance 5%) from a particular date. -single choice reply-	4

(optional)	
3. Landfilling of recyclable/compostable waste (to be defined) should be banned. -single choice reply-(optional)	4
4. Landfilling of waste that is combustible should be banned. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
5. Landfilling of waste should be banned if it has not been pre-treated to a level where the potential to lead to methane emissions from landfills has been virtually eliminated. -single choice reply-(optional)	4
<p>Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.</p> <p>First solution: -open reply-(optional)</p> <p>Second solution: -open reply-(optional)</p> <p>Third solution: -open reply-(optional)</p>	
In order to take into account the large differences between Member States' current levels of landfilling, would you agree that an approach which sets targets that take account of the existing situation in each Member State is appropriate (for instance by fixing a landfilling reduction percentage per year)? -single choice reply-(optional)	No
<h2>Targets as a Tool in Waste Legislation</h2>	
Do you believe the Commission should go further than simply setting targets for Member States to achieve? If you select "No" there are no more questions and you can submit your response by clicking on the button below. -single choice reply-(compulsory)	Yes
<h2>Suggestions for Change</h2>	
1. Develop guidance on the implementation of effective producer responsibility schemes to improve the transparency of the systems as well as their cost effectiveness. -single choice reply-(optional)	Yes

2. Develop guidance on the proper implementation of the waste hierarchy. -single choice reply-(optional)	Yes
3. Ensure a closer monitoring by the Commission of progress accomplished by Member States in applying the waste hierarchy. For those Member States moving too slowly to meet the legally binding targets, develop mechanisms to ensure that key instruments such as a combination of economic and legal instruments (landfill/incineration taxes/bans, EPR schemes, incentives for municipalities and citizens, etc.) are applied. -single choice reply-(optional)	Yes
4. Develop criteria for municipalities to implement services of a minimum standard to enable sorting of a range of waste materials for recycling and composting / anaerobic digestion. -single choice reply-(optional)	No
5. Improve the consistency of the definitions used in the legislation and ensure proper monitoring by improved data collection and systematic reliability and validity checks of data reported. -single choice reply-(optional)	Yes

Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.

First solution:

-open reply-(optional)

Second solution:

-open reply-(optional)

Third solution:

-open reply-(optional)

General Comments

Would you like to add any general comments? If so, please use the space provided below.

-open reply-(optional)

1. Regarding packaging, EXPRA is in favour of keeping specific requirements in the PPWD, as it is necessary to have clearly allocated the obligations and responsibilities corresponding to waste streams. The Waste Framework Directive should remain the umbrella Directive but specific requirements for each waste stream should be individually regulated and the PPWD targets should not be incorporated within the WFD targets. 2. It is crucial to analyse the Member States' existing performance towards fulfilling EU waste targets. Clarification and harmonisation of terminology and concepts used, together with standardised calculation methods and data collection procedures are key factors in order to understand whether the current targets are met and importantly to compare data

accurately. In this context, it is also important to identify best practices from top performing Member States, as well as reasons for which others are lagging behind. Ways to improve this should also be identified, as well as cost benefit analyses for the measures identified. 3. EXPRA would be in favour of further assessing higher targets for different waste streams, if the necessary conditions such as harmonised and consistent definitions, data collection techniques and calculation methods are in place first. 4. When analysing the different targets, it is necessary to carry out sound technical, environmental, social and economic assessment of the impacts to reach them for the different waste/streams/materials, also taking into account the progress already made by some of them and the cost-benefit balance of setting more ambitious requirements. 5. Any proposal for targets (recycling, landfill diversion etc) should be equal for all Member States. 6. It is currently not possible to fully compare the quality of recycling results between Member States. Therefore, additional measures could be taken to align the level of quality of Member State reports to the European Commission. This may, for some Member States, lead to a change in the reported recycling results. This possible change may, in turn, impose a different position vis-a-vis the current recycling targets. This position can however not be determined, as this would require methodological changes to be made first. As a result, it is premature to discuss the change of recycling targets. We do not agree with an approach to set higher targets when it is not certain if these targets can realistically be met by each Member State.