

Karmenu Vella
Commisisoner
European Commission,
Rue de la Loi / Wetstraat 200
1049 Brussels

CC: President Juncker, Vice President Timmermans

02 December 2014

Dear Commissioner Vella,

As Managing Director of the Extended Producer Responsibility Alliance (EXPRA), I wish to convey to you my congratulations on your new role as Commissioner for Environment, Maritime Affairs and Fisheries. EXPRA would also like to bring to your attention key aspects of the Waste Target Review under the Circular Economy Package, which requires the new Commission's careful consideration.

EXPRA serves as the alliance for non-profit packaging and packaging waste recovery and recycling systems that are owned by obliged industry. Over the past 20 years, our members across 20 countries thereof 15 EU Member States have co-organised the collection, sorting and recycling of used packaging (with a focus on household packaging) on behalf of industry, to fulfil their legal take back and recycling obligations, serving over 200 million inhabitants and recycling over 14.5 Million tons of packaging per year.

We fully support EU action to drive the Circular Economy and the need to increase recycling towards 2030. However, we consider that a sound-based feasibility study should be conducted prior to setting long-term targets after 2020.

EXPRA moreover believes that further work is still needed with regards to harmonising calculation methods for recycling rates as well as to developing a comprehensive reporting methodology that yields reliable waste management statistics in Europe. This will ultimately ensure that the new targets are socially, economically and environmentally sustainable.

We therefore call on the new Commission to assess in further detail the proposal for amending the Waste Framework and the Packaging and Packaging Waste Directives, with a focus on target levels, recycling measurement and provisions regarding Extended Producer Responsibility (EPR).

We would be delighted to meet with you at your earliest convenience to discuss alternative solutions, and share our views on how EPR, from our own experience, can maximise its contribution to the transition towards a circular economy.

In the meantime, on behalf of all EXPRA members, I wish you the best of success and a fruitful term in office.

Yours Sincerely,



Joachim Quoden
Managing Director
EXPRA aisbl/ivzw

Avenue Olympiades 2
1140 Brussels (Evere)
Belgium