

PU Europe Reaction To The Consultation On The Review Of The European Waste Management Targets

Waste Framework Directive

Key Issues

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?

First issue:

The focus of the Waste Framework Directive should be placed on optimising resource use over the life cycle of end products instead of pure targets. For example, in certain cases, high-efficiency energy recovery might be the economically and environmentally most viable solution. Excluding this option from the 70% target as set by article 11(2)b is therefore not logical.

Second issue:

Figure 1 of this questionnaire shows very significant differences in recycling / levels. Neither modifying the 70% target for C&D waste nor infringement procedures against certain Member States will change this. Waste management is a complex matter with often uncertain economics and involving a large number of different stakeholders. Member States should be encouraged to set up sector forums bringing together regulators, producers and waste management companies in order to identify stumbling blocks to higher recycling / recovery rates, identify solutions and set objectives.

Third issue:

A number of Member States do not dispose of schemes and the infrastructure to collect, sort and recover and/or recycle construction waste. Promoting the development of collection and sorting schemes and the competitiveness of recycling industries is crucial to increase recycling levels and minimise landfill of useful resources.

Suggestions for Revision

	1 = poor idea, not worth consideration	2	3 = moderately good idea, may be worth further consideration	4	5 = very good idea, definitely deserves further consideration
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.			X		
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).			X		

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.		X			
4. Adjust the targets so that biowaste is also included			X		
5. Set targets which reflect environmental weightings for materials (for example, through reference to greenhouse gas savings achieved through recycling).	X				
6. Improve monitoring and validation of the reports submitted by Member States so that the consistency and reliability of data can be validated.			X		
7. Introduce requirements on businesses to sort a range of waste materials for recycling and composting / anaerobic digestion.		X			
8. The 70% recycling target should not include backfilling.	X				
9. Provide clear definitions of recycling and material recovery, and how these should be calculated for the C&D waste stream.					X
10. Mandate sorting of wastes at C&D sites with a special attention to hazardous waste.					X
11. Require facilities which sort 'mixed' C&D wastes to achieve a high level of recycling of the input materials.			X		

Are there any other proposals in addition to the above that you feel deserve serious consideration?

First solution:

Today's C&D waste was produced in the last century, sometimes even before. Policy actions dealing with construction products manufactured today will only have results when dismantling the works, in more than fifty years from now.

The coherence between the different policies and their long-term impacts are essential. The effect of the existing waste policies is dependent on the impacts of other regulations that directly or indirectly touch recycling, like REACH, dangerous substances regulations, and standards. The removal of these barriers on the basis of the technical and scientific knowledge is crucial to enhance the use of recycled materials.

Second solution:

High-efficiency energy recovery should be included in the 70% target as set in article 11 (2) b, if life cycle analyses show that the environmental impact stemming from this solution is not higher than those caused by recycling / recovery solutions.

Third solution:

Construction products used in small quantities in buildings lead to unstable and low-volume waste streams, which affects the economic viability of recycling / recovery. Therefore, a real Internal Market for C&D waste is required so that existing waste treatment facilities can realise economies of scale. Furthermore, research is needed to identify ways of combined waste collection schemes.

Landfill Directive

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?

First issue:

Valuable waste such as plastics should be diverted from landfill to the largest possible extent. A simple landfill ban for plastics would however not serve the purpose in the case of demolition waste. There may be problems in separating all different plastic waste materials on demolition sites. Materials used in small quantities or composite products may be unable to set up economically and environmentally sound waste collection and recycling schemes. Several Member States (A, B, D, DK, NL, S) show that landfill bans are possible when different waste treatment options are put in place.

List of suggestions

	1 = poor idea, not worth consideration	2	3 = moderately good idea, may be worth further consideration	4	5 = very good idea, definitely deserves further consideration
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.			X		
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.				X	
3. Standardise the approach to performance measurement and progress reporting.				X	
4. In Member States where no data exists for 1995, a more recent baseline year should be set with targets adjusted accordingly.			X		
5. Clarify when treated waste should be considered 'no longer biodegradable' from the perspective of the Landfill Directive.			X		
6. Further tighten existing targets (e.g. move progressively towards zero biodegradable municipal waste sent to landfill).			X		
7. Progressively include <i>all biodegradable</i> wastes (not just biodegradable wastes of municipal origin) within targets similar to the existing ones.			X		
8. Introduce targets for the progressive reduction in the quantity of residual waste irrespective of how it is subsequently managed (whether it is sent to incineration, MBT or landfill, or any other residual waste management method).		X			
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				X	

Are there any solutions related to the targets in the Landfill Directive which you feel are important and should be added to those listed above?

First solution:

Setting up a dialogue between Member States to exchange experience in implementing waste policies. It would be particularly important that Member States that have introduced landfill bans (for example for plastics) explain the mix of tools they have put in place to make this work.

Packaging and Packaging Waste Directive

Are there any issues related to the existing targets which you feel are important and should be added to those listed above?

First issue:

It is not logical to set a target limited to recycling. The target should include reuse, recycling and recovery to take account of widely-spread industry practices and environmentally sound solutions. This multiplication of sub-targets is not supported as it removes any flexibility from the market / Member States, and increases the complexity of monitoring / reporting.

Second issue:

The packaging of construction products does not have the intention to look nice and attract buyers' attention. Its exclusive purpose is to protect the product and ensure the health and safety of construction workers. As there is no marketing aspect involved, it is a cost to producers and therefore already limited to a minimum. Imposing any further reduction in packaging material use is therefore not acceptable.

Third issue:

The packaging of construction products is also a support for the legislative requirements as set in the Construction Products Regulation, since it can contain the CE-marking of the product and recommendations for safe handling.

List of suggestions

	1 = poor idea, not worth consideration	2	3 = moderately good idea, may be worth further consideration	4	5 = very good idea, definitely deserves further consideration
1. The methodology for calculating recycling rates should be standardised so that data (and hence performance levels) are comparable across Member States.				X	
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.				X	
3. Bring the recycling targets for different materials closer together to ensure a more level playing field.	X				
4. Incorporate "weightings" for materials recycled based on environmental benefits derived from recycling the material.		X			
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.	X				
6. Set specific targets for recycling of packaging waste from households to encourage further recycling of household packaging.	No response				
7. Remove from the Directive the maximum limit of 80% that stipulates how much packaging waste a Member State is allowed to recycle.				X	
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).		X			
9. Adjust the definitions for reuse and recycling in the Packaging Directive to be consistent with those contained in the Waste Framework Directive.					X
10. Expand the recycling target to include reuse, by allowing the reuse of packaging to be credited to the recycling target.					X
11. Introduce targets for reuse for commercial transit packaging.	X				
12. Introduce targets for reuse for all packaging.	X				

Are there any other proposals in addition to the above that you feel deserve serious consideration?

First solution:

Reuse and recovery of packaging can be an alternative to recycling. These options are already in use and should be considered further.

Second solution:

The number of targets should be reduced to a single one comprising reuse, recycling and recovery of packaging waste. This would reduce regulatory complexity, increase flexibility and lead to similar environmental benefits.

Third solution:

Member States should set up construction packaging waste forums to establish ways to increase reuse, recycling and recovery of packaging waste. Solutions may require investments in collection, transport and treatment infrastructures which will not be possible without a coherent approach involving all stakeholders including public authorities.

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).

Given the differences in national building traditions and design solutions, leading to different quantities in waste streams per material, and the complexity of implementation and monitoring, PU Europe rejects material-specific targets.

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?

No.

Preparation for Reuse

Do you agree with the principle that there should be separate targets for preparation for reuse?

No. Adding more targets would add to the complexity of implementation and surveillance. Whether or not a construction product can be reused after a use phase of many decades depends on many factors beyond the control of producers / contractors. There are also problems in defining “reuse” for construction products. Does a product have to be removed from one building and re-installed in another one? Or is it enough that a product stays in the building when the component it is a part of is renovated?

Recycling Rates

Do you agree with the view that recycling rates should be increased and/or be made to include more materials/waste streams?

No.

In order to take into account the large differences between Member States' current recycling levels, would you agree that an approach which sets targets relative to the existing situation in each Member State (for instance increase of recycling rates by X% per year) is appropriate?

Yes.

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)?

No.

Landfill

	1 = poor idea, not worth consideration	2	3 = moderately good idea, may be worth further consideration	4	5 = very good idea, definitely deserves further consideration
1. Landfilling should be limited to residues from a specified range (to be determined) of waste treatment operations.	X				
2. Landfilling should be limited to a certain percentage of waste generated (for instance 5%) from a particular date.	X				
3. Landfilling of recyclable/compostable waste (to be defined) should be banned.		X			
4. Landfilling of waste that is combustible should be banned			X		
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.			X		

Are there any other proposals in addition to the above that you feel deserve serious consideration?

First solution:

A simple landfill ban will not resolve the problem. Landfilling of recyclable / compostable and combustible waste should be banned as soon as Member States have put in place alternative end-of-life routes (recycling infrastructure, waste-to-energy plants etc.).

Second solution:

Waste on C&D sites should be segregated at least in its mineral and organic fractions. This is a prerequisite to recycling / reuse / recovery.

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)?

Yes.

Targets as a Tool in Waste Legislation

Do you believe the Commission should go further than simply setting targets for Member States to achieve?

Yes.

Going beyond targets

Please indicate whether you believe the following would be appropriate.

	Yes	No
1. Develop guidance on the implementation of effective producer responsibility schemes to improve the transparency of the systems as well as their cost effectiveness		X
2. Develop guidance on the proper implementation of the waste hierarchy	X	
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	X	
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		X
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	X	

Are there any other proposals in addition to the above that you feel deserve serious consideration?

First solution:

Avoid multiple target setting and limit to one overarching reuse, recycling, recovery target so as to reduce compliance complexity and leave maximum flexibility to supply chains and Member States.

Second solution:

Putting the optimisation of resource use on top of the agenda instead of setting too many and rigid targets. This requires a life cycle approach to resources used in products, use phase performance and different end-of-life scenarios. Recycling and recovery are also industrial processes with environmental impacts and primary resource consumption (e.g. transport and transformation).

General Comments

Would you like to add any general comments?

- The EU waste policy must be LCA-based. The focus should not be placed on meeting simple recycling targets, but on optimising resource use. A product may not be recyclable but offer a superior performance and longer life cycle than a competitive (recyclable) product. Only a holistic view based on a life cycle analysis can establish which of the two products is more resource-efficient.
- The standards developed by CEN/TC 350 regarding sustainable buildings provide tools to assess the environmental and economic performance of material choices for specific building design solutions. Construction product-related data are provided through Environmental Product Declarations (EPDs). These EPDs can include information on the environmental impacts of different end-of-life solutions (recycling, incineration, landfill etc.) and therefore provide the above-mentioned holistic view.
- Recyclability as such is theoretically not a major issue for most construction products. However, the term has two dimensions, each of which may reduce recycling options.
 - Technical recyclability: Even when technologies are available, unknown product composition after many decades of use and in-use contamination may make recycling impossible in practice.
 - Economic recyclability: For low-volume construction products, it may be extremely difficult to set up economically viable waste collection and recycling infrastructures. Substantial fluctuations in prices for virgin materials add to the economic uncertainties of products made from recycled materials.
- EU rules should clearly distinguish between short-lived packaging waste and C&D waste. The latter may have been in use for 50, 100 or more years with sometimes unknown composition and in-use contamination. This may have an impact on end-of-life solutions.
- More information on PU and waste management is available in the leaflet [“Waste management and polyurethane insulation in the context of resource efficiency”](#).

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