

Waste Framework Directive

The targets set out in Article 11(2) of the Waste Framework Directive are:

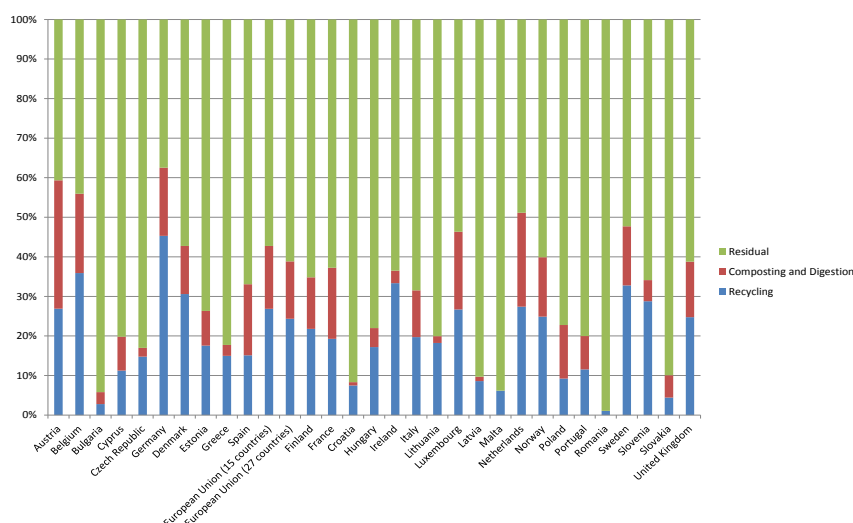
- a) by 2020, the preparing for re-use and the recycling of waste materials such as at least paper, metal, plastic and glass from households and possibly from other origins as far as these waste streams are similar to waste from households, shall be increased to a minimum of overall 50 % by weight.
- b) by 2020, the preparing for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials, of non-hazardous construction and demolition waste excluding naturally occurring material defined in category 17 05 04 in the list of waste shall be increased to a minimum of 70 % by weight.

Article 11 stipulates that by the end of 2014 at the latest, the Commission should examine these targets with a view to, if necessary, reinforcing the targets and considering the setting of targets for other waste streams. Pursuant to Article 9, the Commission should propose, where appropriate, waste prevention and decoupling objectives for 2020. Waste prevention targets are discussed in the section of the consultation concerning the Roadmap on Resource Efficiency (see below).

In an effort to improve quality the Waste Framework Directive has called for the introduction of separate collections. In this regard, Article 10(2) of the Directive states that, *‘Waste shall be collected separately if technically, environmentally and economically practicable and shall not be mixed with other waste or other material with different properties’*. Article 11(1) goes on to say that, *‘Subject to Article 10(2), by 2015 separate collection shall be set up for at least the following: paper, metal, plastic and glass’*.

Figure 1 shows that the combined rate for recycling and composting / digestion of municipal waste ranged from around 5% to more than 60% in different EU Member States (it should be noted that there are some ongoing issues associated with the way this data is reported).

Figure 1: Recycling and Composting of Municipal Waste by Member State (2011 Data)



Source: Eurostat

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

☐ Yes/☐ No

1.1 Key Issues

A number of key issues have been identified in relation to the above targets. These issues are presented in no particular order in the list below.

Targets on Municipal Waste, Article 11 (2) a

1. The targets for preparation for reuse and recycling set out in Article 11(2) of the Waste Framework Directive can be met in different ways. The four methods outlined in the [Commission Decision on calculation methods \(2011/753/EU\)](#) are not equivalent.
2. The easiest route to compliance (of the four methods mentioned above) implies only a small additional effort relative to what is already required under the Packaging Directive. This weakens the significance of the targets.
3. The target waste stream is defined as being waste from *'households and possibly from other origins as far as these waste streams are similar to waste from households'*. This leaves too much room for interpretation and makes the performance against the targets non-comparable.
4. There is some ambiguity about the materials which can be included as counting towards the target under the different calculation methods. This is unhelpful in terms of setting a target against which the performance of all Member States can be compared.
5. There are already concerns regarding the quality of that material which is collected for recycling. This has to be considered in any change to the targets.
6. The [Commission Decision on calculation methods \(2011/753/EU\)](#) lacks appropriate proposals on how to measure preparation for reuse.
7. According to reported data, some Member States have already met and exceeded the recycling targets set out in the Waste Framework Directive and the Packaging Directive.

Construction & Demolition Waste Targets, Article 11 (2) b

8. The [Commission Decision on calculation methods \(2011/753/EU\)](#) provides a clear proposal on how to calculate the recovery rate for construction and demolition (C&D) waste set out in Article 11(2)b of the Waste Framework Directive. However, no reports have yet been submitted by Member States so it is not yet clear what approach different countries will take in this reporting and how they are performing relative to the target.
9. The existing target in the Directive includes other material recovery including backfilling operations. These operations will be complex to measure and calculate and their environmental impact will be uncertain.
10. Recycling and material recovery are poorly differentiated in the Directive.

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.

1. Additional issue

FEAD welcomes the review of targets and considers that the following points are key:

1. The development of a long-term vision for waste management (i.e. even less landfilling and even more recycling) beyond 2020 would provide private waste management operators with the legal certainty to plan the necessary investments ahead. Any review of waste related targets needs to be based upon an ambitious but progressive approach as well as a proper impact assessment (economic, social and environment).
2. Better enforcement of the waste *acquis* to close the gap of existing disparities across Member States
3. When reviewing the targets, harmonised definitions, standardized reporting methodologies and reliable statistics shall be considered as key elements
4. The review should also reflect the possibility of setting targets for commercial and industrial waste
5. Producers should be made responsible further in the context of ecodesign. In such circumstances, producers themselves would be stimulated to conceive less hazardous products which are easier to dismantle and can be recycled in a qualitative and cost-efficient way.

2. Additional issue

FEAD members consider that getting waste and resource efficiency policies right is very important: attainment of a circular economy will depend on private sector investment in infrastructure. This investment is driven not only by targets but by policies as well, and in particular by ensuring full enforcement of existing regulations.

Furthermore, better access to Secondary Raw Materials (SRM) which results from proper waste treatment as well as renewable energies – amongst which, energy from waste – is an efficient solution for enhanced competitiveness and growth that ought to be fostered. The supply of high quality SRMs is a pre-condition to making recycled products a more attractive prospect in the market place. To this end, it is crucial to increase the demand for SRMs on a long-term basis and to promote sustainable resource efficiency.

Another approach to promote greater recycling could be a wider spread of different economic instruments (e.g. extended producer responsibility, pay as you throw schemes, etc.) based on a cost-benefit analysis. This would secure the financing aspect of developing new infrastructures, as well as an improvement of the product design in order to boost a high quality recycling that enables a circular economy.

3. Additional issue

Particular attention must be paid to: state of the art, planning tools for the development of new installations, improvement of collection rates, and/or improvement of sorting out after collection.

1.2 Suggestions for Revision

This section considers options for changes to the Waste Framework Directive. A number of suggested options for changes to the Directive targets are listed below, in no particular order. If you feel that there are possible solutions which are missing from the list, and which you feel should be given careful consideration, you may identify up to three additional solutions which you feel are important in the free text boxes below. Please only identify options which you strongly support.

For each solution that has been identified please give a score, on a scale of 1 to 5, to clearly demonstrate your preference for the solution proposed. For example, give a score of 1 to any options you feel are not worth further consideration and a score of 5 to options you believe are extremely good ideas and should be given serious consideration (this is not a ranking exercise so you may give the same scores to more than one option).

A = poor idea, not worth consideration

C = moderately good idea, may be worth further consideration

E = very good idea, definitely deserves further consideration

Targets on Municipal Waste, Article 11 (2) a

1. Establish a single target and calculation method based only on the quantity of municipal waste collected. This would require that a consistent definition of municipal waste is used in all Member States. **B**
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). **B**
3. Establish a single target and calculation method based only on the quantity of household waste collected. This would require that a consistent definition of household waste is used in all Member States. **D**
4. Adjust the targets so that biowaste is also included. **A**
5. Set targets which reflect environmental weightings for materials (for example, through reference to greenhouse gas savings achieved through recycling). **C**
6. Improve monitoring and validation of the reports submitted by Member States so that the consistency and reliability of data can be validated. **E**
7. Introduce requirements on businesses to sort a range of waste materials for recycling and composting / anaerobic digestion. **D**

Construction & Demolition Waste Targets, Article 11 (2) b

8. The 70% recycling target should not include backfilling. **B**
9. Provide clear definitions of recycling and material recovery, and how these should be calculated for the C&D waste stream. **D**
10. Mandate sorting of wastes at C&D sites with a special attention to hazardous waste. **D**
11. Require facilities which sort 'mixed' C&D wastes to achieve a high level of recycling of the input materials. **D**

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.

1. Additional solution

In order to boost recycling and to ensure both higher volumes of waste being recycled and a high quality of input material, and in the context of policy proposals to reduce landfill and incineration gradually, it is important to encourage separate collection of biowaste and to ensure separate collection of dry recyclates, including co-mingled collection, where technically, environmentally and economically feasible. Setting up more systems for separate collection would come at increased costs for citizens and local authorities, which need to be paid. The profits from the secondary raw materials that can be gained through more separate collection cannot always compensate for these costs. Hence, the final decision on collection schemes must be kept at local level. Separate collection of bio-waste should be developed in priority for massive flows (commercial or industrial) rather than for smaller domestic flows.

2. Additional solution

Having one calculation method for all the Member States must be a priority, as it would be useful to clarify and harmonise the EU's existing targets for household and similar waste, but only if this resulted in a workable solution for all Member States which is measurable and comparable.

3. Additional solution

Today, household waste and waste from similar streams have different meanings, depending on the Member State. Therefore, the EC should consider clearly separating household waste from commercial and industrial waste in the List of Waste. Beyond 2020, a single recycling target for household waste as well as a single target for commercial and industrial waste should be set. .