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**FEAD POSITION ON THE  
THEMATIC STRATEGY ON WASTE PREVENTION AND RECYCLING**  
of 21 December 2005 [COM (2005) 666]  
**AND IN VIEW OF THE DEVELOPMENT OF A GENERAL WASTE MANAGEMENT POLICY**  
*April 2006*

FEAD is the European Federation which represents the European waste management industry. Our members are national waste management associations, which have an approximate 60% share in the household waste market and handle more than 90% of industrial and commercial waste in Europe, with a collective annual turnover of € 50 billion.

We have 18 members from 17 EU Member States and Norway. FEAD represents companies with activities in all forms of waste management. These companies employ over 300 000 people who operate around 3 000 controlled landfills, 1 350 recycling and sorting centres, 1 000 composting sites and 350 incinerators and play an important role in the determination of the best environmental option for waste management problems.

### **Introduction**

FEAD welcomes the development of a strategy for the future EU waste policy but calls for improvements. The Strategy was meant to provide a framework for the future development of the EU recycling policy. The strategy did not succeed to deliver such a framework, limiting itself to political statements on recycling without concrete proposals for their implementation. At the same time, the Strategy is not limited to recycling, as the title would suppose, but deals with waste management in general, going far beyond what was supposed to be a recycling strategy. However, it fails to develop a general waste policy in an appropriate manner. FEAD considers that both a Strategy on Waste Prevention and Recycling and a Waste Management policy are needed.

FEAD's position on this document is therefore structured in two parts: Part I elaborates the necessary instruments for a true Thematic Strategy on Waste Prevention and Recycling, and Part II comments on key issues putting them in a broader context of an integrated Waste Management Policy. Hereby, FEAD refers to its position paper on the Revision of the Waste Framework Directive (WFD).

## Summary

### I - Thematic Strategy on the prevention and recycling of waste

- A Thematic Strategy on the prevention and recycling of waste would deliver a **positive contribution for the future EU waste policy**. It has to be the objective of this policy to reduce the overall negative environmental impact of resource use. Proposals which aim towards promoting recycling, in a move towards more sustainable resource use practices, are the right means to achieve this goal. The way, the Commission tackles this project is insufficient. Undeveloped ideas are discussed while a **road map with concrete implementation measures and instruments is missing**.
- Life-cycle assessments can support a sustainable waste policy. However, more information on the implementation of the life-cycle approach is needed. It should **only complement** established EU waste policy instruments.
- Waste prevention programmes have up to now failed to be an effective tool for waste prevention. A proper implementation of the **concept of producer responsibility** (or manufacturer responsibility) is a much stronger instrument to prevent waste than waste prevention programmes set up at Member State level. Producer responsibility should therefore continue to be an essential feature of Community waste legislation.
- The creation of **EU standards for recycling activities and recycled materials** would ensure a high level of environmental protection and support the development of a European market for recycling. In this regard a directive which sets **general rules for recycling activities** should be made. Furthermore, the **IPPC Directive** should be extended to all waste management installations.
- Alongside other instruments can be used to promote markets for recycled materials, for example promotion of green procurement or education and tax incentives. **Separate collection** can be a vital tool to achieve increased quantities of recyclables and high quality standards on waste for recycling. These are all very important instruments to allow the sustainable development of recycling in Europe.
- The need for a dedicated **directive on the biological treatment of waste** and organic matter recycling exists. A harmonised and strategic European approach on the biological treatment of waste is an important contribution to environmental protection and the sustainable use of resources.
- The full implementation of existing waste legislation and the equal enforcement across all Member States should be a primary objective in order to achieve a level playing-field in Europe. The proper **implementation of the Landfill Directive** will have positive effects on recovery as a whole.
- Waste legislation needs modernisation and simplification to deliver a clear regulatory framework for waste management activities. However, regulation provides control and guarantees a high level of environmental and health protection. This level should **not be reduced** by current Commission initiatives.

## Summary

### II - About a Waste Management Policy

- The Thematic Strategy on Waste Prevention and Recycling goes far beyond its scope as it addresses the whole waste management sector. FEAD supports an **integrated approach** to waste management and calls for a **strategy dedicated to the future Waste Management Policy** which would have provided a more coherent basis for the Revision of the WFD.
- FEAD requests that the measures recommended in the Thematic Strategy are founded on a precise **analysis of all waste flows**.
- FEAD is in favour of a modernisation and a simplification of the existing legislation. However, this **must not weaken the environmental protection** supported by the current legislation. FEAD is therefore in favour of maintaining a separate Directive on Hazardous Waste and on Waste Oils and calls for Directives on other waste treatments such as biological treatment and recycling.
- FEAD calls for waste management policy to clearly address the measures taken in order to satisfy the principles stipulated in Article 174 of the EC Treaty (Objective: protection of the quality of the environment and of human health and rational utilisation of natural resources).
- FEAD welcomes that basic guidelines for waste management remain simple and based on a **three-step waste hierarchy** (waste prevention - recovery - disposal). No recovery operation can be said to be better than others. Pushing too far one option is usually detrimental to the economic and environmental equilibrium of the whole.
- FEAD suggests that the Commission develops an open, transparent and **scientific approach on the implementation of the life-cycle thinking** before applying this principle in the EU waste policy.
- FEAD calls to maintain proven principles and instruments such as the **'polluter pays' principle** or the **extended producer's responsibility** and to make sure that the waste management costs are borne by the waste generators and not by the de-polluters.
- FEAD welcomes the introduction of a criterion based on energy efficiency but advocates a **simplified formula**. The threshold should be based on the energy efficiency performances which are achievable when using the BATs as recommended in the Thematic Strategy and its impact assessment.
- For the sake of environmental protection, the procedure to clarify the **end-of-waste status** must be strictly controlled.
- FEAD considers that the **use of economic instruments must be monitored** so that they do neither distort competition nor European objectives.
- The **comitology procedure** is widely referred to in the WFD proposal. This procedure should be limited to technical developments. Political issues should undergo co-decision.

# I. Thematic Strategy on the Prevention and Recycling of Waste

FEAD welcomes a strategy focusing on recycling. Waste policy has to be an integrated part of resource savings. Promoting recycling and recovery of waste increases the resource efficiency of the European economy and reduces the negative environmental impact of use of natural resources. The environmentally sound recovery of waste is an important element of a sustainable resource policy. However, the **Communication does not work out the strategy** to achieve this.

In the 6<sup>th</sup> **Community Environment Action Programme** the European Parliament and the Council gave the Commission the task to develop a thematic strategy on waste recycling, including *inter alia* measures aimed at ensuring source separation, the collection and recycling of priority waste streams; further development of producer (or manufacturer) responsibility, development and transfer of environmentally sound waste recycling and treatment technology.

The Commission Communication is not only missing these elements, other instruments necessary for the development of a sustainable recycling market have not been developed either.

Whilst the Strategy needs to aim above all to **promote secondary material recovery** and reduce waste production, waste policy should **not preclude other forms of recovery**, including energy recovery, which should be equally encouraged when they represent an environmental benefit at an acceptable cost. FEAD maintains that it is an **integrated approach to waste management**, which will provide the most sustainable resource management practices. Nevertheless, in the long term we support the European Parliament in its call to gradually **reduce the quantities of waste for disposal to a minimum**.

## 1 Content of the Strategy

In its strategy the Commission expresses its concern about the environmental impact of waste. Waste is seen as an environmental, social and economic issue for all modern economies. The Commission therefore considers waste management as a central pillar of EU environment policy. In the communication certain shortcomings have been identified: a lack of implementation of existing waste legislation, insufficient exploitation of the potential for waste prevention and recycling and an inadequate reflection of the emerging knowledge about the environmental impacts caused by use of natural resources in waste policy.

The Commission regards the way resources are used as intimately related to waste generation and management. Recovering materials and energy embedded in waste are seen as an effective tool to use resources in a better way. Waste policies should aim at reducing the overall environmental impacts associated with the use of resources. As a long-term goal the EU should seek to avoid waste or use it as a resource. In achieving the aim of moving up the hierarchy, away from disposal and more and more to recycling and recovery, the Commission sees incineration – operated with adequate energy efficiency rates - as a useful way to recover energy contained in waste.

The Communication also raises the issue of emissions. Waste management generates emissions to air, water and soil as well as noise and other nuisances. According to the Commission further diversion of municipal waste from landfill to composting, recycling and energy recovery could produce additional reductions in greenhouse gas emissions ranging from 40 to over 100 Mt CO<sub>2</sub> equivalent per year.

Finally the Commission stipulates that Europe's drive to deal with waste in environmentally sound ways generates jobs and business opportunities. The EU waste management and recycling

sector has a high growth rate and an estimated turnover of over €100 billion per year. It is labour intensive and provides between 1.2 and 1.5 million jobs. The recycling industry supplies increasing amounts of resources to manufacturing industry: at least 50% of the paper and steel, 43% of the glass and 40% of the non-ferrous metal produced in the EU are currently made from recycled materials.

Therefore, the Commission sees as the strategy's key objective to make Europe a recycling society that seeks to use waste, where it cannot be prevented, as a resource. The future EU policy on waste should therefore focus on

- Reduce the environmental impacts of waste
- Promote the prevention of waste
- Strengthen recycling activities by setting standards
- Further development of the EU's recycling policy
- Modernise and simplify waste legislation
- Improve implementation

FEAD agrees in principal with these findings, repeats however that the Communication does not address these issues in the appropriate manner.

## 2 Reduce the environmental impacts of waste

FEAD welcomes a move towards more sustainable resource use practice by focusing waste policy on the key environmental impacts. The **life-cycle approach** examines environmental impacts at each stage in the life of a resource or product with the aim of minimising the overall impacts. The life-cycle approach applied to waste means that the reduction of nuisances as well as the resources savings must be assessed.

FEAD asks for further explanations on the implementation of the life-cycle approach. It is unclear which elements such an approach contains. Explanation is lacking on how it can be implemented in practise. These problems have to be tackled before the life-cycle approach is applied in EU waste policy. FEAD suggests that the Commission develops an open, transparent and scientific approach on this.

In any case the life-cycle approach should not be seen as a general tool in EU waste policy, but rather **as a mean to determine the appropriate waste management operation in a flexible 3-step waste hierarchy**. Moreover, such an approach should not replace the current waste policy that has been proven very successful in the past. FEAD urges the Commission to keep proven instruments such as producer responsibility and high waste stream-based recycling quotas that guarantee a sustainable resource management.

## 3 Promote the prevention of waste

FEAD shares the view of the Commission that to date, efforts to successfully implement **waste prevention programmes have failed**. After comprehensive environmental and economic analysis, no functioning method for the application of quantified waste prevention targets has been found. It would be more effective for EU policy to focus on how to make waste management even more efficient in an effort to reduce the environmental impact of resource use. For example, it is important that waste prevention focus on the reduction of the hazardous characteristics of waste flows and not only on their quantitative reduction.

FEAD believes that the proper implementation of the **concept of producer (or manufacturer) responsibility** is a much stronger instrument to prevent waste than waste prevention

programmes set up at Member State level. Producer responsibility encourages producers to extract, recover and recycle more materials and should be regarded as the most effective way to ensure costs associated with material recovery are met. The European Parliament in its resolution of 18 March 2004 has confirmed that producer responsibility should continue to be an essential feature of Community waste legislation.

#### **4 Strengthen recycling activities by setting standards**

FEAD is in favour of proposals which aim to promote recycling, in a move towards harmonised standards across the Community for recycling activities and recycled materials. **EU standards for recycling activities and recycled materials** ensure a high level of environmental protection and support the development of a European market for recycling.

Harmonised rules on recycling would facilitate the creation of a stable market for recyclates. Therefore, in a general approach to establish European recycling market a further push for higher levels of recycling is crucial. The need for cost-benefit analyses would still be valid. Unlike the two currently most widely used waste treatment options in the EU (namely landfill and incineration), which are governed by an EU Directive, recycling is not subjected to a harmonised set of stringent environmental rules. The Commission proposal on the Waste Framework Directive is a first step to provide these rules. FEAD asks in this regard for **a Directive which sets equal rules for the operation of waste treatment facilities** that are not currently covered by EU law, similar to the existing Directives on landfill and incineration.

FEAD welcomes in this respect the Commission initiative to revise the **IPPC Directive** in order to extend its scope on further waste treatment installations. All waste treatment installations (recovery and disposal) should be included within the remit of the IPPC Directive.

FEAD agrees that the recovery of biowaste should be addressed as a priority in future EU waste policy. However, FEAD would like to express its **disappointment about the absence of** reference to the possible development of **a specific Directive on the biological treatment of waste and organic matter recycling**. A harmonised and strategic European approach on the biological treatment of waste is important for achieving a high level of environmental protection and the conservation of soils. A Directive would not only boost investments in biological treatment facilities, but also help Member States to comply with the Landfill Directive diversion targets of biodegradable waste.

**Cost-benefit analyses** must include externalities and should be based on clearly defined objectives. EU policy should focus on how to make waste management even more efficient in an effort to reduce the environmental impact of resource use. Such cost-benefit analyses should be used to establish the optimum level of recycling, in order that the best overall balance of waste management options may be used having the greatest positive effect on the sustainable use of resources.

A strategy focusing on recycling is necessary, as action is needed here. However, other treatment options such as energy recovery should also be recognized for the role they play in overall recovery and resource use. FEAD believes that **all forms of recovery** must be combined in a flexible way to reflect national and local approaches. The Commission proposal on the Waste Framework Directive allows such an approach by requiring high environmental and health standards for recovery and disposal.

Despite the clear request in the 6<sup>th</sup> EAP no reference is made to **separate collection**. Separate collection, though, is a vital tool to achieve increased quantities of recyclables, such as those derived from paper, glass, biowaste and diffuse hazardous waste. However, new techniques for

collection of mixed fractions should be allowed when they can reach the same quality goals for recycling as separate collection.

Much to our regret the Commission has not taken up the request made by the European Parliament in its resolution of 18 March 2004 which proposed practical measures to **ensure the competitiveness of secondary raw materials** against primary raw materials. FEAD considers this as essential for the survival of long term, sustainable recycle markets.

Finally, the **full implementation of the Landfill Directive** will have positive effects on recovery as a whole. Landfill reduction is already introduced in the Directive but advanced notice of its implementation must be provided to allow for the effective push towards greater recovery. In a step to foster further recovery the quantities of waste for disposal should be gradually reduced to a minimum. **Harmonised landfill tax at European level** can also be an effective instrument for reducing dependence on landfill and we believe it should be further explored to determine how this could be used more effectively. With a **further reduction of waste for disposal**, other waste treatment options, such as energy recovery and recycling options, have to take up the short fall created by reduced landfilling. In some Member States the acceptance of Energy from Waste at a high level of environmental and health protection needs to be increased.

However, in a number of cases we have to depend on **disposal operations**, including landfills. It has to be stressed that even in a recycling society disposal operations, in compliance with high environmental standards, will have to take place. It is therefore essential to improve on disposal techniques and safety measures.

## **5 Further elaboration of the EU's recycling policy**

FEAD agrees with the Commission that the implementation of a **material-specific approach needs further examination** before it can be considered an adequate tool for EU waste policy. The Commission will undertake a detailed analysis of the long-term feasibility and viability of a material-specific approach. The value of such a system would be to include waste materials in the recycling scheme, which are not included in the waste-stream approach for one reason or another. However, the practical implementation is unclear. Such an approach has not yet been tested and does present several risks, similar to those posed by Communitywide targets, such as whom to make responsible, how to maintain high standards for recycling and how to organise the financing. These aspects form the basis of such a new approach and therefore must be discussed in detail with all interested parties and solutions found before projects or schemes can be put in place.

FEAD would urge the Commission to focus the EU's recycling policy on **producer responsibility for specific waste streams**. FEAD does not consider there to be any other viable option which would allow for the costs of the recovery of waste to be met.

FEAD welcomes the prospect of greater emphasis on widening the **scope of economic instruments**. A general provision encouraging Member States to apply fiscal and/or economic instruments to reduce the environmental impact of waste without distorting the internal market or other policies of the EU could be helpful.

Whilst recognising the greater role for economic instruments, FEAD calls on the Commission to **adequately distinguish between fiscal and economic instruments**, as each will provide different benefits.

Fiscal instruments, which are defined by Member States can lead to **distortions of the internal market**. In order to ensure further investments in eco-efficient waste treatment facilities take place, a broadly equivalent regulatory regime should apply across the EU to provide adequate certainty for investors in modern waste management infrastructure.

## **6 Modernise and simplify waste legislation**

FEAD agrees with the Commission that waste legislation to a certain degree needs modernisation whilst **ensuring high standards of regulation remain**. Legislation has evolved over time. There are some overlaps and practical application has shown the need for certain clarifications. It should be modernised in order to deliver a clear regulatory environment for waste management activities.

Regulation provides the framework for the operation of the waste management industry. Regulation provides control on the management of society's waste and proposed Commission initiatives should **not reduce the safeguards applied to the management of waste**. It is crucial that the basis of waste management continues to be the protection of human health and the environment. However the right type of regulation can maintain these safeguards and ensure proper environmental outcomes more efficiently, effectively and without imposing undue costs to operators and to society as a whole.

In this regard FEAD is **not in favour of integrating the Hazardous Waste Directive** into the Waste Framework Directive. The technicalities of hazardous waste treatment need a dedicated piece of legislation. FEAD fears that the integration of hazardous waste into the Waste Framework Directive could undermine the importance of the application of strict rules for this waste stream. The same applies with respect to the proposed deletion of the **Waste Oil Directive**.

## **7 Improve implementation**

FEAD welcomes the Commission's approach to improve the implementation of existing waste legislation. The full implementation of existing waste legislation and the equal enforcement across all Member States is vital to secure a high level of environmental protection and to reduce the negative environmental impact of use of natural resources while promoting the recycling and recovery of waste.

## II. About a Waste Management Policy

### 1 Need for a Waste Management Policy

The Thematic Strategy addresses in fact the whole waste management sector.

FEAD considers that it is an **integrated waste management system** involving all kinds of treatment, which will provide the most sustainable resource management practices. Waste Management is not limited to a few treatments and the overall system, including other aspects, such as waste re-use, waste collection and refuse disposal, need also to be seriously addressed in a Waste Management Policy.

Waste Management is much wider than Waste Prevention and Recycling. Therefore, the Waste Framework Directive should be based on a clear and structured Waste Management policy covering other aspects such as waste collection, other forms of recovery and disposal of waste.

On the other hand, in the package of documents made available by the Commission on 21/12/2005 (Proposal for a revision of the WFD, 'Thematic strategy', its Impact Assessment and explanatory documents), FEAD has identified conflicting statements, lack of clarity and loopholes.

FEAD calls for the elements given in the Thematic Strategy and their consequences to be checked and reorganised into a coherent document dedicated to the future Waste Management policy and warns about the risk of a partial deregulation.

### 2 Policy to be based on a sturdy basis

Few data on waste are given in the Strategy. They are not clear and far from being exhaustive. FEAD reminds that municipal waste which is mainly addressed in the Strategy proposal is a minor part of the total waste flow and certainly the most well known. Other waste such as construction and demolition waste, agricultural waste and industrial waste are nearly ignored although their volume may add up to far more than municipal waste.

FEAD requests that the measures recommended in the Thematic Strategy are founded on a **precise and detailed analysis of all waste flows**, in comparison with the existing capacities of collection and treatment.

### 3 Improve implementation

FEAD welcomes the Commission's approach to improve **the implementation of existing waste legislation**. FEAD considers essential that before starting a new policy, a detailed inventory of the implementation of the existing legislation and of its impacts is made available and that a report is given about the legislation which is said not to have brought the expected environmental benefits.

FEAD asks for this assessment of the situation and demands that existing regulation, in particular, Directive 99/31 related to landfill, is strictly implemented and that the non compliant sites are closed without any delay and after-care be ensured.

#### **4 Modernise and simplify waste legislation without weakening**

FEAD is in favour of a modernisation and a simplification of the existing legislation but this must **not weaken the environmental protection** supported by the current legislation.

Hazardous waste requires specific measures. FEAD requests that Hazardous waste directive is not merged, and so weakened, into the Waste Framework Directive.

As said in the Strategy, some recycling or recovery facilities can cause pollution if badly operated. FEAD therefore requires that **all waste management plants are subject to a permit**.

Directives exist only for incineration and landfill. FEAD requires that similar directives are made for waste treatment operations which are not yet covered such as recycling processes and biological treatment plants.

#### **5 Reduce the environmental impacts of waste** - *(see also FEAD Position Paper on the WFD)*

FEAD welcomes a move towards more sustainable resource use practice by focusing waste policy on the key environmental impacts. FEAD calls for waste management policy to clearly address the measures taken in order to satisfy the principles stipulated in Article 174 of the EC Treaty.

#### **6 Three-step waste hierarchy** - *(see also FEAD Position Paper on the WFD)*

FEAD welcomes that basic guidelines for waste management remain simple and based on a **three-step waste hierarchy** (waste prevention - recovery - disposal).

FEAD considers that a more detailed hierarchy would complicate the already very complex dual distinction between Recovery and Disposal operations without additional environmental benefit.

FEAD asks for further **explanations on the implementation of the life-cycle approach**. In particular, explanation is lacking on how it can be implemented in practise. Therefore, FEAD suggests that the Commission develops an open, transparent and scientific approach on this before applying this principle in EU waste policy.

FEAD requests that the complementarity of the different waste treatment options is clearly acknowledged and that the role of waste disposal is recognised as a part of an integrated waste management system.

#### **7 'Polluter pays' principle** - *(see also FEAD Position Paper on the WFD)*

One of the most powerful and proven tools to give the producers of the products the sense of responsibility is to apply the 'polluter pays' principle and the 'extended producer's responsibility.

The 'polluter pays' principle is not satisfactorily addressed in the Strategy. Although, it is clearly laid down in Article 15 of the current WFD, FEAD underlines that it has just disappeared in the corresponding Article 9 of the WFD proposal.

FEAD urges the legislator to maintain proven principles such as the **'polluter pays' principle**, the **'extended producer's responsibility'** and to make sure that the waste management costs are borne by the waste generators and not by the de-polluters.

## 8 Foster all forms of recovery

FEAD welcomes that the Strategy considers as beneficial impacts of the proposed changes that it results in more composting, material and energy recovery from waste. FEAD would welcome an even stronger **emphasis of recovery from waste**; this would contribute to savings of primary raw materials and to security of energy supply.

No recovery operation can be said to be better than others everywhere, at any time and in any proportion. Pushing too far one option is usually detrimental to the economic and environmental equilibrium of the whole.

The biological treatment of waste should be promoted considering the poor organic matter content of certain European soils.

Energy as well appears every day more and more on the political agenda and this will be reinforced in the next decades. FEAD sees a major role of the waste management industry in contributing to the security of energy supply at European level.

Biogas recovery in landfills is a very efficient greenhouse gas emission reduction tool which needs to be strongly encouraged.

## 9 Recovery/Disposal operations - (see also FEAD Position Paper on the WFD)

The strategy clearly says that *"The main present problem with the definitions of recovery and disposal in the Waste Framework Directive is that they are used for different purposes. In the Recycling Directives they are used to set targets and in the Waste Shipment Regulation they are used to determine whether the internal market rules apply to shipments of waste.*

*Ideally they would only be used for setting targets and a simpler system would be used for shipments of waste. However, because of gaps in existing European waste management standards and because of the need for waste management structures and policies to adapt, it is too early for such a change to the waste legislation."*

FEAD regrets that, although the Commission recognised the above-mentioned problem, it failed to come up with an adequate solution within the proposal for a revision of the WFD.

## 10 R1/D10 criterion - (see also FEAD Position Paper on the WFD)

FEAD considers that municipal waste incinerators may be qualified as recovery operations to be of utmost importance and that this status (R1) is determined by a criterion based on energy efficiency.

FEAD opposes the introduction of a complex formula with a very high threshold in Annex II of the proposed WFD. This high threshold is not backed up by any study although the Impact Assessment clearly states that in the case of a high threshold, this would be set "for example on the basis of life cycle assessments comparing various recovery operations" (p.48). As stated in the Thematic Strategy and its accompanying Impact Assessment (§6.7. 'preferred set of options', p.56), FEAD requests that the efficiency of municipal waste incinerators is based on the energy efficiency performances which are achievable when using the Best Available Techniques (see 'BAT 62 a' in Chapter 5 of the Waste Incineration BRef). Such an approach would take into consideration the local conditions and would also ensure that small plants or plants with little or no demand for the heat they produce are not discriminated.

The demands on energy efficiency must be fulfilled by all types of plants incinerating waste and not only to facilities dedicated to the processing of municipal solid waste.

**11 End of waste** - *(see also FEAD Position Paper on the WFD)*

For the sake of environmental protection, the procedure to clarify the **end-of-waste status must be strictly controlled**. The list of eligible waste streams must be determined by co-decision. The general conditions for a waste deemed to cease to be a waste must be clearly stated in the WFD. The technical criteria to be met by each waste stream should be dealt with by comitology.

**12 Level playing field** - *(see also FEAD Position Paper on the WFD)*

FEAD requests that a **level playing field** is set up for all waste treatment activities and that the use of **economic instruments** is monitored in order that they do not distort competition nor European objectives.

**13 Comitology** - *(see also FEAD Position Paper on the WFD)*

FEAD does not support an extensive use of the comitology procedure. FEAD considers that the **comitology procedure is appropriate for technical adaptation/developments** but not for political issues.