



Fédération Européenne des Activités de la Dépollution et de l'Environnement
European Federation of Waste Management and Environmental Services
Europäische Föderation der Entsorgungswirtschaft

14th April 2011

FEAD Position Paper on the Raw Materials Initiative

FEAD welcomes the ongoing initiatives at EU level related to raw materials and is of the opinion that this work is of utmost importance for European industries to maintain their global competitiveness. In that regard, we would like to highlight the important role that the waste management sector can play in providing a solution to the increased dependency of European industries on critical raw materials as identified by the European Commission.

Recycling is a high-tech industry with sophisticated methods that allows it to derive metals and other secondary raw materials from waste which are then re-introduced into the life-cycle of new products. In Germany, for instance, 13,23% of industry's raw materials needs were met by the secondary raw materials sector in 2009 – the steel sector alone bought in around 20 million tons of steel scrap during that year - and as a result produced almost 45% of all steel made in Germany from recycled material.

Create better framework conditions for Secondary Raw Materials (SRMs)

In order to decrease the dependency of Europe on primary raw materials to which access, in some cases, is ecologically and geopolitically difficult, framework conditions for the EU waste management sector must be further improved. Additional efforts are needed to allow the “recycling society” in Europe to realize its full potential. This concerns, in particular, the establishment of fair competition rules for all market operators (public and private), the full application of the single market rules with regard to separately collected waste for recovery and the harmonized implementation of EU waste legislation across Europe (e.g. Waste Framework Directive, Waste Shipments Regulation, Landfill Directive etc.).

Develop further demand-side measures for recycling

Manufacturers and industries should be incentivised to replenish depleted raw materials and to furnish their energy needs by means other than by tapping into the natural environment. High quality secondary raw materials issued from proper waste management treatment as well as renewable energies - amongst which, energy from waste – are efficient solutions that ought to be fostered.

The supply of high quality secondary raw materials is a pre-condition to making recycled products a more attractive prospect in the market place. To this end, it is important to stabilise the demand for SRMs on a long-term basis and to promote sustainable resource efficiency. In this regard, the European Union and Member States should come up with a mixture of market-based instruments and regulatory measures at both levels.

FEAD therefore would call upon the European Commission, the European Parliament and Member States to:

1. Allow for more consistency and better communication between product design(-ers) and waste policies/waste management operators in order to boost recycling;
2. Ensure a proper implementation of the extended producer responsibility principle;
3. Incentivise the use of biofuels from waste (e.g. anaerobic digestion, landfill gas);

APOH, Slovakia
ARS, Romania
ASEGRE, Spain
BDE, Germany
CAOH, Czech Republic

DWMA, Netherlands
ESA, UK
EWMA, Estonia
FEBEM-FEGE, Belgium
FISE, Italy

FLEA, Luxembourg
FNADE, France
IWMA, Ireland
KSZGYSZ, Hungary
LASUA, Latvia

NORSK INDUSTRI, Norway
PASEPPE, Greece
PIGO, Poland
SRI, Sweden
VÖEB, Austria
YYL, Finland

4. Introduce mandatory green public procurement targets. Based on an equal performance, it should be mandatory to give preference to secondary raw materials in public procurement;
5. Develop common minimum standards for recycling activities.

Combat Illegal shipments

One of the main concerns, not only for the waste management industry, but for the European industry and society in general, is the illegal shipments of waste under the “re-use” label. Very often this waste is shipped to third-countries where the waste is dumped or not treated in conformity with European waste legislation. FEAD members therefore support the continuous focus of the European Commission on combating illegal shipments of waste as underlined in its Communication on raw materials of 2nd February 2011.¹

European waste management companies have invested in the workers and infrastructure to treat waste in accordance with strict regulations. Bypassing these high treatment standards, through unlawful shipments and dumping of waste, must be stopped.

FEAD is of the opinion that the main action to combat illegal shipments and in particular the illegal shipment of end-of-life vehicles and WEEE is to ensure consistent inspection and control procedures (eg. by increasing the number of inspectors and inspections of potentially unlawful shipments). This is a key element to guarantee the proper application of the Waste Shipments Regulation.

In that regard, FEAD supports increased activities of IMPEL (European Union Network for the Implementation and Enforcement of Environmental Law) so as to ensure that sufficient resources are allocated to enforce the Waste Shipments Regulation.

FEAD is the European Federation representing the European waste management industry. FEAD's members are national waste management associations covering 20 Member States and Norway. They have an approximate 60% share in the household waste market and handle more than 75% of industrial and commercial waste in Europe. Their combined annual turnover is approximately € 75 billion.

FEAD represents about 3000 companies with activities in all forms of waste management. These companies employ over 320000 people who operate around 2400 recycling and sorting centres, 1100 composting sites, 260 waste-to-energy plants and 900 controlled landfills. They play an important role in the determination of the best environmental option for waste management problems.

¹ COM (2011) 25, “Tackling the challenges in commodity markets and on raw materials”.