



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

**FEAD contribution on
questionnaire supporting Commission analysis
on the appropriateness of setting targets for biowaste recycling**
January 2011

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 € 54 billion.

FEAD represents about 3000 companies with activities in all forms of waste management. These companies employ over 295000 people who operate around 1800 recycling and sorting centres, 1100 composting sites, 260 waste-to-energy plants and 1100 controlled landfills. They play an important role in the determination of the best environmental option for waste management problems.

FEAD welcomes the opportunity to contribute to the Commission's assessment of the appropriateness of setting targets for biowaste recycling. FEAD members are committed to the sustainable management of biowaste and therefore support initiatives at European level aimed at promoting the recycling of biowaste, the production of compost and its use on land and in growing media.

FEAD however regrets that these initiatives are spread in different legislative acts, thereby missing the opportunity to deliver a coherent and consistent approach to the management of biowaste at European level in a specific legislative act.

Please find below the FEAD contribution to questions 4 and 8:

4. Added Value of EU legislation. Would setting a recycling/separate collection target for bio-waste deliver added value in comparison with current legislative regime (including the Landfill Directive and the Waste Framework Directive, especially Art 5 and 22,) if this existing legislative regime is fully implemented?

The Landfill Directive does indeed provide an incentive not to landfill biodegradable waste but fails to promote its recycling. In terms of bio-waste management, the Waste Framework Directive (article 22) does not set legally binding measures.

Although the waste hierarchy and the application of the end-of-waste concept to biodegradable waste are useful instruments, they are insufficient to establish the appropriate driver to generate the necessary amount – critical mass – of biowaste.

FEAD therefore considers that a target – accompanied by the appropriate legal guidance - will deliver added value. FEAD also supports a consistent and full implementation of the current legislative framework.

There are strong environmental and economic arguments for a 'market-pull' mechanism to complement the 'market-push' mechanisms set out in the Landfill Directive and the Waste Framework Directive.

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

These arguments have been expressed several times by numerous stakeholders. We would recall in that regard the arguments listed in the Biowaste Alliance position paper dated June 2009¹:

- explore the full potential of using soil organic matter as a carbon sink and help achieve the goals of the European Climate Change Programme;
- provide a clear political signal with waste management objectives and comprehensive guidelines for the management of biodegradable waste. This would enable the private and public sectors across the EU to make the appropriate investments and would therefore help Member States fulfil the diversion targets of the Landfill Directive;
- tackle the constant decline of soil organic matter in arable land and encourage the recovery of organic matter in line with the Thematic Strategy for Soil Protection;
- support the requirement of Article 22 of the Waste Framework Directive to encourage the separate collection of biowaste, its environmentally sound treatment and use of the produced compost and digestate;
- help meeting European market and customer demands for quality assured composts and digestates produced according to high quality standards;
- promote the efficient use of nutrients, humus and energy resources in organic waste in line with the Thematic Strategy on the Sustainable Use of Natural Resources;
- provide incentives for Member States to set up national public awareness raising campaigns and green public procurement strategies to promote waste prevention in general and local educational and composting initiatives in order to ensure a wider mobilisation of the general public;
- boost rural job creation and economic growth as advocated by the Rural Development Strategy and Lisbon Agenda;
- create a flexible and cost-effective recycling option which can be easily adapted to local conditions in each individual Member State; and
- provide legal certainty at EU level for the biological treatment of waste by ensuring long-term confidence for investors, banks and industry and avoiding unacceptable financial risk for both the private and public sectors.

8. Form of recycling targets. What are in your opinion the advantages and disadvantages of setting targets:

- a) for the recycling of bio-waste expressed as the amount of bio-waste subject to composting or anaerobic digestion and resulting with the production of quality compost/digestate;
- b) for the separate collection of bio-waste, leaving Member States freedom to choose further treatment of collected bio-waste?

FEAD supports the elaboration of recycling targets but warns against the following aspects:

- Considering the difference in current recycling levels across Europe, an appropriate level for all European Member States will be difficult to set.
- Prior to setting a recycling target, the definition of 'recycling' in the light of biowaste management should be clarified and applied consistently across Europe. In that regard, FEAD is opposed to the restriction of the definition of 'recycling' to end-of-waste quality only. The definition of 'recycling' should be broader and encompass, as stated in the Waste Framework Directive, the 'reprocessing of organic matter'².

A target that would allow Member States to demonstrate that they are making progress in terms of biowaste recycling over time would be supported by FEAD.

Another path that would find the support of FEAD is the elaboration of a target on the minimum renewable/recycled matter content in growing media, soil improvers and fertilisers. The target would ensure that mineral fertilisers would be partially substituted by renewable organic fertilisers, thereby

¹ Position paper of the Biowaste Alliance, Calling on the Need for European-Wide Legislation Covering the Treatment of Biowaste, 8 June 2009

² FEAD Italian member, FISE, shares the view that the definition of recycling should be limited to 'end-of-waste' quality only. FEAD UK member, ESA, is of the opinion that a clear output standard for biowaste derived products should set the limit for recycling.

ensuring the recycling of valuable organic matter and phosphorous. Such a target would positively address the need to protect soils and to recycle limited nutrient resources – especially phosphorous.

In concrete terms, the target should:

- for growing media and soil improvers, take into consideration the need to save non-renewable organic matter as peat, keep the organic matter content of soil stable over time and guarantee the humus balance of soil.
- for fertilisers, include a minimum level of nitrogen, phosphorus or potassium from renewable sources.

Such a target set at European level would deliver a stimulus for demand for biowaste-derived products and act as a catalyst for the development of the infrastructure required to produce high quality compost and/or digestate. Developing and growing markets for these outputs would be the most effective driver for increasing high-quality recycling of biowaste. This measure would also provide the necessary support for the uptake of the most environmentally sound biowaste treatment techniques, for the delivery of the waste hierarchy and would as well contribute to resources security within Europe.
