



Fédération Européenne des Activités de la Dépollution et de l'Environnement
European Federation of Waste Management and Environmental Services
Europäische Föderation der Entsorgungswirtschaft
30 September 2011

FEAD Position Paper on the EC Roadmap to a Resource Efficient Europe

FEAD welcomes the Roadmap to a Resource Efficient Europe of the European Commission and is of the opinion that it is a major milestone for European industries to maintain their global competitiveness. In that regard, we would like to highlight the important role that the waste management sector plays in the accomplishment of increased resource efficiency throughout Europe. Further progress towards a resource-efficient and recycling European society can only be made, if the right economic and regulatory framework conditions are put in place.

FEAD supports the Commission's plan to assess the introduction of measures such as the development of minimum recycled material rates, durability, re-usability and recyclability criteria and extension of the producer's responsibility for key products in 2012. Further measures which FEAD fully supports are:

- strengthening the requirements on Green Public Procurement (GPP) for products with significant environmental impacts
- expanding the scope of the Eco-design Directive to also cover non-energy related products
- setting requirements to boost the material resource efficiency of products
- review of fiscal policies and instruments in the Member States with a view to effectively support resource efficiency.

The key objective now is to concretize these goals and provide a more detailed and specific assessment.

As to the review of landfill diversion targets, FEAD supports a further and progressive reduction of the landfilling of biodegradable waste and in general of waste which can be efficiently recovered by other means. Such measures will only be effective if accompanied by appropriate measures supporting the recycling and recovery of the diverted waste and providing legal certainty for investments in new facilities.

In order to realise the goal of a resource-efficient Europe, a restructuring of European structural funds is essential. FEAD therefore welcomes the Commission's approach whereby cohesion policy will be aligned more strongly with the objectives of the Europe 2020 strategy and waste projects will take account of the five-stage waste hierarchy. However, this can only be achieved if projects are made accessible for private capital and know-how. FEAD therefore urges policy-makers at European level to improve the framework conditions for alternative financing instruments, in particular for public-private partnerships. In this way, cohesion policy can make a contribution to disseminating high quality environmental standards rapidly across the entire Union.

This shift, essentially from low-cost landfill to higher-cost treatment options, will require significant capital outlay in new infrastructure. This in turn will shift the business model for the sector from a gate-fee driven disposal business to a value-added market-driven business, centred on trading in recyclates and recovered energy. In order to foster the development of this process, the implementation of common minimum standards for recycling is a necessity.

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

Points of concern

A key concern, not only for the waste management industry, but for the European industry and society in general, is the illegal shipment of waste. Too often, a “re-use” label is misused to circumvent waste legislation. FEAD members therefore support the continuous efforts of the European Commission on combating illegal shipments of waste. Curtailing and stopping illegal shipments will also require greater commitment and financial resources from the Member States. We trust that the current work of the European Commission on better implementation of waste legislation and the future initiative on increased and harmonized inspections will address the issue of illegal shipments satisfactorily. This work should result in an extension of the competences and waste-related profile of the European Environmental Agency (EEA) and, in any case, in a closer cooperation between the European Commission, EUROSTAT, IMPEL and the European Environmental Agency.

FEAD would like to express caution on the suggestion to ensure that, by 2020, all relevant Substances of Very High Concern are placed on the REACH Candidate List. Recyclers are often processing wastes that are containing legacy substances and even though some substances might be included on the REACH candidate list or even banned, their lifecycle still continues. This could render the recycling of a number of streams extremely difficult. Therefore, we urge ECHA and the Commission to rigorously assess the impact on recycling when placing substances on the candidate list.

Another point of concern for us focuses on the comprehensive review of all EU air pollution policies by 2013. The revision of the IPPC Directive/IED Directive was completed just recently. One of the objectives of the revision was, according to DG ENV, that the goals set in the Thematic Strategy on Air Pollution can only be attained through a revision. At this stage, ensuring reliability and predictability in terms of planning is important for the investments that our sector is undertaking. The comprehensive review of all EU air pollution policies should therefore take place in close cooperation with all stakeholders.

In conclusion

The Roadmap is a positive long-term strategy and FEAD fully supports it. Many of its provisions though need to be underpinned now by concrete measures and actions. A first key objective is to ensure that EU waste legislation is properly implemented across all member states and is accompanied by the appropriate economic instruments. In this respect, FEAD advocates for better and coherent definitions and environmental harmonized standards.

As professionals in waste management, FEAD members are convinced that the Roadmap opens a window of opportunities for our sector. We are prepared to contribute to its realization through our investments, the exchange of best practises and the transfer of our know-how. In order to achieve the set objectives however, there is a need to ensure fair competition between private and public companies. Private waste management companies ought to be given a better access to public-private partnerships and to EU-funding.

FEAD is the European Federation representing the European waste management industry. FEAD's members are national waste management associations covering 20 Member States. 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.