

Consultation on the Review of the European Waste Management Targets

Personal Details	
In what capacity are you responding to this consultation? -single choice reply-(compulsory)	As an industry, not-for-profit, or academic organisation (i.e. all other stakeholders)
Name -open reply-(compulsory)	Siebert
Surname -open reply-(compulsory)	Stefanie
Email address -open reply-(compulsory)	info@compostnetwork.info
What type of organisation do you represent? -single choice reply-(compulsory)	Not-for-profit/non-governmental organisation
What is the name of your company or organisation? -open reply-(compulsory)	European Compost Network ECN e.V.
In which country is your head office/organisation based? -single choice reply-(compulsory)	Germany
<p>Your contribution will be published on the official website of the Targets Review Project and on Your Voice in Europe. Please use the dropdown list below to indicate if you want your contribution to remain anonymous.</p> <p>See Personal Data to view the Commission's guidelines regarding how your personal data is protected. Your data is subject to the following specific privacy statement:</p> <p><i>"Received contributions, together with the identity of the contributor, will be published on the Internet, unless the contributor objects to publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case the contribution may be published in anonymous form. Otherwise the contribution will not be published nor will, in principle, its content be taken into account."</i></p>	I give permission for my feedback to be published as it is
-single choice reply-(compulsory)	
Waste Framework Directive	
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	Yes

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

-single choice reply-(**compulsory**)

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.

First issue: -open reply-(**optional**)

The demarcation between municipal waste and household waste as addressed as the 2 possible reference origins in many MS are not clearly defined. This is mainly due to the fact that the collection systems cover waste from households and also other entities (e.g. shops, restaurants and other commercial enterprises included in the catchment area for the collection of municipal/household waste) ... and this in a “unsystematic” manner for residual waste and recyclables. Depending on the settlement type, often both, residual waste and packaging materials (paper, plastics, metals, glass) are collected in road containers which are accessible for households as well as for commercial entities. In other regions door to door collection is realised for residual waste and some of the packaging (dry recyclables) fractions. Even there is no common definition on European level for “household waste” that could be used consistently. In this way the criterion “municipal” or “household” is obsolete and creates a lot of confusion. Therefore the term household waste should be completely substituted by municipal waste .

Second issue: -open reply-(**optional**)

Home composting as possible “biowaste” fraction that can be accounted for recycling: There is no accepted or trustworthy methodology to estimate quantities of organic garden and kitchen waste which is composted in the backyard of citizens. When allowing home composting to be accounted as recycling, it would be very easy to invent any figure in order to fulfil the targets ... without any evidence. Allowing home composting to be accounted as recycling will allow achievement of the targets in a non transparent, vague and non traceable way. Therefore home composting should be reported under the PREVENTION regime indicating specific measures that have been taken to encourage and support it.

Third issue: -open reply-(**optional**)

Suggestions for Revision

1. Establish a single target and calculation method based only on the quantity of <i>municipal</i> waste collected. This would require that a consistent definition of municipal waste is used in all Member States. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
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). -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
3. Establish a single target and calculation method based only on the quantity of <i>household</i> waste collected. This would require that a consistent definition of household waste is used in all Member States. -single choice reply-(optional)	1 = poor idea, not worth consideration
4. Adjust the targets so that biowaste is also included -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration

5. Set targets which reflect environmental weightings for materials (for example, through reference to greenhouse gas savings achieved through recycling). -single choice reply-(optional)	1 = poor idea, not worth consideration
6. Improve monitoring and validation of the reports submitted by Member States so that the consistency and reliability of data can be validated. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
7. Introduce requirements on businesses to sort a range of waste materials for recycling and composting / anaerobic digestion. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
8. The 70% recycling target should not include backfilling. -single choice reply-(optional)	
9. Provide clear definitions of recycling and material recovery, and how these should be calculated for the C&D waste stream. -single choice reply-(optional)	
10. Mandate sorting of wastes at C&D sites with a special attention to hazardous waste. -single choice reply-(optional)	
11. Require facilities which sort 'mixed' C&D wastes to achieve a high level of recycling of the input materials. -single choice reply-(optional)	

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.

First solution:

-open reply-(optional)

Setting recycling targets for separately collected bio-waste! It is not realistic that the WFD will be fully implemented in all consequences and thus delivers the expected effects. In addition landfill diversion targets do not prescribe or give any preference to specific treatment or recycling options for the biodegradable waste types. Art 5 and 22 do not really effectuate separate collection and bio-waste recycling in specific. Only specific bio-waste targets move the waste management world, introduce developments and lead to investments. In Member States where no consistent strategies for bio-waste have been established, all options including mass burning, mixed waste treatment by means of MBT and disposal of the stabilised organic fraction as well as potential use of low grade stabilised materials are considered as alternative to separate collection and biological treatment. Therefore, mainly based on lack of knowledge and experience and in this case as a result of missing political and regulatory guidance in many cases it is likely that decisions on bio-waste management are taken which would contradict the principles of environmental and economic sustainability as well as the waste hierarchy. Recycling targets for separately collected bio-waste would essentially contribute to larger recovery of renewable resources (mainly plant nutrients N/P/K/Ca/Mg/trace elements and organic matter) and would reduce landfilling and incineration.

Second solution: -open reply-(optional)

As regards proposed solution Nr. 6 of "Targets on Municipal Waste, Article 11 (2) a": In order to improve monitoring and validation of the reports submitted by Member States so that the consistency and reliability of data can be validated" it is an urgent need to revise the European Waste List by adding specifications which better describe qualitative criteria relevant for recycling. The qualitative description within Group 19 would be of utmost important in order to distinguish between several waste treatment measures which produce specific

fractions which are suited for being sent to recycling plants and others which are not. Only in this way reporting and evaluation of waste recycling measures and the preparation in waste treatment facilities can be realised in a traceable and comparable manner. The current 'List of Waste' creates considerable problems in this respect! The Austrian or the Belgium approach could serve as an example.

Third solution: -open reply-(optional)

Landfill Directive

Do you want to respond to the questions on the Landfill Directive? If you select "No" you can move on to the next section of the consultation which deals with the Packaging and Packaging Waste Directive. If you select "Yes" the questions relating to the Landfill Directive will open up below.

-single choice reply-(compulsory)

Yes

Key Issues

Are there any issues related to the targets in the Landfill 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.

First issue: -open reply-(optional)

Second issue: -open reply-(optional)

Third issue: -open reply-(optional)

Suggestions for Revision

1. Revise the targets so that they are set in such a way that they do not penalise countries whose economies are growing faster after starting from a lower base. -single choice reply-(optional)	1 = poor idea, not worth consideration
2. Establish a legal obligation for reporting on 'municipal waste' and enforcing the use of a single definition of the term by all Member States. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
3. Standardise the approach to performance measurement and progress reporting. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
4. In Member States where no data exists for 1995, a more recent baseline year should be set with targets adjusted accordingly. -single choice reply-(optional)	4
5. Clarify when treated waste should be considered 'no longer biodegradable' from the	5 = very good idea, definitely deserves further consideration

perspective of the Landfill Directive. -single choice reply-(optional)	
6. Further tighten existing targets (e.g. move progressively towards zero biodegradable municipal waste sent to landfill). -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
7. Progressively include <i>all biodegradable</i> wastes (not just biodegradable wastes of municipal origin) within targets similar to the existing ones. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
8. Introduce targets for the progressive reduction in the quantity of residual waste irrespective of how it is subsequently managed (whether it is sent to incineration, MBT or landfill, or any other residual waste management method). -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
9. Define 'pre-treatment' in an unambiguous manner so that the ban on landfilling waste that is not pre-treated is applied equally across all countries. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration

Are there any issues related to the targets in the Landfill 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.

First solution:
-open reply-(optional)

Referring to option No. 5) above: "Clarify when pre-treated waste should be considered 'no longer biodegradable' from the perspective of the Landfill Directive", here it would be urgent to introduce the definition of biodegradability after biological stabilisation in an MBT plant. Minimum criteria such as respiration rate, oxygen consumption (AT4, TOC determined in eluate) should be introduced in order to set a threshold to be accepted as equivalent to "inert".

Second solution: -open reply-(optional)

Third solution: -open reply-(optional)

Packaging and Packaging Waste Directive

Do you want to respond to the questions on the Packaging and Packaging Waste Directive? If you select "No" you can move on to the next section of the consultation which deals with the Roadmap to a Resource Efficient Europe. If you select "Yes" the questions relating to the Packaging and Packaging Waste Directive will open up below. -single choice reply-(compulsory)	Yes
---	-----

Key Issues

Are there any issues related to the existing targets 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, for example, markets for recycled packaging waste.

First issue: -open reply-(optional)

There is a lot of confusion how to distinguish and separate between data on packaging recycling and general recycling of packaging like materials included in household waste / municipal waste collection (door to door, collection points, recycling centres, informal collection). Very often several collection schemes are applied within one region or municipality. Materials are delivered to the same separation or pre-treatment facility. In this way double accounting for reporting pursuant to the Packaging DIR as well as the WFD may be the case. At least no proper allocation of waste streams is possible! In this way it is very difficult for local and national authorities to prepare proper reporting documents.

Second issue: -open reply-(optional)

Third issue: -open reply-(optional)

Suggestions for Revision

1. The methodology for calculating recycling rates should be standardised so that data (and hence performance levels) are comparable across Member States.

-single choice reply-(optional)

5 = very good idea, definitely deserves further consideration

2. Remove from the Packaging Directive the target for packaging waste from municipal sources and include it into the Waste Framework Directive to ensure full consistency with the existing target on municipal waste recycling.

-single choice reply-(optional)

5 = very good idea, definitely deserves further consideration

3. Bring the recycling targets for different materials closer together to ensure a more level playing field.

-single choice reply-(optional)

4. Incorporate “weightings” for materials recycled based on environmental benefits derived from recycling the material. -single choice reply-(optional)

5. The targets for some packaging materials could be subdivided into subcategories; for example, metals could be divided into non-ferrous and ferrous metals. The same could apply for plastic; for example, separate targets could be set for PET, LDPE, and HDPE. -single choice reply-(optional)

6. Set specific targets for recycling of packaging waste from households to encourage further recycling of household packaging. -single choice reply-(optional)

<p>7. Remove from the Directive the maximum limit of 80% that stipulates how much packaging waste a Member State is allowed to recycle. -single choice reply-(optional)</p>	
<p>8. Introduce a target for prevention of packaging waste (the development of waste prevention targets is covered in a broader manner in a later section of this consultation). -single choice reply-(optional)</p>	
<p>9. Adjust the definitions for reuse and recycling in the Packaging Directive to be consistent with those contained in the Waste Framework Directive. -single choice reply-(optional)</p>	
<p>10. Expand the recycling target to include reuse, by allowing the reuse of packaging to be credited to the recycling target. -single choice reply-(optional)</p>	
<p>11. Introduce targets for reuse for commercial transit packaging. -single choice reply-(optional)</p>	
<p>12. Introduce targets for reuse for all packaging. -single choice reply-(optional)</p>	
<p>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.</p> <p>First solution: -open reply-(optional)</p>	
<p>Second solution: -open reply-(optional)</p>	
<p>Third solution: -open reply-(optional)</p>	
<p>The Commission is keen to encourage higher rates of recycling. It recognises, however, the need to maintain the quality of recycled material so that it can be used profitably and with losses kept to a minimum between the collection and recycling stages. Keeping in mind the need to maintain quality, please select from the dropdown lists below the highest level of recycling that you believe could reasonably be achieved for each of the materials. Below you will be asked the year by which you believe these targets could realistically be achieved (i.e. between 2020 and 2025).</p> <p>Paper and Cardboard: -single choice reply-(optional)</p>	

Glass -single choice reply-(optional)	
Metals -single choice reply-(optional)	
Plastic: -single choice reply-(optional)	
Wood: -single choice reply-(optional)	
All Packaging -single choice reply-(optional)	
Other Material (please specify below) -single choice reply-(optional)	50%
If you have entered a recycling rate for "Other Material" above, please state what material this is for: -open reply-(optional)	Bio-waste, including green waste
Paper and Cardboard -single choice reply-(optional)	
Glass -single choice reply-(optional)	
Metals -single choice reply-(optional)	
Plastic -single choice reply-(optional)	
Wood -single choice reply-(optional)	
All Packaging -single choice reply-(optional)	
Other material (as defined above) -single choice reply-(optional)	2025

Consultation Regarding the Aspirations of the Roadmap to a Resource Efficient Europe

Waste Prevention

Do you agree with the principle that there should be targets for waste prevention?
-single choice reply-(compulsory)

Yes

Do you think there is a case for setting prevention targets on specific waste streams/materials/products? If so, which waste streams/materials/products do you feel should be covered by new targets and why? Please provide an answer for each material/waste stream in the free text boxes below.

Waste Stream /Material/Product 'A':
-open reply-(optional)

Home composting and on-site composting schemes, Reasons for new Targets: Home composting and on-site composting means direct use of the produced organic residues from kitchens and gardens by the garden owners at the site (property) where they originate from. Therefore home composting is a classical prevention method because the organic waste never enters the municipal waste management route. It prevents the respective collection and treatment efforts (infrastructure and costs).

Waste Stream /Material/Product 'B': -open reply-(optional)

Waste Stream /Material/Product 'C': -open reply-(optional)

Waste Stream /Material/Product 'D': -open reply-(optional)

1. In line with the proposal in the Roadmap, a 3 = moderately good idea, may be worth further consideration

requirement that waste generated per capita is in decline by 2020. -single choice reply-(optional)	
2. Targets for decoupling of municipal waste from economic growth in line with Article 9(c) of the Waste Framework Directive. For example, the difference between the annual change in municipal waste per capita (X%) and the annual change in GDP per capita (Y%) should demonstrate a decoupling tendency such that over comparable (e.g. four year) periods, the value of (Y – X) is increasing in value. -single choice reply-(optional)	
3. Consistent reporting of household waste arisings across Member States would act to produce a level playing field for setting absolute targets on waste prevention (e.g. no greater than X kg per household per year). The targets could exhibit a declining trend over time. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
4. New requirements could be set on Member States to incrementally increase the number of prevention measures in place, and the overall coverage of these measures. For example, the number of households who have signed up to say “no” to unwanted mail, or the number of households covered by measures to reduce food wastage. -single choice reply-(optional)	1 = poor idea, not worth consideration
5. Introduce requirements for progressive coverage of households by pay-as-you throw schemes. -single choice reply-(optional)	4
Preparation for Reuse	
Do you agree with the principle that there should be separate targets for preparation for reuse? -single choice reply-(compulsory)	No
Recycling Rates	
Do you agree with the view that recycling rates should be increased and/or be made to include more materials/waste streams? -single choice reply-(compulsory)	Yes
Household Waste -single choice reply-(optional)	75%
Municipal Waste -single choice reply-(optional)	75%
Commercial Waste -single choice reply-(optional)	80%

Industrial Waste -single choice reply-(optional)	85%
Construction & Demolition Waste -single choice reply-(optional)	80%
<p>In order to take into account the large differences between Member States' current recycling levels, would you agree that an approach which sets targets relative to the existing situation in each Member State (for instance increase of recycling rates by X% per year) is appropriate? -single choice reply-(optional)</p>	
<p>So far only municipal waste and construction and demolition waste are covered by specific recycling targets in the Waste Framework Directive, whilst other Directives cover packaging, WEEE, ELVs and batteries. Do you think there is a case for setting recycling targets on waste streams/materials/products that are not already covered by targets in existing Directives? If so, which waste streams/materials/products do you feel should be covered by new targets and why?</p> <p>Waste Stream /Material/Product 'A': -open reply-(optional)</p>	
<p>Bio-waste - there is a need for setting recycling targets for separately collected bio-waste It is not realistic that the WFD will be fully implemented in all consequences and thus delivers the expected effects. In addition landfill diversion targets do not prescribe or give any preference to specific treatment or recycling options for the biodegradable waste types. Art 5 and 22 do not really effectuate separate collection and bio-waste recycling in specific. Only specific bio-waste targets move the waste management world, introduce developments and lead to investments. In Member States where no consistent strategies for bio-waste have been established, all options including mass burning, mixed waste treatment by means of MBT and disposal of the stabilised organic fraction as well as potential use of low grade stabilised materials are considered as alternative to separate collection and biological treatment. Therefore, mainly based on lack of knowledge and experience and in this case as a result of missing political and regulatory guidance in many cases it is likely that decisions on bio-waste management are taken which would contradict the principles of environmental and economic sustainability as well as the waste hierarchy. Recycling targets for separately collected bio-waste would essentially contribute to larger recovery of renewable resources (mainly plant nutrients N/P/K/Ca/Mg/trace elements and organic matter) and would reduce landfilling and incineration.</p>	
<p>Waste Stream /Material/Product 'B': -open reply-(optional)</p>	
<p>Waste Stream /Material/Product 'C': -open reply-(optional)</p>	
<p>Waste Stream /Material/Product 'D': -open reply-(optional)</p>	
<h3>Limiting Incineration of Waste Which Might Otherwise be Recycled</h3>	
<p>Do you agree with the view that a maximum level should be set for the amount of waste that can be incinerated for different waste streams (e.g. household waste and/or commercial waste)? -single choice reply-(compulsory)</p>	<p>No</p>
<h3>Landfill</h3>	

1. Landfilling should be limited to residues from a specified range (to be determined) of waste treatment operations. -single choice reply-(optional)	1 = poor idea, not worth consideration
2. Landfilling should be limited to a certain percentage of waste generated (for instance 5%) from a particular date. -single choice reply-(optional)	1 = poor idea, not worth consideration
3. Landfilling of recyclable/compostable waste (to be defined) should be banned. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
4. Landfilling of waste that is combustible should be banned. -single choice reply-(optional)	2
5. Landfilling of waste should be banned if it has not been pre-treated to a level where the potential to lead to methane emissions from landfills has been virtually eliminated. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration

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.

First solution:

-open reply-(optional)

Second solution:

-open reply-(optional)

Third solution:

-open reply-(optional)

In order to take into account the large differences between Member States' current levels of landfilling, would you agree that an approach which sets targets that take account of the existing situation in each Member State is appropriate (for instance by fixing a landfilling reduction percentage per year)?

-single choice reply-(optional)

Yes

Targets as a Tool in Waste Legislation

Do you believe the Commission should go further than simply setting targets for Member States to achieve? If you select "No" there are no more questions and you can submit your response by clicking on the button below. -single choice reply-(compulsory)

Yes

Suggestions for Change

1. Develop guidance on the implementation of effective producer responsibility schemes to improve the transparency of the systems as well as their cost effectiveness. -single choice reply-
(optional)

Yes

2. Develop guidance on the proper implementation of the waste hierarchy. -single choice reply-(optional)

Yes

3. Ensure a closer monitoring by the Commission of progress accomplished by Member States in applying the waste hierarchy. For those Member States moving too slowly to meet the legally binding targets, develop mechanisms to ensure that key instruments such as a combination of economic and legal instruments (landfill/incineration taxes/bans, EPR schemes, incentives for municipalities and citizens, etc.) are applied. -single choice reply-
(optional)

Yes

4. Develop criteria for municipalities to implement services of a minimum standard to enable sorting of a range of waste materials for recycling and composting / anaerobic digestion. -single choice reply-(optional)

Yes

5. Improve the consistency of the definitions used in the legislation and ensure proper monitoring by improved data collection and systematic reliability and validity checks of data reported. -single choice reply-(optional)

Yes

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.

First solution:

-open reply-(optional)

Second solution:

-open reply-(optional)

Third solution:

-open reply-(optional)

General Comments

Would you like to add any general comments? If so, please use the space provided below.

-open reply-(optional)

Most important would be to merge recycling targets of the WFD with the targets of the Packaging DIR. Only ONE consistent piece of legislation is needed to set requirements for recycling irrespective from the origin of the materials and waste streams. The inconsistent and ambiguous overlapping of the 2 directive led to considerable confusion, misinterpretation and also misuse.