

EU waste legislation proposals in the Circular Economy Package:

A unique opportunity to use the untapped potential of bio-waste

16 February 2017

Taking into account the European Parliament's ENVI Committee vote on the amendments to the Waste Framework Directive (WFD), the European Compost Network (ECN) would be pleased if you could take into consideration the following recommendations during the on-going negotiations in the Council.

The ENVI report on the WFD sends a clear signal towards high quality recycling. ECN feels that the inclusion of a definition of organic recycling and the obligation for separate collection of bio-waste will lead to improved sustainable bio-waste management in Europe. In particular, ECN would like to address the following bio-waste related issues covered by the ENVI report:

Bio-waste comprises up to 50% of the municipal solid waste (MSW) produced in Member States: separate collection and recycling of bio-waste is crucial to meet the overall MSW recycling rates specified in Article 11(2) of the WFD. However, we believe that **strict and enforceable requirements** are needed to ensure the separate collection of bio-waste requested from Member States. As supported by the ENVI Committee, ECN calls for the **removal of the conditionalities** for the separate collection of bio-waste or at least to define precisely in which exceptional cases these exemptions could be applied.

- **Recommendation:** Remove the TEEP (*technically, environmentally and economically practicable*) conditionalities to the separate collection of bio-waste.

The ENVI Committee concluded that their proposals for separate collection of bio-waste (which could not be landfilled or used in incineration plants) would guarantee a 100% recycling of bio-waste. ECN believes the inclusion of a **separate target for the recycling of bio-waste**, in line with the Commission's own recommendations in their impact assessment, would bolster MS actions in this regard and provide a more pragmatic approach to ensure this recycling takes place. In order to ensure bio-waste is collected and treated according to the **best available practices**, the Commission needs to **publish guidance on the setting up of collection and treatment schemes for bio-waste**.

- **Recommendation:** Include a separate target for the recycling of bio-waste. The Commission should publish guidance on the setting up of collection and treatment schemes for bio-waste to assist MS.

Where it comes to **composting**, ECN feel that **each situation asks for a tailored solution** in which no specific form (like home composting as suggested by the ENVI Committee, composting on site or industrial composting) should be preferred over another.

- **Recommendation:** Ensure the liberty of tailor-made composting solutions rather than prescribing one preferred method over another.

High quality recycling of bio-waste is necessary, not only to protect the environment but also to guarantee a quality output for the costumers of the products coming out of this recycling. To ensure high quality output, especially in organic recycling plants where there are no sorting operations per se, there is a **need for requirements on the quality of input**. ECN supports a maximum (10%) limit on the non-biodegradable materials entering the final recycling process of separately collected bio-waste. This should be included in the criteria standard on the input materials for separately collected bio-waste developed by the European standardisation organisations, as suggested by the ENVI Committee.

- **Recommendation:** Establish quality standards for the input of bio-waste going into the recycling process.

As bio-waste is not covered by any kind of effective incentive scheme, in order to achieve high recycling results, we propose that every Member State shall **mandatorily introduce an incentive scheme dedicated to bio-waste**. In this regard, we support the ENVI Committee's incentive schemes for the separate collection and development of markets for secondary raw materials.

- **Recommendation:** Introduce incentives schemes dedicated to the separate collection and uptake of bio-waste.

To effectively measure the sorting and recycling of bio-waste, the introduction of European waste codes for source separated municipal bio-waste as suggested by the ENVI Committee would be very helpful and is therefore strongly supported by ECN.

- **Recommendation:** Introduce European waste codes for source separated municipal bio-waste.

To further harvest the potential of bio-waste for circular economy objectives, **commercial and industrial bio-waste** should be **separately collected and recycled**. This bio-waste is not covered under the current definition of municipal solid waste but provides a significant resource for soil improvers, biogas and other bio-based applications. The ENVI Committee asks the EC to consider setting up similar recycling measures for commercial and industrial bio-waste by the end of 2018, which ECN feels should be enforced by concrete targets.

- **Recommendation:** Introduce targets for the separate collection and recycling of commercial and industrial bio-waste.



About ECN

The **European Compost Network (ECN)** is the leading European membership organisation promoting sustainable recycling practices by composting and anaerobic digestion of organic resources and guarding over the quality and safe use of the recovered organic fertilisers/soil improvers.

The European Compost Network is a membership organisation with 66 members from 28 European countries. Members include all European bio-waste organisations and their operating plants, research, policy making, consultants and authorities. ECN represents 20 bio-waste organisations from 13 European countries, 26 companies producing bio-based products, 6 environmental NGOs, 11 academic (research) institutes in environmental, agricultural and natural sciences and three environmental agencies. Through its member organisations, ECN represents more than 3,000 experts and plant operators with a biological waste treatment capacity above 30 million tonnes.