



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

Brussels, 21 October 2015

Frans Timmermans
First Vice-President of the European Commission

Object: Binding targets at EU-level and pull measures should be key elements of the Circular Economy Package

Dear Mr Timmermans,

I am writing to you as President of FEAD, representing the private waste management industry across 20 national member associations in Europe.

FEAD members have provided a comprehensive input to the recent consultations on the Commission's revised Circular Economy Package. It is in our view essential that the EU takes leadership in designing policy and legislation which support and facilitate moving materials up the waste hierarchy and putting them to beneficial use. This should include action on eco-design and the fostering of sustainable markets for recycled materials.

In our view binding recycling and landfill diversion targets at EU level should be a central part of the revised Package. This is vital to provide legal certainty beyond 2020 and so give the private sector a firm basis for making business and investment decisions on waste and resource management infrastructure. FEAD strongly believes that these targets should remain harmonised at EU level, with longer transition periods and additional support for some Member States where necessary.

Today, 31% of all municipal waste is still landfilled, on average, in the EU-28 and half of the Member States still landfill more than 50% of municipal waste. If I take my country as an example, without binding landfill diversion targets at EU level, progress towards higher recycling in the UK would not have reached the current level.

Especially in the Central and Eastern European countries which are still lagging far behind, landfill reduction targets are a pre-requisite to foster the required investments in treatments higher up the waste hierarchy. It is of utmost importance that EU-funds are allocated to projects ensuring treatments higher up the waste hierarchy.

FEAD's position is that only wastes for which no environmentally sound or economically practicable recycling or recovery operations exist should be landfilled. At the same time, landfilling should remain available for those wastes where it is the best overall environmental option.

Based on a binding landfill diversion target set at EU level, Member States can still apply the most appropriate instruments for their specific situation in order to reduce the landfilling of waste.

APOH, Slovakia
ARMD, Romania
ASEGRE, Spain
BDE, Germany
ESA, UK

EWMA, Estonia
FEBEM-FEGE, Belgium
FISE, Italy
FLEA, Luxembourg
FNADE, France

HRABRI ČISTAČ, Serbia
IWMA, Ireland
LASUA, Latvia
NORSK INDUSTRI, Norway
PASEPPE, Greece

PIGO, Poland
SRI, Sweden
VA, Netherlands
VÖEB, Austria
YTP, Finland

In the run up to COP 21, it needs to be stressed that landfill reduction will contribute significantly to mitigating GHG emissions. European landfills emit the equivalent of 60 million tons of CO₂ which equals around 35% of the total emissions of the steel producing industry.

Furthermore, the Commission's original proposals on waste targets were mainly about the supply side. The proposals to ban recyclable waste from landfill by 2025, and to set a 70% recycling target for municipal waste by 2030 would vastly increase the supply of secondary raw materials. But where will the demand for these additional materials come from?

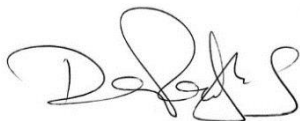
Secondary raw materials compete with raw materials from primary sources. The environmental cost of using primary raw materials should be better reflected in their price. In some respects, such as homogeneity, secondary raw materials are at a disadvantage to primary raw materials. Recyclers also face challenges relating to the application of the REACH chemicals regulation.

If Europe truly believes in the wider economic, environmental and social advantages of a circular as opposed to a linear economy, it must recognise that market forces alone, even market forces bolstered by supply side measures, will not deliver a more Circular Economy. If the cost of collecting and sorting secondary raw materials outweighs the output value of that material, it could become uneconomic to collect and process much of Europe's recyclable waste.

That is why FEAD is calling on the Commission to put much more emphasis on the demand side in its revised proposals by including the following "pull" measures:

- Minimum recycled content requirements for selected products
- Minimum green public procurement requirements at EU level to boost purchase of recycled products and materials
- Eco-labelling rules to incorporate indications of recycled content and recyclability
- Lower or zero rate of VAT on second hand goods and products with recycled content

I would like to thank you in advance for the consideration you will give to our recommendations.



David Palmer-Jones
President



Nadine De Greef
Secretary General

FEAD is the European Federation representing the European waste management industry. FEAD's members are national waste management associations covering 18 Member States, as well as Norway and Serbia. 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.