

Réponse finale de l'Afep au questionnaire de la Commission européenne sur les objectifs de gestion des déchets

Les réponses portent uniquement sur les sections 3, 6 et 7 après accord des entreprises, compte tenu de la position intersectorielle de l'Afep.

1. Personal Details

In what capacity are you responding to this consultation?* (compulsory)

. As an industry, not-for-profit, or academic organisation (i.e. all other stakeholders)

Name : Boquet, Director for Environment and Energy issues at Association française des entreprises privées.

Surname

Email address : fn.boquet@afep.com

What type of organisation do you represent?*

- Industry trade body/organisation
- Industry
- Not-for-profit/non-governmental organisation
- Academic institution
- Other

If other, please specify

What is the name of your company or organisation?*

In which country is your head office/organisation based?*

France

In what country do you live ?

France

Please provide the full name of the public authority/body for which you are responding.

Association française des entreprises privées

In what country are you based ? France

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.

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:

"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 Otherwise the contribution will not be published nor will, in principle, its content be taken into account."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 give permission for my feedback to be published as it is**

– **Please ensure that my feedback is kept anonymous**

2. Consultation for European Citizens (pas de réponse Afep à cette section)

As a citizen of the European Union you can either answer the more technical consultation that is open to all stakeholders, or you can answer a small number of questions relating to the general themes covered in the technical consultation. Alternatively, you can respond to both the technical and citizen consultation. You can download a full list of all of the questions from the official website of the Targets Review Project.

To which consultations would you like to respond? Please select one of the following three options:

Do you make efforts to reduce the amount of household waste you produce?*

Please identify which of the following actions you are undertaking to reduce your waste (you may tick more than one option if appropriate):

What are the main reasons why are you not trying to reduce the amount of waste you produce (you may tick more than one option if appropriate)?

Do you sort your waste out for recycling?*

What are the reasons for not sorting out your waste for recycling?

For what reasons are you sorting your waste (select more than one option if appropriate)?

- Sorting waste is compulsory in my municipality.
- I pay less if I sort my waste for recycling.
- I think recycling helps to save the resources of the planet.
- I need to sort my waste so that my refuse bin does not become too full.
- It is something that the public authorities recommend I do.
- All my neighbours are sorting their waste.

— Other reasons.

Which of the following wastes are you regularly sorting (please tick multiple options if appropriate)?

Would you sort out other waste streams for recycling if it was made convenient for you to do so?*

Which additional waste streams would you like to be collected for recycling?

Municipal waste management represents a cost for the public authorities. Amongst the following proposals, please tick the one you agree with most strongly. The costs of municipal waste management should be paid by: *

General taxes paid by all citizens.

- Partly by general taxes, and partly by those placing products on the markets (such as producers of electronic goods, companies whose products are sold in packaging, etc.).
- Partly by general taxes, and partly by charges linked to the amount of unsorted waste produced by the household (so that those households producing less waste, or making greater efforts to recycle, are paying less than the others).
- By a combination of general taxes, contributions from companies selling goods whose packaging may end up
- as waste, and charges linked to the amount of unsorted waste produced by the household.
- Other (please explain below).

Please explain what you mean by "Other":*

3. Waste Framework Directive (réponse Afep à cette section)

The targets set out in Article 11(2) of the Waste Framework Directive are:

- a)** by 2020, the preparing for re-use and the recycling of waste materials such as at least paper, metal, plastic and glass from households and possibly from other origins as far as these waste streams are similar to waste from households, shall be increased to a minimum of overall 50 % by weight.
- b)** by 2020, the preparing for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials, of non-hazardous construction and demolition waste excluding naturally occurring material defined in category 17 05 04 in the list of waste shall be increased to a minimum of 70 % by weight.

Article 11 stipulates that by the end of 2014 at the latest, the Commission should examine these targets with a view to, if necessary, reinforcing the targets and considering the setting of targets for other waste streams. Pursuant to Article 9, the Commission should propose, where appropriate, waste prevention and decoupling objectives for 2020. Waste prevention targets are discussed in the section of the consultation concerning the Roadmap on Resource Efficiency (see below).

In an effort to improve quality the Waste Framework Directive has called for the introduction of separate collections. In this regard, Article 10(2) of the Directive states that, 'Waste shall be collected separately if technically, environmentally and economically practicable and shall not be mixed with other waste or other material with different properties'. Article 11(1) goes on to say that, 'Subject to Article 10(2), by 2015 separate collection shall be set up for at least the following: paper, metal, plastic and glass'.

Figure 1 shows that the combined rate for recycling and composting / digestion of municipal waste ranged from around 5% to more than 60% in different EU Member States (it should be noted that there are some ongoing issues associated with the way this data is reported).

Figure 1: Recycling and Composting of Municipal Waste by Member State (2011 Data)

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

3.1. Key Issues

A number of key issues have been identified in relation to the above targets. These issues are presented in no particular order in the list below.

Targets on Municipal Waste, Article 11 (2) a

1. The targets for preparation for reuse and recycling set out in Article 11(2) a of the Waste Framework Directive can be met in different ways. The four methods outlined in the **Commission Decision on calculation methods (2011/753/EU)** are not equivalent.
2. The easiest route to compliance (of the four methods mentioned above) implies only a small additional effort relative to what is already required under the Packaging Directive. This weakens the significance of the targets.
3. The target waste stream is defined as being waste from 'households and possibly from other origins as far as these waste streams are similar to waste from households'. This leaves too much room for interpretation and makes the performance against the targets non-comparable.
4. There is some ambiguity about the materials which can be included as counting towards the target under the different calculation methods. This is unhelpful in terms of setting a target against which the performance of all Member States can be compared.
5. There are already concerns regarding the quality of that material which is collected for recycling. This has to be considered in any change to the targets.
6. The Commission Decision on calculation methods (2011/753/EU) lacks appropriate proposals on how to measure preparation for reuse.
7. According to reported data, some Member States have already met and exceeded the recycling targets set out in the Waste Framework Directive and the Packaging Directive.

Construction & Demolition Waste Targets, Article 11 (2) b

The **Commission Decision on calculation methods (2011/753/EU)** provides a clear proposal on how to calculate the recovery rate for construction and demolition (C&D) waste set out in Article 11(2)b of the Waste Framework Directive. However, no reports have yet been submitted by Member States so it is not yet clear what approach different countries will take in this reporting and how they are performing relative to the target.

The existing target in the Directive includes other material recovery including backfilling operations. These operations will be complex to measure and calculate and their environmental impact will be uncertain.

Recycling and material recovery are poorly differentiated in the Directive.

*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? **No.** 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: /

Second issue: /

Third issue: /

3.2. Suggestions for Revision

This section considers options for changes to the Waste Framework Directive. A number of suggested options for changes to the Directive targets are listed below, in no particular order. If you feel that there are possible solutions which are missing from the list, and which you feel should be given careful consideration, you may identify up to three additional solutions which you feel are important in the free text boxes below. Please only identify options which you strongly support.

List of suggestions

For each solution that has been identified please give a score, on a scale of 1 to 5, to clearly demonstrate your preference for the solution proposed. For example, give a score of 1 to any options you feel are not worth further consideration and a score of 5 to options you believe are extremely good ideas and should be given serious consideration (this is not a ranking exercise so you may give the same scores to more than one option).

Please note: solutions 1 to 7 listed below deal with the targets on **municipal waste** (i.e. Article 11 (2)

a), whilst items 8 to 11 deal with the **construction & demolition waste** target (i.e. Article 11 (2) b).

a: 1 = poor idea, not worth consideration

b: 2

c:

3 = moderately good idea, may be worth further consideration

d: 4

e: 5 = very good idea, definitely deserves further consideration

	a	b	c	d	e
1. Establish a single target and calculation method based only on the quantity of municipal waste collected. This would require that a consistent definition of municipal waste is used in all Member States.					X
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).		X			
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.			X		
4. Adjust the targets so that biowaste is also included			X		
5. Set targets which reflect environmental weightings for materials (for example, through reference to greenhouse gas savings achieved through recycling).		X			
6. Improve monitoring and validation of the reports submitted by Member States so that the consistency and reliability of data can be validated.					X
7. Introduce requirements on businesses to sort a range of waste materials for recycling and composting / anaerobic digestion.				X	
8. The 70% recycling target should not include backfilling.			X		
9. Provide clear definitions of recycling and material recovery, and how these should be calculated for the C&D waste stream.					X
10. Mandate sorting of wastes at C&D sites with a special attention to hazardous waste.					X
11. Require facilities which sort 'mixed' C&D wastes to achieve a high level of recycling of the input materials.			X		

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

1/ Extending the existing targets to include other specific waste streams beyond paper, metal, plastic and glass does not seem appropriate: an assessment of the present state of waste streams is a prerequisite. If the assessment concludes that new targets could be set, then this decision should be left to the subsidiarity of Member States, given the geographic specificities of the fluxes.

2/ The current state in which 4 calculus methodologies can be applied for municipal waste is not satisfactory: there is strong need for a unique methodology at EU level, including the way imports and exports are to be taken into account (it is a major source of distortion between Member States at present). It is also of utmost importance to better define the conditions and the procedure under which a waste ceases to be a waste. Those evolutions should be implemented in view of better harmonization between Member States.

3/ An impact assessment should be carried out in order to identify benefits and concerns on proposition number 8.

Second solution: /

Third solution: /

4. Landfill Directive (pas de réponse Afep à cette section)

The relevant targets under Article 5.2 of the Landfill Directive are:

- a) by 16 July 2006, biodegradable municipal waste going to landfills must be reduced to 75 % of the total amount (by weight) of biodegradable municipal waste produced in 1995 or the latest year before 1995 for which standardised Eurostat data is available;
- b) by 16 July 2009, biodegradable municipal waste going to landfills must be reduced to 50 % of the total amount (by weight) of biodegradable municipal waste produced in 1995 or the latest year before 1995 for which standardised Eurostat data is available; and
- c) by 16 July 2016, biodegradable waste going to landfills must be reduced to 35% of the total amount (by weight) of biodegradable municipal waste produced in 1995 or the latest year before 1995 for which standardised Eurostat data are available.

Note that some Member States have been allowed an additional four years to comply in cases where they were landfilling more than 85% of their waste in 1995. Performance against the targets is shown in Figure 2 for countries without such derogations, and those eligible for derogations, respectively. The Figure shows that of those countries without derogations, only Italy appears to have failed to meet the 2009 target. Of those countries with derogations, Cyprus, Czech Republic, Greece, Latvia, Lithuania, Malta, Poland and Portugal are shown to be landfilling more than the Directive allows (Croatia has a derogation from the first target to 2013). It should be noted, however, that for the last five of these countries the performance against the target has been based on an estimate.

Figure 2: Percentage of biodegradable municipal waste landfilled in 2006, 2009 and 2010 compared with the amount generated in 1995: A) countries without derogations; and B) countries with derogations

Notes: Graph A) 2010 data estimated for all countries by Italy. Graph B) 2009 data are estimated for Bulgaria, Poland and Portugal. The 2010 data are estimated for all countries but Ireland and the United Kingdom. Diverting derogations: Ireland: derogation only for the 2006 and 2009 targets, to be met by 2010 and 2013. Portugal: derogation only for the 2009 and 2016 targets, to be met in 2013 and 2020. Slovenia: derogation only for the 2016 target, to be met by 2020. Croatia must meet the targets by 2013, 2016, and 2020.

Source: European Environment Agency (2013) Managing Municipal Waste – A Review of Achievements in 32 European Countries, EEA Report No 2 / 2013, Luxembourg: Publications Office of the European Union, 2013.

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.

*

Yes	No
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4.1. Key Issues

1A number of key issues have been identified in relation to the above targets. These issues are presented, in no particular order, below:

1. The targets set out in Article 5(2) of the Landfill Directive are more difficult to meet for countries where consumer consumption was low in 1995, but has subsequently grown rapidly (resulting in increasing waste arisings). Countries which already had high levels of consumption in 1995 and whose economic growth has been slower are likely to find it much easier to meet the targets.
2. Targets do not have the same effect across all countries since the term 'municipal waste' is applied differently across Member States.
3. The landfill diversion targets may lead countries simply to switch from landfilling large proportions of waste to treating large amounts of waste through incineration or mechanical biological treatment (MBT), so there is no guarantee of a significant move up the waste hierarchy.
4. Reporting against the Article 5(2) targets is not very accurate. This is because the target relates to a group of wastes (that is, biodegradable wastes) which, in order to be measured, requires reliable figures on the composition of municipal waste, or of landfilled municipal waste. This information is often not available within many Member States, and where it is, it is often out of date.
5. The Directive does not define how waste categories such as 'bio-plastics', 'textiles', or 'fines', which are frequently found in composition analyses, should be defined in terms of biodegradability.
6. The reference date of 1995 effectively sets a reference point for which data are not well known in many instances, as many countries had no reliable data on waste composition available at that time. This is a greater problem for new Member States.
7. Countries have adopted different approaches to the assessment of when waste is deemed to be 'no longer biodegradable' (for example, using fermentability measurements, or thresholds, and using different test methods or hurdle values). This leads to different costs for pre-treating biodegradable wastes in different countries (it is important to note that this is not the acceptance criteria).
8. Too much waste is still landfilled and more needs to be done to limit the disposal of material which could otherwise be put to a useful purpose.

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:

Second issue:

Third issue:

4.2. Suggestions for Revision

A number of suggested options for change to the Landfill Directive targets are listed below, in no particular order. If you feel that there are possible solutions which are missing from the list, and which you feel should be given careful consideration, you may identify up to three additional solutions which you feel are important in the free text boxes below.

List of suggestions

For each solution that has been identified please give a score, on a scale of 1 to 5, to clearly demonstrate your preference for the solution proposed. For example, give a score of 1 to any options you feel are not worth further consideration and a score of 5 to options you believe are extremely good ideas and should be given serious consideration (this is not a ranking exercise so you may give the same scores to more than one option).

a: 1 = poor idea, not worth consideration

b: 2

3 = moderately good idea, may be worth further consideration

d: 4

e: 5 = very good idea, definitely deserves further consideration

	a	b	c	d	e
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.					
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.					
3. Standardise the approach to performance measurement and progress reporting.					
4. In Member States where no data exists for 1995, a more recent baseline year should be set with targets adjusted accordingly.					
5. Clarify when treated waste should be considered 'no longer biodegradable' from the perspective of the Landfill Directive.					
6. Further tighten existing targets (e.g. move progressively towards zero					

biodegradable municipal waste sent to landfill).					
7. Progressively include all biodegradable wastes (not just biodegradable wastes of municipal origin) within targets similar to the existing ones.					
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).					
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.					

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:

Second solution:

Third solution:

5. Packaging and Packaging Waste Directive (pas de réponse Afep à cette section)

As a reminder, the key targets contained in Article 6(1) of the Packaging and Packaging Waste Directive are currently:

- Article 6(1)b: no later than 31 December 2008 60 % as a minimum by weight of packaging waste will be recovered or incinerated at waste incineration plants with energy recovery;
- Article 6(1)d: no later than 31 December 2008 between 55 % as a minimum and 80 % as a maximum by weight of packaging waste will be recycled;
- Article 6(1)e: no later than 31 December 2008 the following minimum recycling targets for materials contained in packaging waste will be attained:

(i) 60 % by weight for glass;

(ii) 60 % by weight for paper and board;

(iii) 50 % by weight for metals;

(iv) 22.5 % by weight for plastics, counting exclusively material that is recycled back into plastics;

(v) 15 % by weight for wood.

It's worth noting that the 12 new Member States have derogations from the dates set out here, giving them more time to comply (the relevant years are between 2012 and 2015). In addition to the above, Article 9 of the Directive sets out essential requirements to promote the fitness for purpose of packaging, as well as its reusability and recoverability (notably, its recyclability). No specific targets are set, however, in Article 9.

The Graphic below shows how the different Member States fared against the 2008 target for recycling (55%) in the year 2010, according to data reported to Eurostat. The Table indicates considerable variation in reported performance levels. It should be noted that all countries who reported a recycling rate below 55%, with the exception of Sweden, are entitled to a derogation and so would not have had to meet the target at this time.

Figure 4: Reported Performance of Member States, Recycling of Packaging Waste (2010 Data)

Note: the dashed line indicates the 55% target for 2008, or later years in the case of the newer Member States

Source: Eurostat

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.*

Yes	No
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5.1. Key Issues

A number of key issues have been identified in relation to the above targets. These issues are listed, in no particular order, below. Please note that matters related to the Essential Requirements and eco-design are being considered under a separate study.

1. There are significant differences in the way Member States report on the Article 6(1) targets. For example:
 - **Three different calculation methods** are officially recognised by the Commission for calculating the amount of packaging placed on the market;
 - The point at which materials are considered to have been recycled varies between Member States (e.g. some Member States report on the quantity of material collected, while others report the actual quantity of material reprocessed);
 - Where countries export materials for recycling, it is more difficult to report the actual quantity of material that is ultimately recycled;
 - The basis for assessing the quantity of packaging material being recycled is often very difficult because packaging and non-packaging fractions of a given material may be collected, or subsequently mixed, together (necessitating the use of estimation methods of varying quality);
 - Assumptions regarding the way recycling and recovery are reported for metals varies across countries (e.g. Member States take different approaches, and use different assumptions, for estimating recycling rates from incinerator bottom ash/MBT plants, while others do not take this source of metal packaging into account); and
 - The definition of ‘recycling’ blurs into ‘recovery’ in some Member States.

All of these factors have consequences in terms of how easy or difficult it is for Member States to fulfil the Directive targets. It also affects the comparability of the performance data.

2. Some Member States have established minimum thresholds below which producers have no reporting and/or recycling obligation. These de-minimis thresholds are based on the quantity of packaging material placed on the market by producers. Differences in these thresholds mean that estimates of how much packaging is placed on the market vary in accuracy.
3. Based on the current targets in the Packaging Directive, Member States that reuse packaging materials gain no recognition for this. Indeed, using more reusable packaging, in order to

comply with the waste hierarchy, makes it more difficult for Member States to achieve the recycling targets.

4. There is an overlap between the Waste Framework Directive recycling target for municipal waste and the targets of the Packaging Directive.
5. Down-cycling' is a widely reported problem in the recycling of packaging waste (the focus appears to be on quantity recycled rather than the quality of the materials being recycled).
6. There is no strong basis for the different recycling rates that have been set for glass, paper/board, metals, plastics, and wood in Article 6(1)e of the Packaging Directive. These weight based targets do not have an environmental basis and are therefore not in alignment with the Resource Efficiency Roadmap and Raw Materials Initiative.
7. The different material recycling targets set out in Article 6(1)e mean that there is no level playing field across all materials (e.g. the recycling target for glass is much higher than that for plastics).
8. Article 6(1)d of the Packaging Directive sets a maximum limit of 80% on the amount of packaging waste a Member States can recycle.* Such a limitation does not seem well-aligned with the aspirations to improve resource efficiency within the EU.
9. According to reported data (see above), many Member States have already met and exceeded the recycling targets set out in the Packaging Directive.
10. Several countries focus on recovering packaging waste from commerce and industry with limited recovery of packaging waste from households.
11. The share of the overall cost of recycling which is met by 'producers' varies hugely across countries (from close to 0% to 100%).
12. There are some inconsistencies across Member States in how composite materials are treated under the Directive.

**Article 6(1)d states that: 'no later than 31 December 2008 between 55 % as a minimum and 80 % as a maximum by weight of packaging waste will be recycled.'*

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:

Second issue:

Third issue:

5.2. Suggestions for Revision

A number of suggested options for change to the Packaging Directive targets are listed below, in no particular order. Please note, once again, that matters related to the Essential Requirements and eco-design are being considered under a separate study. If you feel that there are possible solutions which are missing from the list, and which you feel should be given careful consideration, you may identify up to three additional solutions which you feel are important in the free text boxes below.

List of suggestions

For each solution that has been identified please give a score, on a scale of 1 to 5, to clearly demonstrate your preference for the solution proposed. For example, give a score of 1 to any options you feel are not worth further consideration and a score of 5 to options you believe are extremely good ideas and should be given serious consideration (this is not a ranking exercise so you may give the same scores to more than one option).

- a: 1 = poor idea, not worth consideration
b: 2
c: 3 = moderately good idea, may be worth further consideration
d: 4
e: 5 = very good idea, definitely deserves further consideration

	a	b	c	d	e
1. The methodology for calculating recycling rates should be standardised so that data (and hence performance levels) are comparable across Member States.					
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.					
3. Bring the recycling targets for different materials closer together to ensure a more level playing field.					
4. Incorporate “weightings” for materials recycled based on environmental benefits derived from recycling the material.					
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.					
6. Set specific targets for recycling of packaging waste from households to encourage further recycling of household packaging.					
7. Remove from the Directive the maximum limit of 80% that stipulates how much packaging waste a Member State is allowed to recycle.					
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).					
9. Adjust the definitions for reuse and recycling in the Packaging Directive to be consistent with those contained in the Waste Framework Directive.					

	a	b	c	d	e
10. Expand the recycling target to include reuse, by allowing the reuse of packaging to be credited to the recycling target.					
11. Introduce targets for reuse for commercial transit packaging.					
12. Introduce targets for reuse for all packaging.					

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:

Second solution:

Third solution:

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).

Paper and Cardboard:

60%	75%	90%
65%	80%	>90%
70%	85%	

Glass

60%	75%	90%
65%	80%	>90%
70%	85%	

Metals

50%	70%	90%
55%	75%	>90%
60%	80%	
65%	85%	

Plastic

22,5%	50%	80%
25%	55%	85%
30%	60%	90%
35%	65%	>90%
40%	70%	
45%	75%	

Wood

15%	45%	75%
20%	50%	80%
25%	55%	85%
30%	60%	90%
35%	65%	>90%
40%	70%	

All Packaging

55%	70%	85%
60%	75%	90%
65%	80%	>90%

Other Material (please specify below)

15%	40%	70%
20%	45%	75%
22,5%	50%	80%
25%	55%	85%
30%	60%	90%
35%	65%	>90%

If you have entered a recycling rate for "Other Material" above, please state what material this is for:

Timeline for future recycling rates

Please indicate the year by which you think it would be possible to achieve the recycling rates that you have defined for each of the materials listed above.

- a: 2020
- b: 2021
- c: 2022
- d: 2023
- e: 2024
- f: 2025

Paper and Cardboard	a	b	c	d	e
Glass					
Metals					
Plastic					
Wood					
All Packaging					
Other material (as defined above)					

6. Consultation Regarding the Aspirations of the Roadmap to a Resource Efficient Europe (réponse Afep à cette section)

In order to contribute to the development of resource efficiency within Europe the Commission has adopted aspirational targets for waste prevention and management in the **Roadmap to a Resource Efficient Europe** (the Roadmap). These aspirational targets were proposed in the Commission's proposal for a **7th Environmental Action Plan**. In the Roadmap, the following aspirations are included within the overall Milestone for 2020:

1. Waste generated per capita is in absolute decline;
2. More materials, including materials having a significant impact on the environment and critical raw materials, are recycled;
3. Reuse and recycling are economically attractive options, with more material recycled and high quality recycling ensured;
4. Energy recovery is limited to non-recyclable materials (compostable materials are also considered to be recyclable); and
5. Landfilling is virtually eliminated.

This section includes questions on the application of the Roadmap on Resource Efficiency and its relation to the evolution of the main targets contained in legislation. In the sections below, questions will be asked on the application of the existing targets.

6.1. Waste Prevention

Setting targets for waste prevention across countries with different levels of per capita income, and with quite different industrial structures, is not straightforward. The difference in industrial structures makes it extremely difficult to set targets which present an equal challenge for different countries. Figure 4 shows how much the figures for waste per inhabitant vary across countries.

Ideally, it might be possible to set targets at a sectoral level, but this may pose challenges in terms of data quality.

For municipal waste, the widely varying per capita income levels mean that when targeting household, or municipal wastes for waste prevention one would need to be sensitive to these variations (which are already reflected in different rates of per capita waste generation – see Figure 5 below). Finally, since waste generation is affected by the state of the economy, in order to clearly isolate the effects of waste prevention activity, targets should ideally highlight the effects of waste prevention rather than the impact of changes in economic conditions (otherwise, ‘waste prevention’ may actually reflect depressed economic conditions). In principle, this is what is referred to in Article 9 (c) of the Waste Framework Directive, which suggests that where appropriate, by the end of 2014, waste prevention and decoupling objectives for 2020 may be established.

Figure 4: Total Waste Generated per Capita (2010 Data)

Source: Eurostat

Figure 5: Municipal Waste Generated per Capita (2011 Data)

Source: Eurostat

Do you agree with the principle that there should be targets for waste prevention?

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
-----------------------------------------	-----------------------------

Do you think there is a case for setting prevention targets on specific waste streams/materials/products?

Companies believe that continuous improvement is necessary to better prevent wastes. They consider that such an improvement can only be set up by:

- identifying specific homogenous product categories ;
- defining, for each category, methodologies of prevention without integrating systematically a quantitative target ;
- fostering voluntary initiatives by the whole value-chain or by companies at sector or sub-sector levels ;
- giving priority to eco-conception;
- identifying key competitiveness indicators as well systemic indicators which can help foster waste prevention ;
- finally, setting progressive targets that are compatible with industrial investment cycles.

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': /

Waste Stream /Material/Product 'B': /

Waste Stream /Material/Product 'C': /

Waste Stream /Material/Product 'D': /

Suggestions for new waste prevention targets

For each solution that has been identified please give a score, on a scale of 1 to 5, to clearly demonstrate your preference for the solution proposed. For example, give a score of 1 to any options you feel are not worth further consideration and a score of 5 to options you believe are extremely good ideas and should be given serious consideration (this is not a ranking exercise so you may give the same scores to more than one option).

a: 1 = poor idea,

b: 2 = not worth consideration

c: 3 = moderately good idea,

d: 4 = may be worth further consideration

e: 5 = very good idea, definitely deserves further consideration

	a	b	c	d	e
1. In line with the proposal in the Roadmap, a requirement that waste generated per capita is in decline by 2020.				X	
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.					X
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.			X		
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.	X				
5. Introduce requirements for progressive coverage of households by pay-as-you throw schemes.				X	

6.2. Preparation for Reuse

The Commission recognises the contribution to resource efficiency that can be made through preparation for reuse.

In principle, there are a range of wastes which could be targets for preparation for reuse, notably furniture and WEEE. However, setting targets for preparation for reuse for such materials is not considered to be straightforward:

the quantities are not generally well known across Member States, and the proportion of what is discarded that can be sorted and repaired may vary across countries.

Do you agree with the principle that there should be separate targets for preparation for reuse?*

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
-----------------------------------------	-----------------------------

Do you think there is a case for targets for preparation for reuse on specific waste streams/materials/products?

Reuse should be excluded from the recovery objective of the Directive, as a way to encourage it.

If so, which waste streams/materials/products do you feel should be covered by a target, and how should the target be specified? Please provide an answer for each material/waste stream in the free text boxes below.

Waste Stream /Material/Product 'A': /

Waste Stream /Material/Product 'B':

Waste Stream /Material/Product 'C':

Waste Stream /Material/Product 'D':

6.3. Recycling Rates

The Commission is keen to see that more materials are recycled, especially critical raw materials and those that have a significant impact on the environment.

Do you agree with the view that recycling rates should be increased and/or be made to include more materials/waste streams?

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
------------------------------	----------------------------------------

At this stage, it is important that Eastern European countries cope up with Western European countries in terms of recycling efficiency. The 1st report on this subject is expected in September 2013 and therefore, it is necessary to read its conclusions in order to see whether the targets established for 2020 will be met.

Future recycling rates

Please tick the boxes which you believe represent the highest level of recycling that could reasonably be obtained for each of the listed waste streams by 2025. Please note that you should answer this question based on a view as to what can be achieved for the whole waste stream. Please also note that you do not have to give an answer in each column if you feel you lack the knowledge to do so.

Prior to this table, the Commission should have indicated the current state of play in terms of data for each stream. It is therefore not possible to identify new trends for 2025. Companies also underline the lack of any target on the collection of waste; it is an important cause of the difficulty to intensify recycling. Strengthening current recycling rates should be subject to a full-fledged economic and technical feasibility study. Recycling rates should be based on types of materials given their suitability for such treatment.

- a: 50%
- b: 55%
- c: 60%
- d: 65%
- e: 70%
- f: 75%
- g: 80%
- h: 85%
- i: 90% or more

Household Waste	a	b	c	d	e	f	g	h	i
Municipal Waste									
Commercial Waste									
Industrial Waste									
Construction & Demolition Waste									

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?

Yes	No <input checked="" type="checkbox"/>
-----	----------------------------------------

Specific efforts made by Member States from one year to the next can be measured and reported but they should not replace common requirements for all Member States. For those which are in more difficult economic situation, specific adjustments in deadlines have already been decided at EU level and they should be respected.

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?

Before introducing new targets for recycling, specific targets for the collection of waste should be implemented. A state of play on the current percentage of recycling for all relevant streams should be made available. Improvement of recycling rates could also be obtained through a better organisation of the companies belonging to that field and more widely, by the whole corresponding value-chain.

If so, which waste streams/materials/products do you feel should be covered by new targets and why?

Waste Stream /Material/Product 'A': /

Waste Stream /Material/Product 'B': /

Waste Stream /Material/Product 'C': /

Waste Stream /Material/Product 'C': /

6.4. Limiting Incineration of Waste Which Might Otherwise be Recycled

As stated above the Roadmap aims to ensure that energy recovery is limited to non-recyclable materials.

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)?

Yes	No X
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Companies consider that material and energy recovery are essential. However, their view is that flexibility should be better taken into account as landfills solutions will tend to be reduced while incineration plants will tend to be more numerous to face the volume of waste. Therefore, any evolution considering the level of incineration of the waste streams must be subject to a prior and thorough impact assessment study. If such a study shows global positive impacts given specific materials, evolutions should only be envisaged in a very progressive approach which is founded on industrial investments cycles.

Setting a maximum level of incineration

Would you support the implementation of a maximum level for the amount of waste that could be incinerated as applied to one or more of the following waste streams:

	Yes	No
Household/ municipal waste		X
Commercial waste		X
Industrial waste		X
Construction and demolition waste		X

Other than the above waste streams are there any other to which you think a maximum level of incineration should apply? **No.**

If so, please specify in the text boxes below.

Other stream 'A'

Other stream 'B'

Other stream 'C'

Define a maximum level of incineration (pas de réponse Afep à cette section)

If you support the application of the concept to one or more waste streams, at what level do you believe it would be appropriate to set this for those waste streams in 2025?

- a: 10%
- b: 15%
- c: 20%
- d: 25%
- e: 30%
- f: 35%
- g: 40%
- h: 45%
- i: 50%
- j: 55%

Household Waste	a	b	c	d	e	f	g	h	i	j
Municipal Waste										
Commercial Waste										
Industrial Waste										
Construction & Demolition Waste										

6.4.1. Landfill (réponse Afep à cette section)

There are a number of possible ways in which the Commission's aspirational target that landfill should be 'virtually eliminated' could be implemented. Several options are defined below.

Suggestions for reducing the landfilling of waste

For each solution that has been identified please give a score, on a scale of 1 to 5, to clearly demonstrate your preference for the solution proposed. For example, give a score of 1 to any options you feel are not worth further consideration and a score of 5 to options you believe are extremely good ideas and should be given serious consideration (this is not a ranking exercise so you may give the same scores to more than one option).

a: 1 = poor idea,

b: 2 = not worth consideration

c: 3 = moderately good idea,

d: 4 = may be worth further consideration

e: 5 = very good idea, definitely deserves further consideration

	a	b	c	d	e
1. Landfilling should be limited to residues from a specified range (to be determined) of waste treatment operations.			X		
2. Landfilling should be limited to a certain percentage of waste generated (for instance 5%) from a particular date.	X				
3. Landfilling of recyclable/compostable waste (to be defined) should be banned.				X	
4. Landfilling of waste that is combustible should be banned.				X	
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.			X		

Are there any other proposals in addition to the above that you feel deserve serious consideration?

Yes.

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: It is very important to identify and stop all activities of illegal landfills.

Second solution: Tax provisions could be examined in order to identify their impacts on a better recovery of waste.

Third solution: /

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)?

Yes X	No
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7. Targets as a Tool in Waste Legislation (réponse Afep à cette section)

It is clear that the targets in existing Directives have, in most countries, led to greater attention being given to the management of waste. Most countries are fulfilling, or seem likely to fulfil, the recycling targets under the Packaging Directive (though some are missing the recovery targets in the earlier version of the Directive). The targets under the Landfill Directive seem likely to be missed by some countries, but for many others the targets in the Directive have provided the impetus to move municipal waste out of landfill and to increasingly manage wastes as a resource. It is too early to say how Member States will fare against the existing targets set in the Waste Framework Directive but the most recent statistics clearly indicate large differences between Member States' recycling levels. There are, as yet, no targets for waste prevention at the EU level, though both the Waste Framework Directive and the Roadmap to a Resource Efficient Europe anticipate the possibility of such targets being set in future.

Earlier sections of this consultation indicate that Member State performance is still highly variable where waste management performance is concerned. In those countries where targets seem unlikely to be met, it seems fair to say that the failure can be attributed to a reluctance to implement the policy instruments which have transformed waste management practice in the more successful Member States. Key instruments in this regard are as follows:

1. Landfill taxes increase the costs of disposal, and hence, make other solutions financially more viable in comparison. The use of taxes on landfill, and the level at which they are applied, varies significantly between Member States. Some countries, recognising the desirability of recycling over incineration, have also implemented taxes on incineration to help ensure that as waste moves out of landfill it does not simply move into incineration. The use of restrictions on landfill or incineration could also help move waste away from landfill or incineration.
2. Member States have often relied upon producer responsibility schemes to ensure proper funding of separate collection and recycling of various waste streams. These schemes have been of uneven quality. The relationship with municipalities takes different forms, the transparency of the systems is not always ensured, they appear to vary considerably in their cost effectiveness and the nature of the financial set up can lead to a situation where the system deployed gravitates towards the bare minimum that needs to be done to report a successful achievement of the desired targets. In addition, the breadth of application of EPR schemes (beyond packaging, batteries, end-of-life vehicles and waste electrical and electronic equipment) varies considerably across Member States.
3. Some Regional or National authorities have set in place systems of subsidies and penalties to incentivize municipalities to make greater efforts to encourage waste prevention and to intensifying the separate collection of wastes to improve recycling.
4. There is substantial variation in the extent to which pay as you throw schemes have been implemented in Europe. As well as encouraging greater recycling, such schemes, where appropriately designed, can help prevent waste.
5. Some countries have set rules which they wish householders, companies, and other organisations to follow. The use of mandates or regulations, either requiring the sorting of waste (for example, by commercial companies) or the provision of services to enable the sorting of waste (for instance by, or on behalf of, local authorities) is uneven across Member States.
6. Some countries have made use of targets for recycling which go beyond the minimum levels specified in EU Directives. In these cases, it is not unusual for some form of incentive, or sanction, to be announced so as to make it clear that the targets are not to be ignored.

It is sometimes the case that waste management plans developed by Member States reiterate the targets set out in EU Directives, and whilst stating they will be met, they offer little by way of clearly defined measures to give reassurance in this regard. In several countries the waste management plans are established at regional or local levels without a proper consolidation of the plans at national level.

Concerns have also been expressed that EU structural or cohesion funds have tended to be overly focused on the lower tiers of the waste hierarchy. If not carefully co-ordinated, such investment may stall initiatives aimed at improving recycling rates and encouraging waste prevention. This issue has been recently addressed with the **new regulation on the use of regional funds** and the definition of ex-ante conditions to be met by the Member States.

Alongside these concerns regarding the policy instruments used, there are also some questions to be answered regarding the definitions used in the legislation, and the reliability and comparability of the data reported by different countries regarding their performance levels. Where the approach to performance measurement and monitoring is not made clear, it should be expected that countries will report performance in varying ways. This reduces the comparability of the data and leads to some discussion as to what the preferred approach to performance measurement should actually be.

The above discussion raises important questions as to whether it is sufficient for the Commission to set targets and leave implementation to the Member States (as is currently the case), or whether there is a rationale for going further than 'just' setting targets.

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.

Yes <input checked="" type="checkbox"/>	No
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7.1 Suggestions for Change

Going beyond targets

As you answered "Yes" to the above question, please indicate whether you believe the following would be appropriate (select "Yes"/"No" from the dropdown lists):

	Yes	No
1. Develop guidance on the implementation of effective producer responsibility schemes to improve the transparency of the systems as well as their cost effectiveness.	<input checked="" type="checkbox"/>	
2. Develop guidance on the proper implementation of the waste hierarchy.	<input checked="" type="checkbox"/>	
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	<input checked="" type="checkbox"/>	

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.		
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.	X ou rien	
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.	X	

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:

Second solution:

Third solution:

8.1 General Comments (pas de réponse Afep à cette section)

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

Useful links

Official Website of the Targets Review Project: <http://www.wastetargetsreview.eu/>
EU Member State Municipal Waste Management Model: <http://www.wastemodel.eu/>
Europa: <http://ec.europa.eu/>
Eunomia Research & Consulting: <http://www.eunomia.co.uk/>
Your Voice in Europe: <http://ec.europa.eu/yourvoice/>

Background documents

Click HERE for a full list of questions contained in the consultation:
<http://www.wastetargetsreview.eu/section.php/4/1/consultation/bab1d9393f16166bb6a9b6dc316868a8>