

Consultation Response – Targets Review - Final Version

This paper provides guidance on how to respond to the 'targets review' consultation. (<http://www.wastetargetsreview.eu/section.php/4/1/consultation>). After seeking the groups' feedback, the responses have been consolidated in this document.

Please note that the consultation document is inflexible, and if it asks for the answer to be rated from 1 to 5, or yes/no, I could not include your comments. Therefore, you might see some comments that have been moved into other sections or deleted. When possible, your comments have influenced the score (1 to 5, etc).

IMPORTANT: Please respond to the consultation by 10 September. Input after that date will not be considered by the Commission.

As always, if you have any question/comment please let me know.

Thank you,

Ariadna

Waste Framework Directive

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

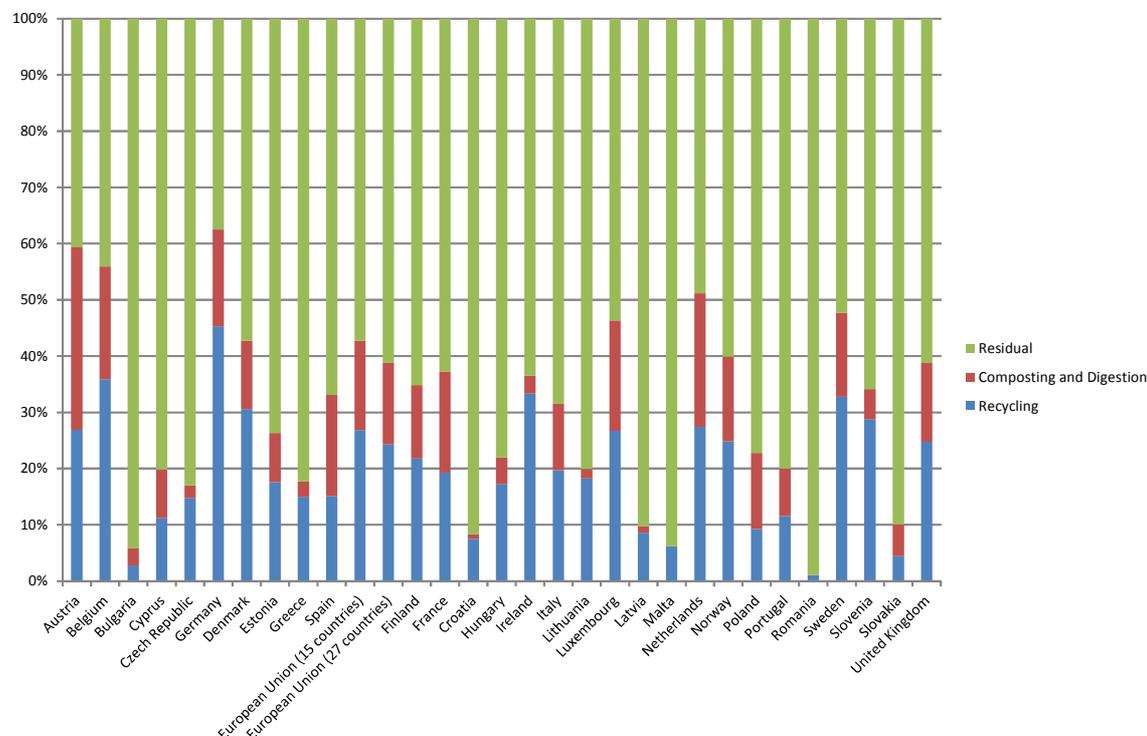
- a) by 2020, the preparing for re-use and the recycling of waste materials such as at least paper, metal, plastic and glass from households and possibly from other origins as far as these waste streams are similar to waste from households, shall be increased to a minimum of overall 50 % by weight.
- 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)



Source: Eurostat

1.1 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) 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

8. 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.
9. 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.
10. 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? 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.

¿Existen cuestiones relacionadas con los objetivos de la Directiva Marco de Residuos, que sientes son importantes y deben añadirse a los anteriores? Si es así, por favor describa un máximo de tres temas adicionales en los cuadros de texto (por favor asegúrese de que sólo entra un tema claramente definido por caja). Tenga en cuenta que estos temas deben estar relacionados con los objetivos existentes, no con otras cuestiones relacionadas con el estado general de la gestión de residuos.

1. Additional issue

The implicit assumption in the Waste Framework Directive is that recovery is better than landfill and is equivalent to recycling. This is not correct. For example, in the case of plastics, recycling is much better than landfilling or incineration, especially from a climate analysis point of view. If recycling is not possible, landfilling plastics has advantages over incineration, due to carbon capture and storage.

This results in a poor emphasis being placed on the top of the waste hierarchy. In other words, there are no targets on prevention or preparation for reuse/reuse, which means that most of Europe's waste management takes place at the bottom of the waste hierarchy. Sadly, having waste prevention plans in place alone is not enough to move European waste management to the top of the waste hierarchy.

El supuesto implícito en la Directiva marco de residuos es que la recuperación es mejor que el vertedero y es equivalente al reciclaje. Esto no es correcto. Por ejemplo, en el caso de los plásticos, el reciclado es mucho mejor que la descarga en vertedero o incineración, especialmente desde un punto de vista de análisis del clima. Si el reciclado no es posible, el vertido de plásticos tiene ventajas sobre la incineración, debido a la captura y almacenamiento de carbono.

Esto resulta en un pobre énfasis a la parte superior de la jerarquía de residuos. En otras palabras, no hay objetivos de prevención o preparación para la reutilización / reutilización, lo que significa que la mayor parte de la gestión de residuos de Europa tiene lugar en la parte inferior de la jerarquía de residuos. Lamentablemente, sólo con planes de prevención de residuos no es suficiente para mover la gestión europea de residuos a la parte superior de la jerarquía de residuos.

2 Additional issue

Since source segregation is not compulsory, although the main waste materials are collected it doesn't mean that the quality is good enough for closed-loop recycling. In addition, other municipal waste fractions, such as textiles or biowaste, should also be part of the materials included in the WFD for municipal separate collection.

Dado que la segregación de origen no es obligatoria, aunque se recogen los principales materiales de desecho, no significa que la calidad sea lo suficientemente buena para el reciclaje en ciclo cerrado. Además, otras fracciones de residuos municipales, como el textil o los residuos biológicos, también deben formar parte de los materiales incluidos en la DMR para la recogida selectiva municipal.

3 Additional issue

Data collection in member states needs to be improved and validated. This needs to be part of the target review, since otherwise the figures reported by member states on whether they meet the targets are not credible.

Recycling targets should include only the net waste that is going to be recycled and not what is initially diverted from incineration or landfill.

Es necesario mejorar y validar la recolección de datos en los Estados miembros. Esto tiene que ser parte de la revisión de objetivos, ya que de lo contrario las cifras notificadas por los Estados miembros sobre si cumplen con los objetivos no son creíbles.

Los objetivos de reciclaje deben incluir sólo los residuos netos que van a ser reciclados y no los que se desvían inicialmente de la incineración o de los vertederos.

1.2 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.

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).

1 = poor idea, not worth consideration

3 = moderately good idea, may be worth further consideration

5 = very good idea, definitely deserves further consideration

Para cada solución que ha sido identificada por favor da una puntuación en una escala de 1 a 5, para demostrar claramente su preferencia por la solución propuesta. Por ejemplo, dar una puntuación de 1 a las opciones que usted piense no merecen mayor consideración y una puntuación de 5 a las opciones que creas que son muy buenas ideas y se deben ser seriamente consideradas (esto no es un ejercicio de clasificación por lo que puede dar la misma puntuación a más de una opción).

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5 = muy buena idea, sin duda merece una mayor consideración

Targets on Municipal Waste, Article 11 (2) a

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. **5**

Establecer un objetivo y un método de cálculo basado sólo en la cantidad de residuos municipales recogidos. Para ello sería necesario que se utilice una definición coherente de residuos municipales en todos los Estados miembros.

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). 5

Ampliar los objetivos existentes para incluir otros flujos de residuos específicos más allá del papel, metal, plástico y vidrio (por ejemplo, madera, residuos de alimentos, textiles y otros materiales en los residuos municipales).

3. Establish a single target and calculation method based only on the quantity of *household* waste collected. This would require that a consistent definition of household waste is used in all Member States. 1

Establecer un único objetivo y método de cálculo basado sólo en la cantidad de residuos domésticos recogidos. Para ello sería necesario que se utilizara una definición coherente de los residuos domésticos en todos los Estados miembros.

4. Adjust the targets so that biowaste is also included. 5

Modificar los objetivos de manera que también se incluyan los biorresiduos.

5. Set targets which reflect environmental weightings for materials (for example, through reference to greenhouse gas savings achieved through recycling). 5

Establecer objetivos que reflejen las valoraciones ambientales de los materiales (por ejemplo, mediante la referencia a la reducción de gases de efecto invernadero lograda a través del reciclaje).

6. Improve monitoring and validation of the reports submitted by Member States so that the consistency and reliability of data can be validated. 5

Mejorar el seguimiento y la validación de los informes presentados por los Estados miembros para que la consistencia y fiabilidad de los datos se puedan validar.

7. Introduce requirements on businesses to sort a range of waste materials for recycling and composting / anaerobic digestion. 5

Introducir requisitos a las empresas que clasifican una amplia gama de materiales de desecho para su reciclaje y compostaje / digestión anaeróbica

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

8. The 70% recycling target should not include backfilling. 5

El objetivo de reciclado del 70% no debe incluir los materiales usados como relleno

9. Provide clear definitions of recycling and material recovery, and how these should be calculated for the C&D waste stream. 5

Proporcionar una definición clara de reciclaje y recuperación de materiales, y cómo éstos deben ser calculados para el flujo de residuos de C & D

10. Mandate sorting of wastes at C&D sites with a special attention to hazardous waste. 5

Obligación de clasificar los residuos C&D en los lugares donde se producen, con una especial atención a los residuos peligrosos

11. Require facilities which sort 'mixed' C&D wastes to achieve a high level of recycling of the input materials. 5

Exigir que las instalaciones que clasifican residuos C & D mezclados alcancen un alto nivel de reciclado de los materiales de entrada

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.

¿Hay otras propuestas, además de lo anterior que sientes merecen seria consideración? Si es así, por favor describa hasta tres soluciones adicionales en los cuadros de texto (como en la lista anterior, por favor asegúrese de que sólo se introduce una solución claramente definida por caja). Por favor, sólo incluir opciones con las que se esté claramente a favor.

1. Additional solution

Introduce compulsory source segregation to ensure that material pollution is minimised and allows high-quality recycling.

Introducir la clasificación por origen obligatoria para garantizar que la contaminación del material se reduce al mínimo y permite el reciclado de alta calidad.

2. Additional solution

Promote the top of the waste hierarchy by:

- 1) Introducing prevention, reuse and preparation for reuse targets, and
- 2) Introducing bans on recyclable and compostable materials going to landfill and incineration (with or without energy recovery).

Also, rather than having only a system of penalties, put in place financial incentives so that member states move quickly to the top of the waste hierarchy.

Promover la parte superior de la jerarquía de residuos a través de:

- 1) Introducir objetivos de prevención, reutilización y preparación para la reutilización, y
- 2) Introducir la prohibición de que materiales reciclables y compostables vayan a vertederos o se incineren (con o sin recuperación de energía).

Además, en lugar de tener sólo un sistema de sanciones, disponer de incentivos financieros para que los estados miembros se muevan rápidamente hacia la parte superior de la jerarquía de residuos.

3. Additional solution

It is essential that the revision exercise includes a revision of Article 2.6 of the [Commission Decision of 18 November 2011, establishing rules and calculation methods for verifying compliance with the targets set in Article 11\(2\) of Directive 2008/98/EC on calculation methods \(2011/753/EU\)](#), which allows compost-like output (digestion of mixed municipal solid waste) to be considered recycling and, therefore, to be counted as a contribution towards meeting the recycling targets.

Es esencial que el ejercicio de revisión incluya la revisión del artículo 2.6 de la Decisión de la Comisión de 18 de noviembre de 2011, sobre el establecimiento de normas y métodos de cálculo para verificar el cumplimiento de los objetivos establecidos en el artículo 11 (2) de la Directiva 2008/98/CE relativa a los métodos de cálculo (2011/753/EU), que permite que la producción de pseudo-compost (digestión de los residuos sólidos urbanos mezclados), se considere reciclaje y, por lo tanto, se contabilice como una contribución para el logro de los objetivos de reciclado.

The Waste Framework Directive should include a clear differentiation between compost produced from organic material collected selectively and others. Compost-like should not be considered as recycled material and called stabilised biowaste.

La Directiva Marco de residuos debe incluir una clara diferenciación entre el compost producido a partir de materia orgánica recogida selectivamente y otros. El pseudo-compost no debe ser considerado como material reciclado y se debe denominar materia orgánica estabilizada.

Landfill Directive

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

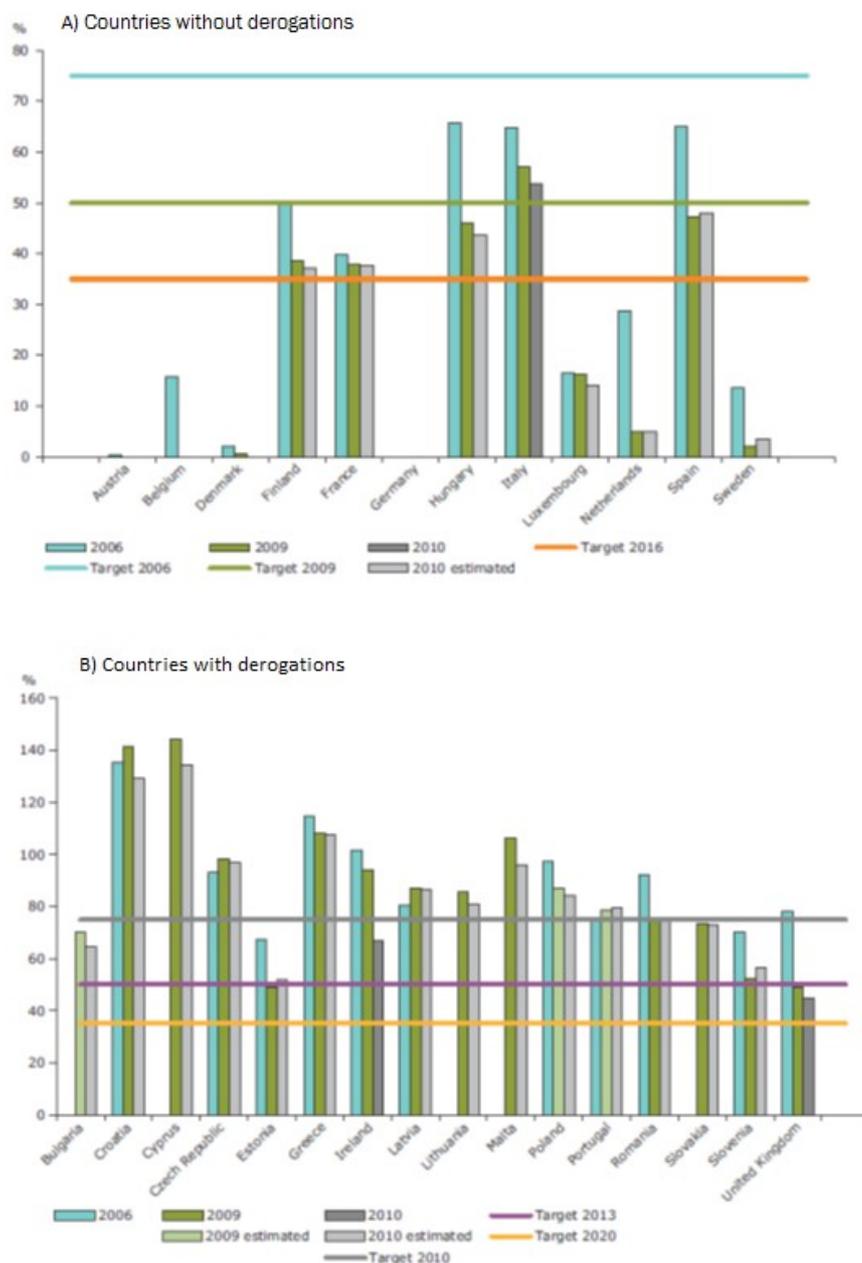
- a) by 16 July 2006, biodegradable municipal waste going to landfills must be reduced to 75 % of the total amount (by weight) of biodegradable municipal waste produced in 1995 or the latest year before 1995 for which standardised Eurostat data is available;
- b) by 16 July 2009, biodegradable municipal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

1.3 Key Issues

A 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.

¿Existen cuestiones relacionadas con los objetivos de la Directiva de Vertederos que entiendes son importantes y deben añadirse a los anteriores? Si es así, por favor describa un máximo de tres temas adicionales en los cuadros de texto (por favor

asegúrese de que sólo entra un tema claramente definido por caja). Tenga en cuenta que estos temas deben estar relacionados con los objetivos existentes, no con otras cuestiones relacionadas con el estado general de la gestión de residuos.

1. Additional issue

The Landfill Directive should seriously discourage the use of landfill (for all materials, not only biodegradable waste) and aim to send zero waste to both landfill and incineration across the EU. Any strategy that discourages or bans the use of landfill should go hand in hand with the banning of incineration, to avoid a shift to an unsuitable alternative.

La Directiva sobre vertederos debe desalentar seriamente el uso de vertederos (para todos los materiales, no sólo los residuos biodegradables) y establecer el objetivo de enviar cero residuos a vertedero y a incineración, en toda la UE. Cualquier estrategia que desanime o prohíba el uso de vertederos debe ir de la mano de la prohibición de la incineración, para evitar un cambio a una alternativa inadecuada.

2. Additional issue

As well as the requirement to pre-sort and remove the recyclable materials before they end up in landfill, there should be a strong emphasis on composting and feeding AD plants.

Además de la obligación de pre-seleccionar y retirar los materiales reciclables antes de que acaben en vertederos, debe haber un fuerte énfasis en las plantas de compostaje y biometanización.

3. Additional issue

In order to discourage the use of landfills, the EU should reward the member states that introduce a system of high landfill tax (hand in hand with high incineration taxes to avoid a shift from landfill use to incineration).

Con el fin de desalentar el uso de los vertederos, la UE debería recompensar a los Estados miembros que introduzcan un sistema de elevadas tasas de vertedero (de la mano de elevadas tasas de incineración para evitar cambiar de usar vertederos a usar incineradoras).

1.4 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.

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).

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Para cada solución que ha sido identificada por favor da una puntuación en una escala de 1 a 5, para demostrar claramente su preferencia por la solución propuesta. Por ejemplo, dar una puntuación de 1 a las opciones que usted piense no merecen mayor consideración y una puntuación de 5 a las opciones que creas que son muy buenas ideas y se deben ser seriamente consideradas (esto no es un ejercicio de clasificación por lo que puede dar la misma puntuación a más de una opción).

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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. **1**

Revisar los objetivos de modo que se establezcan de tal manera que no penalicen a los países cuyas economías están creciendo más rápido y que han empezado a partir de una base inferior

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. **5**
3. Standardise the approach to performance measurement and progress reporting. **5**
4. In Member States where no data exists for 1995, a more recent baseline year should be set with targets adjusted accordingly. **5**
5. Clarify when treated waste should be considered 'no longer biodegradable' from the perspective of the Landfill Directive. **3**
6. Further tighten existing targets (e.g. move progressively towards zero biodegradable municipal waste sent to landfill). **5**
7. Progressively include all biodegradable wastes (not just biodegradable wastes of municipal origin) within targets similar to the existing ones. **5**
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). **5**

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. 5

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.

1. Additional solution

A reduction in residual waste arisings per capita (in kg) should be considered.

2. Additional solution

Put in place financial incentives for member states in order to encourage the rapid move to the top of the waste hierarchy (rather than having a system of penalties only). Even though the Commission cannot impose taxes across the EU, those member states that put in place financial incentives to reflect the waste hierarchy and promote the top of it (moving away from landfill and incineration) should be rewarded.

3. Additional solution

Include the notion of "storage landfills" for those waste free of biodegradable waste but which contain homogeneous recyclable waste whose recycling is not yet economically viable and as a consequence the resources are sent to incineration when embodied energy speaks in favour of recycling.

NO VEIG CLARA AQUESTA OPCIÓ, POTSER EL SUBSTITUIRIA PER L'APUNT DEL BUREAU EUROPEU:

The setting of targets for reduction of residual waste should be set in WFD, not in landfill Directive to avoid their future restriction to residual waste being landfilled (and not as mentioned above being sent to landfill or incineration or MBT).

Packaging and Packaging Waste Directive

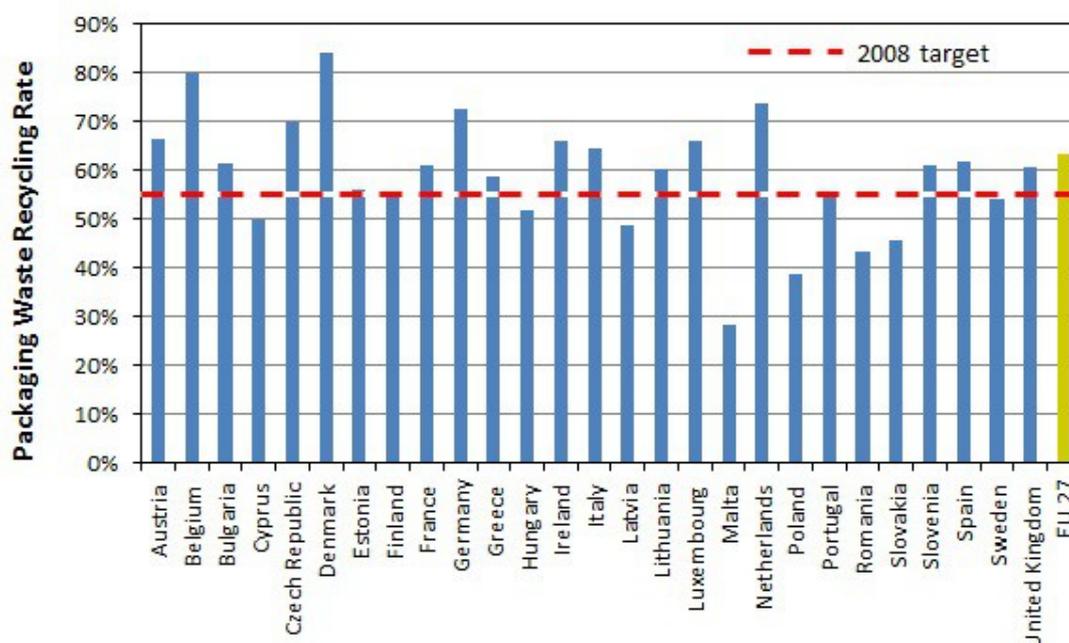
As a reminder, the key targets contained in Article 6(1) of the Packaging and Packaging Waste Directive are currently:

- ³⁵₁₇ 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;
- ³⁵₁₇ 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;
- ³⁵₁₇ 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 3: 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

1.5 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:
 - a. Three [different calculation methods](#) are officially recognised by the Commission for calculating the amount of packaging placed on the market;
 - b. 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);
 - c. Where countries export materials for recycling, it is more difficult to report the actual quantity of material that is ultimately recycled;
 - d. 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);

- e. 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
- f. 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.¹
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.

¹ 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.’

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.

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 the materials packaging waste recycling.

1. Additional issue

The Directive should not set a maximum recycling rate, and nor should it have recovery targets, as this is not compatible with the waste hierarchy.

2. Additional issue

There are no prevention or preparation for reuse/reuse targets, which means that there are no incentives to move Europe to the top of the waste hierarchy.

3. Additional issue

Since down-cycling is a widely reported problem in the recycling of packaging waste is necessary that the Directive includes an obligation to establish deposit refund systems and harmonized at EU level following the line of the report produced by the IEEP for the 7th EAP ("Running out of time. Stepping up action for Europe's Environment") asking for a "greater role for deposit/take-back systems", as key for progressing in the "circular economy" and central for implementing the 2050 Road Map for A Europe Efficient in the Use of Resources.

1.6 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.

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).

1 = poor idea, not worth consideration

3 = moderately good idea, may be worth further consideration

5 = very good idea, definitely deserves further consideration

1. The methodology for calculating recycling rates should be standardised so that data (and hence performance levels) are comparable across Member States. **5**
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**
3. Bring the recycling targets for different materials closer together to ensure a more level playing field. **5**
4. Incorporate “weightings” for materials recycled based on environmental benefits derived from recycling the material. **3**
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. **1**
6. Set specific targets for recycling of packaging waste from households to encourage further recycling of household packaging. **5**
7. Remove from the Directive the maximum limit of 80% that stipulates how much packaging waste a Member State is allowed to recycle. **5**
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). **5**
9. Adjust the definitions for reuse and recycling in the Packaging Directive to be consistent with those contained in the Waste Framework Directive. **5**
Expand the recycling target to include reuse, by allowing the reuse of packaging to be credited to the recycling target. **2**
10. Introduce targets for reuse for commercial transit packaging. **5**
11. Introduce targets for reuse for all packaging. **5**

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.

1. Additional solution

Ban the landfill and incineration of packaging waste by having a target that decreases gradually and eventually reaches zero.

2. Additional solution

Consider introducing prevention targets for packaging.

3. Additional 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	Glass	Metals	Plastic	Wood	All Packaging	Other Material (please specify)
60%	60%	50%	22.5%	15%	55%	15%
65%	65%	55%	25%	20%	60%	20%
70%	70%	60%	30%	25%	65%	22.5%
75%	75%	65%	35%	30%	70%	25%
80%	80%	70%	40%	35%	75%	30%
85%	85%	75%	45%	40%	80%	35%
90%	90%	80%	50%	45%	85%	40%
>90%	>90%	85%	55%	50%	90%	45%
		90%	60%	55%	>90%	50%
		>90%	65%	60%		55%
			70%	65%		60%
			75%	70%		65%
			80%	75%		70%
			85%	80%		75%
			90%	85%		80%
			>90%	90%		85%
				>90%		90%
						>90%

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

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.

Paper and cardboard	Glass	Metals	Plastic	Wood	All Packaging	Other Material (as defined above)
2020	2020	2020	2020	2020	2020	2020
2021	2021	2021	2021	2021	2021	2021
2022	2022	2022	2022	2022	2022	2022
2023	2023	2023	2023	2023	2023	2023
2024	2024	2024	2024	2024	2024	2024
2025	2025	2025	2025	2025	2025	2025

Roadmap to a Resource Efficient Europe

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.

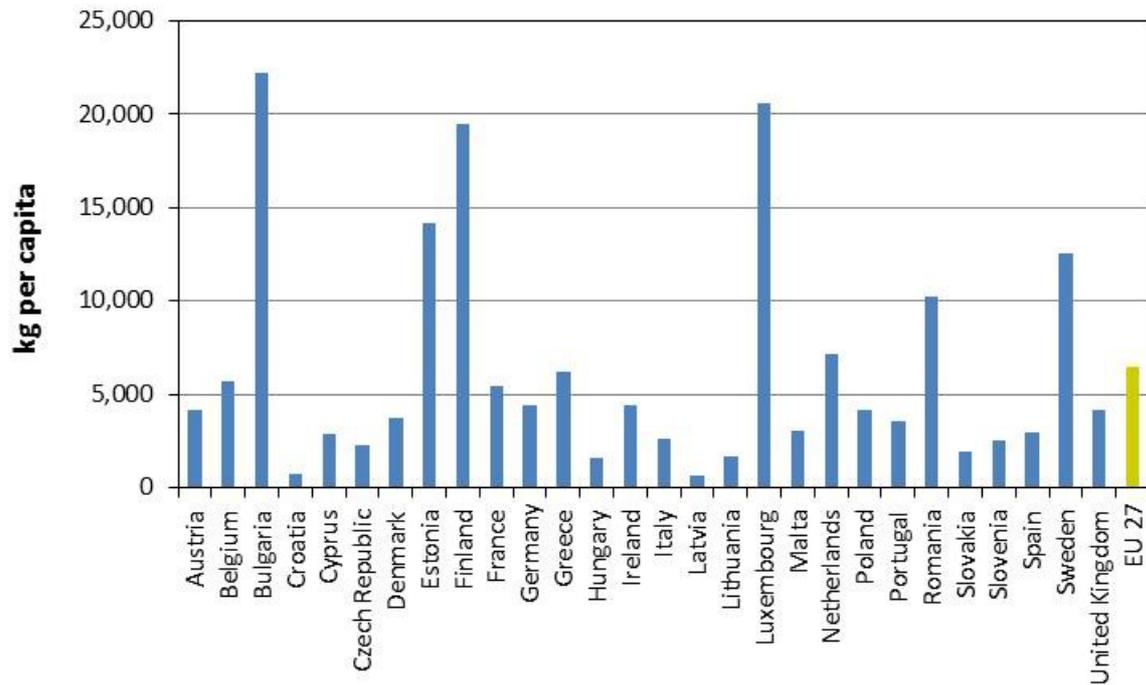
This section includes questions on the application of the Roadmap on Resource Efficiency and its relation to the evolution of the main targets contained in legislation. In the sections below, questions will be asked on the application of the existing targets.

1.7 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.

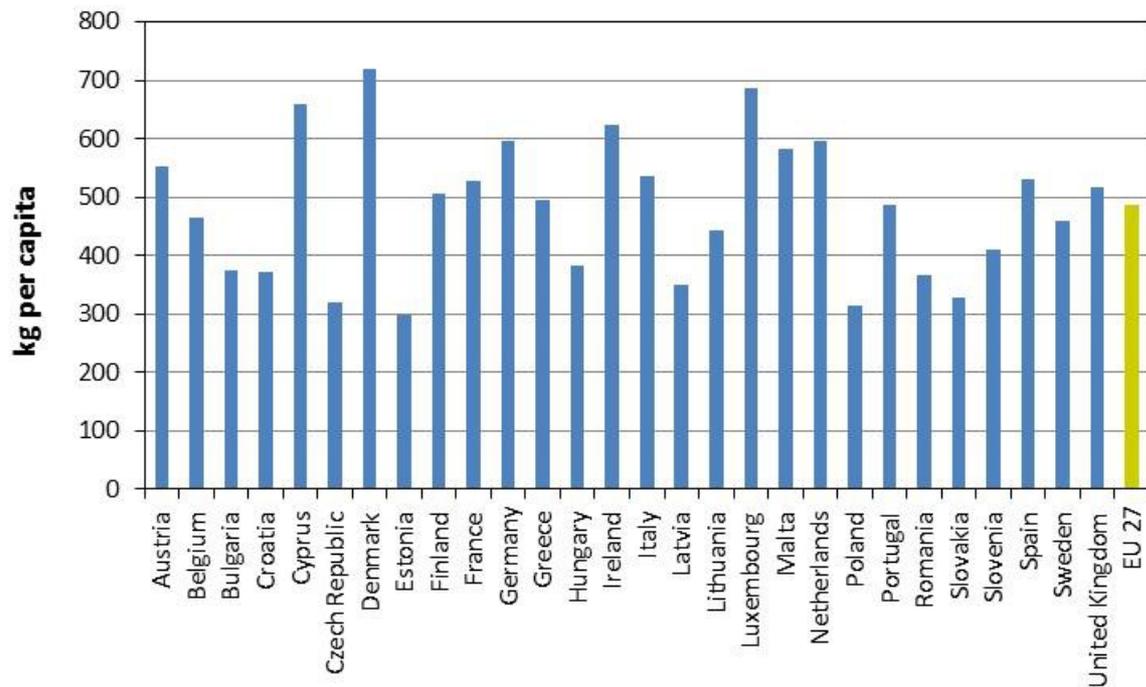
For municipal waste, the widely varying per capita income levels mean that when targeting household, or municipal wastes for waste prevention one would need to be sensitive to these variations (which are already reflected in different rates of per capita waste generation – see Figure 5 below). Finally, 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 / No] **YES**

Do you think there is a case for setting prevention targets on specific waste streams/materials? If so, which waste streams/materials 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	Reason for New Targets
A total waste generation	A to drive waste generation down
B residual waste	B so that more waste is prevented, reused and recycled
C industrial waste	C to drive waste generation down at an early stage
D hazardous waste	D to reduce the amount of toxic substances in the environment

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).

1 = poor idea, not worth consideration

3 = moderately good idea, may be worth further consideration

5 = very good idea, definitely deserves further consideration

[Radio button matrix runs alongside each of the options listed below].

1. In line with the proposal in the Roadmap, a requirement that waste generated per capita is in decline by 2020. **5**
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. **4**
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. **5**

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. **3**
5. Introduce requirements for progressive coverage of households by pay-as-you throw schemes. **5**

1.8 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 re-use, 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 / No] **YES**

Do you think there is a case for targets for preparation for reuse on specific waste streams/materials/products? 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	How Should the Target be Specified?
A WEEE	A 20% by 2025
B Furniture/bulky waste	B 20% by 2025
C Textiles	C 30% by 2015
D Bottles/cans	D 20% by 2025

1.9 Recycling Rates

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

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

[Yes / No] **YES**

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.

Household Waste	Municipal Waste	Commercial Waste	Industrial Waste	Construction & Demolition Waste
50%	50%	50%	50%	50%
55%	55%	55%	55%	55%
60%	60%	60%	60%	60%
65%	65%	65%	65%	65%
70%	70%	70%	70%	70%
75%	75%	75%	75%	75%
80%	80%	80%	80%	80%
85%	85%	85%	85%	85%
90% or more	90% or more	90% or more	90% or more	90% or more

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] YES

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?

Waste Stream /Material/Product	Reason for New Targets
A biowaste	A It makes up the largest fraction of municipal waste
B industrial and commercial	B High volume of waste and toxicity
C Bulky waste	C Most bulky waste is reusable or recyclable
D Textiles	D High consumption and low recycling. Increasing recycling of textiles would

	create new jobs
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1.10 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

[Yes/No] **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:**

³⁵/₁₇ Household/municipal waste [Yes/No]

³⁵/₁₇ Commercial waste [Yes/No]

³⁵/₁₇ Industrial waste [Yes/No] Construction and demolition waste [Yes/No]

Other than the above waste streams are there any other to which you think a maximum level of incineration should apply? If so, please specify:

1. Other stream

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? (Please indicate the level in the Table below).

Maximum incineration level	Household Waste	Municipal Waste	Commercial Waste	Industrial Waste	Construction & Demolition Waste
10%					
15%					
20%					
25%					
30%					
35%					
40%					
45%					
50%					
55%					

1.11 Landfill

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.

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).

1 = poor idea, not worth consideration

3 = moderately good idea, may be worth further consideration

5 = very good idea, definitely deserves further consideration

[Radio button matrix runs alongside each of the options listed below].

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

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.

³⁵₁₇ Additional solution

Landfilling clean non-biodegradable difficult to recycle waste-streams –such as PVC- could be considered not as a landfill option but rather as a storage facility waiting for the time when recycling them is technically safer and economically sensible.

³⁵₁₇ Additional solution

³⁵₁₇ Additional 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/No] **YES**

Targets as a Tool in Waste Legislation

1.12 Key Issues

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/No] **YES**

1.13 Suggestions for Revision

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):

[The following options are included in a matrix alongside each item in the list: 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. **Yes**
2. Develop guidance on the proper implementation of the waste hierarchy. **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. **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. **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. **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.

1. Additional solution

Separate collection, especially of biowaste must be made mandatory.

2. Additional solution

There is an incinerator overcapacity in the EU. Stop funding new ones with EU public money.

3. Additional solution

Ensure that NGOs and social organisations have a say in the definition of the waste plan and open possibilities of complaints from them if what is being implemented contradicts the EU legislation.

General Comments

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