

# Consultation on the Review of the European Waste Management Targets

<b>Personal Details</b>	
In what capacity are you responding to this consultation? -single choice reply-( <b>compulsory</b> )	As an industry, not-for-profit, or academic organisation (i.e. all other stakeholders)
Name -open reply-( <b>compulsory</b> )	Detlev
Surname -open reply-( <b>compulsory</b> )	Bruhnke
Email address -open reply-( <b>compulsory</b> )	Detlev.Bruhnke@avista-oil.de
What type of organisation do you represent? -single choice reply-( <b>compulsory</b> )	Industry trade body/organisation
What is the name of your company or organisation? -open reply-( <b>compulsory</b> )	GEIR - Groupement Européen de l'Industrie de la Régénération
In which country is your head office/organisation based? -single choice reply-( <b>compulsory</b> )	Belgium
<p>Your contribution will be published on the official website of the <b>Targets Review Project</b> and on <b>Your Voice in Europe</b>. Please use the dropdown list below to indicate if you want your contribution to remain anonymous.</p> <p>See <b>Personal Data</b> to view the Commission's guidelines regarding how your personal data is protected. Your data is subject to the following specific privacy statement:</p> <p><i>"Received contributions, together with the identity of the contributor, will be published on the Internet, unless the contributor objects to publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case the contribution may be published in anonymous form. Otherwise the contribution will not be published nor will, in principle, its content be taken into account."</i></p>	I give permission for my feedback to be published as it is
-single choice reply-( <b>compulsory</b> )	
<b>Waste Framework Directive</b>	
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	No

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

-single choice reply-(compulsory)

## Landfill Directive

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

-single choice reply-(compulsory)

No

## Packaging and Packaging Waste Directive

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

No

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

### Waste Prevention

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

-single choice reply-(compulsory)

No

### Preparation for Reuse

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

-single choice reply-(compulsory)

No

### Recycling Rates

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

-single choice reply-(compulsory)

Yes

Household Waste -single choice reply-(optional)

Municipal Waste -single choice reply-(optional)

Commercial Waste -single choice reply-(optional)

Industrial Waste -single choice reply-(optional)

85%

Construction & Demolition Waste -single choice reply-(optional)	
In order to take into account the large differences between Member States' current recycling levels, would you agree that an approach which sets targets relative to the existing situation in each Member State (for instance increase of recycling rates by X% per year) is appropriate? -single choice reply-(optional)	Yes
<p>So far only municipal waste and construction and demolition waste are covered by specific recycling targets in the Waste Framework Directive, whilst other Directives cover packaging, WEEE, ELVs and batteries. Do you think there is a case for setting recycling targets on waste streams/materials/products that are not already covered by targets in existing Directives? If so, which waste streams/materials/products do you feel should be covered by new targets and why?</p> <p>Waste Stream /Material/Product 'A': -open reply-(optional)</p>	
<p>GEIR believes recycling targets for waste oils will be an important step towards resource efficiency in Europe. Setting EU regeneration targets for waste oils will be an important step forward towards resource efficiency in Europe. Waste oils are a waste stream which can be recycled limitless times and recycling is technically feasible. Moreover, recycling waste oils has economic, environmental and social benefits compared to other waste management options for this waste stream. At present, waste management options vary a lot in different EU Member States. Therefore, GEIR proposes two levels of targets: 1. Waste oil collection targets for all Member States of 95% by 2025. 2. Dynamic targets for the regeneration of waste oils: Minimum 5% or 10% annual increase in regeneration of waste oils from the total collected volume of waste oils in each Member State by 2025. A final goal to reach 85% regeneration of waste oils by 2025 applicable to all Member States should be included. This would take into account the specifics of the current situation at Member State level and allows the formulation of national management plans with intermediate targets to achieve the EU-wide final targets. Regeneration targets at EU level as brought forward under 2. will be helpful in terms of defining the most efficient waste management option across the EU along with helping Member States to achieve efficient recycling of waste oil. This in turn will support development of a European resource efficient society. At present, several EU Member States – Spain, Greece, etc – have similar national legislation in place which works efficiently and can be taken as examples at EU level.</p>	
<p>Waste Stream /Material/Product 'B': -open reply-(optional)</p>	
<p>Waste Stream /Material/Product 'C': -open reply-(optional)</p>	
<p>Waste Stream /Material/Product 'D': -open reply-(optional)</p>	
<h3>Limiting Incineration of Waste Which Might Otherwise be Recycled</h3>	
<p>Do you agree with the view that a maximum level should be set for the amount of waste that can be incinerated for different waste streams (e.g. household waste and/or commercial waste)? -single choice reply-(compulsory)</p>	Yes
<p>Household/ municipal waste -single choice reply-(optional)</p>	

Commercial waste -single choice reply-(optional)	
Industrial waste -single choice reply-(optional)	Yes
Construction and demolition waste -single choice reply-(optional)	
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 in the text boxes below.	Waste Oils-10 per cent maximum rate for incineration, allowing Member States to deviate to a lower rate
Other stream 'A' -open reply-(optional)	
Other stream 'B' -open reply-(optional)	
Other stream 'C' -open reply-(optional)	
Household Waste -single choice reply-(optional)	
Municipal Waste -single choice reply-(optional)	
Commercial Waste -single choice reply-(optional)	
Industrial Waste -single choice reply-(optional)	10%
Construction & Demolition Waste -single choice reply-(optional)	
<b>Landfill</b>	
1. Landfilling should be limited to residues from a specified range (to be determined) of waste treatment operations. -single choice reply-(optional)	
2. Landfilling should be limited to a certain percentage of waste generated (for instance 5%) from a particular date. -single choice reply-(optional)	
3. Landfilling of recyclable/compostable waste (to be defined) should be banned. -single choice reply-(optional)	
4. Landfilling of waste that is combustible should be banned. -single choice reply-(optional)	
5. Landfilling of waste should be banned if it has not been pre-treated to a level where the potential to lead to methane emissions from landfills has been virtually eliminated. -single choice reply-(optional)	
<p>Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.</p> <p>First solution: -open reply-(optional)</p>	

Second solution:

-open reply-(optional)

Third solution:

-open reply-(optional)

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

-single choice reply-(optional)

## Targets as a Tool in Waste Legislation

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

Yes

## Suggestions for Change

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

Yes

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

Yes

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

Yes

4. Develop criteria for municipalities to implement services of a minimum standard to enable sorting of a range of waste materials for

recycling and composting / anaerobic digestion.

-single choice reply-(optional)

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

Yes

Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.

First solution:

-open reply-(optional)

Second solution:

-open reply-(optional)

Third solution:

-open reply-(optional)

## General Comments

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

-open reply-(optional)

Better implementation of the current Waste Framework Directive is key to the success of a revised EU waste policy. Setting recycling targets for additional waste streams and monitoring closely their implementation will be important going forward along with putting in place additional measures as listed in section 7.1.