



Recycling Coalition's reaction to the Commission draft proposed package for the Thematic Strategy on the prevention and recycling of waste.

The need for a recycling definition in the Waste framework Directive

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In the context of the elaboration of the Thematic Strategy on the prevention and recycling of waste, as required by the 6th Environmental Programme, DG Environment issued a draft version of the Communication on the Thematic Strategy as well as a draft proposal for amendment of the Waste Framework Directive (WFD).

The Recycling Coalition, a broad group of stakeholders (see below) covering several material streams and environmental interests welcome the Waste Strategy's commitment that ***"The long term goal is for the EU to become a recycling society, organised around the maximum recovery of materials where this makes environmental and economic sense, and energy recovery where this is more efficient"***.

However the coalition is still deeply concerned about the absence of fundamental elements to move towards this recycling society, in particular:

- a definition of recycling in the Waste Framework Directive.
- waste stream recycling legislation and EU harmonised recycling targets as a central policy tool of EU waste policy

The present paper focuses on the need to include a recycling definition in the WFD.

The need for a recycling definition in the Waste Framework Directive

While DG Environment included a definition for recovery and re-use in its draft version of the WFD, no definition for "recycling" has been proposed. We strongly believe a definition for "recycling" is necessary for the following reasons:

- A need for a harmonised and enforceable approach

The lack of definition of "Recycling" in the waste Framework Directive is a problem in that, divergent waste stream specific definitions, lack of definition in other waste legislation or divergence in Member State interpretations lead to a difference in the way recycling targets are measured and in the acceptance of technologies for recycling.

A single "Recycling" definition in the Waste Framework Directive is therefore needed for harmonisation reasons. Without a harmonised definition it is also not possible to have coherent enforcement across the EU.

- Preserving the waste hierarchy

It is important to keep Recycling distinct from energy recovery and disposal (as is established in the 1996 Waste Strategy). As technologies develop that could potentially blur the line between material recycling and other uses of the material – such as chemical process feedstock, it is necessary to adapt to these realities and differentiate between the processes. This is especially important in the context of the continued existence of recycling targets as steering tools and producer responsibility. A recycling definition should exclude specifically both chemical and thermal energy transfer processes. This umbrella definition should lead where necessary to appropriate adaptation of daughter directive definitions of recycling.

- A material based definition

We believe a recycling definition should be material based so that a material remains available to undertake a new cycle giving birth to a new material. Recyclability is the intrinsic property of a material to remain available for a "new" material cycle for producing products; this means that the input material is transferred either into the same or another material, maintaining a maximum of structural integrity. It should include the transformation of organic matter to compost and digestate and specifically exclude operations that use the material for energy or chemical feedstock processes.

Such a definition provides greater legal certainty and should be inserted in article 3 of the Commission's proposal for amending the Waste Framework Directive.

The recycling coalition consists of the following organisations:

European Metal Trade & Recycling Federation (EUROMETREC);
European Ferrous Recovery & Recycling Federation (EFR);
European Recovered Paper Association (ERPA);
Confederation of European Paper Industries (CEPI);
Groupement Européen de l'Industrie de la Régénération (GEIR) ;
European Compost Network (ECN) ;
European Environmental Bureau (EEB).

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