

FEAD feedback to the EC proposal for Decision on the 8th Environment Action Programme (EAP)

FEAD, the European Waste Management Association, represents the private waste and resource management industry across Europe. Private waste management companies operate in 60% of municipal waste markets in Europe, and in 75% of industrial and commercial waste.

FEAD welcomes the European Commission’s proposal for a Decision for the **8th Environment Action Programme (EAP)**. We deem that the 8th EAP should be an effective and high-level strategic tool guiding environmental policy to accelerate the EU’s transition to a climate-neutral, resource-efficient clean and circular economy in a just and inclusive way and achieve the environmental objectives of the UN SDGs, the Paris Climate Agreement (COP21, 2015), and the European Green Deal (EGD).

According to the proposal, “the 8th EAP has the long-term priority objective for 2050 that citizens live well, **within the planetary boundaries in a regenerative economy where nothing is wasted**, no net emissions of greenhouse gases are produced and economic growth is decoupled from resource use and environmental degradation.” In this direction, the Proposal highlights the important role that the European Environment Agency (EEA) and the European Chemicals Agency (ECHA) ought to play in the implementation of the new EAP. Thus, the EU Chemicals Strategy for Sustainability and the Zero Pollution ambition will be at the heart of the Programme.

The European private waste management sector, represented by **FEAD**, will play a significant role in **realising those strategies** and in **achieving the objectives** laid down in Article 2 of the proposed decision. A prerequisite for achieving any targets is the valuation of natural resources, based on the valuation of their non-recoverability and the damage, caused by their exploitation. In that sense, the need for increased efficiency of materials and recirculation of high-quality materials is vital, thereby making the **circular economy’s** role in the reduction of GHG emissions from raw material extraction, from products’ manufacture and use, and from other economic activities, and in minimising resource consumption crucial. **The circular economy itself is embedded in waste management activities**, meaning that the waste management sector and the circular economy’s contribution to the “green transition” go hand in hand.

Currently, half of greenhouse emissions result from resource extraction and processing¹. Strong recycling policies leading to significant savings in resources and energy, while avoiding CO₂ emissions, can make a significant difference along the product value chain. Favouring recycled materials over raw materials is only one way to do this. As a matter of fact, the carbon footprint of recycled PET is 90% less

¹ European Commission (2019). “Communication on the European Green Deal”, p.22.

than the virgin counterpart, for textiles it is 98%, for steel up to 85%, aluminium 92%, paper 18%². Estimations from recent **studies** indicate that “a more circular economy can make deep cuts to emissions from heavy industry: in an ambitious scenario, as much as 296 million tonnes CO₂ per year in the EU by 2050, out of 530 in total – and some 3.6 billion tonnes per year globally.”³

However, to fully achieve the sustainability of products and services, **ambitious and environmentally sound waste management practices must be fostered**. We now expect the EU to set up the needed conditions allowing the waste management industry to act as their key ally in the ambitious environmental and climate goals of the EGD and the EU Climate Law. Waste management activities are at a crossroads with several challenges that the 8th EAP must respond to:

- Making the best use of all resources, by optimising the **material recovery** of recyclable/recoverable waste as well as the **energy recovery** of non-recyclable waste;
- Facilitating recycling, or even making it feasible, through binding rules on **eco-design**, including **phasing out of Substances of Very High Concern (SVHCs)**. To improve the protection of human health and the environment from the risks that can be posed by chemicals, the EC needs to strike the right balance between recycling/recovery policy as proposed by the new Circular Economy Action Plan and the aims of chemicals/products legislation.
- Acknowledging the positive role recycling and material recovery activities play in avoiding CO₂ emissions from the manufacturing sector, and recognising that **the entire waste management chain results in avoiding more CO₂ than it emits**;
- Boosting **recycling markets** and granting a **competitive advantage to recycled/recovered materials**, with higher taxation of the CO₂ and the energy content of fossil fuels.

FEAD is committed to the objectives of the European Green Deal and considers the above-mentioned aspects apt for providing the adequate stimuli both for addressing GHG emissions and enhancing of the circular economy in Europe.

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² According to the Bureau of International Recycling (BIR).

³ Material Economics. (2018). The Circular Economy - a Powerful Force for Climate Mitigation: Transformative innovation for prosperous and low-carbon industry. p. 8. Available at: <https://materialeconomics.com/publications/the-circular-economy-a-powerful-force-for-climate-mitigation-1#:~:text=This%20report%20investigates%20how%20a,contribute%20to%20cutting%20CO2%20e,missions.&text=Making%20better%20use%20of%20the,halway%20towards%20net%2Dzero%20e,missions.>