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FEAD Feedback to the JRC Study on separate collection

FEAD, the European Waste Management Association, representing the private waste and resource management industry across Europe, **welcomes the objective to improve the performance of waste management systems in the EU, in particular to achieve high quality recycling, which is essential for a circular society.** As stated in the Circular Economy Action Plan, high quality recycling relies on *effective separate collection* of waste.

To improve separate collection, the Commission proposes to harmonise separate waste collection systems across the EU. An improvement of the separate collection systems is welcomed by the waste management industry, although it should be carefully assessed where the needed improvements can be achieved by way of harmonisation. In this respect, FEAD is concerned that harmonization may not be the most appropriate way to achieve *effective separate collection* in all cases considering that local factors are essential in this context, and a cost-benefit approach should be taken into account. As a matter of fact, the waste management competence sits usually with local authorities. Thus, and according to the principle of subsidiarity, the EU should act only if and in so far as the objectives of the proposed action cannot be sufficiently achieved by the Member States (including at regional and local level). Maximising the allocation of public support, costs for citizens and economic operators, private investments, remain a key driver for the design of waste management policies.

Importance of local factors and consideration of the best environmental outcome

A harmonised system risks failing to sufficiently address the diverse local factors existing across the EU, such as density, urban structure (towns vs. villages) and size of the population and its development or variability in time or during the year (e.g., touristic regions). Local factors also include geographical factors (e.g., islands or remote areas) and climate conditions. When considering local factors, the integration of the collection system in the whole waste management chain (availability of appropriate sorting and treatment facilities) and the existing market conditions for recycled/recovered materials, in particular for composts, are also a relevant aspect.

A harmonised system is not only hardly suitable to all local specificities (one-size-fits-all approach), but also lacks adaptability or flexibility, which is essential e.g., regarding climate change, emergency situations (health or environment) or in cases of development of rural areas or sparsely populated areas.

In any case, a cost-benefit analysis should be carried out. Benefits to consider are sanitary/health and environmental/circularity. However, the additional recycling/recovery rate per invested euro should also be taken into account. The quality of the collection and the capability of making long term choices are also key. **In general, consideration should be given to the best overall environmental outcome in a given local context.**

Importance of harmonised data collection and comparable data

A critical aspect is the fact that statistical reporting and data collection is not harmonised across the EU. Data reporting and data collection vary from one city to another, which means that reported performances (collection and capture rates) are not comparable and, as a consequence, averages at national level most of the time do not make sense. There are inconsistencies on the reporting to Eurostat by Member States on waste management, whereas no EU reporting exists on waste collection. In addition, EU reported data should be audited. A harmonisation of the separate collection systems across the EU should especially not be done on the basis of studies and literature dated more than 3 - 4 years ago. **A first comparison tool to consider should be the national waste management plans, which are also the baseline for the waste management sector.**

Importance of behavioural aspects

Sociocultural aspects should also be strongly considered. (Re)education of citizens takes years. Private waste management companies are usually involved in promoting new habits, in changing for better practices such as the ones to ensure a better source segregation and selective collection. Therefore, we are particularly aware of the challenges posed by improving citizens' and economic operators' behaviour. **If the goal is to improve separate collection systems in the EU, for households in particular, it may be beneficial to avoid confusing the population e.g., by changing colour codes (bins, bags, containers) for "harmonisation".** In addition, harmonisation of colour codes has no significant environmental added value but will generate significant costs.

Commingled collection and the importance of separate collection of biowaste

The concrete circumstances are also relevant when assessing the possibility of commingled waste streams. In general, separate collection provides the better results. However, as mentioned above, consideration should be given to the best environmental outcome in a given local context. In any case, **the separation of dry and wet fractions is crucial, which means that biowaste should always be collected separately.**

Considerations on economic instruments

Consideration should further be given on how to finance the so-called harmonisation. Expanding EPR schemes has the adverse effect of duplicating financing circuits at the citizens/consumers' costs: the collection of same waste flows might be financed from the EPR system, without any decrease of municipal taxes. Costs resulting from changing the collection infrastructure (bins, containers), and changing frequencies, would be high. More traffic from collection vehicles would cause more CO2 emissions and more costs as well. EPR systems do not need further harmonisation beyond the already existing EU legislation.

DRS can be a good complement **ONLY** in specific situations (e.g., portable batteries), but they risk competing against door-to-door systems and duplicate investments. It should definitely not be an EU recommendation/obligation to be developed.

Concluding remarks

In general, the focus or goal should not be the forced harmonisation but the improvement of the separate collection systems, where needed, which can be done e.g., sharing best practices (to be adapted to each specific environment) or through the development of guidelines. If there are loopholes in the implementation of mandatory obligations, this does not mean that harmonisation is needed, but a need for strengthening the implementation. FEAD advocates in this sense, for an obligation of results but not for

an obligation of means. A one-size-fits-all approach is not appropriate for the waste management sector and there is currently not sufficient data available to consider what concrete parameters could be harmonised. The availability of qualitative and comparative data is essential. On the basis of such data, performance benchmarks can be developed and only once this is achieved, harmonisation should be considered, and only carried out where suitable to achieve *effective separate collection*. In any case, a detailed matrix of waste flows and situations (geography, economics, etc) should show that there is no “one-size fits-all” solution, and help target the only situations where, potentially, there would be added value – if any – in a harmonisation process.

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