

15 November 2021, Brussels

FEAD Feedback to the JRC Study on separate collection - Subgroup 0: Cross cutting and transversal issues

1. Life cycle assessment and costing

- Do you align with the analysis of the most **critical parameters**, or, if not, what in your view are additional (critical) parameters we should pay attention to in terms of **data collection**?

From the discussion paper:

- Separate collection rate (also known as capture rate, source-segregation rate, etc.)
- Share of door-to-door versus bring collection (reflecting different quality, e.g. misthrow/purity rates)
- Density of collection points, frequency of collection, single/commingled collection affecting labour/fuels
- Misthrow/Purity rates (often linked to the type of collection scheme)
- Presence of a deposit-refund scheme (e.g. for PET bottle waste)
- Presence of a PAYT scheme (incurring reduction of residual waste and better capture by households)
- Single stream versus commingled collection of packaging (e.g. plastic packaging waste)
- Separate collection of biowaste (likely improving the quality of remaining recyclables)

The above listed are relevant criteria although some may be difficult to estimate in some cases. Missing critical parameters are:

- the population 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, commuters).
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- From an **LCA/LCC** boundary perspective, what are **the critical choices that one should pay attention to when assessing collection schemes**, particularly when focusing on separate collection of biowaste?

The following aspects should be considered:

- Cost-benefit analysis:
 - o Benefits such as sanitary/health, environmental/circularity should be considered.
 - o However, the recycling/recovery rate per invested euro should also be taken into account.
- Quality of the collection
- Long term choices
- Local factors: Geography (e.g., islands or remote areas), climate conditions.
- 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.
- Consideration of the best environmental outcome in a given local context.

2. Data reporting by MS

- What are the most relevant **data gaps and problems** faced in an EU-wide comparative assessments of separate collection systems (e.g. in terms of environmental impacts or cost-benefit ratios)?

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.

A main concern is that the 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.**

- Are there relevant **inconsistencies** in waste accounting between different countries that need to be taken into account?

There are inconsistencies on the reporting to Eurostat by Member States on waste management, whereas no EU reporting at all exists on waste collection. EU reported data should be audited.

- Which could be **solutions** to the data problem, e.g. are there additional data sources?

Digital solutions with a platform with shared parameters should be considered.

3. Role and potential of economic instruments

- From your experience and knowledge, which are the **most suitable economic instruments**?
 - a. For which waste-streams?
 - b. Are there some combinations of instruments and waste-streams that do not work well?
 - c. More generally, which are the caveats (design details?) and important drawbacks (e.g. works only in certain context, cultural factors ...) of the different instruments?
 - d. Are there other, less-known economic instruments that are worthwhile to be considered?

- PAYT: Works good if (outdoor) space to store but could rise social inequalities. It is a good tool for analytical accountancy if paid e.g., through an invoice to each household, but not when paid though a fee on each grey bag.

- DRS: Risk to compete against door-to-door systems and duplicate investments. It can be a good complement ONLY in specific situations (e.g., portable batteries). It should not be an EU recommendation/obligation to be developed.

- Other: EPR schemes for household waste showed positive impact for some difficult streams (difficult to capture), but should include incentives for separate collection, education and information programmes for those households. 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. EPR systems do not need further harmonisation beyond the already existing EU legislation and should especially not be promoted for industrial and commercial waste (polluter pays and performant B2B schemes).

4. Behavioural characteristics of households

- From your experience and knowledge, which behavioural characteristics of households do you see as **particularly important** in the context of separate waste collection? And how should they be taken into account?
 - a. Are they particularly relevant for certain economic instruments?
 - b. Which separate collection system aspects cause the greatest 'inconvenience'?
 - c. What potential do you see for 'nudging', i.e. providing information on good or bad household performance to motivate improvement?

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.

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