

15 November 2021, Brussels

FEAD Feedback to the JRC Study on separate collection - Subgroup 2: Dry recyclables

1. Identification of bins, bags and containers (colours/symbols)

- What will be the **most suitable way of harmonising waste collection bin/containers/bag?**

(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.

2. Deposit Refund Schemes

- What are the costs/savings associated with the implementation of DRS (both reuse and recycling) (e.g., investment, operational cost, reduced cost for street sweeping, avoidance of littering)

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), but should not be an EU recommendation/obligation to be developed.

3. Extended producer responsibility

- Is there a **need for a harmonization of EPR** beyond the existing EU legislations?

- If yes, how what are the minimum criteria for a harmonised EPR (e.g., harmonised/standardized definitions and calculation method?)
- If no, what are the reason to refrain for it?

No, EPR systems do not need further harmonisation beyond the already existing EU legislation. 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.

- What are the additional necessary instruments to achieve the ambitious goals of the circular economy package with existing EPR schemes (e.g., eco-modulation of EPR fees, extend additional types/applications of plastics)?

EPR schemes should in any case not be extended to industrial and commercial waste. Ecomodulation is positive and already implemented.

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