

29 February 2024, Brussels

FEAD's contribution to the Stakeholder Consultation on the CoR opinion on 'what is the role of local and regional authorities in the transition towards a circular economy'

Full implementation of waste policy targets in all EU Member States is essential for the transition towards a circular economy, and this is an area where local and regional authorities play a crucial role; but not the only one. FEAD published last summer its vision for 2030, in which it identified five action points for which the collaboration and support of all relevant actors is needed and welcomed. In addition to implementation and enforcement, local and regional authorities will also play an important role in

- Achieving industrial excellence and professionalism in waste management by granting the needed permits, addressing excessive and unnecessary bureaucratic hurdles and NIMBY effects;
- Ensuring fair and transparent markets for waste; and
- Ensuring enhanced communications on the value of waste, through education and awareness raising.

A dedicated section on the role of local and regional authorities in the transition towards a circular economy is provided at the end of the document.

FEAD's vision & mission

FEAD's vision for 2030 is to shift Europe's overall material use towards recycled materials through industrial excellence in waste management. Our mission is to supply the European economy with secondary raw materials and energy, while managing waste in a safe and environmentally responsible way.

FEAD's goal

In a context where there is an increased future demand for materials in the EU¹, where annual waste generation is projected to increase by 70% by 2050 globally², and where the EU is faced with increasing raw material scarcity due to extreme pressure on global supply chains, **boosting the EU's domestic capacity to supply its industry with high quality raw materials from recycling is paramount.**

Therefore, we need to **urgently accelerate the uptake of secondary raw materials** into the economy. To do so, our goal is to **support the European Union's ambition to double its Circular Material Use Rate (CMUR) in this decade.**

But despite its stated ambitions in the Circular Economy Action Plan, the EU is currently not on track to meet its target. In 2021, the CMUR was evaluated at 11.7%, which represented a decrease of 1.1

¹ Global Material Resources Outlook to 2060

² World Bank (2018), What a Waste 2.0: A Global Snapshot of Solid Waste Management to 2050:
<http://hdl.handle.net/10986/30317>

percentage points compared to 2020. In order to double the CMUR, the EU would need to reach a rate close to **25% by 2030**, meaning a **15-fold increase** in the average EU CMUR growth rate of the previous decade.

Clearly, a step change needs to occur.

FEAD’s target

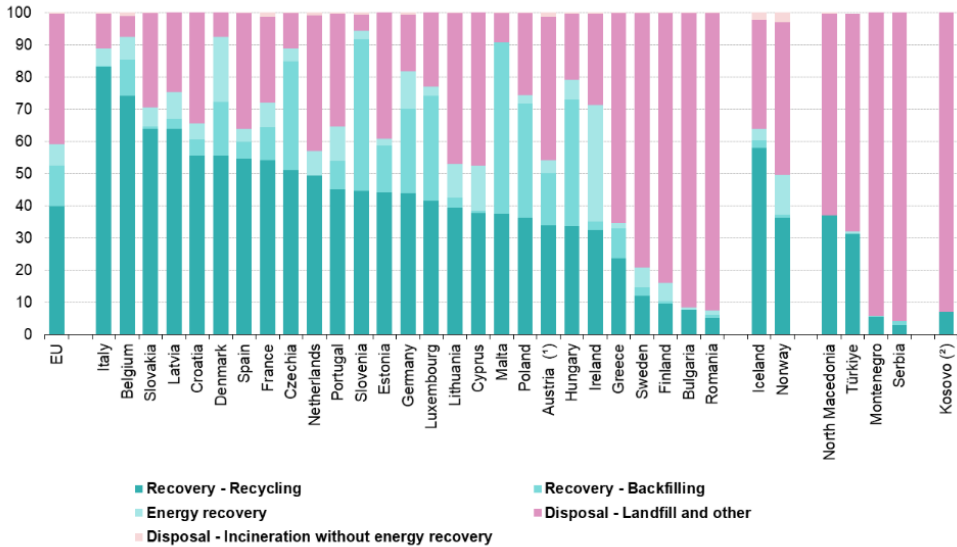
That is why we strive to achieve a **75% target for the recycling of all waste in the EU by 2035**.

The recycling of all waste is approximated by the amount of waste recycled in recovery plants in the EU, minus imported waste destined for recovery plus exported waste destined for recovery abroad. FEAD’s target is in line with the scenarios outlined by the European Environment Agency in its report “How far is Europe from reaching its ambition to double the circular use of materials?”³.

In 2020, the recycling of all waste was approximated at 40% at EU-level⁴, and this was largely equivalent to the waste being sent to landfill and other disposal operations. By setting such an ambitious target of recycling 75% of all waste, FEAD is signalling to policymakers and the whole circular economy value chain that **concerted and ambitious action is required to boost the uptake of secondary raw materials into the economy**.

With the right policy and regulatory framework, our sector can ensure that products, components and materials that become waste are effectively recycled. However, for the share of materials that do not meet the quality requirements for recycling, or where recycling does not deliver the best overall environmental performance, other solutions exist for waste management. In particular, recovering the energy contained in the waste complements recycling as a means to achieve the EU’s climate goals of becoming climate neutral by 2050.

Waste treatment by type of recovery and disposal, 2020
(% of total treatment)



(*) Value of incineration for Austria estimated by Eurostat.
 (**) This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo Declaration of Independence.
 Source: Eurostat (online data code: env_waslrt)



³ https://www.eea.europa.eu/ds_resolveuid/GH1BT004N8

⁴ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Waste_statistics#Total_waste_generation

FEAD's 5 asks & actions

To achieve our targets, we have identified the following action points.

1. Circular Economy Value Chain Partnerships

Boosting the uptake of secondary raw materials into the economy will require Circular Economy Value Chain Partnerships that connect the waste management sector with industrial production.

In particular, Circular Economy Value Chain Partnerships will need to base themselves on two major principles:

- The establishment of **large-scale and effective separate collection systems**, where public authorities (in the case of municipal waste), waste producers and waste collectors cooperate on the basis of clear obligations and responsibilities;
- **Concerted action between the waste management sector, industrial production and product or service design**, in particular towards:
 - Developing specifications on industrial quality requirements for the uptake of secondary raw materials in industrial production;
 - Identifying demand-driven measures, such as recycled content targets on certain material streams or product categories;
 - Improving the ecodesign of products, to facilitate recycling and restrict the presence of hazardous substances in waste materials;
 - Developing joint R&D programmes to optimise the uptake of secondary raw materials in production and find new outlets for the recycling of waste materials.

There are promising regulatory approaches that are already underpinning such principles, for instance:

- **Single-Use Plastics Directive**: by 2029, 90% of all PET beverage bottles placed on the EU market must be collected; and by 2030, each PET beverage bottle placed on the market in the EU must contain at least 30% of recycled plastic. Such mandatory collection and recycled content targets stimulate demand for secondary raw materials and trigger investments along the recycling chain to push waste materials up the waste hierarchy.
- **Critical Raw Materials Act**: at least 15% of the EU's annual consumption of Critical Raw Materials must come from recycling by 2030. Besides the necessary investments into collection and recycling facilities, such a benchmark must also be accompanied by industrial partnerships with the waste management sector to define the quality requirements for the uptake of secondary raw materials into industrial production and final products.
- **Batteries and Waste Batteries Regulation**: targets have been set on the collection of portable batteries (73% by 2030) and batteries from light means of transport (61% by 2031). All collected batteries will have to be recycled, with for instance material recovery targets on lithium of 50% by 2027 and 80% by 2031. This must be accompanied by industrial partnerships with the waste management sector to ensure the uptake of these materials into industrial processes.

- **Ecodesign for Sustainable Products Regulation:** establishing an Ecodesign Forum to ensure that EU product policy is based on strong ecodesign requirements, and where FEAD is committed to take a leadership to align product policy with the possibilities and constraints of waste management.

But Circular Economy Value Chain Partnerships will need to **deepen and strengthen the cooperation between waste management and industrial production for specific products or materials**. In addition to the above, FEAD is calling for partnerships to be extended and amplified in the following sectors:

- **Construction & demolition**, which is by far the sector generating the largest volumes of waste and represents a huge potential to be reintegrated into the material cycle as recycled building materials;
- **Textiles**, with exports of used textiles having tripled from the EU between 2000 and 2019 and representing a major loss of material;
- **Furniture**, representing access to about 10 million tonnes of material every year;
- **Automotive**, despite 78% of materials from end-of-life vehicles being recycled in 2020, 79% of material inputs for new vehicles come from virgin raw materials – whereas 14 million new vehicles were added in 2020, which represents a vast opportunity for integrating more secondary raw materials into the automotive industry⁵.
- **Electrical and electronic equipment**, as nearly half of all discarded waste electrical and electronic equipment (WEEE) in Europe is not properly collected and recycled.
- **Chemicals**, to eliminate hazardous substances in waste materials.

2. Full implementation of waste policy targets in all EU Member States

We urge policymakers at all levels of governance to implement existing European waste legislation, in particular in relation to the separate collection of different waste streams.

Large-scale collection systems are paramount to prevent materials from ending up in the environment and ensure the availability of waste materials to be recycled back into the economy. Likewise, recycling obligations support the development of relevant waste management infrastructure to recycle and recover those waste materials.

Yet there is still a long way to go, and crucial targets will need to be met in all EU Member States:

- Municipalities must establish and improve the separate collection of waste, especially household waste:
 - To recycle up to 65% of municipal waste by 2035;
 - To respect a 10% cap on municipal waste being landfilled by 2035 and the obligation to respect the waste treatment hierarchy before landfilling;
 - To recycle 70% of packaging waste by 2030.

⁵ Circle Economy & Bain & Company: “Beyond Recycling: the circular opportunity for passenger cars in Europe”: https://assets.website-files.com/5d26d80e8836af2d12ed1269/637ba81ee18b7524a94e4a36_20221121%20-%20BAIN%20report%20-%20Passenger%20Cars%20-%20210x297mm.pdf

- Producers of commercial and industrial waste must also establish and improve the separate collection of waste, in particular to:
 - Achieve the minimum annual collection rate of 65% of the average weight of electrical and electronic equipment placed on the market in the 3 preceding years;
 - Achieve the minimum annual reuse and recycling target of 85% for all end-of-life vehicles by an average weight per vehicle;
 - Achieve a minimum of 70% preparing for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials, of non-hazardous construction and demolition waste.

3. Industrial excellence and professionalism in waste management

FEAD and its members stand for industrial excellence in all waste management operations. Our technical, technological and professional know-how are vital to the circular economy, conserving natural resources, minimising greenhouse gas emissions and preserving a clean environment. It should be reminded that waste management services are also the foundation of a well-functioning society, ensuring that natural and urban environments are safe, clean and hygienic.

Our activities make a valuable contribution to all aspects of the circular economy:

- Waste collection and adaptive logistics, either on behalf of municipalities or for commercial, industrial and other waste streams;
 - Technology-intensive treatment and recycling systems that optimise the value of waste materials for the uptake of secondary raw materials into the economy;
 - Waste-to-energy plants that produce energy from non-recyclable waste, which contributes to phasing out fossil fuels and decarbonising the electricity and heat sector while eliminating pollutants from the material cycle and enabling the recycling of valuable materials from the incineration ashes;
 - Production of Refuse Derived Fuels from non-hazardous, non-recyclable waste to substitute fossil fuels;
 - Decontamination techniques for hazardous waste;
 - Reducing greenhouse gas emissions through Carbon Capture Utilisation and Storage;
 - Landfill management systems that preserve soil quality, protects underground water and limits the emission of greenhouse gases;

FEAD and its members are committed to continuously improve the quality and availability of recyclates in order to provide industry with a reliable supply of secondary raw materials. With more waste materials becoming available and an increased demand for recyclates, the waste management sector is set to invest 60 BN€ over the next 12 years on innovation and capacity-building.

Our investments will:

- Support the continuous improvement of our own processes, including through digitalisation, making machines more sustainable and saving energy within business processes;
- Accompany the development of recycling, treatment and recovery techniques, and we call upon the EU to actively engage R&D spending on waste management and recycling, e.g. through the Horizon Europe or LIFE programmes;

- Provide technical assistance to municipalities and public authorities, to ensure that all waste management infrastructure is extracting maximum value out of waste materials and treats waste for the best possible environmental outcome. The waste management sector therefore is willing to invest, alongside public authorities, in the implementation of EU waste legislation in all Member States, with the support of the European Investment Bank, Cohesion Policy and other EU funding instruments.

4. Fair and transparent markets for waste

To encourage further private sector investment in the circular economy, we call upon all policymakers to ensure the full implementation of a European internal market for waste:

- Opening up household waste markets to competition and guaranteeing a level playing field for all private operators;
- Enforcing Single Market rules on state aid, in particular with regard to public undertakings;
- Creating a level playing field for the primary materials industry and the recycling industry, e.g. avoiding introducing more restrictive limits than for raw materials, or through equal treatment in the exemption of costs and burdens for energy purchases;
- Stimulating demand for secondary raw materials by making use of green public procurement, to prioritise the purchase of goods that are produced using secondary raw materials; and by establishing specifications on minimum recycled content for further product groups;
- Avoiding legislation that establishes ownership or restricted access over specific waste streams, thereby restricting the free market and competition.

5. Enhanced communications on the value of waste

Unlike any other sector of the economy, waste management is the mirror image of the whole economy: it operates across all product categories, from what's consumed and discarded in households, to industrial, commercial, construction and demolition waste, as well as hazardous waste.

To be successful, the circular economy transition will need to go hand-in-hand with public and industrial acceptance of waste management as an intrinsic part of a well-functioning society and a key pillar of a more independent raw material supply for the EU economy, and our role is to demonstrate its local, economic and environmental value. This will require enhanced communications, raising awareness on the value of waste and the importance of supporting waste management infrastructure.

We will work alongside public authorities to ensure that citizens trust that the materials they sort for recycling are effectively recycled, providing benefits to the environment and bringing jobs & growth to their local areas. Likewise, it is our role to ensure that industries view the waste management sector as a reliable supplier of raw materials, and for policymakers to trust that waste collection is the starting-point for a highly professional, capable and valuable economic activity that keeps materials in the loop, provides energy, and maintains a clean and healthy living environment for all.

What is the role of local and regional authorities in the transition towards a circular economy

The Early Warning Report on waste (EWR) published on 8 June highlighted the pressing need for stronger efforts to meet the recycling objectives and underscores the crucial role of the waste management industry in achieving a sustainable circular economy. According to the EWR, only nine out of the 27 EU member states are projected to meet the targets of preparing for reuse and recycling 55% of municipal waste and recycling 65% of all packaging waste by 2025, raising concerns that the objective of recycling 60% of municipal waste by 2030 may be at risk, particularly in the challenging area of plastic packaging recycling.

FEAD believes that local and regional authorities can play a role in:

1. Policy development and implementation

- i. Regulations: local and regional governments can create, transpose and implement regulations that promote circular practices. As the EWR highlights, there is still progress needed. FEAD agrees⁶ that high capture rates and the quality of separate collection are essential preconditions for preparing for re-use and recycling. The waste management industry is ready to cooperate with national and local authorities and make all necessary investments to enhance recycling rates, but a robust legislative framework that creates a stable market for recycled materials is essential.
- ii. Harmonisation and enforcement of rules and procedures to ensure a level playing field.
- iii. Circular procurement: local and regional authorities can lead by example through their purchasing decisions, favouring products and services with minimal environmental impact and promoting the use of recycled materials.

2. Infrastructure development. The Early Warning Report on Waste provided a preliminary assessment on the target of reducing landfilling of municipal waste to below 10% by 2035. With eight countries exceeding 50% rates, FEAD stresses the urgency to deploy all available municipal waste treatment technologies with the needed capacities. Achieving the targets of the EU waste legislation requires the support of all competent authorities, which must give priority to sorting, recycling and energy recovery plants. Permit procedures, addressing excessive and unnecessary bureaucratic hurdles and unwanted NIMBY effects are areas where local and regional authorities play a crucial role.

3. Education, public involvement and awareness raising among citizens and economic operators about the importance of properly discarding, collecting and recycling waste. This includes ensuring that sufficient resources are available as well as exploring and implementing incentive schemes to maximise the collaboration of the public. Local and regional authorities must support the deployment of waste management infrastructure in their official communication, highlighting the environmental, economic and social benefits, but also explore the implementation of mechanisms such as compensation schemes (toleration fee) to facilitate such deployment in the territory.

⁶ <https://fead.be/position/fead-pledges-commitment-of-the-waste-management-industry-as-member-states-struggle-to-meet-recycling-targets/>

4. Innovation and entrepreneurship

- i. Incubators and funding: supporting businesses that focus on circular economy solutions through funding, grants, and access to facilities.
- ii. Research partnerships: collaborating with local universities and research institutions to develop new technologies and business models that promote circularity.

5. Collaboration and Networking

- i. Partnerships: working with neighbouring municipalities, businesses, and community organizations to share best practices and create regional strategies for the circular economy.
- ii. Networks and platforms: joining regional or national networks dedicated to circular economy initiatives for knowledge sharing and collaboration.

6. **Urban Planning and design**, by integrating circular economy principles into urban planning.

7. Monitoring and Reporting

- i. Data collection: gathering accurate and comparable data on resource use, waste generation, (separate) collection and recycling rates to track progress towards circular economy goals.
- ii. Reporting and evaluation: regularly monitoring and assessing the effectiveness of policies and programs, making adjustments as needed to improve outcomes.

8. **Advocacy and influence**, supporting policies and funding for circular economy initiatives, while participating in international networks and agreements to exchange knowledge and experiences with other regions transitioning to a circular economy.

In essence, local and regional authorities act as catalysts for change, creating an enabling environment for businesses, communities, and individuals to adopt circular practices. Their actions can have a direct impact on resource efficiency, circular economy, job creation, and overall sustainability within their jurisdictions.

FEAD is the European Waste Management Association, representing the private waste and resource management industry across Europe, including 19 national waste management federations and 3,000 waste management companies. Private waste management companies operate in 60% of municipal waste markets in Europe and in 75% of industrial and commercial waste. This means more than 320,000 local jobs, fuelling €5 billion of investments into the economy every year. For more information, please contact:

FEAD Secretariat

info@fead.be