

## Consultation on the Review of the European Waste Management Targets

<b>Personal Details</b>	
In what capacity are you responding to this consultation? -single choice reply-(compulsory)	As a representative of a public authority - Member State, regional or local competent authority
Name -open reply-(compulsory)	
Surname -open reply-(compulsory)	
Email address -open reply-(compulsory)	
Please provide the full name of the public authority/body for which you are responding. -open reply-(compulsory)	Dutch Government
In what country are you based? -single choice reply-(compulsory)	Netherlands
How many inhabitants are covered by your organisation? -open reply-(compulsory)	16000000
<p>Your contribution will be published on the official website of the <b>Targets Review Project</b> and on <b>Your Voice in Europe</b>. Please use the dropdown list below to indicate if you want your contribution to remain anonymous.</p> <p>See <b>Personal Data</b> to view the Commission's guidelines regarding how your personal data is protected. Your data is subject to the following specific privacy statement:</p> <p><i>"Received contributions, together with the identity of the contributor, will be published on the Internet, unless the contributor objects to publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case the contribution may be published in anonymous form. Otherwise the contribution will not be published nor will, in principle, its content be taken into account."</i></p> <p>-single choice reply-(compulsory)</p>	I give permission for my feedback to be published as it is
<b>Waste Framework Directive</b>	
Do you want to respond to the questions on the Waste Framework Directive? If you select "No" you	Yes

can move on to the next section of the consultation which deals with the Landfill Directive. If you select "Yes" the questions relating to the Waste Framework Directive will open up below.

-single choice reply-(**compulsory**)

Are there any issues related to the targets in the Waste Framework Directive which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of waste management.

First issue: -open reply-(**optional**)

Lacking and/or vague definitions in the directives lead to different interpretations, and consequently to varying enforcement and licensing in different Member States. This influences international trade and the level playing field. Examples of unclear definitions are "household waste", "municipal waste" and "similar waste". Avoid these definitions or define them in a very clear manner.

Second issue: -open reply-(**optional**)

Monitoring, validation, calculation and reporting is carried out differently in Member States.

Third issue: -open reply-(**optional**)

In reviewing targets it is important to weigh benefits of setting ambitious targets and keep involved the Member States that face difficulties complying those targets. As long as several Member States are far from achieving targets, setting more ambitious targets might not be effective.

## Suggestions for Revision

<p>1. Establish a single target and calculation method based only on the quantity of <u>municipal</u> waste collected. This would require that a consistent definition of municipal waste is used in all Member States. -single choice reply-(<b>optional</b>)</p>	<p>3 = moderately good idea, may be worth further consideration</p>
<p>2. Extend the existing targets to include other specific waste streams beyond paper, metal, plastic and glass (for example, wood, food waste, textiles, and other materials in municipal waste). -single choice reply-(<b>optional</b>)</p>	<p>3 = moderately good idea, may be worth further consideration</p>
<p>3. Establish a single target and calculation method based only on the quantity of <u>household</u> waste collected. This would require that a consistent definition of household waste is used in all Member States. -single choice reply-(<b>optional</b>)</p>	<p>5 = very good idea, definitely deserves further consideration</p>
<p>4. Adjust the targets so that biowaste is also included -single choice reply-(<b>optional</b>)</p>	<p>3 = moderately good idea, may be worth further consideration</p>
<p>5. Set targets which reflect environmental weightings for materials (for example, through reference to greenhouse gas savings achieved through recycling). -single choice reply-(<b>optional</b>)</p>	<p>4</p>
<p>6. Improve monitoring and validation of the reports submitted by Member States so that the consistency and reliability of data can be</p>	<p>5 = very good idea, definitely deserves further consideration</p>

validated. -single choice reply-(optional)	
7. Introduce requirements on businesses to sort a range of waste materials for recycling and composting / anaerobic digestion. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
8. The 70% recycling target should not include backfilling. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
9. Provide clear definitions of recycling and material recovery, and how these should be calculated for the C&D waste stream. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
10. Mandate sorting of wastes at C&D sites with a special attention to hazardous waste. -single choice reply-(optional)	4
11. Require facilities which sort 'mixed' C&D wastes to achieve a high level of recycling of the input materials. -single choice reply-(optional)	4
<p>Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.</p> <p>First solution: -open reply-(optional)</p> <p>Clarify definitions to avoid different interpretations. Clarify responsibilities of different actors to ensure a level playing field.</p> <p>Second solution: -open reply-(optional)</p> <p>Uniform monitoring, validation, calculation, reporting and enforcement.</p> <p>Third solution: -open reply-(optional)</p> <p>Remove the exclusion of hazardous waste from the calculation method for the target of C&amp;D waste.</p>	
<h2>Landfill Directive</h2>	
<p>Do you want to respond to the questions on the Landfill Directive? If you select "No" you can move on to the next section of the consultation which deals with the Packaging and Packaging Waste Directive. If you select "Yes" the questions relating to the Landfill Directive will open up below.</p> <p>-single choice reply-(compulsory)</p>	Yes
<h2>Key Issues</h2>	
<p>Are there any issues related to the targets in the Landfill Directive which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of waste management.</p> <p>First issue: -open reply-(optional)</p> <p>Targets should be set for household and industrial waste instead of municipal waste.</p>	

Second issue: -open reply-(optional)

Third issue: -open reply-(optional)

## Suggestions for Revision

1. Revise the targets so that they are set in such a way that they do not penalise countries whose economies are growing faster after starting from a lower base. -single choice reply-(optional)	2
2. Establish a legal obligation for reporting on 'municipal waste' and enforcing the use of a single definition of the term by all Member States. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
3. Standardise the approach to performance measurement and progress reporting. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
4. In Member States where no data exists for 1995, a more recent baseline year should be set with targets adjusted accordingly. -single choice reply-(optional)	2
5. Clarify when treated waste should be considered 'no longer biodegradable' from the perspective of the Landfill Directive. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
6. Further tighten existing targets (e.g. move progressively towards zero biodegradable municipal waste sent to landfill). -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
7. Progressively include <u>all biodegradable</u> wastes (not just biodegradable wastes of municipal origin) within targets similar to the existing ones. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
8. Introduce targets for the progressive reduction in the quantity of residual waste irrespective of how it is subsequently managed (whether it is sent to incineration, MBT or landfill, or any other residual waste management method). -single choice reply-(optional)	2
9. Define 'pre-treatment' in an unambiguous manner so that the ban on landfilling waste that is not pre-treated is applied equally across all countries. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration

Are there any issues related to the targets in the Landfill Directive which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly

defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of waste management.

First solution:

-open reply-(optional)

In reviewing targets it is important to weigh benefits of setting ambitious targets and keep involved the Member States that face difficulties complying those targets. As long as several Member States are far from achieving targets, setting more ambitious targets might not be effective.

Second solution: -open reply-(optional)

Suggestion 2: we support the uniform reporting, however, targets should be set for household and industrial waste instead of municipal waste.

Third solution: -open reply-(optional)

## Packaging and Packaging Waste Directive

Do you want to respond to the questions on the Packaging and Packaging Waste Directive? If you select "No" you can move on to the next section of the consultation which deals with the Roadmap to a Resource Efficient Europe. If you select "Yes" the questions relating to the Packaging and Packaging Waste Directive will open up below. -single choice reply-(compulsory)

Yes

## Key Issues

Are there any issues related to the existing targets which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of, for example, markets for recycled packaging waste.

First issue: -open reply-(optional)

Enforcement differs among Member States.

Second issue: -open reply-(optional)

The option in the Packaging Directive to calculate the recycling percentages as laid down in Commission Decision 2005/270/EC, by using the amount placed on the market (art. 2, sub 2, last phrase) is not in line with the calculation methods offered in the WFD.

Third issue: -open reply-(optional)

Lacking of any adoption of bioplastic packaging.

## Suggestions for Revision

1. The methodology for calculating recycling rates should be standardised so that data (and hence performance levels) are comparable across Member States.

-single choice reply-(optional)

5 = very good idea, definitely deserves further consideration

2. Remove from the Packaging Directive the target for packaging waste from municipal sources and

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include it into the Waste Framework Directive to ensure full consistency with the existing target on municipal waste recycling. -single choice reply-(optional)	
3. Bring the recycling targets for different materials closer together to ensure a more level playing field. -single choice reply-(optional)	2
4. Incorporate "weightings" for materials recycled based on environmental benefits derived from recycling the material. -single choice reply-(optional)	4
5. The targets for some packaging materials could be subdivided into subcategories; for example, metals could be divided into non-ferrous and ferrous metals. The same could apply for plastic; for example, separate targets could be set for PET, LDPE, and HDPE. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
6. Set specific targets for recycling of packaging waste from households to encourage further recycling of household packaging. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
7. Remove from the Directive the maximum limit of 80% that stipulates how much packaging waste a Member State is allowed to recycle. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
8. Introduce a target for prevention of packaging waste (the development of waste prevention targets is covered in a broader manner in a later section of this consultation). -single choice reply-(optional)	1 = poor idea, not worth consideration
9. Adjust the definitions for reuse and recycling in the Packaging Directive to be consistent with those contained in the Waste Framework Directive. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
10. Expand the recycling target to include reuse, by allowing the reuse of packaging to be credited to the recycling target. -single choice reply-(optional)	4
11. Introduce targets for reuse for commercial transit packaging. -single choice reply-(optional)	4
12. Introduce targets for reuse for all packaging. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.	

First solution:

-open reply-(optional)

Next to the environmental pressure of packaging, take also care of the product-packaging combination (e.g. more packaging could lead to less food waste due to postponed expiration date).

Second solution: -open reply-(optional)

Introduce European quality standards to ensure a level playing field.

Third solution: -open reply-(optional)

Formulate a vision on bioplastics, based on a clear definition of bioplastics.

The Commission is keen to encourage higher rates of recycling. It recognises, however, the need to maintain the quality of recycled material so that it can be used profitably and with losses kept to a minimum between the collection and recycling stages. Keeping in mind the need to maintain quality, please select from the dropdown lists below the highest level of recycling that you believe could reasonably be achieved for each of the materials. Below you will be asked the year by which you believe these targets could realistically be achieved (i.e. between 2020 and 2025).

75%

Paper and Cardboard:

-single choice reply-(optional)

Glass -single choice reply-(optional)

90%

Metals -single choice reply-(optional)

85%

Plastic: -single choice reply-(optional)

50%

Wood: -single choice reply-(optional)

45%

All Packaging -single choice reply-(optional)

70%

Other Material (please specify below) -single choice reply-(optional)

50%

If you have entered a recycling rate for "Other Material" above, please state what material this is for: -open reply-(optional)

Beverage carton

Paper and Cardboard -single choice reply-(optional)

2022

Glass -single choice reply-(optional)

2022

Metals -single choice reply-(optional)

2022

Plastic -single choice reply-(optional)

2022

Wood -single choice reply-(optional)	2022
All Packaging -single choice reply-(optional)	2022
Other material (as defined above) -single choice reply-(optional)	2022

## Consultation Regarding the Aspirations of the Roadmap to a Resource Efficient Europe

### Waste Prevention

Do you agree with the principle that there should be targets for waste prevention?  
-single choice reply-(compulsory)

Yes

Do you think there is a case for setting prevention targets on specific waste streams/materials/products? If so, which waste streams/materials/products do you feel should be covered by new targets and why? Please provide an answer for each material/waste stream in the free text boxes below.

Waste Stream /Material/Product 'A':  
-open reply-(optional)

Yes, there is a case for setting prevention targets, however, only on specific waste streams and provided that the targets can be realized, monitored and enforced. Setting relative targets could be a possibility. However, further research is needed to investigate how these targets should be set.

Waste Stream /Material/Product 'B': -open reply-(optional)

Waste Stream /Material/Product 'C': -open reply-(optional)

Waste Stream /Material/Product 'D': -open reply-(optional)

1. In line with the proposal in the Roadmap, a requirement that waste generated per capita is in decline by 2020. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
2. Targets for decoupling of municipal waste from economic growth in line with Article 9(c) of the Waste Framework Directive. For example, the difference between the annual change in municipal waste per capita (X%) and the annual change in GDP per capita (Y%) should demonstrate a decoupling tendency such that over comparable (e.g. four year) periods, the value of (Y – X) is increasing in value. -single choice reply-(optional)	4
3. Consistent reporting of household waste arisings across Member States would act to	4



produce a level playing field for setting absolute targets on waste prevention (e.g. no greater than X kg per household per year). The targets could exhibit a declining trend over time. -single choice reply-(optional)	
4. New requirements could be set on Member States to incrementally increase the number of prevention measures in place, and the overall coverage of these measures. For example, the number of households who have signed up to say "no" to unwanted mail, or the number of households covered by measures to reduce food wastage. -single choice reply-(optional)	2
5. Introduce requirements for progressive coverage of households by pay-as-you throw schemes. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
<b>Preparation for Reuse</b>	
Do you agree with the principle that there should be separate targets for preparation for reuse? -single choice reply-(compulsory)	Yes
Do you think there is a case for targets for preparation for reuse on specific waste streams/materials/products? If so, which waste streams/materials/products do you feel should be covered by a target, and how should the target be specified? Please provide an answer for each material/waste stream in the free text boxes below.	
Waste Stream /Material/Product 'A': -open reply-(optional)	
In the question above we mean: "No", however, to mention the following exception we had to click "Yes" in the drop down box. Car wrecks could be a suitable waste stream for targets on preparation for reuse. However, this is only a small stream.	
Waste Stream /Material/Product 'B': -open reply-(optional)	
Waste Stream /Material/Product 'C': -open reply-(optional)	
Waste Stream /Material/Product 'D': -open reply-(optional)	
<b>Recycling Rates</b>	
Do you agree with the view that recycling rates should be increased and/or be made to include more materials/waste streams? -single choice reply-(compulsory)	Yes
Household Waste -single choice reply-(optional)	65%

Municipal Waste -single choice reply-(optional)	65%
Commercial Waste -single choice reply-(optional)	65%
Industrial Waste -single choice reply-(optional)	80%
Construction & Demolition Waste -single choice reply-(optional)	90% or more
In order to take into account the large differences between Member States' current recycling levels, would you agree that an approach which sets targets relative to the existing situation in each Member State (for instance increase of recycling rates by X% per year) is appropriate? -single choice reply-(optional)	No
<p>So far only municipal waste and construction and demolition waste are covered by specific recycling targets in the Waste Framework Directive, whilst other Directives cover packaging, WEEE, ELVs and batteries. Do you think there is a case for setting recycling targets on waste streams/materials/products that are not already covered by targets in existing Directives? If so, which waste streams/materials/products do you feel should be covered by new targets and why?</p>	
<p>Waste Stream /Material/Product 'A': -open reply-(optional)</p>	
<p>Textile. Recycling of textile would be beneficial because manufacturing of textile entails major environmental pressure while it is still discarded after use.</p>	
<p>Waste Stream /Material/Product 'B': -open reply-(optional)</p>	
<p>Waste Stream /Material/Product 'C': -open reply-(optional)</p>	
<p>Waste Stream /Material/Product 'D': -open reply-(optional)</p>	
<h3>Limiting Incineration of Waste Which Might Otherwise be Recycled</h3>	
Do you agree with the view that a maximum level should be set for the amount of waste that can be incinerated for different waste streams (e.g. household waste and/or commercial waste)? -single choice reply-(compulsory)	No
<h3>Landfill</h3>	
1. Landfilling should be limited to residues from a specified range (to be determined) of waste treatment operations. -single choice reply-(optional)	4
2. Landfilling should be limited to a certain	4

percentage of waste generated (for instance 5%) from a particular date. -single choice reply- (optional)	
3. Landfilling of recyclable/compostable waste (to be defined) should be banned. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
4. Landfilling of waste that is combustible should be banned. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
5. Landfilling of waste should be banned if it has not been pre-treated to a level where the potential to lead to methane emissions from landfills has been virtually eliminated. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
<p>Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.</p> <p>First solution: -open reply-(optional)</p> <p>Suggestion 2 proposes to limit landfill to a certain percentage of waste generated, however, a distinction should be made between different waste streams.</p> <p>Second solution: -open reply-(optional)</p> <p>Third solution: -open reply-(optional)</p>	
In order to take into account the large differences between Member States' current levels of landfilling, would you agree that an approach which sets targets that take account of the existing situation in each Member State is appropriate (for instance by fixing a landfilling reduction percentage per year)? -single choice reply-(optional)	No
<h3>Targets as a Tool in Waste Legislation</h3>	
Do you believe the Commission should go further than simply setting targets for Member States to achieve? If you select "No" there are no more questions and you can submit your response by clicking on the button below. -single choice reply-(compulsory)	Yes
<h3>Suggestions for Change</h3>	
1. Develop guidance on the implementation of effective producer responsibility schemes to	Yes

improve the transparency of the systems as well as their cost effectiveness. -single choice reply- (optional)	
2. Develop guidance on the proper implementation of the waste hierarchy. -single choice reply-(optional)	Yes
3. Ensure a closer monitoring by the Commission of progress accomplished by Member States in applying the waste hierarchy. For those Member States moving too slowly to meet the legally binding targets, develop mechanisms to ensure that key instruments such as a combination of economic and legal instruments (landfill/incineration taxes/bans, EPR schemes, incentives for municipalities and citizens, etc.) are applied. -single choice reply- (optional)	Yes
4. Develop criteria for municipalities to implement services of a minimum standard to enable sorting of a range of waste materials for recycling and composting / anaerobic digestion. -single choice reply-(optional)	No
5. Improve the consistency of the definitions used in the legislation and ensure proper monitoring by improved data collection and systematic reliability and validity checks of data reported. -single choice reply-(optional)	Yes
<p>Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.</p> <p>First solution: -open reply-(optional)</p> <p>1) Link waste policy to industry policy (e.g. create jobs in re-use and recycling, discuss sustainability and recycling when negotiating trade agreements, set requirements regarding recycling and re-use on new products). 2) Stimulate Member States to promote the waste hierarchy by legal instruments (bans) and financial instruments (subsidies and tax schemes).</p> <p>Second solution: -open reply-(optional)</p> <p>3) Promote knowledge exchange, e.g. by exchanging best practices, a databank, establish contacts between entrepreneurs in different Member States. 4) Promote changing roles of producer and consumer e.g. lease. 5) Promote sustainable procurement of Member States' public authorities.</p> <p>Third solution: -open reply-(optional)</p> <p>6) Ensure coherent reporting and enforcement within EU. 7) Establish a European body that takes care of harmonized implementation of the directives.</p>	
<h2>General Comments</h2>	

Would you like to add any general comments? If so, please use the space provided below.

-open reply-[\(optional\)](#)

1) Unclear definitions also influence the answering of this consultation. E.g. our rating in questions on biowaste and backfilling depend on interpretation of these definitions. 2) In paragraph 3 "Recycling rates" (questions on the Roadmap to a Resource Efficient Europe), the percentages mentioned are ambitious and unlikely to be achieved easily by all Member States. 3) The directives, Roadmap and consultation focus on targets for government and businesses, while the consumer has a major influence on the quality and quantity of waste arising, through, for example, consumer acceptance and commitment to waste separation. 4) The review should assess where the current waste directives, and other related legislation, prevent resource efficiency (circular economy). E.g. consider how to deal with the negative impact REACH authorization may have on the recycling activities and ambitions in Europe. 5) Consider subsidiarity. 6) Ensure opportunities for new and innovative technologies. 7) Problems appear related to Essential Requirements of packaging. However, this is out of the scope of this consultation and therefore these issues are not mentioned here.