

A FLEXIBLE APPROACH TO THE WASTE MANAGEMENT HIERARCHY: Lessons from ten years of packaging waste management

EUROPEN welcomes the Commission's recognition of the need for a flexible approach to waste management recovery options, including reuse. These recovery options form part of the broad waste hierarchy outlined in the European Commission Thematic Strategy on Prevention and Recycling of Waste and are reflected in the proposal to revise the Waste Framework Directive¹. EUROPEN supports the Commission's proposal on this point.

Our member companies representing Europe's packaging and packaged goods industries support this flexible approach because:

1. More than a decade of experience in successfully meeting the waste management obligations of the Directive on Packaging and Packaging Waste² has proved the necessity and the benefit of a flexible approach to the choice and deployment of waste management options.
2. Through the packaging waste recovery systems which industry has funded and operated (mostly in co-operation with regional and local authorities), the need for a flexible range of waste management options has been confirmed as essential for environmental, social and financial reasons.
3. A study of packaging waste management systems funded by the European Commission has shown that *'regional or local conditions to a large extent determine which of the options (reuse, recycling, or recovery [sic]) is preferable from the point of view of a high level of environmental protection'*.³

Based on these facts, EUROPEN is very concerned by various stakeholders' proposals to introduce a "rigid" EU-wide waste management hierarchy. This commonly quoted hierarchy varies in its exact form, but usually ranks waste management options in a preferred order: waste minimisation, re-use, material recycling, composting, energy recovery, incineration without energy recovery, landfilling.

We understand that some members of Council, the European Parliament and the Committee of the Regions are drafting amendments to the Commission's proposal that would make this rigid hierarchy legally binding. The value of this approach has serious limitations because:

- The rigid hierarchy has no scientific or technical basis.
- The rigid hierarchy is not useful in practice because it cannot accommodate a combination of waste management options. Experts increasingly recognise that to optimise the management of municipal solid waste, a combination of recovery and treatment options is required.
- The rigid hierarchy does not address cost, so cannot determine whether waste management systems given priority in law are also economically sustainable.

Over the past decade the use of life cycle assessment (LCA) by waste managers has become increasingly standard practice and, in many cases, has led to significant improvements in the management of solid waste. These improvements have been achieved on a local scale, based on a local, LCA-derived hierarchy. A rigid EU-wide hierarchy cannot account for local conditions.

The EU Directive on Packaging and Packaging Waste proposed that ... *"life cycle assessments should be completed as soon as possible to justify a clear hierarchy between reusable, recyclable and recoverable packaging"*. The subsequent Commission-funded study to investigate the outcome of this concluded that LCA does not justify such an EU-wide hierarchy of recovery options. In fact, an attempt to require the use of one recovery option in preference to another would actually run counter to environmental improvements in production, consumption and waste management and take us further away from the goal of sustainable development⁴.

Other studies⁵ and empirical evidence similarly show that a single fixed hierarchy between different recovery methods is not appropriate, since there is no universal 'best' waste management system. The optimal system for any region will always vary according to local resources, needs and priorities.

EUROPEN supports increased efforts to develop truly integrated waste management systems, which use a range of options to reduce the overall environmental burdens of waste management.⁶ To help design such systems, solid waste LCAs, run by waste managers and planning authorities, can be used. These efforts are more likely to result in the sustainable management of waste than policies based on a rigid waste hierarchy. The overall aim must be to maximise the efficiency of resource use throughout the product life cycle.

The successful experience of the packaging sector convinces EUROPEN members that the Commission's modernised approach to the waste management hierarchy will yield both environmental and economic benefits.

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¹ *"The waste hierarchy should not be seen as a hard-and-fast rule, particularly since different waste treatment methods can have different environmental impact."* COM (2005) 666 final.

² Directive 94/62/EC

³ RDC Coopers and Lybrand 1997. Eco-balances for Policy-making in the Domain of Packaging and Packaging Waste. Reference no.: B4-3040/95001058/MAR/E3

⁴ *ibid*

⁵ Coopers and Lybrand, 1996. Cost Benefit Analysis of the Different Municipal Solid Waste Management Systems: Objectives and Instruments for the Year 2000. Final Report for European Commission, DGXI. March 1996.

⁶ White, P.R., Franke, M. and Hindle, P. (1995) Integrated solid waste management: a lifecycle inventory. Blackie Academic and Professional, Glasgow. 362pp.