

29 August 2006

TO:  
European Parliament,  
Council of the European Union  
Committee of the Regions

## REVISION OF THE EU WASTE FRAMEWORK DIRECTIVE

### An Open Letter from European Industry Organizations<sup>1</sup>

The European Commission proposal to revise Europe's framework legislation on waste has precipitated a vigorous and healthy debate among stakeholders about its many aspects. One vital element of this debate is the "waste hierarchy". This important and complex topic has been dominated by a discussion on how many steps a "hierarchy" might contain but has been completely lacking in scientific rigour and sufficient consideration of fundamental principles of EU law.

One view has emerged—reflected in amendments in a draft report for debate in the European Parliament—which, if adopted in law, would introduce a rigid 5 step hierarchy of waste management options. Any possible derogation from such a hierarchy would require individual justification.

A rigid hierarchy would be unworkable in practice and would not bring any additional environmental benefits. Any derogation procedure would be unavoidably onerous for local authorities and industry.

The attached paper describes the hierarchy issue in detail and provides evidence from a variety of EU cities and regions—based on practical experience—of why such a rigid hierarchy is not realistic.

**For these reasons we support retaining the present EU policy and Commission proposal which places prevention as the highest priority, final disposal as the least favoured option and a flexible approach to the choice of recovery options**

<sup>1</sup> The European Organization for Packaging and the Environment (EUROPEN), Alliance for Beverage Cartons and the Environment (ACE), European Brands Association (AIM), Beverage Can Makers Europe (BCME), Confederation of the Food and Drink Industries of the EU (CIAA), European Federation of Bottled Water (EFBW), EuroCommerce, European Federation of Corrugated Board Manufacturers (FEFCO), *PlasticsEurope*, European Soft Drinks Industry (UNESDA)