
VOTING RECOMMENDATIONS TO MEPs ON THE REVISION OF THE WASTE FRAMEWORK DIRECTIVE

EUROPEN members support the use of a life-cycle approach in decisions as proposed in the revision of the Waste Framework Directive so that waste is not considered in isolation. As a general principle, we urge policy-makers not to introduce product requirements in legislation that is intended to regulate how waste is handled. This is necessary to avoid legal inconsistencies, particularly with regard to harmonised definitions, and to prevent further fragmentation of the internal market.

1. WASTE MANAGEMENT HIERARCHY

The hierarchy is useful as a guiding principle against which to assess options, in particular when waste management plans are being developed or revised at a national or regional level. It has to be applied **flexibly** because each local situation and each product or waste stream is different.

A study commissioned by EUROPENⁱ demonstrates, for example, that the best waste management options for cities may not be appropriate or feasible in peripheral, rural regions where population density is low and climatic conditions may have to be considered. Similarly, the best option for one waste stream, taking into account environmental, economic and social impacts, may be different to the best option for another. It is not always best for the environment to choose waste management options in strict accordance with the 5-step waste management hierarchy.

Granting derogations only on the basis of life-cycle and cost-benefit analyses would not result in more efficient or effective waste management, nor reduce environmental impact and would conflict with the principles of 'Better Regulation'. Such a **derogation procedure** would cause **excessive bureaucracy with little or no environmental benefit** and would be very difficult to implement. This approach would raise a number of questions: who will determine the scope and make these analyses? Will they follow the ISO Standard? Who will peer review the results? Who will make the final decision and on what legal basis? Who will pay for all this? It is also in contradiction with the European Parliament's Resolutions on **Better Lawmaking**.

For these reasons, EUROPEN can support the Environment Committee's adoption of Amendments 32 and 54.

2. WASTE PREVENTION PROGRAMMES AND TARGETS

Although Member States certainly have a part to play in addressing prevention, the prospect of 27 different plans and 27 different ways of measuring prevention would make it very difficult for both small and large businesses to operate at optimal efficiency across the EU and could distort competition.

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The Common Position delegates responsibility for preparing **prevention programmes** to Member States. EUROOPEN sees a strong need for harmonized European guidelines for their design and implementation. Clear EU guidelines on waste prevention are a pre-requisite in order to safeguard the proper functioning of the Internal Market.

For these reasons, EUROOPEN can support the Environment Committee's adoption of Amendment 73.

Stabilisation and decoupling of waste for final disposal from growth in GDP is an appropriate aim. However, it is inevitable that some waste will be generated as a result of economic activity. The setting of **quantitative targets** to address this is **risky and almost impossible to measure**. Prevention targets are unlikely to achieve their stated aim and whichever way they are implemented, targets are almost certain to cause discrimination and internal market distortions.

EUROOPEN recommends that the European Commission be asked to report on the feasibility of setting qualitative waste prevention objectives for 2020, based on best available practices, and taking into account Eurostat statistics for 1995-2003ⁱⁱ which show that growth in municipal waste in the EU-15 closely follows the growth in GDP, and that there has been an absolute decrease in municipal waste sent to landfill.

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ⁱ *The use of the waste hierarchy in certain parts of Europe: Examples of a flexible approach to the hierarchy*, Ffact Management Consultants, July 2006. http://www.europen.be//download_protected_file.php?file=106

ⁱⁱ *Waste Generated and Treated in Europe*, Data 1995-2003, EC/Eurostat 2005.