

European Commission – Call for evidence for an Impact Assessment on the revision of the EU Waste Framework Directive

The European Compost Network (ECN) welcomes the publication of the call for evidence for an impact assessment by the European Commission and the twofold objectives to improve the overall environmental outcome of waste management in line with the waste hierarchy and [to improve] the implementation of the polluter pays principle.

Most of the policy options identified by the European Commission are likely to achieve an important impact towards the achievement of its goals. Supporting member states through guidance on EPR schemes and separate collection are still needed options in numerous Member States to achieve the ambitious targets of 65% recycling by 2035.

At the same time, regulatory developments can support more ambitious policy making, including by restricting the scope of the derogation to implement the separate collection provided for in Article 10(3) WFD, and introducing residual waste reduction targets.

In particular, the ECN supports the development and introduction of **minimum requirements for source segregation and separate collection for high quality recycling** with the objective of avoiding contamination of recyclable waste. The ECN believes this measure will provide more clarity and certainty for the recyclers on the responsibilities and enforcement for quality concerns of bio-waste. A maximum level of non-target material in the collection of bio-waste would be beneficial to consider. Moreover, it is considered to be an effective and efficient measure to achieve higher quality compost and digestate products from biological recycling of bio-waste.

The ECN highlights few additional policy options for consideration in the European Commission's impact assessment to reduce waste generation and upscale recycling rate. It is recommended to propose a **reduction target on the amount of bio-waste disposed in residual waste**. Although there is already in the Landfill Directive a reduction target of bio-waste sent to landfills, a dedicated target on collection is needed to provide the right incentives. There is already extensive evidence and knowledge that 1/3 of residual waste is commonly composed of biodegradable fractions, majority of which comes from household

kitchen. The German Environmental Agency¹, the DECISIVE project², Zero Waste Europe and the Bio-based Industry Consortium³ and the European Compost Network⁴ have collected such evidence in different reports and studies.

Paragraph 6, Article 11 of the Waste Framework Directive lays down the European Commission's commitment to consider the setting of several preparation for re-use and **recycling targets** on different waste streams including **bio-waste**. This impact assessment seems definitely the right time to comply with the mentioned provision and the ECN would welcome such consideration.

About the European Compost Network (ECN)

The **European Compost Network** (ECN) is the leading European membership organisation promoting sustainable recycling practices by composting and anaerobic digestion of organic resources and guarding over the quality and safe use of the recovered organic fertilisers and soil improvers. With 68 members from 27 European Countries ECN represents more than 4500 experts and plant operators with more than 45 million tonnes of biological waste treatment capacity.

1 Comparative analysis of residual municipal waste from representative regions in Germany https://www.umweltbundesamt.de/sites/default/files/medien/479/publikationen/texte_113-2020_analyse_von_siedlungsrestabfaellen_abschlussbericht.pdf

2 Report on collection set-up performance : DECISIVE Deliverable D6.6 <https://tore.tuhh.de/handle/11420/11515>

3 Bio-waste generation in the EU: current capture levels and future potential <https://biconsortium.eu/downloads/bio-waste>

4 ECN Guidance on Separate Collection <https://www.compostnetwork.info/download/ecn-guidance-on-separate-collection/>