



MUNICIPAL WASTE EUROPE

– promoting public responsibility for waste

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Municipal Waste Europe has received draft documents from Arcadis, to provide comments. The documents include a draft set of characteristics of waste prevention together with a visual map of waste prevention initiatives organised in a life cycle perspective. The documents also include a selection of fact sheets on waste prevention from different perspectives.

Background

In line with Waste Framework directive article 9 the Commission is to present an interim report on the evolution of waste generation and the scope of waste prevention, including the formulation of a product eco-design policy addressing both the generation of waste and the presence of hazardous substances in waste.

Arcadis has been assigned to provide input for this report.

What is waste generation?

The reader of the documents will need further guidance to the very important difference between prevention of waste and prevention of waste being generated.

The first is traditionally seen as "preparing for re-use" or other lower steps in the waste hierarchy. It is not seen as a part of prevention actions (as waste has already been generated) but rather as a part of waste treatment.

Prevention of waste being generated is not a target of the waste management or waste treatment sector generally. Some actions will however affect or naturally be carried out by the waste sector.

The Arcadis documents combine both concepts. The life cycle fact sheets states the difference but does not provide clear guidance. The Guidance to the Analysis mixes the both and even if the problem is addressed, no clear guidance is provided. The Visual map includes references to instruments addressing the quality rather than the quantity of the waste.

What is prevention?

The main question for the analysis is clearly to establish is prevention is to be measured in Quantitative or Qualitative terms.

The Quantitative prevention idea appears to mean that all waste is to be prevented equally. This idea is more vaguely described but the prevention focuses on the targets and is always relative to the impact.

The Arcadis documents seem both to know the difference and to ask for clarification while asking for comments supporting one or the other as the primary target.

The Commission Guidelines for Waste Prevention does not include either concept and it is not clear why the analysis for 2011, is concentrating on them.

Draft set of characteristics of waste prevention

Position 1

“Waste prevention should be of secondary importance compared with diminishing environmental and human health impact and saving resources in the whole life cycle of products.”

Municipal Waste Europe: Waste prevention is the first but not the only step in the waste hierarchy. Prevention is not a goal in it self but rather an instrumental way of managing resources in a more sustainable way. The flexibility included in art. 4 item 2 for the waste hierarchy also states that this flexibility “requiring waste streams departing from the hierarchy”. Prevention is a part of the whole. The interaction with reuse, recycling and use of recycled materials and substances is essential. Prevention cannot be seen as an independent of environmental thinking.

Discussions will not be entirely avoided with the proposed approach, but the difficult and impossible prioritising between different actions can only be reduced while concentrating on the common goal.

The clarification should include an differentiation of the term “re-use” under the Waste Framework Directive article 3, point 13, which does not affect waste, and re-use as a part of preparing for re-use, the second tenant to the waste treatment hierarchy in article 4, point 2. Re-use in the first case is not waste, while preparations for re-use of waste only affect those substances or objects which the holder discards or intends or is required to discard. It is very important to clarify the difference between these two definitions. We enclose a diagram to illustrate the difference clearly.

Position 2

“Quantitative environmental and resource depletion prevention (including quantitative waste prevention) should be on top of a hierarchy of life cycle alternatives.”

Municipal Waste Europe finds that in the perspective of environmental protection including human health, qualitative prevention is of more importance. Reduction of hazardous substances and materials is in that aspect, of first importance to prevent, especially where alternative substances provide equal functions. In the aspect of saving resources, qualitative prevention can be of more importance. The two are however not exclusive but rather supportive of each other.

The presence of hazardous substances in waste provides extra difficulties for waste treatment. Its avoidance it the single greatest improvement and support for the development of sustainable waste management that can be achieved. This requires qualitative actions.

The discussion paper introduces clarifying preferences regarding services, not products. It would be interesting to analyse the waste prevention effects on the service sector

Position 3

“Quantitative prevention is an absolute concept. Qualitative prevention is a gradual concept. Therefore quantitative prevention usually better than qualitative prevention.”

Municipal Waste Europe: It is clear that quantitative prevention is easier to measure than qualitative prevention. An absolute concept does however not mean it is better. Actions for preventing waste are connected to the protection of the environment and human health. Prevention can however not be a target in it self, not even if the measuring becomes difficult. Investments of time and resources into prevention measures need to be balanced to the results. The best prevention therefore concentrates on the most hazardous substances or waste streams.

The Arcadis document clarification to position 3 uses an uncommon terminology when referring to the hazardousness of substances and waste streams and the potential alternative risks with the substitution principle. It is not in line with the terminology of the Commission Guidelines for waste prevention and it makes the text very difficult to understand.

Position 4

“Qualitative prevention is not a good concept to order in the waste treatment hierarchy.”

Municipal Waste Europe finds the clarification filled with misconceptions. Qualitative prevention is best judged through a life cycle approach, the same judgement to be used for the evaluation of the entire waste hierarchy in the Waste Framework Directive. Development of Life Cycle Assessment methods is one tool to use in these assessments.

With a clear understanding of qualitative prevention definition, there seems to be no reason why it cannot stand alone. The relationship to the other steps in the waste hierarchy seems to be confused. The proper treatment of waste, as to its suitability for recycling, recovery or disposal is decided through the life cycle approach, as the waste hierarchy is not absolute.

Position 5

“Reuse is prevention, preparing for reuse is no prevention but there is a thin line between the both concepts”

Municipal Waste Europe finds that the Arcadis clarification need a reference to the Waste Framework directive in order to clarify the terms reuse and preparing for reuse. Applications in Member States and by academia are interesting but not when contradictory to current legal definitions.

See position 1 for further discussion about the terms.

Cleaning of bottles for re-use is traditionally not included in waste treatment processes, as the bottles are not waste (see the re-use definition in Waste Framework directive article 3 point 13).

Life cycle fact sheets

The fact sheets need to be revised and carefully adjusted. The sheets should to contain comparable texts on identical or similar subjects.

They also include measures not strictly seen as prevention of non-waste, which is good and showing the complex supporting measures that will reduce environmental impact from waste. It clarifies the connection between environmental targets and the quantitative measures as the waste phase prevention actions often are identical to the non-waste prevention actions, for example to prepare for reuse through reparability.

We will be happy to be apart of continued discussion.

Respectful regards,

Gunnel Klingberg
Secretary general

Municipal Waste Europe is the European association representing municipalities responsible for waste management and their publicly owned waste management companies. The association is founded in 2008 with the aim to promote public responsibility for waste and to provide a platform for policy input.

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Annex:
 Illustration of the differences between the two reuse concepts.

