



## Harmonisation of Separate Collection Position Paper

As the municipalities of Europe responsible for the collection of Municipal Waste, we have been discussing the concept of harmonising separate collection raised by the Green Deal and the second Circular Economy Action Plan at length.

The collection of waste from multiple waste generators is a task which needs to be tailored to each locality, each demographic and each location's unique climatic requirements. For this reason, waste collection is not something that can be designed at regional, national or supranational level and Municipal Waste Europe members see no benefits in attempting to do so. On the contrary, municipalities, which have been responsible for waste collection throughout history, find that any such attempts would be counter-productive, leading to confusion and ultimately, lower rates of reuse and recycling.

A 'waste collection model', to define the term used in the European Green Deal, would include the type and colour of bins used, number and description of waste fractions collected, the density of the bin network and where they are placed, frequency of collection, routing protocol, types of waste collection trucks and their number, types of incentives, types of penalty for wrong sorting and levels of fines and tender specifications. All of these decisions depend on local factors; getting just one wrong would lead to an unsuccessful model. In addition to this, going into this level of detail would infringe upon the subsidiarity principle, taking too much of the decision-making power away from Member States as per Articles 192-193 of the Treaty on the Functioning of the European Union.

Discussions have already begun at EU level on some of the harmonisation points raised in both the European Green Deal and the CEAP 2.0, such as harmonising the colour of waste bins. The ultimate aim behind the idea of harmonising separate waste collection would be to achieve a circular economy through recovery of materials from the EU waste stream. However, as mentioned above, care should be taken to identify exactly which aspect of such harmonisation would achieve this goal.

What will certainly serve to assist and enhance the creation of a circular economy with respect to secondary raw materials, is knowledge brokerage, lower waste quantities, a reduced variety of waste types, in particular polymers, which would make recycling easier, and a clearly identifiable link between the waste to be disposed of and the container into which it should be disposed to ensure the correct waste treatment.

### **Knowledge Brokerage:**

It is clear that there are still many municipalities around Europe that would benefit from significant improvement to their separate collection systems and recycling rates. We suggest, from positive prior experience, that comprehensive schemes are put in place to ensure that all municipalities with such challenges are paired with municipalities with a similar culture, demographic and governance structure who have overcome these challenges. This enables municipalities with low recycling rates and high landfill rates to learn



how their counterpart, with whom they can identify, was able to overcome the same obstacles and take a 90% landfilling rate to below 10% and a recycling rate from below 10% to above 50% in years not decades.

This will demand considerable effort and incur costs to those experienced municipalities that are called to help others. In order to encourage them to do so and so they can afford to make the necessary personnel available for such training, specific and sufficient funds would need to be made available. We have already come across such challenges with the TAIEX EIR PEER 2 PEER tool. It is an excellent tool which we look forward to using again when travel is once again possible, however it needs to be strengthened with more funding for those municipalities that will be called on to share their knowledge on how to overcome specific local challenges in municipalities similar to them. If acceptable to TAIEX it would be helpful not to lose time over the coming months, if the TAIEX EIR PEER TO PEER projects could continue in virtual form.

Municipal Waste Europe proposes that a tangible effect is most likely to be obtained by investing in targeted knowledge exchange, completing or upgrading collection materials and equipment for waste collection where necessary and in sufficient sorting and recycling capacity in the EU, taking the social dimension and GDP into account when deciding on the location of these new installations. Our members find that this would be an appropriate use for the Just Transition Fund and other funds related to speeding the process of economic transformation towards a circular, sustainable, carbon neutral economy as intended by the Green Deal and both Circular Economy Action Plans.

#### **Using Labelling as a Harmonising Opportunity:**

In an effort to facilitate the sorting of waste by the waste holder, Denmark came up with a system of labels based on colours and pictograms, which they are rolling out in their country on a voluntary basis with some success. This was discussed among the Nordic European countries who have also adopted the system, adapting it to their national situation. It has since been named the 'Nordic Pictogram System' for ease of reference.

Municipal Waste Europe supports and proposes the use of the Nordic Pictogram System for waste sorting, now embraced by all Nordic countries and progressively being taken up by the Baltic states, as a relevant response to the Commission's aim to harmonise waste sorting. It includes pictograms for all products and waste treatment methods. The concept is that every product and material has its own symbol, the symbol is placed on the product by the producer and by the waste sector on the waste collection containers. If more than one material or product is to be collected in the same container, the container will bear all relevant symbols next to each other.

MWE members have agreed that a harmonised system of symbols at EU level, based on the Nordic Pictogram System, would be helpful. The decision on the colours to associate with the pictogram should be left to Member State decision in order to enable adaptation to other existing systems, for example the draft BSI standard being used in Italy. MWE greatly encourages the adoption of the same system of symbols by the production sector which would complete the communication method and improve the prospect of achieving a circular economy.

This is also in line with the CEAP 2.0 action to look into product labelling. This waste sorting system is perfectly suited to matching the symbol on the waste product with the appropriate bin, taking uncertainty away from



the consumer and increasing the chances of obtaining a higher quality waste stream for recycling and less recyclable waste in the residual fraction.

There are existing rules for waste labels on packaging, however they provide no link between the label and the waste container. Current labelling on packaging requires the disposer to have knowledge of the materials in the package they are holding and to take a decision on how to dispose of it. It is also different in every EU Member State and sometimes in different cities within the same country. This has repeatedly proven to be confusing and to result in waste appearing in the wrong bin, reducing the effectiveness of the ensuing recycling process to recover materials. The pictograms take that need for a decision away, delivering clean quantities of the same material in each bin.

Clarifying sorting in this way will also have a positive financial impact on collection and recycling.

Municipal Waste Europe proposes that the symbols in Annex II, taken from the Nordic pictogram system, are used to form the basis of a voluntary common labelling system for EU Member States. This remains an area of Services of General Interest and as such, a system of governance with municipalities at its core would need to be developed at national and at European level in order to ensure that the system of pictograms develops in such a way as to deliver the aims of the Green Deal and CEAP 2.0.

Annex I contains the relevant references made in the European Green Deal and the Circular Economy Action Plan 2.0.

Annex II contains the main pictograms of the more than 90 in the Nordic Pictogram System which would assist in facilitating sorting in door to door or collection point collection systems as well as at Civic Amenity Sites. Member States are free to adopt any or all of the pictograms in the Nordic Pictogram System.

#### **Conclusions:**

With the benefit of experience of multiple waste collection systems and waste management systems, Municipal Waste Europe advises limiting discussion at EU level to harmonisation of labelling, using the existing Nordic system of pictograms. Also for discussion should be the expansion of the existing TAIEX EIR PEER to PEER tool to act as an effective knowledge brokerage tool whose resulting revised local waste collection and local waste management plan will have facilitated access to funding, linked to successful implementation of the plan.

Thanking you in advance for your consideration of our proposal and looking forward to discussing this further with you,

Vanya Veras  
Secretary General  
[vanya.veras@municipalwasteurope.eu](mailto:vanya.veras@municipalwasteurope.eu)



## ANNEX 1

### EU POLICY ON THE ISSUE:

#### EUROPEAN GREEN DEAL:

1. To simplify waste management for citizens and ensure cleaner secondary materials for businesses, the Commission **will also propose an EU model for separate waste collection**
2. Access to resources is also a strategic security question for Europe's ambition to deliver the Green Deal. Currently... **Only 12%** of the materials ...industry... uses **come from recycling**

#### CIRCULAR ECONOMY ACTION PLAN 2.0:

1. Prevention: waste reduction targets for specific streams, enhanced... extended producer responsibility schemes, ...shall serve the objective to significantly reduce total waste generation and **halve** the amount of residual (non-recycled) **municipal waste by 2030**
2. **High quality recycling** relies on effective separate collection of waste
3. To help citizens, businesses and public authorities better separate waste, the Commission will **propose to harmonise separate waste collection systems**
4. **This proposal will address the most effective combinations of separate collection models:**
  - the density and accessibility of separate collection points (including in public spaces, taking account of regional and local conditions ranging from urban to outermost regions)
  - common bin colours
  - **harmonised symbols for key waste types**
  - **product labels**
  - **information campaigns**
  - **economic instruments**
  - standardisation and the use of quality management systems to assure the quality of the collected waste destined for use in products, and in particular as food contact material
5. EU-wide **harmonised model for separate collection of waste and labelling**
6. **...rules on recycled content and measures to improve the collection and recycling rates of all batteries**, ensure the recovery of valuable materials and provide guidance to consumers; ...
7. **...boosting the sorting, re-use and recycling of textiles**, including through innovation, encouraging industrial applications and regulatory measures such as extended producer responsibility

## ANNEX 2

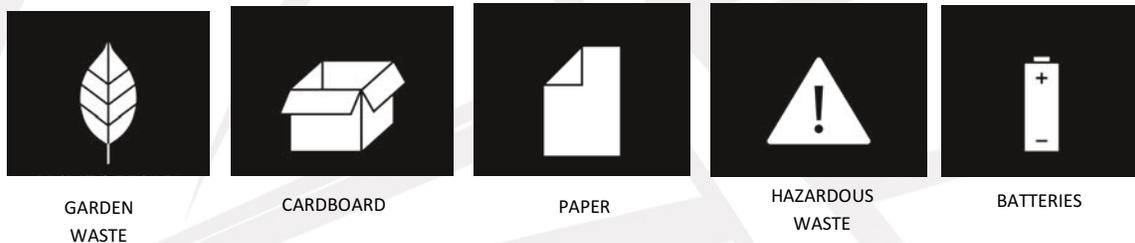
### Nordic Pictograms

#### Pictograms for waste bins (household and similar collection)

Key waste streams for separate collection:



Example of some of the additional waste streams for collection door to door, by proximity bring system or at collection centre:



**Outline Version:**

Particularly useful for application to packaging or products in relief or to reduce impurities and increase recyclability.

