

Consultation on the Review of the European Waste Management Targets

Personal Details	
In what capacity are you responding to this consultation? -single choice reply-(compulsory)	As an industry, not-for-profit, or academic organisation (i.e. all other stakeholders)
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What type of organisation do you represent? -single choice reply-(compulsory)	Not-for-profit/non-governmental organisation
What is the name of your company or organisation? -open reply-(compulsory)	Municipal Waste Europe AISBL
In which country is your head office/organisation based? -single choice reply-(compulsory)	Belgium
<p>Your contribution will be published on the official website of the Targets Review Project and on Your Voice in Europe. Please use the dropdown list below to indicate if you want your contribution to remain anonymous.</p> <p>See Personal Data to view the Commission's guidelines regarding how your personal data is protected. Your data is subject to the following specific privacy statement:</p> <p><i>"Received contributions, together with the identity of the contributor, will be published on the Internet, unless the contributor objects to publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case the contribution may be published in anonymous form. Otherwise the contribution will not be published nor will, in principle, its content be taken into account."</i></p>	I give permission for my feedback to be published as it is
-single choice reply-(compulsory)	
Waste Framework Directive	
Do you want to respond to the questions on the Waste Framework Directive? If you select "No" you can move on to the next section of the consultation	Yes

which deals with the Landfill Directive. If you select “Yes” the questions relating to the Waste Framework Directive will open up below.

-single choice reply-(**compulsory**)

Are there any issues related to the targets in the Waste Framework Directive which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of waste management.

First issue: -open reply-(**optional**)

The calculation method for recycling needs to be revised. The Commission Decision on Calculation Methods (2011/753/EU) considers both source separated collected waste and the output of sorting plants equally as recycled waste. However, there can be up to 30% impurities in the collected waste which constitutes considerable distortion to the recycling figures. The majority of Member States today, measure the input to recycling plants as their recycled quantities. The calculation method should also take account of quantities exported and act as one of the control measures which limit export of recycled waste to only those quantities which meet the minimum quality specifications. The definition of recycling also needs to be revised, in order that the sorted recyclables which exit sorting plants are measured, rather than the collected waste which is delivered to these sorting plants. Furthermore, it is necessary to set quality standards for recycling. Through repeated recycling, the quality of the recyclate deteriorates: fibres get shorter and the level of impurities gradually increases. These aspects must be integrated into a quality standard. As the Commission mentions in point 5 above, minimum quality specifications, perhaps in the form of impurity levels, should be applied to the sorted materials. Targets would need to be aligned to this new definition and specifications. Municipal Waste Europe proposes that ‘R’ criteria for high quality recycled material are set. Definitions and targets should be identical in all waste directives with the Waste Framework Directive as the reference document. The Waste Directives focus very heavily on source-separated collection. However, mechanical separation of compatible, mixed, dry recyclables can sometimes be a good alternative to the source-separation of all fractions and depends greatly on local circumstances. The Waste Directives should therefore set targets on quantity and quality but not on how to achieve these. ‘Zero waste’ should not be used as a term within the Waste Directives. The term ‘Landfill Ban’ is more appropriate.

Second issue: -open reply-(**optional**)

There should be a COMMUNICATION TARGET. A main barrier to the collection of high quantities and quality of recyclable materials and products is lack of communication to all actors, both citizens and economic activities. A communication target with clear examples of what constitutes communication would oblige governmental bodies to engage in communication activities as part of their waste management plan. Producer Responsibility organisations must contribute financially and actively. In practical terms, Member States should adopt and implement annual communication campaigns on waste.

Third issue: -open reply-(**optional**)

One calculation method is needed across the EU in order to make the figures comparable. The calculation method should also be based on a uniform understanding of the sources of waste from which data is to be collected, without disturbing the organisation of waste management in Member States which have different definitions of Municipal Waste. The sources to be included are: Household and similar commercial and industrial waste. Data should be collected for these waste streams regardless of who collects and treats the waste, whether this is municipalities, producer responsibility organisations or private waste management companies. Again, exported quantities which meet the quality criteria must be included in this calculation. There should be a separate calculation method for other commercial and industrial wastes which are not similar to household waste either in character or quantity.

Suggestions for Revision

1. Establish a single target and calculation method based only on the quantity of *municipal* waste collected. This would require that a consistent definition of municipal waste is used in all Member States. -single choice reply-(**optional**)

5 = very good idea, definitely deserves further consideration

2. Extend the existing targets to include other specific waste streams beyond paper, metal,

5 = very good idea, definitely deserves further consideration

plastic and glass (for example, wood, food waste, textiles, and other materials in municipal waste). -single choice reply-(optional)	
3. Establish a single target and calculation method based only on the quantity of <i>household</i> waste collected. This would require that a consistent definition of household waste is used in all Member States. -single choice reply-(optional)	1 = poor idea, not worth consideration
4. Adjust the targets so that biowaste is also included -single choice reply-(optional)	4
5. Set targets which reflect environmental weightings for materials (for example, through reference to greenhouse gas savings achieved through recycling). -single choice reply-(optional)	1 = poor idea, not worth consideration
6. Improve monitoring and validation of the reports submitted by Member States so that the consistency and reliability of data can be validated. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
7. Introduce requirements on businesses to sort a range of waste materials for recycling and composting / anaerobic digestion. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
8. The 70% recycling target should not include backfilling. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
9. Provide clear definitions of recycling and material recovery, and how these should be calculated for the C&D waste stream. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
10. Mandate sorting of wastes at C&D sites with a special attention to hazardous waste. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
11. Require facilities which sort 'mixed' C&D wastes to achieve a high level of recycling of the input materials. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration

Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.

First solution:

-open reply-(optional)

Clarity in the reporting of data is needed, stipulating that any organisation collecting and recycling waste in the whole chain must report quantities received (with a description of the waste or recyclables) and quantities sorted (including when exported) or recycled. This includes municipalities and publicly owned waste management companies, producer responsibility organisations and private waste management companies. Producers must also have an obligation to report quantities put on the market, for materials covered by a producer responsibility obligation in law, relating this figure to the quantities of virgin and recovered raw material purchased. Penalties for offenders should be introduced, either in EU or Member State legislation. In order to achieve the objectives of the Waste Framework Directive, especially the promotion of waste prevention, the preparation for reuse, recycling and other high-level modes of recovery, as

well as resource efficiency ensuring the protection of the environment and human health, complete, detailed and correct data concerning waste production and management is of utmost importance. Waste streams of all origins (including construction and demolition wastes) must be clearly trackable from the phase of waste production up to the final recovery or disposal. For this, clear, uniform and extensive monitoring- and reporting duties of the Member States need to be introduced in the Waste Framework Directive.

Second solution: -open reply-(optional)

There must be an obligation for all producers and importers to participate in a producer responsibility scheme and thereby to pay towards the recovery of the products and materials they put on the market. It must be made clear that Member States should fine those not participating in a scheme and that producers/EPR schemes and Member States share accountability for achieving the material recovery (recycling) targets. Producers/EPR schemes must ensure that Municipalities are fully compensated for the costs of collection, which they incur as part of achieving the targets. Currently, the WFD sets targets and requirements for the separation and recycling of waste. However, waste and resource management should be much more about reducing the amount of residual waste. Therefore, an annually progressive target should be set, progressively minimising the amount of residual municipal waste going to final treatment (landfill or energy recovery).

Third solution: -open reply-(optional)

It must be clear that collection of Municipal Waste is a Service of General Interest and as such must be facilitated by clear rules and division of responsibilities. Municipalities are responsible for the collection of waste from their citizens and in many Member States this also includes commercial activities and industry within their geographical area. By clarifying that Municipalities are responsible for collection and producers are responsible for paying for collection to be carried out in such a way that enables the recovery of the materials and products which they put on the market, cherry-picking can be avoided and the Municipality can be protected from the additional cost of collecting and treating abandoned or problematic waste. Producers must be responsible for the collection and treatment of 100% of the materials they put on the market, not only the proportion which is separately collected or sorted for recycling. The cost of treating their products which end up in the residual waste fraction must also be covered, as should the cost of cleaning up litter.

Landfill Directive

Do you want to respond to the questions on the Landfill Directive? If you select "No" you can move on to the next section of the consultation which deals with the Packaging and Packaging Waste Directive. If you select "Yes" the questions relating to the Landfill Directive will open up below.

-single choice reply-(compulsory)

Yes

Key Issues

Are there any issues related to the targets in the Landfill Directive which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of waste management.

First issue: -open reply-(optional)

Landfill diversion measures are necessary and should be implemented in such a way as to promote material and energy recovery in line with the waste hierarchy. As no tax can be set at EU level, Landfill bans are a better option. We therefore support the introduction of landfill bans on recyclable, biodegradable and combustible wastes, provided that there is a clear definition of what these three terms encompass together with measurement criteria for landfills.

Second issue: -open reply-(optional)

For existing landfills, the collection and sound management of landfill gas has not been sufficiently guaranteed in many countries so far due to the lack of specific targets in the landfill directive. In the interest of climate and resource protection further requirements should be laid down. Specific targets should be laid down in the field of landfill degasification (minimum extraction volume per m3 waste).

Third issue: -open reply-(optional)

There is a need to streamline the various definitions in the Waste Directives of the EU and the MSs (e.g. "municipal waste" and

“biological degradability”). On the basis of harmonised definitions and one calculation method, the same targets for all Member States should be set, with perhaps different timelines for different Member States. The longer timelines should be tied to annual achievements.

Suggestions for Revision

1. Revise the targets so that they are set in such a way that they do not penalise countries whose economies are growing faster after starting from a lower base. -single choice reply-(optional)	1 = poor idea, not worth consideration
2. Establish a legal obligation for reporting on ‘municipal waste’ and enforcing the use of a single definition of the term by all Member States. -single choice reply-(optional)	4
3. Standardise the approach to performance measurement and progress reporting. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
4. In Member States where no data exists for 1995, a more recent baseline year should be set with targets adjusted accordingly. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
5. Clarify when treated waste should be considered ‘no longer biodegradable’ from the perspective of the Landfill Directive. -single choice reply-(optional)	4
6. Further tighten existing targets (e.g. move progressively towards zero biodegradable municipal waste sent to landfill). -single choice reply-(optional)	4
7. Progressively include <i>all biodegradable</i> wastes (not just biodegradable wastes of municipal origin) within targets similar to the existing ones. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
8. Introduce targets for the progressive reduction in the quantity of residual waste irrespective of how it is subsequently managed (whether it is sent to incineration, MBT or landfill, or any other residual waste management method). -single choice reply-(optional)	1 = poor idea, not worth consideration
9. Define ‘pre-treatment’ in an unambiguous manner so that the ban on landfilling waste that is not pre-treated is applied equally across all countries. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration

Are there any issues related to the targets in the Landfill Directive which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of waste management.

First solution:

-open reply-(optional)

A landfill ban should be introduced for recyclable and combustible wastes, with the requirement that material recovery takes precedence over energy recovery or preparation for energy recovery in order that the landfill ban does not result only in the construction of treatment systems for mixed municipal waste and of waste to energy plants. In this way, prevention, re-use, recycling and recovery are effectively fostered. In this context, a transition period could apply during which countries have the time to set up their own high-level recovery/recycling capacities and in parallel can have the use of such capacities in other countries. This period must be limited in time and, as an additional condition, the shipment of untreated waste to a better treatment option than is locally available should not be considered as environmentally negative on the whole.

Second solution: -open reply-(optional)

The full and effective implementation of the existing legal framework would be a first step in the right direction to reduce the disposal of waste eligible for material and energy recovery in landfills. Additional EU-wide measures need to be included in the Landfill Directive to enforce and consistently implement the current legal requirements. Environmental performance criteria need to be employed for all methods of waste management and the quality of secondary raw material (similarly to the R1-criterion in the field of energy recovery).

Third solution: -open reply-(optional)

The waste acceptance criteria are not included in the Landfill Directive (1999/31/EC) as such but in the related Decision 2003/33/EC (Decision establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC).

Packaging and Packaging Waste Directive

Do you want to respond to the questions on the Packaging and Packaging Waste Directive? If you select "No" you can move on to the next section of the consultation which deals with the Roadmap to a Resource Efficient Europe. If you select "Yes" the questions relating to the Packaging and Packaging Waste Directive will open up below. -single choice reply-(compulsory)	Yes
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Key Issues

Are there any issues related to the existing targets which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of, for example, markets for recycled packaging waste.

First issue: -open reply-(optional)

It should be clearly mentioned in the legislation that the responsibility for organizing the collection of recyclables - including plastics, at the doorstep of private consumers is a public responsibility and therefore lies with municipalities and their public waste management companies. The Packaging directive should apply to transport packaging as well (tertiary, pallets and more) as well as primary and secondary packaging.

Second issue: -open reply-(optional)

Although most Member States have implemented the Packaging Directive by applying producer responsibility, the Directive itself does not impose producer responsibility as such. This is one of the reasons for which there is such wide disparity in the implementation of this Directive across Member States. Article 8 of the Waste Framework Directive (on Extended Producer Responsibility) should be revised to take account of experience and should apply across all waste directives.

Third issue: -open reply-(optional)

Financial responsibility should be set up in the directive in order that Municipalities' costs for collection are clearly covered by producers.

It is entirely inappropriate to set an upper limit for recycling. Only minimum values should be set.

Suggestions for Revision

<p>1. The methodology for calculating recycling rates should be standardised so that data (and hence performance levels) are comparable across Member States.</p> <p>-single choice reply-(optional)</p>	<p>5 = very good idea, definitely deserves further consideration</p>
<p>2. Remove from the Packaging Directive the target for packaging waste from municipal sources and include it into the Waste Framework Directive to ensure full consistency with the existing target on municipal waste recycling.</p> <p>-single choice reply-(optional)</p>	<p>3 = moderately good idea, may be worth further consideration</p>
<p>3. Bring the recycling targets for different materials closer together to ensure a more level playing field.</p> <p>-single choice reply-(optional)</p>	<p>3 = moderately good idea, may be worth further consideration</p>
<p>4. Incorporate “weightings” for materials recycled based on environmental benefits derived from recycling the material. -single choice reply-(optional)</p>	<p>2</p>
<p>5. The targets for some packaging materials could be subdivided into subcategories; for example, metals could be divided into non-ferrous and ferrous metals. The same could apply for plastic; for example, separate targets could be set for PET, LDPE, and HDPE. -single choice reply-(optional)</p>	<p>3 = moderately good idea, may be worth further consideration</p>
<p>6. Set specific targets for recycling of packaging waste from households to encourage further recycling of household packaging. -single choice reply-(optional)</p>	<p>3 = moderately good idea, may be worth further consideration</p>
<p>7. Remove from the Directive the maximum limit of 80% that stipulates how much packaging waste a Member State is allowed to recycle.</p> <p>-single choice reply-(optional)</p>	<p>5 = very good idea, definitely deserves further consideration</p>
<p>8. Introduce a target for prevention of packaging waste (the development of waste prevention targets is covered in a broader manner in a later section of this consultation). -single choice reply-(optional)</p>	<p>4</p>
<p>9. Adjust the definitions for reuse and recycling in the Packaging Directive to be consistent with those contained in the Waste Framework Directive. -single choice reply-(optional)</p>	<p>5 = very good idea, definitely deserves further consideration</p>
<p>10. Expand the recycling target to include reuse, by allowing the reuse of packaging to be</p>	<p>4</p>

credited to the recycling target. -single choice reply- (optional)	
11. Introduce targets for reuse for commercial transit packaging. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
12. Introduce targets for reuse for all packaging. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
<p>Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.</p> <p>First solution: -open reply-(optional)</p> <p>On point 10. Preparation for re-use should be included in the recycling definition and target. Quantities collected through deposit-return systems must be included in the national statistics.</p> <p>Second solution: -open reply-(optional)</p> <p>Measurements of recycled quantities for the achievement of the recycling targets should be taken after the sorting operation. There should be minimum quality specifications for the post sorting recycle.</p> <p>Third solution: -open reply-(optional)</p> <p>Traceability through brokers and dealers must be ensured to verify that sorted recyclables go to further recycling plants or directly to production plants to be processed. All steps in the recycling chain should be measured and should have a reporting obligation. The export of sorted and recycled materials should only be permissible when the receiving installation can prove that they meet European quality standards.</p>	
<p>The Commission is keen to encourage higher rates of recycling. It recognises, however, the need to maintain the quality of recycled material so that it can be used profitably and with losses kept to a minimum between the collection and recycling stages. Keeping in mind the need to maintain quality, please select from the dropdown lists below the highest level of recycling that you believe could reasonably be achieved for each of the materials. Below you will be asked the year by which you believe these targets could realistically be achieved (i.e. between 2020 and 2025).</p> <p>Paper and Cardboard: -single choice reply-(optional)</p>	80%
Glass -single choice reply-(optional)	85%
Metals -single choice reply-(optional)	90%
Plastic: -single choice reply-(optional)	60%
Wood: -single choice reply-(optional)	50%
All Packaging -single choice reply-(optional)	75%

Other Material (please specify below) -single choice reply-(optional)	50%
If you have entered a recycling rate for "Other Material" above, please state what material this is for: -open reply-(optional)	Textiles (also non-packaging)
Paper and Cardboard -single choice reply-(optional)	2025
Glass -single choice reply-(optional)	2025
Metals -single choice reply-(optional)	2025
Plastic -single choice reply-(optional)	2025
Wood -single choice reply-(optional)	2025
All Packaging -single choice reply-(optional)	2025
Other material (as defined above) -single choice reply-(optional)	2025

Consultation Regarding the Aspirations of the Roadmap to a Resource Efficient Europe

Waste Prevention

Do you agree with the principle that there should be targets for waste prevention?
-single choice reply-(compulsory)

Yes

Do you think there is a case for setting prevention targets on specific waste streams/materials/products? If so, which waste streams/materials/products do you feel should be covered by new targets and why? Please provide an answer for each material/waste stream in the free text boxes below.

Waste Stream /Material/Product 'A':
-open reply-(optional)

In general it is important to emphasise that waste prevention is above all a question of consumption and not waste treatment. As such, prevention should be subject to Key Performance Indicators based on best practice in the EU and what is to be measured. There should be key performance indicators for: 1. Household waste and similar household waste (including biowaste, e.g. food waste and from agricultural sources) 2. Waste under producer responsibility, and; 3. Waste Other than under (1) and (2). WEEE: prevention Key Performance Indicators should be set which limit hazardous material and substance content in order to increase recyclability. Also the prevention target should include the longevity of the products and the ease with which they can be dismantled for recycling. (eco-design)

Waste Stream /Material/Product 'B': -open reply-(optional)

Plastic packaging: a prevention target is needed which will prevent the marketing of plastic packaging which cannot be easily sorted and recycled at acceptable cost. All plastic packaging should be recyclable. Non-recyclable packaging should be subject to high taxes in order to discourage their use. 'Recyclable' in this context requires proof of actual recycling, as there is a great deal of plastic packaging on the market which carries a 'recyclable' label but is not recycled in practice due to high costs of sorting and/or recycling. The same applies to composite materials. The recycling of composite materials is difficult and results in considerable quantities of sorting residues. Therefore, the quantities of these materials put on the market should be minimized. When putting the materials on the market, a certificate documenting the reusability/recyclability of the materials should be obligatory.

Waste Stream /Material/Product 'C': -open reply-(optional)

Hazardous waste should be subject to recovery targets in order to promote its collection, re-use and recycling (for example in the case of paint), based on producer responsibility.

Waste Stream /Material/Product 'D': -open reply-(optional)

Medicines and healthcare waste: there should be a collection target which supports the creation of a collection scheme.

1. In line with the proposal in the Roadmap, a requirement that waste generated per capita is in decline by 2020. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
2. Targets for decoupling of municipal waste from economic growth in line with Article 9(c) of the Waste Framework Directive. For example, the difference between the annual change in municipal waste per capita (X%) and the annual change in GDP per capita (Y%) should demonstrate a decoupling tendency such that over comparable (e.g. four year) periods, the value of (Y – X) is increasing in value. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
3. Consistent reporting of household waste arisings across Member States would act to produce a level playing field for setting absolute targets on waste prevention (e.g. no greater than X kg per household per year). The targets could exhibit a declining trend over time. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
4. New requirements could be set on Member States to incrementally increase the number of prevention measures in place, and the overall coverage of these measures. For example, the number of households who have signed up to say “no” to unwanted mail, or the number of households covered by measures to reduce food wastage. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
5. Introduce requirements for progressive coverage of households by pay-as-you throw schemes. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration

Preparation for Reuse

Do you agree with the principle that there should be separate targets for preparation for reuse? -single choice reply-(compulsory)

Yes

Do you think there is a case for targets for preparation for reuse on specific waste streams/materials/products? If so, which waste streams/materials/products do you feel should be covered by a target, and how should the target be specified? Please provide an answer for each material/waste stream in the free text boxes below.

Waste Stream /Material/Product 'A':

-open reply-(optional)

We agree that there should be a measure, however a Key Performance Indicator may be more effective than a Target as re-use is an area which is hard to measure due to the involvement at source of many companies which collect (sometimes repair) and re-sell in the same understanding as re- use. We believe this should not be discouraged.

Waste Stream /Material/Product 'B':

-open reply-(optional)

Waste textiles: centralised collection, sorting and subsequent use (e.g. sale) depending on the quality in each case. In this context criteria like eco- efficiency and socially sustainable recovery/recycling have to be defined that have also to be complied with abroad. (This, incidentally, applies to all waste streams and management modes.)

Waste Stream /Material/Product 'C':

-open reply-(optional)

Furniture: take-back by retailers or through a centralised collection system, subsequent second-hand-marketing via centralised shops and via the internet.

Waste Stream /Material/Product 'D':

-open reply-(optional)

Recycling Rates

Do you agree with the view that recycling rates should be increased and/or be made to include more materials/waste streams? -single choice reply-(compulsory)	Yes
Household Waste -single choice reply-(optional)	70%
Municipal Waste -single choice reply-(optional)	70%
Commercial Waste -single choice reply-(optional)	90% or more
Industrial Waste -single choice reply-(optional)	90% or more
Construction & Demolition Waste -single choice reply-(optional)	90% or more
In order to take into account the large differences between Member States' current recycling levels, would you agree that an approach which sets targets relative to the existing situation in each Member State (for instance increase of recycling rates by X% per year) is appropriate? -single choice reply-(optional)	Yes

So far only municipal waste and construction and demolition waste are covered by specific recycling targets in the Waste Framework Directive, whilst other Directives cover packaging, WEEE, ELVs and batteries. Do you think there is a case for setting recycling targets on waste streams/materials/products that are not already covered by targets in existing Directives? If so, which waste streams/materials/products do you feel should be covered by new targets and why?

Waste Stream /Material/Product 'A':

-open reply-(optional)

Plastics – reduction of the impacts of plastic waste on the environment and more efficient use of the resources originally needed for products.

Waste Stream /Material/Product 'B':

-open reply-(optional)

Bio-waste – use of the waste stream to produce climate-friendly and resource-friendly energy.

Waste Stream /Material/Product 'C':

-open reply-(optional)

Textiles and Furniture, as there is positive experience in some member states already, in taking them out of the waste stream through separate collection, reuse and recycling. The reuse and recycling of textiles has a significant impact on the potential to reduce the CO2 impact of these products throughout their lifecycle.

Waste Stream /Material/Product 'D':

-open reply-(optional)

Hazardous waste should be covered by producer responsibility. As the cost for treatment of hazardous waste is usually quite high and it is a difficult waste stream to collect, there is currently no stimulus for its separate collection.

Limiting Incineration of Waste Which Might Otherwise be Recycled

Do you agree with the view that a maximum level should be set for the amount of waste that can be incinerated for different waste streams (e.g. household waste and/or commercial waste)?

-single choice reply-(compulsory)

No

Landfill

1. Landfilling should be limited to residues from a specified range (to be determined) of waste treatment operations. -single choice reply-(optional)

5 = very good idea, definitely deserves further consideration

2. Landfilling should be limited to a certain percentage of waste generated (for instance 5%) from a particular date. -single choice reply-(optional)

5 = very good idea, definitely deserves further consideration

3. Landfilling of recyclable/compostable waste (to be defined) should be banned. -single choice reply-(optional)

5 = very good idea, definitely deserves further consideration

4. Landfilling of waste that is combustible should be banned. -single choice reply-(optional)

5 = very good idea, definitely deserves further consideration

5. Landfilling of waste should be banned if it has not been pre-treated to a level where the potential to lead to methane emissions from landfills has been virtually eliminated. -single choice reply-(optional)

5 = very good idea, definitely deserves further consideration

Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.

First solution:

-open reply-(optional)

The disposal of waste in landfills should be restricted to residues of certain waste treatment processes (still to be determined).

Second solution:

-open reply-(optional)

Third solution:

-open reply-(optional)

In order to take into account the large differences between Member States' current levels of landfilling, would you agree that an approach which sets targets that take account of the existing situation in each Member State is appropriate (for instance by fixing a landfilling reduction percentage per year)?

-single choice reply-(optional)

Yes

Targets as a Tool in Waste Legislation

Do you believe the Commission should go further than simply setting targets for Member States to achieve? If you select "No" there are no more questions and you can submit your response by clicking on the button below. -single choice reply-(compulsory)

-single choice reply-(compulsory)

Yes

Suggestions for Change

1. Develop guidance on the implementation of effective producer responsibility schemes to improve the transparency of the systems as well as their cost effectiveness. -single choice reply-

(optional)

Yes

2. Develop guidance on the proper implementation of the waste hierarchy. -single choice reply-

(optional)

Yes

3. Ensure a closer monitoring by the Commission of progress accomplished by Member States in applying the waste hierarchy. For those Member States moving too slowly to meet the legally binding targets, develop mechanisms to ensure that key instruments such as a combination of economic and legal instruments (landfill/incineration taxes/bans, EPR schemes, incentives for municipalities and citizens, etc.) are applied. -single choice reply-

(optional)

Yes

4. Develop criteria for municipalities to implement services of a minimum standard to enable sorting of a range of waste materials for

Yes

recycling and composting / anaerobic digestion. -single choice reply-(optional)	
5. Improve the consistency of the definitions used in the legislation and ensure proper monitoring by improved data collection and systematic reliability and validity checks of data reported. -single choice reply-(optional)	Yes
<p>Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.</p> <p>First solution: -open reply-(optional)</p>	
<p>Second solution: -open reply-(optional)</p>	
<p>Third solution: -open reply-(optional)</p>	
<h2>General Comments</h2>	
<p>Would you like to add any general comments? If so, please use the space provided below. -open reply-(optional)</p>	
<p>Both PUSH and PULL factors are needed in order to move to a circular and resource efficient economy. The waste directives are primarily based on PUSH-factors, ensuring that waste is separated and recycled. As a PULL-factor, the use of secondary raw materials should be stimulated.</p>	