



D4.6 – Policy recommendations & development needs related to the waste framework conditions

Executive summary of the policy recommendations

Jean-Benoit Bel – ACR+ & Brooke Flanagan – EUROCITIES

Credits

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Topic 1: Clarify and harmonise separation guidelines for paper and packaging waste for a better communication and a more consistent mining of secondary raw materials

There is much heterogeneity when it comes to local separation guidelines for paper and packaging waste. In several Member States, sorting guidelines can be very different from one local authority to another. This situation has several shortcomings: it makes sorting instructions unclear for inhabitants, and makes the sorted materials inconsistent for recyclers.

Besides, the questions of extending the current sorting guidelines for paper and packaging waste to other materials is still open for many players, as it would make sorting behaviours more convenient and possibly simpler for inhabitants, but it could also hinder the quality of sorted materials and make further sorting operations much more complicated and expensive.

Recommendation 1.1: Harmonisation of sorting guidelines



PPW

Making sorting guidelines more homogeneous at regional, national, and possibly European level consist in defining:

- **A common definition of the waste to be sorted** ("do's and don't's");
- **A common separation scheme**, i.e. common instructions when it comes to what fractions are source separated, co-mingled, or not sorted;
- At least, **a limited number of combinations could be defined**, so that it can be adapted to different contexts, e.g. the size available for inhabitant to sort different fractions;
- **A common colour scheme and visual communication.**

Extension of separation guidelines to all types of plastic packaging is feasible and should be promoted if the sorting centres are adapted to sort these new fractions. Ongoing experiences show that this is technically feasible and leads to higher capture rates without hindering the quality of the sorted fractions. A key aspect of the extension of sorting guidelines is the communication to inhabitants, who must be presented with clear instructions, as well as with the reasons behind the extension.

Topic 2: Improve local collection of WEEE to improve source separation and quality, and allow high quality recycling and re-use

Quality recycling and preparing for re-use of WEEE is only possible if source separation is properly organised and sufficient, so that the different streams are not contaminated or damaged, and WEEE reach the recycling and preparing for re-use facilities in proper conditions. Local illegal behaviours can seriously hinder the quality of the sorted WEEE, thus reducing the incomes and resources to sustain quality waste collection systems.

Recommendation 2.1: Increase source separation of WEEE



WEEE

Improving source separation of WEEE can be achieved by implementing several actions:

- **Adequate compensations to civic amenities based on the level of WEEE segregation;**
- **Ban or penalise mixed collection of WEEE with bulky waste;**
- **Boost more accessible and visible collection points by:**
 - Encouraging the implementation of **retailer collection points** for small WEEE, IT equipment and lamps;
 - Promoting the implementation of **secured collection points in other places** often visited by a high number of citizens such a supermarkets or schools;
 - Make sure that these collection points are visible through the **implementation of ad-hoc information tools and the centralisation of information;**
- **Improve training of staff in municipal collection points and retail.**

Recommendation 2.2: Tackle illegal practices for WEEE management at collection level



WEEE

To tackle illegal practices occurring at collection levels, several actions should be promoted:

- **Ban cash transactions for metal scrap;**
- **Adapt compensations to civic amenities based on the detected level of scavenging;**
- **Limit kerbside collection for WEEE;**
- **Promote the securing of municipal collection points, by:**
 - Implementing **closed containers with locks** to store WEEE;
 - **Marking** the WEEE collected at CAS **with bright, indelible paint;**
 - Implementing **video surveillance;**
 - **Adapting collection frequency** of WEEE from the CAS to limit their storage time;
 - Fostering **collaboration with local police.**
- **Enhance monitoring of individual collection points.**

Topic 3: EPR fee modulation for packaging waste and WEEE

Current recycling performances are also limited by the nature of waste that they have to handle: some packaging waste fractions do not have proper recycling routes and end up in energy recovery. In addition, the environmental benefits of WEEE recycling seem limited for specific fractions, such as IT equipment, which can partly be attributed to the technical difficulty of effectively dismantling them. Therefore, improving recycling and re-use performances also needs a better design of products, which can be promoted through eco-modulation of EPR fees.

Recommendation 3.1: EPR fee modulation for packaging waste



PPW

It seems challenging to come up with a simple criterion to modulate the EPR fee. Several options can be listed:

- **Recyclability:** taking into consideration the existence of a recycling industry and end-users of sorted materials, the combination of different materials within the same packaging;
- **Actual recycling rates;**
- **Cost for the end-of-life.**

Harmonisation of fee modulation across Europe should contribute to making the fee system easier to implement, and have a more significant impact on efforts made by producers toward eco-design.

Recommendation 3.2: EPR modulation for WEEE



WEEE

Such eco-modulation can take the form of bonuses or maluses when the product or the producer is not complying with specific requirements such as:

- The availability of repair instructions for repairers;
- The guaranteed availability of spare parts for a sufficient period of time;
- The possibility to dismantle with commercially available tools;
- The possibility to upgrade the products from a material and software point-of-view (e.g. for mobile phones, laptops, and computers);
- The proposition of extended warranty.
- The presence of specific hazardous substances that are known to hinder recycling (e.g. flame retardant);
- The presence of paint/coating that limit the possibilities of recycling of plastics.

Defining clear criteria for assessing the reparability or recyclability of EEE products is complex, and requires collaborative efforts from the different players, e.g. EEE producers and recyclers.

Topic 4: Improve knowledge and data availability for more alignment along the value chain, better informed local experts, and more consistent comparisons

Challenge:

The lack of harmonised data hinders the efficiency of the different recycling value-chains as well as consistent comparisons among local waste collection system. Improving knowledge requires more harmonised monitoring and reporting systems set at regional, national, and possibly European level. It is particularly relevant regarding the implementation of the new Waste Framework Directive and the calculation of the new targets.

Recommendation 4.1: More consistent monitoring for local waste data, including costs, composition analysis, and end-application

ALL

The following propositions are recommended:

- The establishment of **regional/national reporting systems** for local waste data, based on consistent methods and terminologies;
- The inclusion of **figures on quality of the sorted fractions**;
- The establishment of **common methods for reporting costs and performing composition analyses**;
- The **promotion of cost reporting and composition analyses at local level**; or packaging PRO;
- Alternatively, **regional or national campaigns on composition analyses** could be proposed;

Recommendation 4.2: More transparency and traceability over the value chain



PPW

- Member States should set up and implement **electronic registries** to allow the reporting from the various players of the recycling value-chain by capitalising on existing databases, such as the ones developed by EPR organisations.
- The **consistency of the reporting system with the new recycling targets**, and the question of traceability have to be reviewed to match the new requirements;
- Whenever possible, require sorting and recycling units to **keep track of the output materials by identifying their source**;
- For processes that mix together waste from different sources, **assess the individual composition and contamination rates** of the different input materials **through consistent sampling of the input**.

Recommendation 4.3: Distinguish closed-loop from open-loop recycling for PPW monitoring



PPW

Differentiating closed and open-loop recycling gives some interesting insight on the quality of sorted materials and the contribution of waste collection to resource management. Closed-loop recycling implies that the new product in which the material is reprocessed will enable the same application in the next life-cycle, i.e. that it is recycled into the same or similar-quality application.

Propositions for the classification as “closed-loop recycling” are given in the following table:

PPW fraction	Closed-loop recycling
Glass	Production of glass packaging (bottles or jars)
Paper	Production of fibres for paper production
Cardboard	Production of fibres for cardboard production
Ferrous metal	Production of ferrous packaging
Non-ferrous metal	Production of non-ferrous packaging
PET	Production of PET bottles

Recommendation 4.4: Involve all players that can influence collection rates



WEEE

- Run **regular surveys** to assess citizens’ level of awareness and disposal behaviours;
- **Educate consumers**, by developing and running targeted communication campaigns;
- **Collect information on the unreported flows** by developing sampling protocols to estimate the shares of WEEE in mixed residual waste and WEEE hoarded.
- **Develop a national WEEE monitoring strategy**, including the creation of a single database to centralise the reported quantities, and the identification of actors that have access to WEEE.
- Develop harmonised methodologies to know **where the missing WEEE flows are**;
- **Involve all actors that may influence collection rates in a national strategy**, by agreeing on the roles they should play and the obligations assigned to them;
- **Clarify reporting guidelines**;
- Control the collected data through **frequent audits and inspections** organised by PRO and/or government agencies;
- Run national campaigns for **enforcing appropriate reporting and involvement of stakeholders** able to influence collection rates.

Topic 5: Improve the recycling of construction and demolition waste

The challenge for waste authorities is to develop or identify a local market for secondary CDW fractions, which then provides the demand for diverted materials. In addition, the cost of diverting the materials ideally needs to be lower than using the materials for backfilling, so fiscal measures, taxes or bans should be explored.

Recommendation 5.1: Landfill bans or taxes for recyclable construction and demolition waste



CDW

To prevent CDW being sent to landfill and to ensure the cost-benefit of diversion is positive for waste authorities, **landfill bans, gate fees (taxes) or incentives for recycling of fractions should be implemented.** The EU could go further in exploring or encouraging landfill bans for CDW or particular fractions to ensure that there is an incentive for the development of local markets, separate collection by waste authorities and, in the long-term, improved design of buildings to avoid CDW from demolition.

It is important to ensure that the scale at which the ban/tax is implemented is **sufficient to ensure that there is no incentive to transport the waste further to a landfill which does not have a ban or tax in place**, or to illegally dispose of it. Ideally this should be done at national or regional level to ensure that CDW leakage to adjoining landfill sites does not occur.

Topic 6: Ensure the economic relevance of higher recycling performances

In many EU territories, landfilling and incineration costs are too low, making recycling a more expensive solution. In order to increase the recycling of materials, it is important to change that equation to increase the costs of landfilling and incineration when compared with recycling. Other measures could be implemented to support the improvement of the performance of the waste authority and to provide an incentive for households to successfully sort their waste and recycling.

Recommendation 6.1: EPR financing for local authorities aimed at improving performance



PPW

National EPR agreements could be modified to provide support to struggling local waste authorities, instead of only rewarding the levels of performance. There are two ways in which this could be implemented:

- Through the EPR enabling framework or regulations of the Member State, which would formalise the requirement within national schemes. This could also prioritise certain circumstances or local challenges that need additional support.
- Through the development and funding of a workstream at national level to support local authorities to improve performance by the PROs

The sharing of information and good practices could be an important element to complement the financial support provided to improve performance.

Recommendation 6.2: Adjust landfill and incineration taxes



PPW

Landfill taxes are a well-established mechanism for incentivising alternative treatment of waste materials and resources. The following recommendations are formulated:

- **Increase the taxes over time** as new and improved alternative treatment are implemented;
- **Consider the rates of tax for both landfill and incineration in tandem** to ensure that perverse incentives are not created;
- Adjust the taxes **based on data on the economic balance of local waste collection systems** to make recycling economically sustainable.

Recommendation 6.3: Promote “Pay As You Throw” obligations or subsidies



PPW

In communities with Pay-As-You-Throw (PAYT) programmes (also known as unit pricing or variable-rate pricing), residents are charged for the collection of residual waste based on the amount they throw away. This creates a direct economic incentive to recycle more and to generate less waste.

There are numerous different methods of applying PAYT schemes, with the part of the fee related to the choice / behaviour of residents linked either to:

1. The size of container chosen by the household;
2. The frequency of collection of a given container;
3. The application of a fee per sack used;
4. The weight of waste set out for collection; or
5. A combination of the above

It is recommended that these incentives to improve household recycling are **part of a suite of financial incentives which address different levels of the system**. National and regional authorities should encourage local authorities to implement such systems through obligations or financial/technical assistance.

This part has been added in December 2020, following a survey addressed to local authorities across Europe and parallel researches on the responses brought by local, regional, and national authorities to the COVID-19 pandemic. More details are available in the [COLLECTORS guidelines](#).

Topic 7 (COVID): help local authorities to deal with the impact of the current and potential new pandemic

The COVID-19 pandemic forced public authorities and municipal waste operators to rapidly adapt their waste management systems and procedures to take into consideration elements such as safety and health measures for employees, waste treatment requirements, general procedures due to coronavirus for waste sector, staff availability, etc. The COVID-19 pandemic has several impacts on municipal waste generation, composition, and the collection services, which required responses from local authorities. The capacity of local waste authorities to cope with the pandemic depended on their **flexibility** to reallocate resources to their different services, their **capacity to maintain** selective collection and civic amenity sites open by **setting priorities**, their possibility to collect potentially-infected waste while **keeping their staff safe**, and their **communication efforts**.

Recommendation 7.1: measures to help local waste collection systems cope with the pandemic

ALL

Several actions and measures can be recommended to help local waste collection system to fulfil their role while keeping collection staff safe:

- **Define and make available clear guidance at national level** on how to collect and treat potentially infected waste and what services to prioritise
- **Promote inter-city cooperation** for instance on setting specific collection routes for infected or quarantined households, or mutualise civic amenity sites.
- **Adapt waste permit for treatment plants:** in case of shortage of capacity, allowing the treatment of e.g., potentially-contaminated sorted waste, or contaminated waste regarded as infectious healthcare waste in municipal waste incinerators can be considered
- **Ensure the economic balance of waste collection system:** to limit the impact of the lack of resources linked with less sorted materials, or the increase of mixed waste to be treated, by reducing taxes on disposal when restrictive measures apply, or by reconsidering EPR funding for 2020.
- **Ensure proper communication between health authorities and waste authorities** for instance on households that are quarantined so that protection equipment and specific collection equipment can be delivered, and that specific collection routes can be set accordingly.
- **Communicate on littering and fly-tipping .**
- **Promote training to multiskilling workers** in preparation of next pandemic.

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