Driving the Circular Economy
A FEAD Strategy for 2014-2020
Foreword

Europe’s private waste and resource industry drives the circular economy

The challenge facing Europe’s industries today is how to achieve sustainable growth in a resource-efficient and environmentally sound way.

The key to doing this is to make the European economy more “circular”, so that waste is reduced and made safe, and what remains is re-used or recycled into new products, or used to generate energy.

The waste and resources industry plays a key role in the circular economy by providing secondary raw materials for Europe’s industries, and energy for its homes, transport and businesses, so improving resource security.

This booklet sets out FEAD’s vision of the policies needed to allow the industry to play its full part in achieving a more sustainable and prosperous European economy.

David Palmer-Jones, FEAD President
FEAD’s Strategy for 2014-2020

Strengthen recyclability in product design and manufacture

Eighty percent of the environmental impact of products is determined at their design stage, providing an excellent opportunity for Europe to take the lead in smart eco-design.

★ **FEAD members will intensify their cooperation with designers and manufacturers** to ensure that products are designed to prevent waste and to be easily reused, dismantled and recycled.

★ **FEAD calls on the EC to speedily adopt eco-design measures** for material resource efficiency, including setting recyclability requirements for selected products such as electronics.
Stimulate the market for recovered materials

Clear market signals would enable the European waste and resources industry to provide more secondary raw materials for European manufacturing and improve resource security.

★ **FEAD calls for stronger rules on Green Public Procurement** at European level to promote the use of products with recycled content and which are recyclable. Public procurement should be by open competition and should not necessarily be awarded to the lowest tender but to the offer which delivers the most sustainable outcome.

★ **FEAD recommends that Extended Producer Responsibility (EPR) schemes should operate in a transparent way**, to encourage manufacturers to use recycled materials and to ensure fair and equal access to materials and resources.

★ **FEAD recommends that the EC explores the possibility of applying a lower rate of VAT to second hand goods and green products, to promote waste prevention and re-use.**

★ **FEAD calls on the EC to adopt eco-labelling rules which enable consumers to choose recycled products.**
Ensure fair competition in waste markets

Fair competition would allow the private sector waste and resource management industry to deliver high quality services to commercial and public sector customers, significantly reducing their costs and environmental impact.

⭐ **FEAD calls for fair competition between the private and public sector providers of waste and recycling services, to allow the private sector to invest in the circular economy.** Safeguards must be put in place so that municipalities which have exclusive rights over household waste do not use their position to cross-subsidise their operations in respect of commercial waste, as this unfair competition undermines private sector service providers.

⭐ **FEAD calls for the opening up of household waste management markets to competition from private entities.** Many member states grant exclusive rights to municipalities or public waste management entities, based on past concerns about hygiene, health and protection of the environment. However, these concerns have been addressed and public monopolies for the management of household waste for recovery are no longer justified.
Stimulate private sector investment in resource management infrastructure

Most Member States rely on the private sector to provide the annual capital investment of €42.9 billion needed from now until 2020 to properly implement the waste acquis, so moving towards a more circular economy.

FEAD calls for full implementation and proper enforcement of existing EU legislation on waste and resource management, which would generate 400,000 jobs while protecting the environment and human health and improving resource security.

FEAD asks the EC to ensure that any EU funds which are provided to Member States for investments in waste management infrastructure for recyclable or residual waste respect the waste hierarchy.

FEAD asks the EC to accelerate programmes designed to strengthen regulatory enforcement in those Member States which are having most difficulty in reaching EU recycling and landfill diversion targets.

FEAD will play its part, supporting national and European regulators by disseminating environmentally responsible management practices across the sector.

Source: ESA

1 BioIS. Implementing EU Waste Legislation for Green Growth (November 2011).
Create a strong reprocessing sector within a global market

Europe’s re-industrialisation strategies could do more to help develop a strong European reprocessing and manufacturing sector, while recognising the validity of the global market in clean secondary raw materials for recycling.

- **FEAD supports an EU industrial policy which would increase demand for the use of secondary resources within Europe.**

- **FEAD’s members operate in a world market for recycling, so it is right that secondary raw materials which currently cannot be reprocessed within the EU are exported for recovery, consistent with the global circular economy, provided this is done in an environmentally sound manner.**

- **FEAD supports strong action against illegal shipments of waste,** notably WEEE and ELVs, including implementation of the revised Waste Shipment Regulation to improve inspection regimes. This is a better solution than trying to impose a mandatory EU certification scheme on recycling facilities worldwide.
**Ensure better information to support policy making**

Effective EU policy-making is hampered by poor data on raw and secondary material flows, partly due to unclear definitions that allow for different interpretations.

- **A key FEAD priority is for the EC to improve statistics on raw material and waste flows, which implies tightening and harmonisation of definitions and calculation methodologies so as to limit inconsistencies in waste statistics.**

- **FEAD recommends that the EC develops a single set of EU models for the evaluation of the environmental burdens associated with primary resource extraction, procurement and conversion to allow for fair competition between primary and secondary raw materials.**
FEAD supports continued efforts by the EC to clarify when waste ceases to be waste, to promote legal certainty, a level playing field across the EU, a strengthening of the internal market, and recovery of secondary raw materials.

FEAD supports efforts to clarify and harmonise definitions across the Member States, and to improve the reporting of waste statistics and data, as well as measures to improve the operation of extended producer responsibility schemes, all of which should aim to ensure transparency and fair competition in the markets for waste and resources.

FEAD supports further increases in recycling as part of the move towards a more circular and resource efficient economy, and looks forward to working with the EU institutions on the practical steps that will need to be taken to turn the Commission’s ambitious vision into reality.

FEAD supports further progressive reductions in landfill, while recognizing that it will not be possible to eliminate it totally for all types of wastes.

FEAD supports a future role for waste-to-energy, mainly limited to dealing with non-recyclable/non compostable waste.

Create a policy framework for a circular economy

FEAD welcomes the European Commission’s July 2014 proposals to revise EU waste legislation and targets, which set out an ambitious long-term vision for Europe’s resources policy beyond 2020. Turning this vision into reality will be challenging and will require considerable investment, mostly from the private sector, thereby creating new business and job opportunities.
FEAD and its members

Europe’s private sector resource management industry guarantees safe and environmentally sound treatment of all types of waste, including municipal and commercial waste as well as hazardous waste and soil remediation. FEAD and its members are strongly committed to continuous improvement and investment in health and safety, going beyond legal requirements.

Improving resource management is one of the best ways of reducing greenhouse gas emissions to meet future climate targets. The European waste and resource management industry plays a major role in climate change mitigation by reducing the use of virgin raw materials. Our industry has also reduced its own emissions by over 65% since 1990.