



# **Stopping the waste: Setting a long term direction for EU waste policy**

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## Why is waste policy important?

- **Waste policy has a major impact on how efficiently we use resources**
- **Waste management techniques have direct and indirect environmental impacts**
- **Everyone experiences waste management, at home and at work**
  - E.g. recycling is one of the most straightforward and easily understood elements of sustainability for the general public



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## What are we trying to achieve?

- **An eco-efficient Europe**
  - Using resources as efficiently as possible
  - Minimising our climate impacts
- **An innovative Europe**
  - Designing products for a more resource-constrained future
  - Eliminating waste
- **A sustainable Europe**
  - This will not happen overnight...
  - However, we must act urgently to both reduce our climate impacts and improve resource efficiency
    - Delaying action is not an option
    - Minimising the impact of climate change will require changes across all policy areas.



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## Why should we be more eco-efficient?

- **Global consumption of resources is increasing rapidly**
  - Fuelled by ever-increasing levels of consumption per capita in richer countries
  - And by a rapid rise in consumption in some very large poorer countries (China and India)
- **This increase is having environmental and economic impacts**
  - Climate change is receiving the most attention
  - But resource use has many other impacts, for example:
    - damage to biodiversity
    - local pollution from mining, depletion of water supplies and pollution from industrial processes, including waste disposal
  - There is also an economic impact as prices of many resources increase
- **The more resource-efficient our economy is, the better we are prepared for the future.**



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## Waste policies to maximise eco-efficiency

- **The top of the waste hierarchy shows the way:**
  - Waste prevention - the best environmental option, avoiding resource use
  - Reuse - reduces need for resources and manufacturing
  - Recycling - reduces need for extraction and processing of new resources
  - Composting - returns nutrients and structure to soils; displaces other fertilizers; sequesters carbon; and, in the case of anaerobic digestion, produces methane which can be used as an energy source.
- **Then we must phase out the rest - the residual waste:**
  - Provision of effective recycling and composting schemes
  - Re-design of goods and materials to be reusable, recyclable or compostable
    - E.g. Supermarkets & packaging
  - More producer responsibility schemes, to oblige producers to recycle their products at end of life, leading to eco-innovation
- **Whilst avoiding anything that will encourage continued production of residual waste**
  - e.g. more incinerators, with long contracts creating demand for residual waste.



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## The Commission's vision?

- **How has the Commission used the opportunity of a revision of the Waste Framework Directive to make the EU more eco-efficient?**
  - They haven't
- **What are they proposing?**
  - A three step waste hierarchy, rather than the well established five step hierarchy
  - Flawed measures to define 'end of waste'
  - A re-branding of incinerators from disposal to recovery
  - Reporting by Member States on waste prevention
- **Why are their proposals so weak?**
  - To help a few powerful industries?
  - Because of anti-regulatory lobbying?
  - Because they lack any vision?
  - Because they want to delay any vision until 2010, when the political environment might be more friendly?



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## Our four key issues

- 1) A full five step waste hierarchy, with policy measures to pull materials up the hierarchy**
- 2) An effective process to both prevent waste (with targets) and to prevent residual waste**
- 3) Measures to ensure recycling and composting happens to the maximum extent possible**
- 4) Retention of key definitions of waste & disposal, e.g:**
  - no re-branding of incinerators as recovery
  - no change to the definition of waste
  - no new loopholes for 'by-products'



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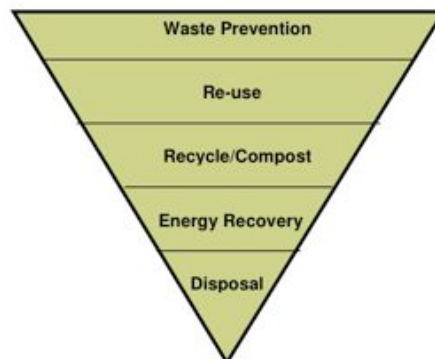
## 1) The waste hierarchy

- **A huge amount of research evidence backs the five step hierarchy, which is why it is so widely adopted.**
  - Many of the challenges to it are based on unreasonable assumptions or manipulated life cycle assessments (these are very easy to manipulate!)
- **There may be exceptional circumstances where it is not the best environmental option.**
  - But such claims must be subject to independent review and stakeholder consultation.



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## The UK's waste hierarchy



As described in "*Review of England's Waste Strategy: A Consultation Document*", DEFRA, February 2006



## Oxfordshire's waste hierarchy



Source: "No Time to Waste", Oxfordshire Joint Municipal Waste Strategy, 2006

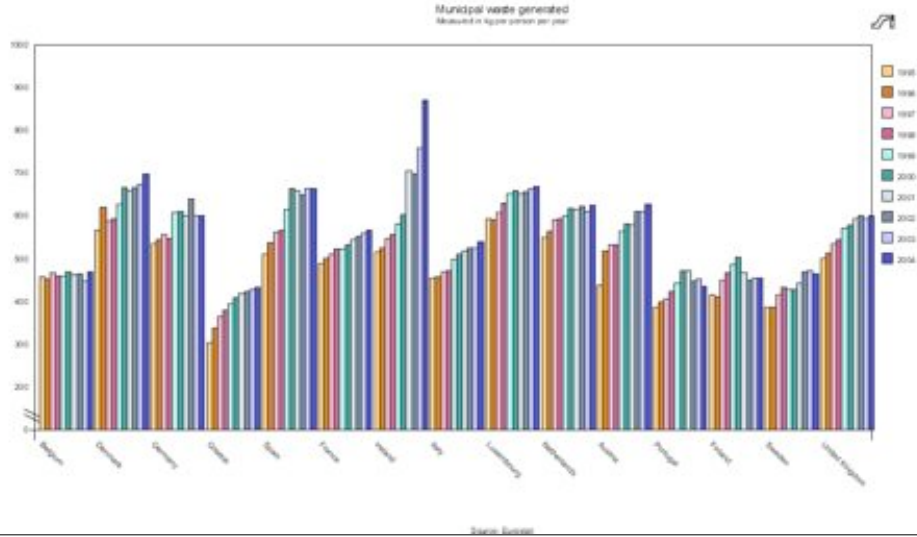


## 2. Waste prevention

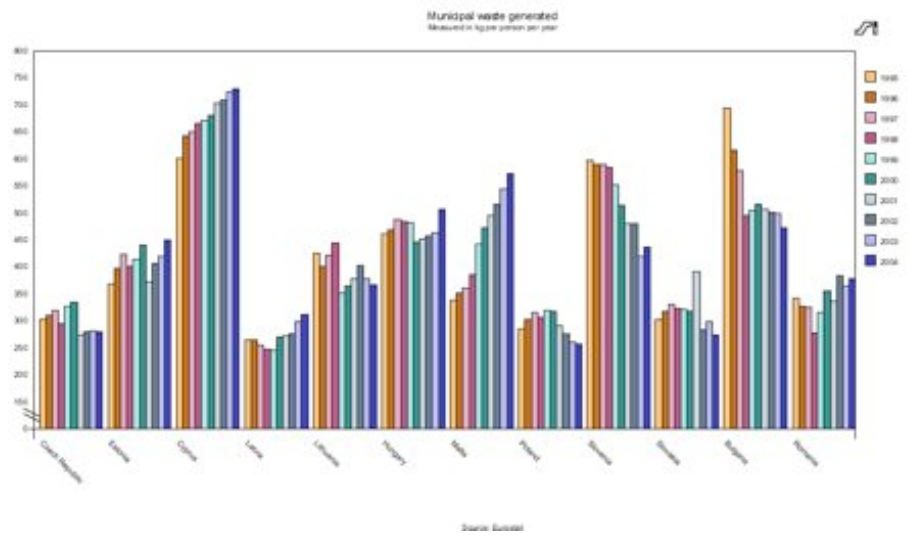
- **Everyone accepts this is an important issue, but it has been talked about since 1975 with little progress.**
- **The Commission is suggesting a plan drawn up by governments, but no process beyond this.**
- **We want an EU-level co-ordination process:**
  - Ensuring common standards and measurements.
  - Sharing best practice and identifying policy measures that can assist in both waste prevention and residual waste prevention.
  - A target to stabilise waste generation by 2012, and the establishment of future targets for prevention.
    - NB: Municipal waste generation is already stabilising in many Member States:



## Municipal waste per capita in the EU-15 (Eurostat)



## Municipal waste per capita in EU-10+2 (Eurostat)





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## 3) Maximising recycling and composting

- **Recycling maximises our resource efficiency**
- **Recycling reduces our climate impacts**
  - E.g. A UK government funded study, reviewing a large number of life cycle assessments [1]:
    - Recycling in the UK is already saving around 10-15 million tonnes of CO2 equivalent per year
      - Equivalent to taking 3.5 million cars off the road
      - NB: Some of this saving actually occurs outside the UK, e.g. in savings in mining & material processing.
    - This study also demonstrated that the majority of life cycle assessments back recycling over incineration
- **Composting (anaerobic digestion) can also be used to generate 100% renewable energy**
- **Composting also sequesters carbon in soils - and improves soil quality.**



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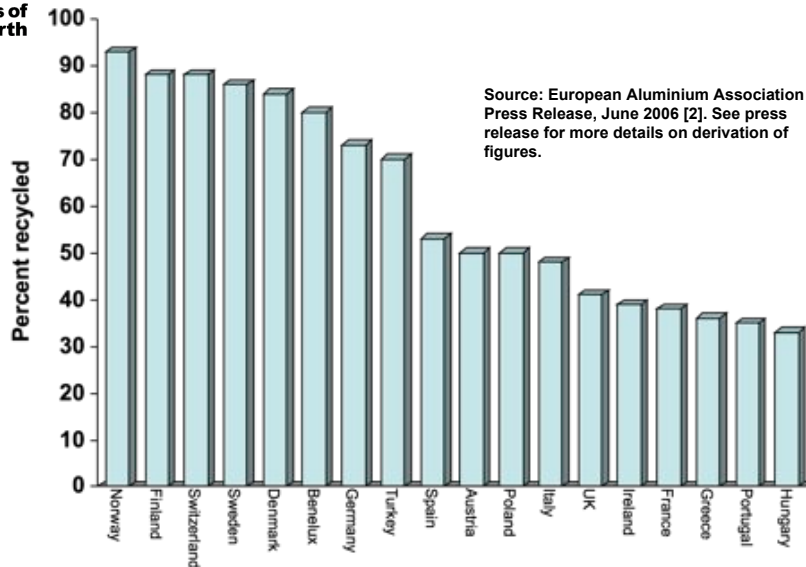
## How to maximise recycling?

- **Commission proposes:**
  - End of waste standards e.g. for compost
    - *“With high environmental reference standards in place the internal market will facilitate recycling and recovery activities.”*
  - Greater controls on recycling facilities
- **In our view**
  - Whilst it is important to develop markets in true non-wastes (e.g. good quality compost), the evidence shows that this is not sufficient
    - We also oppose the use of the comitology process to define end of waste.
- **The Aluminium can example:**



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## Aluminium can recycling - 2005



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## Aluminium - is there a market?

- **Is there a market for aluminium cans?**
  - Yes - in the UK Aluminium cans are worth > €1,100 (£800) per tonne (see <http://www.letsrecycle.com/prices/metalsPrices.jsp>)
- **In spite of this market, in many countries (including the UK), more than 50% of aluminium cans are being disposed of.**
  - Compost will never have a market price like Aluminium!
- **The market is only one influence:**
  - Regulation and facilities are necessary, e.g.:
    - We are proposing that a list of materials should be separately collected or later separated, as this is what mobilises the value of the materials.
    - We are proposing that landfill and incineration of recyclable & compostable materials should be phased out
  - The Member States with the highest recycling rates have had the most regulation and investment



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## Composting and anaerobic digestion - a major opportunity

- **Huge advantages:**
  - An effective method of contributing to diversion of biodegradable waste from landfill
  - Can generate renewable energy through anaerobic digestion
  - Improves soil quality
- **Becoming increasingly important, even in UK:**
  - Separate collection of food waste increasingly common in UK
  - Biologically derived, compostable packaging, will become increasingly common, particularly with high oil prices
    - One big UK supermarket (Sainsbury's) has recently announced a move to compostable packaging



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## Our proposals on recycling and composting

### Three key elements:

- 1) Ensure separate collection or later separation
- 2) An eventual ban on the landfill and incineration of any reusable, recyclable or compostable materials
  - Particularly important for commercial and industrial waste.
- 3) Continued production of daughter directives to deal with particular waste streams
  - e.g. biowaste directive for compost, more producer responsibility legislation.
  - End of waste should be dealt with through daughter directives, not comitology.



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## 4) Retention of key definitions of waste and disposal

- **We want problems to be solved - not re-branded**
- **In particular:**
  - No change to the definition of waste
    - This is now well established in law
  - No new loopholes for 'by-products'
    - Many industries are trying to get their waste re-branded as 'by products'. We do not support this.
  - No re-branding of incinerators as recovery
    - The Commission proposes to overturn the European Court of Justice ruling on Disposal vs Recovery.
    - Their justifications for this are totally unconvincing
    - Such a step would give completely the wrong signal across Europe.



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## Why the Commission wants to re-brand incinerators

- “...there are concerns that if incineration is defined in the same category as landfilling, some local authorities could be tempted to choose the cheapest option (Landfilling), which will in turn degrade the environment” (Impact Assessment Report)
  - Diverting biodegradable waste from landfill is a legal requirement of the landfill directive, whatever local authorities think
- ‘the reputation of MSWI classified as recovery will be better than that classified as disposal’ (Letter from Dimas to Environment Committee)
  - The aim of this law should be to move waste up the hierarchy - not to promote a move from landfill to incineration.
- ‘will classify only the most energy efficient incinerators as recovery operations.....a strong incentive for increasing the energy efficiency of future MWSI’ (Letter from Dimas to Environment Committee)
  - The suggested figure does not only classify the ‘most energy efficient incinerators as recovery - and in any case, the imposition of Best Available Technology is the job of IPPC. Incinerators are also regulated by the Waste Incineration Directive (WID).



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## What is the evidence?

- **The Commission claimed to demonstrate the case in their impact assessment, and in their letter to the Environment Committee.**
- **Yet these have serious deficiencies, e.g:**
  - There is no serious analysis of how promotion of incineration will impact on recycling, despite many examples of negative impacts
  - The letter is based almost entirely on an industry study, which is not fully available (which are the affected incinerators?) and has apparently had no peer review
  - There is no analysis of other options of improving incinerator efficiency - e.g. changes in the Waste Incineration Directive (WID) or IPPC. **Even though WID is to be reviewed in 2007**
  - There is no analysis of why promotion of fossil CO<sub>2</sub> emitting incineration is best way to get material out of landfills, rather than fining of MS through the landfill directive, or a promotion of biowaste collection and composting (e.g. a biowaste directive?)



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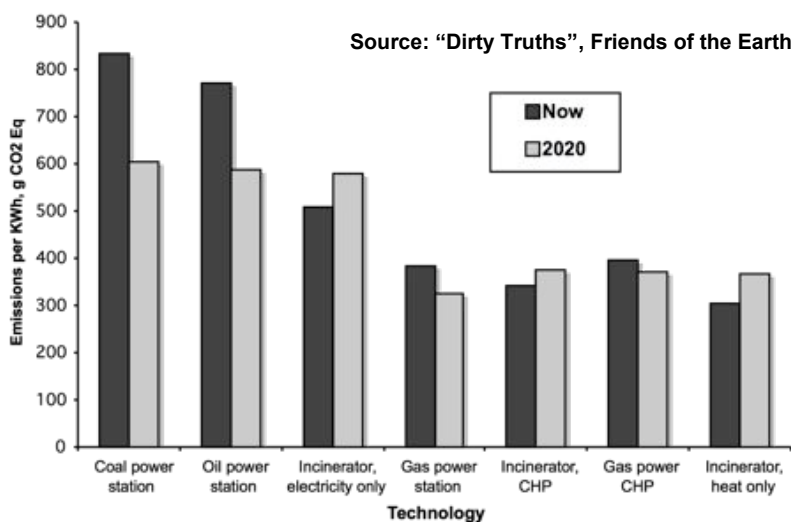
## The climate impacts of incineration

- **A key element of the re-branding attempt is misleading information on the climate impacts of incinerators.**
- **Key issues:**
  - Municipal waste incinerators are inefficient generators of electricity - they are designed to dispose of rubbish, and need a lot of air pollution control equipment.
  - A significant percentage of what is burned in incinerators is fossil-fuel derived - e.g. plastics, synthetic textiles etc. When burnt, this produces fossil fuel derived carbon dioxide.
  - Therefore, the power generated from incinerators is not 'green energy' or 'renewable energy'
- **The impact of these facts on incinerator performance was shown in a report commissioned by Friends of the Earth earlier this year:**
  - Incinerators produce more total CO<sub>2</sub> per unit energy generated than a coal fired power station.
  - If only fossil-fuel derived CO<sub>2</sub> is considered, an electricity only incinerator produces around 33% more than a gas fired power station.



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## Fossil CO<sub>2</sub> pollution from power generation, now and in 2020





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## What's the point of IPPC and WID?

- **Eunomia consultants analysed the Commission's efficiency formula and concluded [4]:**
  - “existing legislation, the Incineration Directive and the IPPC Directive – effectively requires measures to be taken at incinerators to make use of heat ‘as far as is practicable’ as a condition of their being allowed to operate at all.”
  - “a theoretical incinerator could, on the one hand, meet the Commission's efficiency threshold which ensured that it could be defined as ‘recovery’, even though it was not allowed to operate because it was not recovering heat as far as was practicable”
- **If you support the Commission's re-branding – or support even lower efficiencies (e.g. from CEWEP) – you are voting to say that the IPPC Directive has failed.**
  - We would suggest that IPPC should be revised to ensure that it does force the best available technology, as this was the original intention of the legislation.
- **The need for incinerators to be as efficient as possible should be dealt with in next year's review of WID, and in the implementation of IPPC - not by manipulating a third piece of legislation.**



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## Incineration = disposal - examples from UK Government

- “..[the study] somewhat unfairly compares incineration with power generation - to which it does make a contribution - when its main function is waste management...”
  - Ben Bradshaw, UK Government Minister with responsibility for Waste, in letter to Friends of the Earth regarding our ‘Dirty Truths’ report on incineration and climate change, July 2006
- “‘A lot is made about the role of recovery and the energy you get,’ he said. ‘I’m not quite sure about that - it’s primarily a disposal option’”
  - David Mottershead, DEFRA Civil Servant, talking about incineration, September 2006
    - [http://www.edie.net/news/news\\_story.asp?id=11976&channel=0](http://www.edie.net/news/news_story.asp?id=11976&channel=0)



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## Conclusion

- **The case for eco-efficiency is undeniable**
  - To minimise our impacts on climate change.
  - To maximise our resource efficiency, to protect our world whilst allowing poorer countries to improve their standard of living.
  - To make sure that the EU - and its industry - is ahead of the curve in a more resource-constrained world.
- **Waste policy is a key contributor to our eco-efficiency, but requires massive improvement**
  - We must take action now to set out a long term vision, maximising prevention, reuse, recycling and composting, and start to put in place policies and processes to reach this goal.
- **The Parliament has a vital role to play in putting in place this vision and measures, as the Commission has failed in its proposal**
  - We must focus our waste policy on our long term sustainability, not short term assistance for powerful industries.
  - Wasting resources will not help our competitiveness.



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