

**European Parliament Hearing
Future thematic strategy on the prevention and recycling of waste
7 January 2004**

Statement by Mr d'Adda, Chairman of the Environment Working Group

Commissioner,
Members of the European Parliament,
Ladies and Gentlemen,

First I would like to thank Mr. Florenz for organising this hearing on the future thematic strategy on the prevention and recycling of waste. It comes at a very right moment – a few weeks after the official consultation process on the Commission communication has ended and just at the beginning of the debates in Parliament and Council.

The scene of what we are about to develop has been set a couple of years ago in the 6th Environment Action Programme (EAP). It is important to see that the 6th EAP acknowledges the fact, that waste policy cannot be addressed isolated from other policies, in particular those related to resources and to products. This is very important to avoid a difficult situation. Some of the issues addressed in the waste communication can only be solved if we advance with the other policies.

Take the example of waste prevention: Measures to prevent waste cannot be seen independent from the use of resources and from an Integrated Product Policy (IPP). The latter provides the appropriate framework and tools. Therefore it is essential that IPP, Resources and Waste Strategies are linked in a coherent and efficient way. And beyond that, we will have to re-define the relation between horizontal, process-related rules like resource and waste management, IPP or IPPC and the vertical, media-related rules such as water and soil protection and air quality. If we manage to establish better and more efficient measures and instruments in the context of the waste thematic strategy and the other strategies, it should be possible to streamline environmental legislation as a whole and perhaps even abolish some of the existing rules in other areas.

In this context, let me also point to the fact that we are discussing a strategy which will lead to new measures, both legislative and non-legislative. As in any policy field, a legislative measure related to waste management should be subject to an assessment of its impact on business. This should include an answer to the question as to whether legislation is necessary and it should assess possible alternatives to regulation, related both to the initial Commission proposal and to the amendments introduced by Parliament and Council. I would like to stress that business impact assessment is not a tool to prevent good environmental practice, as some may see it. In the end, it serves two objectives:

- To ensure that European legislation contributes to the goals of the Lisbon strategy, to make the EU the most competitive and dynamic knowledge-based economy in the world,
- And to free scarce human and financial resources for an even better contribution of industry to effective environmental measures.

So when we discuss future measures within the frame of the thematic strategy, we need to integrate the business impact aspect into this discussion.

The Communication addresses a broad range of issues, covering things like: prevention targets, material based recovery and recycling targets, targets at European level, the role of producer responsibility, tradable certificates, the definition of waste and of recovery, disposal operations, etc., just to name a few.

Against this background, we need to set priorities. The future waste strategy must focus on what can actually be done to reach the main objective of European waste policy: to prevent or reduce the negative impacts of waste on the environment.

UNICE's position on setting the right priorities is clear:

We need to achieve harmonised standards for waste management operations and facilities. These standards are the key instrument for achieving the objective of preventing and reducing negative environmental impacts of waste.

- We need standards when we talk about reducing waste going to landfill;
- Standards are a better alternative compared to recovery and recycling targets set at European level.
- Above all, harmonised waste management standards are the pre-requisite for a functioning single market of recovered and recycled materials.
- And finally, with an enlarged European Union approaching rapidly, harmonisation and a functioning single market become even more important.

With regard to many of the other points raised by the Commission, I think we need a clear picture of where we stand and what needs to be done:

- Take the example of material-specific targets: for many materials we don't need these targets because we already achieve high recycling rates.
For others, it is impossible at this stage to give a single, clear answer. Cost-benefit and eco-efficiency analysis must be undertaken before we can draw any conclusions. Also we should know more about how the implementation of existing legislation actually works.
- Another example is a system of tradable certificates: Many work still needs to be done before we can say whether it could be a valuable alternative to what we have today.

As far as the proposal to extend IPPC procedures to all recovery activities, UNICE thinks that it would be inappropriate: the IPPC directive defines an integrated approach to the environmental impact of industrial activities (air, water,soil) for which a single authorisation is required instead of the several we used to need.

In the case of waste recovery, usually there is not such a spread of environmental impacts. For that reason, we believe that the extension of IPPC to all the recovery operations appears to go beyond the aim of the IPPC directive and will have the result of discouraging recovery, against the environmental objectives of the strategy.

This brings me to the conclusion that we have to give a clear focus to the further work ahead of the thematic strategy. This requires the Commission to set-up a straightforward and transparent working procedure. And it requires the willingness of all stakeholders to continuously contribute to the Commission work. The European industry is prepared to provide this contribution.

Finally, let me address one issue which has been discussed for a long time: The definition of waste and the closely linked definitions of recovery and disposal operations. UNICE has issued a proposal for amending the Waste Framework Directive some time ago. We welcome the fact that the Commission now addresses these issues in the context of the thematic strategy. Indeed the problems related to the definitions have an impact on the many other waste issues. The number of cases before the European Court demonstrate the need to improve things here. In particular the differing interpretation of the European waste definition in the Member States and the uneven application of waste legislation creates distortions of the internal market. The current situation often prevents effective application of environmental laws, it also hinders access to industrial secondary raw materials. With regard to the economic aspect, UNICE suggests carrying out a study in order to compare the costs between waste and non-waste materials such as administrative costs, logistic costs, permit procedures, financial guarantees for waste management, just to name a few.

Summarizing, UNICE encourages the European institutions

- to continue the work on the thematic strategy,
- to base its approach on harmonised standards
- to focus the work on key issues
- and to continuously involve stakeholders and industry into the process.