



**RREUSE position on the Commission's Communication
Towards a thematic strategy on the prevention and recycling of waste**

RREUSE is the specialised European network of national and regional social economy federations and companies with activities in reuse and recycling. Its member organisations in 11 EU countries combine both social and environmental objectives at an equal level. For many years we have been actively reducing waste through the collection of used clothes, WEEE, furniture etc. Collected items are resold or, when this is not feasible, recycled. The sector represents about 40,000 people.

RREUSE welcomes the approach of the European Commission in organising an extensive consultation procedure with stakeholders to define the future of the European waste policy. At the conference to launch the consultation procedure, held on 18 July in Brussels, the Commission asked for missing elements in the Communication and proposals on the key questions for consultation.

RREUSE is pleased to make the following contribution:

I. Missing elements

- A. 'Reuse' seems to have vanished as part of the waste hierarchy
- B. Awareness of unwanted effect of take back obligations
- C. The lack of horizontal integration of policy

II. Proposals on key questions for consultation

- A. Prevention and ... REUSE!
- B. Ensuring waste treatment is both easy and clean
- C. Setting and reaching reuse targets
- D. Getting the prices right

I. MISSING ELEMENTS

A. 'Reuse' seems to have vanished as part of the waste hierarchy

The introduction of the Communication reads as follows:

*The World Summit on Sustainable Development (September 2002) calls for action to '[p]revent and minimise waste and **maximise reuse**, recycling and use of environmentally friendly alternative materials ... to minimise adverse effects on the environment and to improve resource efficiency'.*

The benefits of reuse

The ultimate goal of waste policy is to protect the environment by aiming that natural resources are used in the most efficient way so that less waste is generated and that its toxicity is reduced to the lowest possible level.

Reuse supports this aim:

- Repair and reuse of end-of-life products delays or avoids products becoming waste. By extending the life of a product the need to buy new products, and therefore the need to consume energy and raw materials in their manufacture and distribution, is deferred.
- Reuse also reduces waste management costs because it may avoid treatment costs.

In addition reuse provides social benefits:

- Social economy projects active in the reuse of products create and sustain jobs for people at risk, such as long-term unemployed, disabled and youngsters.
- Reuse also offers essential household items for people with low incomes.

The environmental, economic and social advantages of reuse are not discussed in the communication at all, let alone proposals to maximise reuse as required for by the Johannesburg summit and the 6th Environmental Action Programme.

Reuse – a separate level in the hierarchy

While the reuse of end-of-life goods is a priority measure to combat the growing waste mountain, the first aim should be the prevention of waste. Manufacturers should therefore design and manufacture in such a way that their products are durable, long lasting and are designed to encourage repair and reuse.

We feel that the correct implementation of the waste hierarchy should include a legislative framework that takes into full account prevention and re-use of waste as the most preferred options in any strategy on waste.

The **reuse of whole products and components** generally means passing them on for second use with the same purpose, if necessary after repair and testing. This prolongation of the life of products by reusing them contributes to waste minimisation. **RREUSE is of the opinion that reuse of products and components should be**

recognised as a separate level in the waste hierarchy in between prevention and recovery. If real progress needs to be made to maximise reuse as agreed at the Johannesburg summit, **reuse needs a definition in itself so that effective measures can be adopted to encourage reuse.**

What is reuse?

In recent EU waste legislation, reuse has been legally defined in slightly different ways (End-of-life vehicles 2000/53/EC, packaging waste 94/62/EC and waste from electrical and electronic equipment 2002/96/EC) but is consistently placed between prevention and recycling. The European Topic Centre on Waste and Material Flows defines reuse as:

Re-use means the use of a product on more than one occasion, either for the same purpose or for a different purpose, without the need for reprocessing. Re-use avoids discarding a material to a waste stream when its initial use has concluded. It is preferable that a product be re-used in the same state e.g., returnable plastic pallets, using an empty glass jar for storing items and using second hand clothes. Reuse is normally preferable to recycling, as there isn't the same requirement for the material to have gone through a detailed treatment process thus helping to save on energy and material usage.

According to most experts reuse is environmentally preferable to recycling due to energy savings in the production phase and raw material usage, except where inefficient products remain in service. Reuse of products extends the life cycle of a product and therefore contributes to waste minimisation.

Policy documents often use the phrase 'reuse of materials' when describing recycling. We feel that the use of the word 'reuse' in this respect leads to confusion and would therefore recommend having a clear distinction on reuse of whole products and their components and the recycling of material. **We propose to remove the word reuse from the overall group of recovery.**

Products and components collected separately because of a take-back obligation for their particular product type are considered to be waste in the collection phase. They cease to be waste when they are being reused. In order to reuse products and components it is sometimes necessary to repair them. There should be clarity about the exact moment when potentially reusable waste ceases to be waste. Common practice is that repair activities mean neither recovery nor recycling. **Potentially reusable waste therefore needs to cease to be waste at the moment that it is judged as being reusable. We propose the implementation of a system of accredited re-users in order to avoid so-called re-use leading to eco-dumping.**

RREUSE was disappointed to discover that reuse, as one of the preferred waste management options within the EU waste hierarchy, has not been dealt with as such in the Communication. The Commission describes an optimal waste management strategy to minimise environmental impacts as 'waste prevention, material recycling, energy

recovery and disposal options'. There is no reference to waste minimisation through reuse, yet for the reasons outlined below, to actually promote reuse this reference is vital.

Prevention and waste minimisation are concepts that are laid down in many policy papers and waste management strategies of Member States at all levels. The Thematic strategy should set at EU level the legal and institutional framework to promote prevention of waste generation, ensure cleaner production, and - **by encouraging reuse of products and components and the recovery of materials - ensure that waste is not wasted.**

Sustainable consumption

Consumers will have to be convinced of the fact that not only new products are beautiful...

In our consumption focused society this concept is far from accepted. People should be made aware of the measures they can take in their daily lives to reduce, reuse and recycle. Environmental advantages (better use of materials and reduction of the need for landfills and incinerators) of reused products and products containing reused components and recycled material need to be emphasized so that a cleaner environment can be left for future generations.

Examples of possible measures include:

- Eco-label on repairable goods, making the consumer aware of the fact that the product is a repaired and/or a repairable good.
- Life expectancy labels (possibly as part of eco-labels) indicating the average lifetime of a product at the point of sale would encourage users to select more durable items.
- Repair centre guides, provided via different media, for citizens so that they have easy access to repair centres.
- Obligation for all Members States to ensure that at regional and/or local level reuse centres are established where citizens would be directed to leave their used products suitable for reuse (currently practice in Netherlands and Belgium). These centres could also play an important role in informing the citizens about the way they can contribute to waste reduction.
- European Reuse and Recycle Day (like European car free day)
- Education programmes for the educators and the educated.
- Programmes for 'green procurement' with the public sector leading by example.

RREUSE therefore calls upon the Commission to:

- Change the title of the Communication into 'Communication towards a Thematic Strategy on the Prevention, Reuse and Recycling of Waste'.

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- Introduce reuse of whole products and their components as a single level in the EU waste hierarchy between prevention and recovery. The waste hierarchy should read as follows:
 - Prevention
 - Less quantity generated
 - Less harmful
 - Reuse of products and components
 - Recovery of materials
 - Recycling
 - Reclamation
 - Other forms
 - Remove the word 'reuse' in the overall group of recovery to avoid confusion.
 - Introduce a system of accredited re-users to avoid so-called reuse leading to eco-dumping.
 - Introduce measures and programmes to maximise awareness raising on reuse and recycling to make sure that 1) consumers are well informed about the products they buy so that they can objectively make their purchase choices, and 2) facilitate ways for citizens and businesses to participate in reuse programmes.

B. Awareness of unwanted effect of take back obligations

The introduction of producer responsibility for the take-back and treatment of some end-of-life products implies that these producers may enter the market wanting to treat the totality of discarded products in a central way. This may reduce the access to reusable products and therefore the activities of social economy in repair, reuse and recycling. Although we agree that producers should be financially responsible regarding the take-back and treatment of waste, it would be dangerous to let producers organise and control the entire chain from collection to treatment etc. This would lead to vertical integration and to a complete control from production to waste treatment by the producers, which could lead to attempts to shorten the technical lifecycle of a product, going directly against the consumer interests. Here, our sector can play an important role by ensuring that those products suitable for reuse are properly repaired and given a second life by disadvantaged people.

RREUSE calls upon the Commission to:

- Be aware of the effects of take back legislation – make sure that "producer responsibility" is primarily seen as financial responsibility for proper treatment of waste and that environmentally and socially preferable options are not hindered.

C. The lack of horizontal integration of policy

The Communication states that it focuses

*'... on the means to promote more sustainable waste management, by minimising the environmental impacts of waste while also taking into account economic and **social considerations**.'*

This reference to social consideration in the introduction of the Communication is the only one. If the Communication aims to identify measures and targets to promote a more sustainable waste management policy, the social dimension cannot be ignored. Its importance and obligation has been confirmed in many EU policy documents, such as the Sustainable Development Strategy. Moreover, since the Lisbon summit of March 2000, the objectives of the European Union are no longer only economic, but also social (creation of more and better jobs and greater social cohesion).

The lack of horizontally integrated European policies is jeopardising the development of our sector.

As explained above, the practical implications of the introduction of producer responsibility (see End of Life Vehicles Directive and Directive on Waste Electrical and Electronic Equipment) risks giving producers complete control from production to collection and treatment. Sorting and re-use should be organised by actors independent from producers. It would be a waste of valuable resources if existing regional infrastructures and operations were replaced by much less eco-efficient centralized solutions. Social companies operating in the field of re-use and/or recycling have been developed in many regions of the European Union, delivering environmentally sound treatment of different waste streams, while at the same time creating social benefits by offering jobs for unemployed and people at risk as well as valuable second hand goods for people with low income. Their role should be recognised and supported in all policy aspects of the European Union.

The **proximity principle**, one of the leading principles in European waste policy, should also be emphasized in this respect. For proper reuse, it is usually essential to sort out appliances in the earliest possible stage of the treatment chain. Therefore, appropriate measures should be taken to establish an integrated network of reuse installations, based on the existing infrastructure, especially for those waste streams where a take-back obligation exists. This network should ensure that end-of-life products suitable for reuse are separated and treated appropriately.

RREUSE feels that the European Union is missing here an opportunity to develop progressive waste policy which will contribute to combating unemployment, in particular for those groups at risk (long term unemployed, youngsters, handicapped, substance misusers, etc). After prevention, reuse is the second preferred option within the waste hierarchy. By promoting this while at the same time creating jobs a real model for sustainable development exists. It only needs formal recognition at EU level.

Replying to letters from RREUSE, several Commission officials have been stating that they *'recognise the importance of the social economy regarding current waste management activities. Certainly, these activities deserve further promotion at all levels'*. It is now the time to put these words into practice.

RREUSE calls upon the Commission to:

- Integrate social with environmental policy by recognising the role of social economy organisations and the opportunities for social employment in the EU's future waste policy (collection, sorting, re-use and recycling of end-of-life products). This would develop the re-use and repair centres to mature enterprises all over Europe, contributing to protection of the environment and creation of jobs at the same time.
- Take the appropriate measures to establish an integrated network of reuse installations, taking into account existing infrastructures.
- Extend the proximity principle to reuse and treatment of those waste streams that are submitted to a take-back obligation.

II. PROPOSALS ON KEY QUESTIONS FOR CONSULTATION

A. Prevention and ... REUSE!

As stated before, reuse of whole products should be introduced as a single step between prevention and recovery and should be the measure to select whole products and appliances, including spare parts, out of the waste stream to repair them and give them a second life. Once the product is selected as being suitable for reuse it ceases to be waste. However the selection should be made by recognised re-use centres in order to avoid eco-dumping and re-use of products with negative impact on other environmental fields.

Excessive waste generation is a symptom of inefficient production processes, low durability of goods and unsustainable consumption patterns. To change the consumption pattern of citizens and prolong the life of goods, reuse of whole products should be recognised as such in the hierarchy to make sure that the necessary measures are taken that will encourage reuse of products.

Technically, a network of reuse centres can directly contribute to quantitative waste prevention by taking reusable end-of-life products from their last owners without letting them enter the waste stream at all. With a view to have a good monitoring system necessary to prepare viable statistics on waste minimisation, these amounts should be shown in the waste statistics.

RREUSE asks the Commission to:

- Change the title of the Communication into 'Communication towards a Thematic Strategy on the Prevention, *Reuse* and Recycling of Waste.

- Clarify the position of reuse of whole products and components by *introducing waste minimisation through reuse as a single level in the EU waste hierarchy in between prevention and recovery.*
- Remove the word re-use in recovery to avoid linguistic confusion with recycling of materials.

RREUSE calls upon the Commission to:

- Member States should be required to set up waste prevention plans, including elements such as eco-taxes, substitution targets, inventories, manuals to design for extended lifetime, for durability, for re-use and reparability, for possible upgrade etc.

B. Ensuring waste treatment is both easy and clean

One of the main objectives of the Commission is to fight sham recovery. The Commission said at the July conference in Brussels that environmental dumping of waste (waste is going to the cheapest but environmentally inferior waste treatment installation) within the EU is a too common practice. One of the problems is that currently the first operation within a treatment chain determines whether the whole chain is to be defined as disposal or as recovery. So, if 1% of the waste is recovered in the first step and 99% is disposed of, according to current law the whole operation is recovery. RREUSE is of the opinion that the whole treatment chain should be considered to define whether an operation is recovery or disposal.

To optimise reuse and recovery of materials an obligatory source separation for reusable products and components of the municipal solid waste stream should be considered. This might be combined with a new more material-oriented approach for certain components (biowaste, plastics, glass). Proper marking of products and components to identify the envisioned treatment path and sufficient information for reuse and recycling should be provided by producers and made available to users, re-users and recyclers.

To ensure a level playing field quality standards as well as reuse, recycling and recovery targets should be equal all over the EU. It is hard to see how local pollution caused by insufficient waste treatment could be compensated for in another member state. EU-wide targets might be appropriate for global problems such as CO₂ emissions or use of specific resources, but could easily become a means of eco-dumping if used in connection with waste. Though the IPPC approach and the use of BREFs for certain recovery or disposal techniques might be helpful, additional standards are certainly needed for specific waste streams and/or specific materials, as are given with the WEEE and ROHS directives.

RREUSE calls upon the Commission to:

- Consider the whole treatment chain to establish whether a waste treatment operation is classified as recovery or disposal.

- Make sure that the proximity principle is applied whenever there is a minimum level of disposal involved in the operation chain to reduce all the external costs (energy consumption, noise, landscape deterioration) of waste transports.
- Consider the introduction of obligatory source separation for further reusable products and components of the municipal solid waste stream.
- Ensure equal standards and targets for reuse, recycling and recovery all over the EU.

C. Setting and reaching reuse targets

RREUSE favours the reuse of whole products and components. While the need to change consumption patterns has been recognised, reuse targets will have to be introduced besides recycling targets. People should be encouraged not just to throw away, but also to see whether reuse and/or repair is possible. Public authorities should provide their citizens with the necessary information about the reuse and repair centres available, while producers and/or distributors should provide all technical information necessary for reuse and repair.

RREUSE calls upon the Commission to:

- Ensure that Member States collect and report data on reuse of whole products for which a take-back obligation exists as well as for the products where it is considered to be possible (textile).
- Introduce minimum reuse targets and timetables for those waste streams where a take-back obligation has been introduced and for those waste streams where it is considered as feasible (textile).
- Member States shall take the appropriate measures to establish an integrated and adequate network of reuse centres. The network must enable products suitable for reuse to be separated from those products that will be treated for recovery.
- Reuse centres should be licensed in a similar but separate way to treatment centres with requirements appropriate to their nature.

D. Getting the prices right

1. The current prices of products do not reflect the exact costs these products bring to the society. The external costs are not internalised. An optimal waste management starts with prevention, followed by reuse and material recovery, but practice learns that most waste is still incinerated or disposed of in landfills. The external costs of landfill and incineration should be internalised, honouring the highest steps in the hierarchy. To ensure that waste is treated higher up the hierarchy, a **tax on landfill** should be introduced. In those countries that have already invested in incineration without energy recovery an **incineration tax** should be introduced as well. Countries facing the political decision on future waste policy should invest in recycling technologies and not

incineration. Landfill tax on its own is not enough, as it would imply a better performance of the other options in the hierarchy: better sorting/dismantling/pre-treatment etc. The tax should also be EU wide to avoid waste being exported from countries where landfill is expensive due to the tax to countries where landfill is cheap. The funds raised should be used for education and awareness raising programmes. Monitoring systems per waste stream are needed covering all the activities from discard to disposal.

2. RREUSE applies for a **lower VAT rate for reused products and components and repair services** because of the environmental results and benefits. Currently there is no lower VAT rate on the sales of reusable products and components, though this would be fully justified by environmental as well as social reasons.

3. The potential of tradable certificates should be investigated for financing the treatment of waste by producers or other obliged actors. Properly introduced, a system of tradable certificates could attribute shares to the unit operations of a treatment chain in terms of amounts of material recovered, on the basis of efficiency ratios. Selling the certificates should provide full compensation for treatment costs for the recycler, while honouring the techniques with higher efficiency ratios. Buying appropriate kinds and amounts of certificates should be the easiest way to demonstrate compliance with reuse, recycling and recovery obligations.

RREUSE calls upon the Commission to:

- Introduce a European tax on landfill and incineration to ensure that waste is treated up the hierarchy.
- Encourage green consumption by reduction of VAT for green products and services.
- Investigate the possibility of introducing systems of tradable certificates to encourage reuse and recycling on a cost efficient basis.

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