

*Re-use and Recycling European Union Social Enterprises*

Mr. José-Manuel Barroso  
President  
European Commission  
B-1049 Brussels

Brussels, 19 April 2005

Dear Mr. President,

**Re: Sustainable Development – How to get beyond the walk of the talk?**

RREUSE<sup>1</sup> would like to come back to the intervention you made at the Stakeholder Forum on Sustainable Development, which took place last week in Brussels. We agree with you that everybody seems to know the word but that very few have looked past the jargon to think about what it really means. But ... there are existing examples, which give environmental and social benefits to society on an economically sound basis. However, for administrative reasons it is very difficult for these existing models at local, regional, national and European level to have the three implicated policy areas horizontally integrated to come to a real promotion of sustainable development.

Our member organisations combine both social and environmental objectives by giving them an equal emphasis. Social economy favours a sustainable model where man and not profit is at the centre. Reuse and recycling activities provide work to an estimated 40,000 people in the social economy organisations. It reduces the hard core of unemployment as a majority of the workforce consists of groups at risk. Taking into account the internalised social and environmental costs, our activity is definitely competitive in macro-economic terms. RREUSE members are unique examples of putting sustainable development **into practice at local level**.

**RREUSE: involved in social and environmental policy**

One of the severe difficulties RREUSE members challenge at local, regional, national and European level is that our activities rely on two main departments; the environmental and social. On both levels we perform quite well. Our re-use and recycling rates give an important contribution to **sustainable production and consumption** as well as to **sustainable waste management**. On social aspects we provide socially excluded groups a kind of work that they can handle, and our members aim to enlarge the possibilities of these groups by training, education and supervision.

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<sup>1</sup>RREUSE is a European network of national and regional social economy federations and enterprises active in re-use and recycling of waste. The network was established in 2001 and now has 17 members from 11 different EU Member States.

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## No integration between the two departments

But the fact that we resort to two departments is causing us a problem. The rewards on the activities are always recognised within the framework of one department, so we perform nice on environmental aspects as well as on social aspects. The biggest value off course can be discovered if one has the ability to see the combination of things. Groups at risk are improving their possibilities by providing services with environmental benefits.

The problem is caused by the lack of integration between the departments. This is illustrated by the fact that we experience so often that social arguments are not valued in environmental issues. The same is true the other way around; environmental benefits are not valued as an advantage towards social criteria. One department, whether it's a local one or at European level, is not competent or able to give values outside its departmental framework. Unfortunately, it is not a custom that department officials see side effects on other departments.

## The steps we undertook so far at EU level

- We have discussed this problem with Commissioner Wallström in July 2003, responsible for the environment at that time, DG Enterprise and DG Social affairs. There seemed to be an initiative between Mrs. Wallström and Diamantoupoulou to present a communication between the two policy areas, to which RREUSE made a contribution, but to our knowledge and regret it was never adopted. We received a lot of support, which is really appreciated, but did not 'get beyond the 'walk of the talk'' as you called it in your intervention.
- Contribution to the public consultation for the review of the SDS: RREUSE was very pleased to see that the objectives of the Review included poverty and social exclusion. For your information, this contribution is attached.
- Extended Impact Assessment on the Thematic Strategy for the Prevention and Recycling of Waste: RREUSE did send an extensive amount of information, both environmental and social. We stated that we have fundamental questions on how supplied information would be used to make a choice of the policy options that will be presented in June 2005. Will the fact that our sector is building on the three pillars of sustainable development be taken into account? Will the fact that we provide a job and education to those who are considered by society as 'not employable' and that we serve low-income groups be well evaluated? RREUSE is therefore worried about the added benefit of this Extended Impact Assessment to the information that you have already received from the different stakeholders, in particular on how the data you received will be valued.

## How to get beyond the 'walk of the talk'?

RREUSE is of the opinion that the Commission should recognise those existing examples that have proven to work! **It is a waste if those who 'have the knowledge and insight to look at ways of making [sustainable development] a reality' do not receive the political support they need to develop their activities!** Waste and resources policy as well as production and consumption policy can become sustainable only if those solutions are promoted which integrate social elements into environmental policy by recognising the opportunities for employment when opting for **reuse**.

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This should include that:

- Reuse of appliances and components is given its appropriate place in the waste treatment hierarchy when the Waste Framework Directive is revised within the development of the Thematic Strategy on Prevention and Recycling,
- Economic instruments such as producer responsibility in waste treatment should not be introduced in a way that minimises costs for the environmental benefits to be paid by producers, while at the same time over-proportionately increasing the costs for the social benefits to be paid by local communities, as it now at least partially happens with the implementation of the WEEE directive.
- National legislation puts into place a system of accredited reuse and repair centres and that these centres have first access to separately collected waste.

When it comes to delivery, the Commission should closely follow the national implementation of Directives to ensure full compliance with the environmental and social targets in all member states and to act against any attempt to weaken the decided rules, as it actually happens e.g. with the preference of reuse over recovery in the German legislation or the treatment requirements of Annex II of the WEEE directive in TAC discussions (see letter to Mrs. M. Klingbeil, DG Environment).

To strengthen the economic base of sustainable activities in the not-for-profit sector the Commission should:

- Fully acknowledge the existence and necessity of the third sector and fully integrate social economy as an important partner in the New Lisbon Strategy
- Allow for VAT reductions for activities with environmental and social benefits, as already discussed with DG taxation.

We would be pleased to exchange views with the Commission on this issue.

Thanks for your attention,

Yours sincerely,

Hans de Graaf,  
President

Cc Vice-President Margot Wallström  
Commissioner Stavros Dimas  
Commissioner Vladimir Spidla  
Commissioner Günther Verheugen  
Commissioner Lászió Kovács

Annexes:

RREUSE – Model for sustainable development

RREUSE – Members

RREUSE - Contribution to the public consultation on the Review of the SDS

RREUSE – Contribution to TSPR

RREUSE/Workability – Letter to Marianne Klingbeil, DG Environment

RREUSE – Letter to Stephen Bill, DG Taxation

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