



Re-use and Recycling European Union Social Enterprises

Commissioner Stavros Dimas
European Commission
Rue de la Loi 200
B-Brussels

18 November 2005

Dear Commissioner,

Re: Draft Thematic Strategy on the Prevention and Recycling of Waste and the draft revision of the Waste Framework Directive

RREUSE is writing you, the President and some of your colleagues, to express its concern about the draft Thematic Strategy on the Prevention and Recycling of Waste and the draft revision of the Waste Framework Directive, which are currently in inter-service consultation.

First, I would like to remind you to a letter RREUSE written to President Barroso, you and several of your colleagues on sustainable development explaining how social economy goes beyond the 'walk of the talk' since decades by putting this concept as well as sustainable waste management at local level into practice¹. The response² we received from Catherine Day on behalf of the President, you and your colleagues states '*I note your suggestions and comments concerning waste management policy. The input made by Rreuse during the consultation process concerning the Thematic Strategy on the prevention and recycling of waste and its impact assessment is taken fully into consideration. Furthermore, I can confirm that a number of options on which Rreuse has made contributions are under consideration, in particular as regards the potential of repair and reuse activities to contribute to preventing waste generation.*'

It seems however that the draft Strategy has not taken our contributions under consideration. I would like to remind you our main point:

Reuse of appliances and components should be given an appropriate place in the waste treatment hierarchy when the Waste Framework Directive. The place of reuse in the current waste hierarchy should be clarified as being a separate step between prevention and recycling/minimization/reduction. If a product is not discarded but donated and therefore not collected as waste, reuse is part of prevention. If a product is discarded via specific take-back legislation and therefore collected as waste, it should be considered as the best

¹ Letter to President Barroso and Commissioners Wallström, Dimas, Spidla, Verheugen and Kovács as a response to the intervention of the President at the Stakeholder Forum on Sustainable Development in April 2005.

² Letter of 13 June, reference CA/amp SYB-2005-AAOS4 1 Barroso/A/2610

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environmental method of handling waste. Specific standards should be set that match with the different reuse activities.

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 and therefore a more favourable waste treatment option than incineration. The European Parliament³ and the Council⁴ have confirmed the upgrading of reuse in their resolutions on the Communication towards the TSPR! Keeping reuse and incineration at the same level in the Waste Framework Directive will favour the development of incineration to the detriment of reuse and recycling activities which is in contradiction to the objective of this Strategy as formulated by the 6th Environmental Action Programme and the Johannesburg summit⁵.

The letter of the President also states that particularly on one point the contribution of RREUSE has been taken into consideration. This concerns '*the potential of repair and reuse activities to contribute to preventing waste generation*'. RREUSE claimed for the introduction of a system of accredited re-users to avoid so-called reuse leading to eco-dumping. The current obligation of Art.16 obliging Member states to draw up waste prevention programmes gives no incentive at all to maximise reuse because the range of illustrative measures of Annex IV should only be taken into account.

So, our question is: where can the recognition and encouragement of reuse be found in this draft text? In this context we would like to emphasize that reuse provides important social benefits because it creates sustainable jobs for people at risk, such as long-term unemployed, disabled and youngsters. Reuse also offers essential household items for people with low incomes.

We would be very pleased to discuss this with you or one of your colleagues before the adoption of the text by the Commission.

Kind regards,

Hans de Graaf
President

Cc. President Barroso
Vice-President Wallström
Commissioner Verheugen
Commissioner Spidla
Commissioner Kovács
Mr. Karl-Heinz Florenz, President of the Environment Committee

³ 17. Proposes that a separate category, 'reuse', be distinguished from the waste category 'recovery', between prevention and recycling; considers that in this way reuse will be defined in its own right and that it will be possible to take effective measures to promote reuse; takes the view that an optimal waste management strategy is a combination of prevention, reuse of products and components, recycling of materials, energy recovery and environmentally-friendly disposal;

⁴ 4. Recognizing the importance of extending product life, the potential of appropriate re-use initiatives, such as deposit-return schemes, markets for second-hand products and associated employment opportunities, calls on the Commission to give recognition to these aspects of waste prevention/minimisation;

⁵ 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'.

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