

# Consultation on the Review of the European Waste Management Targets

<b>Personal Details</b>	
In what capacity are you responding to this consultation? -single choice reply-( <b>compulsory</b> )	As an industry, not-for-profit, or academic organisation (i.e. all other stakeholders)
Name -open reply-( <b>compulsory</b> )	Michal
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What type of organisation do you represent? -single choice reply-( <b>compulsory</b> )	Not-for-profit/non-governmental organisation
What is the name of your company or organisation? -open reply-( <b>compulsory</b> )	RREUSE (Reuse and Recycling European Union Social Enterprises) Transparency Register number: 05052317999-60
In which country is your head office/organisation based? -single choice reply-( <b>compulsory</b> )	Belgium
<p>Your contribution will be published on the official website of the <b>Targets Review Project</b> and on <b>Your Voice in Europe</b>. Please use the dropdown list below to indicate if you want your contribution to remain anonymous.</p> <p>See <b>Personal Data</b> to view the Commission's guidelines regarding how your personal data is protected. Your data is subject to the following specific privacy statement:</p> <p><i>"Received contributions, together with the identity of the contributor, will be published on the Internet, unless the contributor objects to publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case the contribution may be published in anonymous form. Otherwise the contribution will not be published nor will, in principle, its content be taken into account."</i></p>	I give permission for my feedback to be published as it is
<b>Waste Framework Directive</b>	
Do you want to respond to the questions on the Waste Framework Directive? If you select "No" you can move on to the next section of the consultation	Yes

which deals with the Landfill Directive. If you select “Yes” the questions relating to the Waste Framework Directive will open up below.

-single choice reply-(**compulsory**)

Are there any issues related to the targets in the Waste Framework Directive which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of waste management.

First issue: -open reply-(**optional**)

There are no targets relating to waste prevention or preparation for reuse. Having set targets on recycling, one has shifted the focus and investment at national level to meet those targets at the expense of supporting measures at the top of the waste hierarchy. Combined preparation for reuse and recycling targets will do very little, if anything to improve preparation for reuse rates

Second issue: -open reply-(**optional**)

Other municipal waste fractions, such as textiles, furniture and biowaste, should also be part of the materials included in the WFD for municipal separate collection.

Third issue: -open reply-(**optional**)

Data collection in member states needs to be improved, validated and harmonised. Otherwise the figures reported by member states on whether they meet the targets are not comparable.

## Suggestions for Revision

1. Establish a single target and calculation method based only on the quantity of <i>municipal</i> waste collected. This would require that a consistent definition of municipal waste is used in all Member States. -single choice reply-( <b>optional</b> )	5 = very good idea, definitely deserves further consideration
2. Extend the existing targets to include other specific waste streams beyond paper, metal, plastic and glass (for example, wood, food waste, textiles, and other materials in municipal waste). -single choice reply-( <b>optional</b> )	5 = very good idea, definitely deserves further consideration
3. Establish a single target and calculation method based only on the quantity of <i>household</i> waste collected. This would require that a consistent definition of household waste is used in all Member States. -single choice reply-( <b>optional</b> )	1 = poor idea, not worth consideration
4. Adjust the targets so that biowaste is also included -single choice reply-( <b>optional</b> )	5 = very good idea, definitely deserves further consideration
5. Set targets which reflect environmental weightings for materials (for example, through reference to greenhouse gas savings achieved through recycling). -single choice reply-( <b>optional</b> )	3 = moderately good idea, may be worth further consideration
6. Improve monitoring and validation of the reports submitted by Member States so that the consistency and reliability of data can be validated. -single choice reply-( <b>optional</b> )	5 = very good idea, definitely deserves further consideration

7. Introduce requirements on businesses to sort a range of waste materials for recycling and composting / anaerobic digestion. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
8. The 70% recycling target should not include backfilling. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
9. Provide clear definitions of recycling and material recovery, and how these should be calculated for the C&D waste stream. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
10. Mandate sorting of wastes at C&D sites with a special attention to hazardous waste. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
11. Require facilities which sort 'mixed' C&D wastes to achieve a high level of recycling of the input materials. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration

Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.

First solution:

-open reply-(optional)

Introduce separate preparation for reuse targets. It should be noted that combining recycling and preparation for reuse targets will do very little, if anything, to incentivise improvements in preparation for reuse rates in Europe.

Second solution: -open reply-(optional)

Introducing bans on recyclable and compostable materials going to landfill and incineration (with or without energy recovery). Source separation of materials will significantly help improve the quality of recycling.

Third solution: -open reply-(optional)

## Landfill Directive

Do you want to respond to the questions on the Landfill Directive? If you select "No" you can move on to the next section of the consultation which deals with the Packaging and Packaging Waste Directive. If you select "Yes" the questions relating to the Landfill Directive will open up below.

-single choice reply-(compulsory)

Yes

## Key Issues

Are there any issues related to the targets in the Landfill Directive which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of waste management.

First issue: -open reply-(optional)

The Landfill Directive should seriously discourage the use of landfill for all materials, not only biodegradable waste and aim to send zero waste to both landfill and incineration across the EU. Any strategy that discourages or bans the use of landfill should go hand in hand with the banning of incineration, to avoid a shift to an unsuitable alternative. Reporting on waste entering landfill sites should be harmonized, going beyond biodegradable waste.

Second issue: -open reply-(optional)

As well as the requirement to pre-sort and remove the potentially reusable and recyclable materials before they end up in landfill, there should be a strong emphasis on composting and feeding AD plants.

Third issue: -open reply-(optional)

In order to discourage the use of landfills, the EU should reward the member states that introduce a system of high landfill tax (hand in hand with high incineration taxes to avoid a shift from landfill use to incineration). Taxes should be reduced on activities further up the waste hierarchy, for example having zero VAT on repair, maintenance, upgrade services and sales of second hand/refurbished products

## Suggestions for Revision

<p>1. Revise the targets so that they are set in such a way that they do not penalise countries whose economies are growing faster after starting from a lower base. -single choice reply-(optional)</p>	<p>3 = moderately good idea, may be worth further consideration</p>
<p>2. Establish a legal obligation for reporting on 'municipal waste' and enforcing the use of a single definition of the term by all Member States. -single choice reply-(optional)</p>	<p>5 = very good idea, definitely deserves further consideration</p>
<p>3. Standardise the approach to performance measurement and progress reporting. -single choice reply-(optional)</p>	<p>5 = very good idea, definitely deserves further consideration</p>
<p>4. In Member States where no data exists for 1995, a more recent baseline year should be set with targets adjusted accordingly. -single choice reply-(optional)</p>	<p>5 = very good idea, definitely deserves further consideration</p>
<p>5. Clarify when treated waste should be considered 'no longer biodegradable' from the perspective of the Landfill Directive. -single choice reply-(optional)</p>	<p>5 = very good idea, definitely deserves further consideration</p>
<p>6. Further tighten existing targets (e.g. move progressively towards zero biodegradable municipal waste sent to landfill). -single choice reply-(optional)</p>	<p>5 = very good idea, definitely deserves further consideration</p>
<p>7. Progressively include <i>all biodegradable</i> wastes (not just biodegradable wastes of municipal origin) within targets similar to the existing ones. -single choice reply-(optional)</p>	<p>5 = very good idea, definitely deserves further consideration</p>
<p>8. Introduce targets for the progressive reduction in the quantity of residual waste irrespective of how it is subsequently managed (whether it is sent to incineration, MBT or landfill, or any other residual waste management method). -single choice reply-(optional)</p>	<p>5 = very good idea, definitely deserves further consideration</p>

9. Define 'pre-treatment' in an unambiguous manner so that the ban on landfilling waste that is not pre-treated is applied equally across all countries. -single choice reply-(optional)

5 = very good idea, definitely deserves further consideration

Are there any issues related to the targets in the Landfill Directive which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of waste management.

First solution:

-open reply-(optional)

A reduction in residual waste arisings per capita (in kg) should be considered

Second solution: -open reply-(optional)

Put in place financial incentives for member states in order to encourage the rapid move to the top of the waste hierarchy (rather than having a system of penalties only). Even though the Commission cannot impose taxes across the EU, those member states that put in place financial incentives to reflect the waste hierarchy and promote the top of it, should be rewarded.

Third solution: -open reply-(optional)

## Packaging and Packaging Waste Directive

Do you want to respond to the questions on the Packaging and Packaging Waste Directive? If you select "No" you can move on to the next section of the consultation which deals with the Roadmap to a Resource Efficient Europe. If you select "Yes" the questions relating to the Packaging and Packaging Waste Directive will open up below. -single choice reply-(compulsory)

Yes

## Key Issues

Are there any issues related to the existing targets which you feel are important and should be added to those listed above? If so, please describe up to three additional issues in the text boxes below (please ensure that you only enter one clearly defined issue per box). Please note that these issues should be associated with the existing targets, not with other issues related to the general state of, for example, markets for recycled packaging waste.

First issue: -open reply-(optional)

Second issue: -open reply-(optional)

Third issue: -open reply-(optional)

## Suggestions for Revision

1. The methodology for calculating recycling rates should be standardised so that data (and hence performance levels) are comparable across Member

5 = very good idea, definitely deserves further consideration

States. -single choice reply-(optional)	
2. Remove from the Packaging Directive the target for packaging waste from municipal sources and include it into the Waste Framework Directive to ensure full consistency with the existing target on municipal waste recycling. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
3. Bring the recycling targets for different materials closer together to ensure a more level playing field. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
4. Incorporate “weightings” for materials recycled based on environmental benefits derived from recycling the material. -single choice reply-(optional)	4
5. The targets for some packaging materials could be subdivided into subcategories; for example, metals could be divided into non-ferrous and ferrous metals. The same could apply for plastic; for example, separate targets could be set for PET, LDPE, and HDPE. -single choice reply-(optional)	4
6. Set specific targets for recycling of packaging waste from households to encourage further recycling of household packaging. -single choice reply-(optional)	4
7. Remove from the Directive the maximum limit of 80% that stipulates how much packaging waste a Member State is allowed to recycle. -single choice reply-(optional)	4
8. Introduce a target for prevention of packaging waste (the development of waste prevention targets is covered in a broader manner in a later section of this consultation). -single choice reply-(optional)	
9. Adjust the definitions for reuse and recycling in the Packaging Directive to be consistent with those contained in the Waste Framework Directive. -single choice reply-(optional)	
10. Expand the recycling target to include reuse, by allowing the reuse of packaging to be credited to the recycling target. -single choice reply-(optional)	1 = poor idea, not worth consideration
11. Introduce targets for reuse for commercial transit packaging. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
12. Introduce targets for reuse for all packaging.	5 = very good idea, definitely deserves further consideration

-single choice reply-(optional)

Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.

First solution:

-open reply-(optional)

Offer incentives by creating a target for recycled content within the packaging put on the market.

Second solution: -open reply-(optional)

To ensure high-quality recycling, make source segregation compulsory.

Third solution: -open reply-(optional)

Comment/Note: Whilst still in its relative infancy, there are an increasing amount of organisations in the EU who are working with packaging materials and offcuts from industrial processes in order to provide good quality materials for community groups, schools etc., at low cost. This offsets substitutes the need for such groups to buy virgin products/materials and contributes directly to waste prevention. As such there is reuse potential with many different packaging materials such as plastic foils, wood, cardboard etc.

The Commission is keen to encourage higher rates of recycling. It recognises, however, the need to maintain the quality of recycled material so that it can be used profitably and with losses kept to a minimum between the collection and recycling stages. Keeping in mind the need to maintain quality, please select from the dropdown lists below the highest level of recycling that you believe could reasonably be achieved for each of the materials. Below you will be asked the year by which you believe these targets could realistically be achieved (i.e. between 2020 and 2025).

Paper and Cardboard:

-single choice reply-(optional)

Glass -single choice reply-(optional)

Metals -single choice reply-(optional)

Plastic: -single choice reply-(optional)

Wood: -single choice reply-(optional)

All Packaging -single choice reply-(optional)

Other Material (please specify below) -single choice reply-(optional)

If you have entered a recycling rate for "Other Material" above, please state what material this is for: -open reply-(optional)

Paper and Cardboard -single choice reply-(optional)

Glass -single choice reply-(optional)

Metals -single choice reply-(optional)

Plastic -single choice reply-(optional)

Wood -single choice reply-(optional)

All Packaging -single choice reply-(optional)	
Other material (as defined above) -single choice reply-(optional)	
<h2>Consultation Regarding the Aspirations of the Roadmap to a Resource Efficient Europe</h2>	
<h3>Waste Prevention</h3>	
Do you agree with the principle that there should be targets for waste prevention? -single choice reply-(compulsory)	Yes
<p>Do you think there is a case for setting prevention targets on specific waste streams/materials/products? If so, which waste streams/materials/products do you feel should be covered by new targets and why? Please provide an answer for each material/waste stream in the free text boxes below.</p>	
<p>Waste Stream /Material/Product 'A': -open reply-(optional)</p>	
<p>To reduce waste generation / capita</p>	
<p>Waste Stream /Material/Product 'B': -open reply-(optional)</p>	
<p>Residual waste should be reduced in order for more waste is prevented, reused and recycled.</p>	
<p>Waste Stream /Material/Product 'C': -open reply-(optional)</p>	
<p>Comment: It is important that strategies are put in place as an obligation to reduce the amount of products that end up in the waste stream as a result of difficulty to be repaired and/or recycled. Making products more easily repairable would also allow better reuse and preparation for reuse rates (addressed in section 6.2).</p>	
<p>Waste Stream /Material/Product 'D': -open reply-(optional)</p>	
1. In line with the proposal in the Roadmap, a requirement that waste generated per capita is in decline by 2020. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
2. Targets for decoupling of municipal waste from economic growth in line with Article 9(c) of the Waste Framework Directive. For example, the difference between the annual change in municipal waste per capita (X%) and the annual change in GDP per capita (Y%) should demonstrate a decoupling tendency such that over comparable (e.g. four year) periods, the value of (Y – X) is increasing in value. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
3. Consistent reporting of household waste arisings across Member States would act to produce a level playing field for setting absolute targets on waste prevention (e.g. no greater	5 = very good idea, definitely deserves further consideration

than X kg per household per year). The targets could exhibit a declining trend over time. -single choice reply-(optional)	
4. New requirements could be set on Member States to incrementally increase the number of prevention measures in place, and the overall coverage of these measures. For example, the number of households who have signed up to say “no” to unwanted mail, or the number of households covered by measures to reduce food wastage. -single choice reply-(optional)	2
5. Introduce requirements for progressive coverage of households by pay-as-you throw schemes. -single choice reply-(optional)	4

## Preparation for Reuse

Do you agree with the principle that there should be separate targets for preparation for reuse? -single choice reply-(compulsory)	Yes
<p>Do you think there is a case for targets for preparation for reuse on specific waste streams/materials/products? If so, which waste streams/materials/products do you feel should be covered by a target, and how should the target be specified? Please provide an answer for each material/waste stream in the free text boxes below.</p> <p>Waste Stream /Material/Product 'A': -open reply-(optional)</p> <p>The differences in the target options for WEEE, furniture and textiles, reflect the level to which the reuse centres and networks in a given member state are developed and have the capacity to meet the targets. It is also essential to note that any target that is set must be accompanied by guaranteed access to the waste stream for reuse centres in order to sort out potentially reusable items. WEEE Option 1: Set requirement for reporting of WEEE prepared for reuse by year X. Then set a target for preparation for reuse based on a percentage of total WEEE collected. Option 2: Set requirement for reporting of WEEE prepared for reuse by year X. Then set an improvement rate of Y % of WEEE prepared for reuse to be achieved by a particular year or increasing through time to a certain defined level</p> <p>Waste Stream /Material/Product 'B': -open reply-(optional)</p> <p>Furniture Option 1: set requirement for reporting of prepared for reuse furniture by year X. Then set an improvement rate of the amount of furniture prepared for reuse (Y %) by a particular year, or increasing through time For example, France has set a target of a 50% increase in the amount of furniture (by weight) put on the market by reuse centres from the social economy by 2017, in comparison to baseline situation which is being calculated at the time of writing Option 2: Set a target date for reporting of prepared for reuse furniture by year X and set a target for preparation for reuse based on percentage of total furniture collected</p> <p>Waste Stream /Material/Product 'C': -open reply-(optional)</p> <p>Textiles Option 1: Set a target date for the reporting of the amount of textiles prepared for reuse (the sorted fraction of textiles that are directly reusable) by year X. Set a target of what is prepared for reuse in comparison to the amount collected. Option 2: set a target for reporting of prepared for reuse textiles by year X, then set an improvement Y % target by a particular year Note: Separate collection of textiles should move towards 100% in member states. RREUSE members find on average that around 40-60% of collected textiles are still directly reusable (both on a national and international market), with approx. 10 -15% residual (very poor quality textiles, general waste disposed of into textile containers etc.) and the rest amenable for recycling. Differences in the directly reusable fraction are down to quality differences often due to region, season and country.</p> <p>Waste Stream /Material/Product 'D':</p>	

-open reply-(optional)

Further Comments: Potentially reusable products from WEEE, furniture and textiles waste streams have been included in the above because of their proven demand on the second hand market. These are also the three main waste streams handled by members of the RREUSE network i.e. social enterprises active in reuse, preparation for reuse and recycling. In addition social clauses should be included within tendering procedures for the collection, preparation for reuse and recycling (where applicable) in order to help preserve the social value of reuse activities carried out by social enterprises. This should be applicable to all waste streams. Social enterprises active in reuse/preparation for reuse provide true social value and environmental benefits through the provision of jobs and skills opportunities for those who are distanced from the labour market; extending the lifetime of products; and provision of low cost goods available to all income groups

## Recycling Rates

Do you agree with the view that recycling rates should be increased and/or be made to include more materials/waste streams? -single choice reply-(compulsory)	Yes
Household Waste -single choice reply-(optional)	80%
Municipal Waste -single choice reply-(optional)	80%
Commercial Waste -single choice reply-(optional)	85%
Industrial Waste -single choice reply-(optional)	85%
Construction & Demolition Waste -single choice reply-(optional)	90% or more
In order to take into account the large differences between Member States' current recycling levels, would you agree that an approach which sets targets relative to the existing situation in each Member State (for instance increase of recycling rates by X% per year) is appropriate? -single choice reply-(optional)	Yes

So far only municipal waste and construction and demolition waste are covered by specific recycling targets in the Waste Framework Directive, whilst other Directives cover packaging, WEEE, ELVs and batteries. Do you think there is a case for setting recycling targets on waste streams/materials/products that are not already covered by targets in existing Directives? If so, which waste streams/materials/products do you feel should be covered by new targets and why?

Waste Stream /Material/Product 'A':

-open reply-(optional)

- biowaste from MSW and biowaste from commercial/industrial activities over 70% because it makes up the largest fraction of municipal waste

Waste Stream /Material/Product 'B':

-open reply-(optional)

- Industrial and commercial waste over 85% (overall target)

Waste Stream /Material/Product 'C':

-open reply-(optional)

A large amount of furniture waste has potential for reuse. Should bulky waste be considered as only having recycling target, this would

incentivise sending potentially reusable furniture directly for recycling with no incentive to check for potential reuse. Separate preparation for reuse targets, therefore, must accompany any recycling targets. Combined recycling/preparation for reuse targets are not advised

Waste Stream /Material/Product 'D':

-open reply-(optional)

Textiles: Regarding textiles, a large proportion of collected textiles still have the potential for reuse. Social enterprises active in textile collection and sorting find that on average 40-60% of what they collect still has reuse potential, with 10-15% residual and the rest amenable to recycling. It is important to move towards 100% separate collection of textiles at national level, but any recycling target must not come at the expense of preparation for reuse activities

## Limiting Incineration of Waste Which Might Otherwise be Recycled

Do you agree with the view that a maximum level should be set for the amount of waste that can be incinerated for different waste streams (e.g. household waste and/or commercial waste)? -single choice reply-(compulsory)	Yes
Household/ municipal waste -single choice reply-(optional)	Yes
Commercial waste -single choice reply-(optional)	Yes
Industrial waste -single choice reply-(optional)	Yes
Construction and demolition waste -single choice reply-(optional)	Yes
Other than the above waste streams are there any other to which you think a maximum level of incineration should apply? If so, please specify in the text boxes below.	
Other stream 'A' -open reply-(optional)	
Other stream 'B' -open reply-(optional)	
Other stream 'C' -open reply-(optional)	
Household Waste -single choice reply-(optional)	10%
Municipal Waste -single choice reply-(optional)	10%
Commercial Waste -single choice reply-(optional)	10%
Industrial Waste -single choice reply-(optional)	10%
Construction & Demolition Waste -single choice reply-(optional)	10%

## Landfill

1. Landfilling should be limited to residues from a specified range (to be determined) of waste treatment operations. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
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2. Landfilling should be limited to a certain percentage of waste generated (for instance 5%) from a particular date. -single choice reply- (optional)	5 = very good idea, definitely deserves further consideration
3. Landfilling of recyclable/compostable waste (to be defined) should be banned. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
4. Landfilling of waste that is combustible should be banned. -single choice reply-(optional)	3 = moderately good idea, may be worth further consideration
5. Landfilling of waste should be banned if it has not been pre-treated to a level where the potential to lead to methane emissions from landfills has been virtually eliminated. -single choice reply-(optional)	5 = very good idea, definitely deserves further consideration
<p>Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.</p> <p>First solution: -open reply-(optional)</p>	
<p>Second solution: -open reply-(optional)</p>	
<p>Third solution: -open reply-(optional)</p>	
<p>In order to take into account the large differences between Member States' current levels of landfilling, would you agree that an approach which sets targets that take account of the existing situation in each Member State is appropriate (for instance by fixing a landfilling reduction percentage per year)? -single choice reply-(optional)</p>	Yes
<h2>Targets as a Tool in Waste Legislation</h2>	
<p>Do you believe the Commission should go further than simply setting targets for Member States to achieve? If you select "No" there are no more questions and you can submit your response by clicking on the button below. -single choice reply-(compulsory)</p>	Yes
<h2>Suggestions for Change</h2>	
<p>1. Develop guidance on the implementation of effective producer responsibility schemes to</p>	Yes

improve the transparency of the systems as well as their cost effectiveness. -single choice reply- (optional)	
2. Develop guidance on the proper implementation of the waste hierarchy. -single choice reply-(optional)	Yes
3. Ensure a closer monitoring by the Commission of progress accomplished by Member States in applying the waste hierarchy. For those Member States moving too slowly to meet the legally binding targets, develop mechanisms to ensure that key instruments such as a combination of economic and legal instruments (landfill/incineration taxes/bans, EPR schemes, incentives for municipalities and citizens, etc.) are applied. -single choice reply- (optional)	Yes
4. Develop criteria for municipalities to implement services of a minimum standard to enable sorting of a range of waste materials for recycling and composting / anaerobic digestion. -single choice reply-(optional)	Yes
5. Improve the consistency of the definitions used in the legislation and ensure proper monitoring by improved data collection and systematic reliability and validity checks of data reported. -single choice reply-(optional)	Yes
<p>Are there any other proposals in addition to the above that you feel deserve serious consideration? If so, please describe up to three additional solutions in the text boxes below (as in the list above, please ensure that you only enter one clearly defined solution per box). Please only include options which you strongly favour.</p> <p>First solution: -open reply-(optional)</p> <p>As mentioned in section 6.2 there are a number of very important factors that need to be in place in order to meet separate preparation for reuse targets. These include 1. Guaranteed access to the waste stream for accredited/approved reuse centres in order to separate potentially reusable appliances 2. Improved collection and logistics procedure to ensure the correct handling of waste to preserve reuse potential 3. Concerning waste streams such as WEEE, access for reuse centres to the after sales service manuals of the manufacturers, together with any relevant diagnostic tools would greatly help the efficiency of preparation for reuse activities.</p> <p>Second solution: -open reply-(optional)</p> <p>Investigating a possibility to set binding measures such as separate collection of certain waste streams such as biowaste, textiles and bulky items (together with appropriate collection and logistics systems that preserve reuse potential)</p> <p>Third solution: -open reply-(optional)</p> <p>One could also look at structuring financial incentives based on the waste hierarchy e.g. staggering reduced VAT rates for example: "Zero VAT on repair, maintenance, upgrade services and sales of second hand/refurbished products " Allow retailers to recoup VAT through donation of unsold new products to approved/accredited reuse centres from the social economy " Reduced VAT for collection</p>	

services which support preparation for reuse activities " Zero rated VAT for preparation for reuse activities and services carried out by social enterprises " In order to promote a market for recycled materials, the sale of recycled material or material to be recycled should be entitled to a reduced VAT rate. " The sale of recovered material or material to be recovered should be subject to full VAT " Landfill activities should be charged at full VAT

## General Comments

Would you like to add any general comments? If so, please use the space provided below.

-open reply-(optional)

It is essential to address the significant amounts of products that end up being directly recycled, incinerated or landfilled without even being checked for reuse potential as not to extend their lifetime is significantly missed socio-economic and environmental opportunity. Through supporting the involvement and development of social enterprises in achieving targets relating to collection, preparation for reuse and recycling, the EU is better placed to help meet the broader objectives of the EU2020 strategy, namely a resource efficient and socially inclusive Europe. It is essential that we move beyond a 'recycling society' and not use recycling (despite being essential for a sustainable waste management system) as an excuse to not address reuse and preparation for reuse activities.