

A review on the first year of the EU Green Deal

FEAD's contribution to the success of the European Green Deal

Short report

11 December 2020

FEAD, the European Federation for Waste Management and Environmental Services, represents the private waste and resource management industry across Europe. FEAD's members are national waste management associations covering 19 Member States and Norway. FEAD's members represent over:

- ✓ 3,000 companies with activities in all forms of waste management;
- ✓ 60% share in the household waste market;
- ✓ Handle more than 75% of industrial and commercial waste in Europe;
- ✓ Combined annual turnover of approximately € 75 billion;
- ✓ Employment of 320,000 people who operate around 2,400 recycling and sorting centres, 1,100 composting sites, 260 waste-to-energy plants, and 900 controlled landfills.

They enable the transition to a circular economy by producing resources that can be reinjected in the economy and by supplying energy. Our companies add value through innovative and cost-efficient collection, sorting, and recycling of secondary raw materials. As a result, they play a crucial role in achieving the best economic and environmental outcomes.

11th December 2019 – 11th December 2020

From welcoming the European Green Deal to advocating its growth – *an Editorial by the President of FEAD, Peter Kurth*

On 11 December 2019, our Federation **welcomed** the European Green Deal (EGD) as Europe's new growth strategy. Since that day, we have worked hard to make the EGD grow stronger every day. And what a journey that has been!

Ambitions were kept high, despite the Covid-19 pandemic. **FEAD, the European Waste Management Association**, representing the private waste and resource management industry across Europe, **embraced** Europe's commitment to the green transformation to achieve a circular economy, reduce CO₂ emissions and the use of raw material resources, to combat biodiversity loss, and to create new jobs and green growth.

To mark the occasion, FEAD prepared this report highlighting **our contribution towards the implementation and success of the European Green Deal**. It contains all our relevant positions and messages that were issued on numerous public consultations. The report also serves as a **memoir** for us and our members by putting together all our key views in a transparent and concise way. But the report is not merely a record of our work, it is an **acknowledgement** of the first year of the EU Green Deal.

The one-year anniversary of the EU Green Deal is of particular importance to me personally as it coincides with my first year as the President of FEAD. I am proud of FEAD being an active partner in the discussions taking place at EU level, and, together with the companies we represent, a determined actor, of the EU Green Deal.

This report should serve as a **guidance** for what is to come, and we must build on these positive experiences to plan the next steps in 2021.

We hope you enjoy reading through our positions as much as we enjoyed working on them.

Yours sincerely,



Peter Kurth, President of FEAD



Overview of the European Green Deal



The European Green Deal (EGD) was launched on 11 December 2019 and constitutes the European Commission's commitment and response to tackling climate and environmental-related challenges of our generation.¹

“It is a new growth strategy that aims to transform the EU into a fair and prosperous society, with a modern, resource-efficient and competitive economy where there are **no net emissions of greenhouse gases in 2050** and where economic growth is decoupled from resource use. It also aims to protect, conserve, and enhance the EU's natural capital, and protect the health and well-being of citizens from environment-related risks and impacts. At the same time, this transition must be just and inclusive. It must put people first, and pay attention to the regions, industries and workers who will face the greatest challenges. Since it will bring substantial change, active public participation and confidence in the transition is paramount if policies are to work and be accepted. A new pact is needed to bring together citizens in all their diversity, with national, regional, local authorities, civil society and industry working closely with the EU's institutions and consultative bodies.”

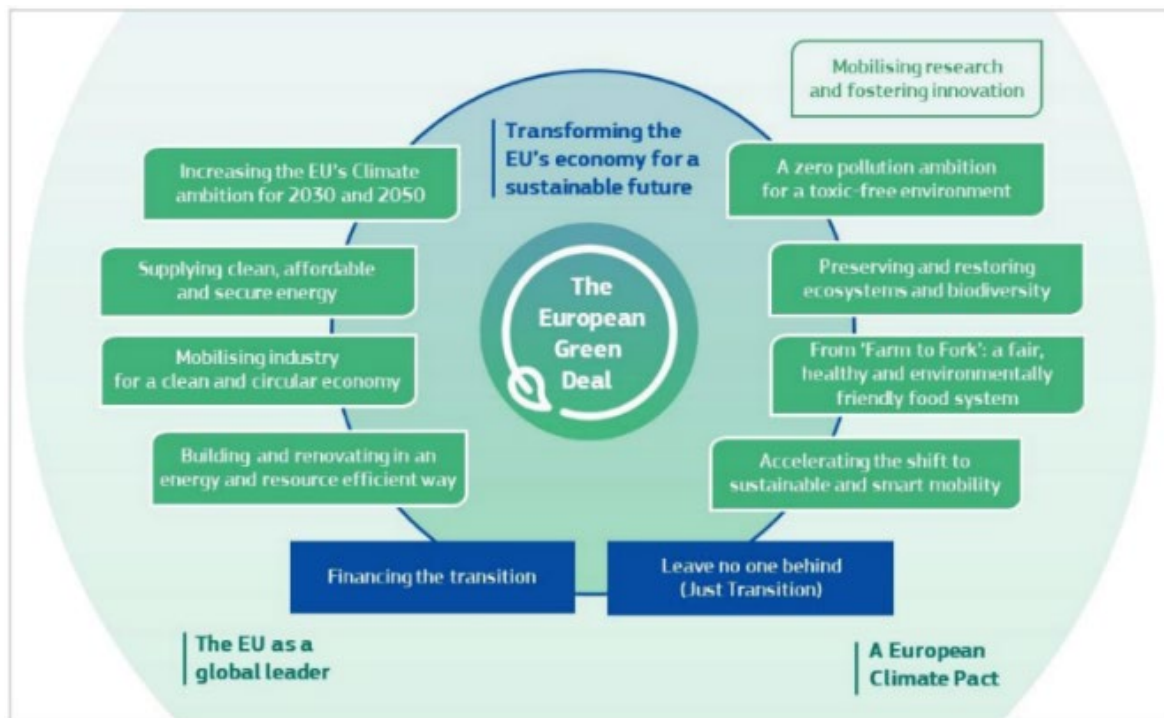
[Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee, and the Committee of the Regions - The European Green Deal, Brussels, 11.12.2019]

Ever since **FEAD** manifested a warm welcome to the European Green Deal², it has been answering the call for active public participation and has proven to be a key ally in the European Green Deal so far. A year after the EGD came into existence, our association has largely contributed to its development and its undisputed success.

¹ Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee, and the Committee of the Regions - The European Green Deal, Brussels, 11.12.2019, COM(2019) 640 final, available at: https://ec.europa.eu/info/sites/info/files/european-green-deal-communication_en.pdf

² <https://fead.be/position/fead-welcomes-the-european-green-deal-2/>

The European Green Deal provides an action plan to boost the efficient use of resources by moving to a clean, circular economy, and to restore biodiversity and cut pollution. The plan outlines the required investments and the available financing tools. It explains how to ensure a just and inclusive transition, how the EU aims to be climate neutral in 2050, and a goal that will be achieved through the legally binding European Climate Law. Reaching the targets of the EGD requires action by all sectors of our economy.



Source: European Commission (2019).³

EGD actions include investing in environmentally friendly technologies, supporting industry to innovate, rolling out cleaner, cheaper and healthier forms of private and public transport, decarbonising the energy sector, ensuring buildings are more energy efficient, and working with international partners to improve global environmental standards. Waste related issues must be tackled nearly in each economic sector, by **“mobilising the industry for a clean and circular economy”**. The EU will also provide financial support and technical assistance to help those that are most affected by the move towards the green economy through the Just Transition Mechanism.⁴ Since the launch of the EGD, the European Commission and the other European

³ European Commission, 2019. Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions The European Green Deal. COM/2019/640 final. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1576150542719&uri=COM%3A2019%3A640%3AFIN> . Last accessed on 11/12/2020.

⁴ https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en

Institutions have been taking actions to bring the EGD to life in all the areas mentioned above.

FEAD fully endorses the European Green Deal as the European Union's growth strategy and considers it as the best tool to attain both an economic recovery and environmental and climate targets. These targets are on the right way to address climate emergency, risks linked to resource scarcity, and the threat to biodiversity.

However, a prerequisite for achieving any targets is the valuation of natural resources, based on the valuation of their non-recoverability and the damage, caused by their exploitation. In that sense, the need for increased efficiency of materials and recirculation of high-quality materials is vital, thereby making the **circular economy's** role in the reduction of GHG emissions from raw material extraction, from products' manufacture and use, and from other economic activities, and in minimising resource consumption crucial.

The European Green Deal and the waste management sector

Waste management activities are at a crossroads with several challenges that the European Green Deal must respond to. The following objectives are core discussion points for waste management and the EGD:

- Making the best use of all resources, by optimising the **material recovery** of recyclable/recoverable waste as well as the **energy recovery** of non-recyclable waste;
- Boosting **recycling markets** with an important shock on **recyclates' demand**;
- Facilitating recycling, or even making it feasible, through binding rules on **eco-design**, including phasing out of Substances of Very High Concern (SVHCs);
- Acknowledging the positive role recycling and material recovery activities play in avoiding CO₂ emissions from the manufacturing sector, and recognising that **the entire waste management chain avoids less CO₂ than it emits**;
- Granting a **competitive advantage to recycled/recovered materials**, with higher taxation of the CO₂ and the energy content of fossil fuels.

To achieve these objectives, the following instruments need to be deployed:

- Regulatory tools ensuring **mandatory recycled content** for some priority products and flows, such as packaging, automotive, construction products, paper, Electrical and Electronic Equipment (EEE), and textiles. Mandatory recycled content rules for products are essential for the creation of a stable and competitive market for recycled materials, while they ensure the strategic availability of critical raw materials in Europe;
- A hierarchy for raw materials, giving priority to secondary raw materials;
- Stronger **implementation** and enforcement of the existing rules and targets;
- Appropriate and legally binding **eco-labelling** rules to facilitate consumers' choice, and to reflect the recyclability of products and the presence of recycled content;
- **Mandatory green public procurement rules**, on some priority sectors;

- Creation of a market for secondary raw materials coming from the recycling of textiles and Waste Electrical and Electronic Equipment (WEEE);
- **Recycling targets** for industrial and commercial waste;
- **Improvement of collection rates** in member states and putting in place appropriate schemes (door-to door collection, civic amenities, deposit and return schemes, etc.) at local and national level (i.e. for e-waste in order to boost recycling rates);
- Recognising and promoting the role of **open markets**: household waste to remain accessible to private waste management, also industrial and commercial waste to stay within a fully open market. Extended Producer Responsibility (EPR) schemes have to remain a tool for improving collection and recycling of some more difficult flows, such as household waste, but EPR should not substitute or be detrimental to performant Business-to-Business (B2B) contracts;
- Duly taking into consideration the need for resources to promote there-use industry and fully support the “right to repair, refurb, durability, and the second life of products”;
- Existing and forthcoming measures for recycling, to implement and strengthen the Waste Hierarchy, should go hand in hand with:
 - recognising the essential role of **Waste-to-Energy (R1) solutions** for non-recyclable waste, as an indispensable complement to more recycling/quality recycling. R1 installations save more CO₂ than they emit, because of the substitution of fossil fuels for heating/cooling and electricity production, and
 - **combatting large scale landfilling** with clear measures ensuring the deviation of recyclable and recoverable waste from landfilling. Environmentally sound disposal solutions should only be used for non-recyclable and non-recoverable waste;
- A **balanced policy for chemicals** by encouraging clear rules that give legal certainty to waste operators, and allow an appropriate balance between high recycling rates, and quality recycling;
- Phasing out all substances of concern, particularly in EEE;
- A **Taxonomy** that takes into consideration the role of both material and energy recovery from waste. Recovering energy from non-recyclable municipal and commercial and industrial waste in R1 installations would save approximately 119 Mt eq CO₂ emissions by 2030;

- **A revised Energy Taxation Directive (ETD)**, that considers fossil fuels' CO₂ content. Resources deriving from higher taxation could be used to support projects fostering a more circular economy. In any case, the ETD should avoid double taxation of any solutions that may be covered also by the EU Emissions Trading System (EU ETS) or other tools;
- **Revised EU waste export rules** ensuring the safe export of waste, guaranteeing environmental protection, combined with enhanced enforcement to fight illegal activities;
- Financial or **fiscal incentives** (e.g. reduced VAT): reduced price of products incorporating recycled content;
- Significant **EU funds** for investments and infrastructure in selective collection and recycling. A stronger push will be needed especially in those member states affected by a severe recession, while experiencing insufficient recycling performances and large scale landfilling;
- Strong **public support** through EU funds, especially for the green recovery from the Covid-19 pandemic and its consequences;
- **Policy coherence** among all relevant pieces of legislation;
- Recognising the role of the waste management sector in climate mitigation; and
- Incentivising cuts in CO₂ emissions from the waste management chain, by **incorporating environmental costs** into the economy and setting up an **independent calculator for avoided emissions**.

FEAD's participation in EU Green Deal initiatives

For the past year, FEAD has been actively participating in almost all initiatives, consultations, surveys, and legislative procedures that the core European institutions have introduced under the umbrella of the European Green Deal.

It is worth saying that, for us, the **circular economy** encompasses all the initiatives cited below.

Our work structure is based around the European Commission's Communication on the EGD, as well as other initiatives, to the extent that we have identified the following categories for our input:



Indicative list of initiatives to which FEAD has provided feedback⁵:

Circular Economy

New Circular Economy Action Plan (CEAP)

Climate Ambition

2030 Climate Target Plan (as part of the EU Climate Law)
Climate pact

Zero Pollution - Emissions

Zero Pollution Ambition for Healthier Planet & Healthier People
Carbon Border Adjustment Mechanism
EU Emissions Trading System
Effort Sharing Regulation
Methane Strategy
Sewage Sludge Directive
Industrial Emissions Directive
E-PRTR Regulation

Energy

Energy Taxation Directive
Smart Sector Integration Strategy
Renewable Energy Directive
Resource Efficiency Directive

Financing the Transition

Sustainable Investment and Taxonomy

Waste Streams & related Issues

Waste Shipments
End-of-Waste Criteria
Packaging and Packaging Waste
End-of-Life Vehicles
Batteries
Recovery and Disposal codes

Buildings

Renovation Wave
Construction Products

Consumers and Products

Consumers and Green Transition
Environmental performance of products & businesses – substantiating claims
Sustainable Products

Chemicals

Chemicals Strategy for Sustainability
Persistent Organic Pollutants (POPs)
ECHA – SCIP Database

⁵ I.e. indicative list of initiatives under the European Green Deal to which FEAD has provided feedback until the publication of this report.

FEAD’s main positions

This section presents FEAD’s main positions and key messages in response to EU initiatives.

In our view, the **circular economy** encompasses all other categories of initiatives, and all the other categories are - by definition - an integral part of the circular economy.



As illustrated in the picture above, the circular economy itself is embedded in waste management activities. The waste management sector and the circular economy’s contribution to the “green transition” go hand in hand. This is because greenhouse gas (GHG) emissions from raw material extraction and from manufacturing must be reduced while resource consumption minimised. Proper waste management of re-incorporated recycled materials in products can bring a significant reduction of CO₂ emissions in a products’ footprint and improve overall material efficiency.

However, to fully achieve the sustainability of products and services, ambitious and environmentally sound waste management practices must be fostered.

Currently, half of greenhouse emissions result from resource extraction and processing⁶. Strong recycling policies leading to significant savings in resources and energy, while avoiding CO₂ emissions, can make a significant difference along the product value chain. Favouring recycled materials over raw materials is only one way to do this. As a matter of fact, the carbon footprint of recycled PET is 90% less than the virgin counterpart, for textiles it is 98%, for steel up to 85%, aluminium 92%, paper 18%⁷.

Estimations from recent **studies** indicate that “a more circular economy can make deep cuts to emissions from heavy industry: in an ambitious scenario, as much as 296 million tonnes CO₂ per year in the EU by 2050, out of 530 in total – and some 3.6 billion tonnes per year globally.”⁸

For the **extensive analysis of all FEAD positions** with regards to the European Green Deal and its initiatives, please consult the full report published on the [FEAD website](#), which is entitled:

“FEAD’s contribution to the success of the European Green Deal - Full report”

⁶ European Commission (2019). “Communication on the European Green Deal”, p.22.

⁷ According to the Bureau of International Recycling (BIR).

⁸ Material Economics. (2018). The Circular Economy - a Powerful Force for Climate Mitigation: Transformative innovation for prosperous and low-carbon industry. p. 8. Available at: <https://materialeconomics.com/publications/the-circular-economy-a-powerful-force-for-climate-mitigation-1#:~:text=This%20report%20investigates%20how%20a,contribute%20to%20cutting%20CO2%20emissions.&text=Making%20better%20use%20of%20the,halway%20towards%20net%2Dzero%20emissions.>

FEAD own initiatives

Apart from directly contributing to the European institutions' work, FEAD has taken on several of own initiatives pertaining to the framework of the European Green Deal.

- **Waste-to-energy legal study**

As mentioned earlier in this report, energy recovery from waste is a vital possibility of making the best use of resources from waste, in particular non-recyclable, residual waste. It plays an important role in the circular economy, as an essential step in the waste management chain. However, the role of waste-to-energy in the context of the provisions of the EU Sustainable Investment Regulation (best known as the Taxonomy Regulation), is not clear, as it is not apparent whether the latter can be considered as activities “substantially contributing” to either climate mitigation or circular economy’s objectives.

To provide clarity, FEAD commissioned a legal analysis and interpretation of the Taxonomy Regulation⁹, which aims at clarifying whether waste incineration for energy recovery, fulfilling R1 energy recovery criteria, can be considered an environmentally sustainable economic activity. This clarity is needed ahead of the detailed definition of "sustainable activities" in the future Taxonomy.



The legal analysis is based on methods applied in interpreting provisions of Union law, taking into account the European waste law and political framework, and **concluded that** (a) waste incineration must be viewed in a differentiated manner, (b)

⁹ Prepared by the consultancy PricewaterhouseCoopers. Available here: https://fead.be/wp-content/uploads/2020/10/FEAD_20200911_Legal_Analysis_Regulation_2020-852_WtETaxonomy_final_EN.pdf

a distinction must be made between incineration for disposal and incineration for energy recovery (R1), and that (c) WtE (R1) is consistent with the circular economy, while also fulfilling other environmental objectives, as long as it complies with the waste hierarchy. Therefore, **recovering the energy from non-recyclable waste must be regarded as an environmentally sustainable economic activity.**

● FEAD events

As an active player in the sphere of the circular economy, FEAD has organised and participated three events of relevance to the Green Deal's objectives:

Ecotoxicity (HP 14) test methods

FEAD held an online workshop on Ecotoxicity (HP 14) Test Methods on 30 June 2020. The workshop illustrated different experiences on test methods used in the evaluation and classification of waste as ecotoxic under the Waste Framework Directive (WFD). Speakers came from different member states and from across a variety of sectors and illustrated their approaches to HP 14 testing.

Implementation of the EU Plastics Strategy

On September 8, 2020, during the IFAT impact Business Summit 2020, FEAD held an online discussion on the EU Plastics Strategy. At the two-year mark since the adoption of this strategy, participants are now discussing its implementation. In this regard, we expect a stronger regulatory action to foster the creation of a competitive market for recyclates.

What will the German Presidency deliver on the Circular Economy?

On 5 November 2020, FEAD held a webinar as a side event of the European Circular Economy Stakeholder Conference¹⁰. The event focused on ongoing discussions under the German Presidency of the Council on the New Circular Economy Action Plan. Discussions focused on key measures needed to ensure the full achievement of EU climate ambitions. Participants discussed some main deliverables foreseen, relating to measures for strengthening recycling markets, such as mandatory recycled contents and eco-design, and waste exports. Waste-to-Energy and landfilling, in line with the waste treatment hierarchy were also discussed. The role of the EU Recovery Plan in relation to the waste management sector was also mentioned as a crucial driver for circularities. Panellists included representatives from the German Federal Ministry of the Environment (German Presidency), the European Parliament, the European Commission, and the NGO sphere.

¹⁰ <https://circulareconomy.europa.eu/platform/en/annual-circular-economy-stakeholder-conference-3-4-november-2020>

○ Informal Working Group on ADR and waste¹¹

Following the Fall session of the Joint Meeting on RID/ADR/ADN¹² (September 2018), FEAD has been the only organisation appointed by Member States to lead an informal working group on specific waste issues concerning ADR. Such informal working group is composed by a selection of interested member states and other industry stakeholders. The group is currently chaired by Baudouin Ska (Denuo, Belgium) and supported by the expertise of specialists from our Dutch, Belgian, German and French federations or their respective members.

The purpose of the informal group is to gather consensus on certain issues requiring proposal for amendment to the ADR, that will be formally voted by all member states in the Joint Meeting (spring and fall session each year). The first meeting of the informal working group took place in April 2019 in Brussels. Since the beginning of the year, FEAD has been able to organise three additional meetings:

- March 2020 (Utrecht): the meeting focused on the finalisation of proposals to be put forward to the Fall Joint Meeting (September 2020). Two of the documents prepared by FEAD were approved by the Joint meeting and will be included in the ADR 2023-version (ADR is updated each 2 years). Issue covered: the transport of empty waste packaging under UN 3509 in sheeted containers end finetuning of the scope.
- October 2020: FEAD was tasked to support member states in finalising documents submitted during the Fall session. The documents presented to the meeting concern the following ADR/waste issues:
 - transport of asbestos in bulk;
 - bulk carriage of waste batteries;
 - weight estimation of waste transported;
 - exemption of ready for use pharmaceutical products (medicines) with a waste status;
 - additional information for on responsible person for the shipment of medical waste;
 - removable dumpster placarding;
 - proposal for multilateral agreements on certain documents.
- November 2020: following the fine-tuning of some documents, FEAD led the presentation of two new issues to be potentially submitted to the Spring Joint Meeting. The latter concern the possible combination of inner-outer packaging and the chemical compatibility of packaging for waste.

¹¹ <https://fead.be/adr/>

¹² RID – Regulation concerning the International Carriage of Dangerous goods by Rail, ADR – European Agreement concerning the International Carriage of Dangerous Goods by Road and ADN – European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterway.

- A further meeting is foreseen following the Spring session of the Joint Meeting.

- **FEAD surveys**

FEAD has initiated various surveys between its members pertaining to the general scope of the EGD, and has shared the outcomes with the European Commission:

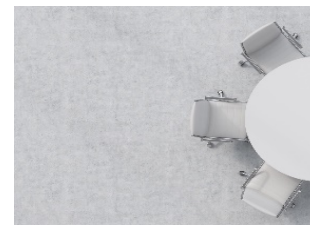
- Covid-19 pandemic and the reaction of the waste management sector in member states.
- Separate collection facts and figures in member states.

- **FEAD outreach**

FEAD frequently issues letters, statements, and press releases on actual and usually pressuring matters. It is also common that we issue such letters and statements jointly with other organisations, depending on the issue.

FEAD interaction with other stakeholders

FEAD is constantly working to participate and be involved in the sharpest debates, international organisations’ meetings, surveys, and so many more actions and processes. The table below lists only an indicative aspect of our work in strengthening the European Green Deal in today’s reality.



Other EU Bodies & Agencies		International Organisations, Institutions, and Bodies		Alliances & Memberships	
European Chemicals Agency (ECHA)	Feedback to ECHA’s feasibility study on the use of comprehensive tools to manage Information flows from Product Supply Chains to waste, which led to the establishment of the SCIP ¹³ Database (pursuant to the Waste Framework Directive)	Basel Convention	Participation to the SIWG ¹⁴ on POPs wastes as observers Participation to the Expert working group on the review of the Annexes of the Basel Convention	Circular Plastics Alliance (CPA)	FEAD participates with experts in a number of CPA working groups, including Agriculture, Packaging, Automotive, Monitoring. Ongoing discussion on the definition of “recycled content”, “standardisation” as well as “collected and sorted waste”.
Committee of the Regions	Consultation on the new CEAP (May 2020)	Stockholm Convention & Rotterdam Convention	Continuous monitoring of the Stockholm and Rotterdam conventions’ work	Industry	In communication with Industry organisations at European level and at members states’ level. BusinessEurope (participation in various Working Groups)
European Environment Agency (EEA)	Continuous monitoring of the Agency’s work	OECD	Participation to the Working Party on Resource Productivity and Waste meetings	Other stakeholders	Member of the European Circular Economy Stakeholder Platform (ECESP); Cooperation with other European and global waste management federations and NGOs; Member of the EPR Club.

¹³ Substances of Concern In articles, as such or in complex objects (Products) (SCIP) database.

¹⁴ Small Intersessional Working Group.

In addition, the participation and contribution of FEAD in European and global events includes the following:

- 16 March 2020 – FEAD participation to the event organised by the European Academies Science Advisory Council (EASAC) on “packaging plastics in the circular economy”.
- 15 July 2020 – FEAD participation in the first IFAT Impact Panel Discussion (Germany).
- 2 September 2020 – FEAD presentation at the PIGO Annual Conference (Poland), on recycling performances in Europe.
- 2 September 2020 – FEAD presentation at the YTP Annual Conference (Finland), on the developments under the European Green Deal.
- 19 October 2020 – FEAD presentation at the 24th International Congress of Environmental Protection - ENVICON (Poland), on environmental Protection and the Circular Economy.
- 29 October 2020 – FEAD presentation at the Estonian Circular Economy Industries Association – Annual Conference (Estonia), presenting a view from Europe regarding waste as a Resource, as well as European and Global market trends.
- 4 November 2020 – European Circular Economy Stakeholders Platform event on Circular Procurement – FEAD moderation of a sub-session.
- 17 November 2020 – FEAD presentation at the BW Expo Digital Summit (Brazil), on the European Green Deal and the waste management sector.
- 18 November 2020 – FEAD presentation at the RDF Conference (United Kingdom), on the European Green Deal, the waste management sector, and waste and energy related issues.
- 23 November 2020 – FEAD participation to an online webinar organised by the Florence School of Regulation on “financing models of municipal waste management”.

What our industry does for Europe

- FEAD is the EU private waste management association.
- We provide local, innovative, and sustainable jobs: up to 400,000 jobs in the waste management sector.
- 5 Billion EUR/year investments in collection and waste management facilities.
- Secondary raw materials provided to the manufacturing sector.
- A key role in climate protection through prevention of GHG emissions through recycling, and waste-to-energy of non-recyclable and non-recoverable waste.



20
National Waste
Management federations



3.000
Private waste
management companies



320.000
Employees
In total



2.400
Recycling and
Sorting centres



900
Controlled
landfills



1.100
Composting
sites



260
Waste-to-energy
Plants



5 billion
Euros In Investments
Per year

APOH Slovakia • **ARMD** Romania • **ASEGRE** Spain • **BDE** Germany
• **CAObH** Czech Republic • **Denuo** Belgium
• **DWMA** Netherlands • **ECEIA** Estonia • **ESA** UK • **FISE** Italy
• **FLEA** Luxembourg • **FNADE** France • **IWMA** Ireland
• **LASUA** Latvia • **NORSK INDUSTRI** Norway • **PASEPPE** Greece
• **PIGO** Poland • **SRI** Sweden • **VÖEB** Austria • **YTP** Finland

The road ahead

FEAD is committed to the objectives of the European Green Deal and will continue working towards building a sustainable and resilient environment by both enhancing the circular economy in Europe and reducing GHG emissions.

Among the challenges and opportunities in the next years we distinguish the following expected actions under the new Circular Economy Action Plan that are directly or indirectly related to waste: the revision of the Packaging and Packaging Waste Directive, the new legal framework for batteries, the proposals for mandatory recycled plastic content and waste reduction, the review of the Ecodesign Directive, the review of the Construction Products Regulation, the EU Strategy for Textiles, the updates of the POPs Regulation, as well as the revision of the Waste Shipments Regulation, and the review of the landfill Directive.

In addition, we anticipate the revision of broader texts, also of crucial importance to our sector, such as the EU ETS/ Effort Sharing Regulation proposal (both related to CO₂ emissions), the revision of the state aid guidelines for environmental protection and energy, the carbon border adjustment mechanism proposal, and the

Renewable Energy and Energy Efficiency Directives, which would reflect the new 2030 climate target, to name but a few.

We are also eager to see the much-needed increase in green funding (Next Generation EU) and in green investments in the Union (Covid19-crisis recovery), to accelerate the achievement of the objectives and goals of the EU Green Deal.



We believe that under a robust and predictable regulatory framework, which will also allow for the development “green economy” businesses, the whole **waste management sector, represented by FEAD, appears as a key ally** in delivering the best results for the ambitious yet required green growth strategy for Europe.

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European Waste
Management Association