

## PRO EUROPE COMMENTS

### European commission communication towards a thematic strategy on the sustainable use of natural resources PRO EUROPE position statement

One of the key priorities of the Sixth Environmental Action Programme (6 EAP) is to decouple environmental impact from economic growth through 'better resource efficiency and resource and waste management'. The 6 EAP establishes a clear link between resource and waste management, recognising at the same time the importance of material recovery from waste as a key element for resource preservation. It sets up the following strategic objectives:

- Ensuring that the consumption of renewable and non-renewable resources and their associated impacts do not exceed the environment's carrying capacity.
- A significant reduction in the quantity of waste for final disposal, as well as in the volumes of hazardous waste.

The Commission Communication *Towards a Thematic Strategy on the Sustainable Use of Natural Resources* aims at developing a framework and measures to achieve these goals.

PRO EUROPE represents national schemes responsible for the collection, recovery and recycling of packaging waste in 21 Member States, 3 candidate countries (Turkey, Bulgaria, Romania), Norway and Canada<sup>1</sup>. PRO EUROPE's member organisations are responsible for meeting the recovery and recycling targets laid down in EU Directive 2004/12/EC on Packaging and Packaging Waste. As practitioners who are closely involved in the collection and recycling of packaging waste, PRO EUROPE has widely collaborated with the European institutions in shaping the revised Packaging Directive by sharing experience and expertise.

Moreover, PRO EUROPE's member organisations have made a significant contribution to job creation throughout Europe. For example, Eco-Emballages in France has contributed to the creation of around 16,000 jobs, since it was founded in 1990 DSD in Germany has created around 17,000 new jobs and in Spain ECOEMBES is responsible for creating 2,500 new jobs<sup>2</sup>.

PRO EUROPE has received with interest the Commission Communication and would like to make the following comments from the perspective of the compliance schemes:

- PRO EUROPE welcomes the Commission's intention to take stock of the last thirty years of waste legislation and to consider any future measure on prevention and recycling in the light of a holistic approach, taking account of the sustainable management of natural resources and the overall environmental impact of products and services along their life cycle.
- The global framework to be jointly developed through the EU strategies on Resource Management, Waste Prevention and Recycling, as well as on Integrated Product Policy (IPP), should combine a mix of legal, voluntary and economic instruments.

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<sup>1</sup> ARA – Altstoff Recycling Austria (Austria); DSD – Duales System Deutschland AG (Germany); Eco Emballages (France), Eco Embalajes Espana (Spain); FOST Plus (Belgium); HE.R.R.CO (Greece); REPA (Sweden); REPAK (Ireland); SPV – Sociedade Ponto Verde (Portugal); VALORLUX (Luxembourg); Materialretur (Norway); CEVKO (Turkey); EKO KOM (Czech Rep.); EnviPak (Slovak Rep.); Green Dot Cyprus (Cyprus); Latvijas Zalais Punkts (Latvia); ÖKOPANNON (Hungary); RekoPol (Poland); SLOPAK (Slovenia); Zaliasis Taskas (Lithuania), GreenPak (Malta), EcoPack (Bulgaria), ERO (Estonia), Eco-Rom (Romania) and the cooperation partners VALPAK (UK) and CSR (Canada)

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- This new framework should ensure a balanced recycling policy from both the environmental and economic points of view. The separate collection and the recovery of valuable materials from waste can achieve significant reductions in the use of natural resources as well as reduce the environmental impact of products. However, optimum recovery targets in the EU should be set at levels which guarantee an overall reduction of environmental impact not only in terms of waste minimisation but also in terms of energy consumption, decrease of transport and emissions, as well as resource preservation, etc. At the same time, the new Strategies should protect and promote the competitiveness and economic viability of the recycling industry.
- The development of a market for secondary raw materials would help reduce pressure on virgin raw material use. PRO EUROPE would therefore recommend an assessment of possible measures to stimulate the demand for these materials. Such measures should be complemented with education and communication initiatives with a view to improving citizens' perception of products made with recycled materials. Moreover we would like to stress the necessity for the promotion of research and development in this area to increase the competitiveness of such materials.
- Information and education is key in achieving a long-term change in consumer behaviour towards a sustainable society. PRO EUROPE member organisations have carried out numerous environmental awareness campaigns and education partnerships with other actors which, in the area of packaging waste, have led to a change in the awareness of the consumer with regard to environment.
- Producer Responsibility and the involvement of all stakeholders is the other key factor for success to solve a problem. The cooperation of industry and authorities within the packaging sector has shown that it is possible to build up sensible and sustainable structure to reduce negative impact of packaging on the environment and to save natural resources. It could be demonstrated that such joint action programs lead to a de-coupling between economic growth and the amount of packaging, e.g. in Austria, France and Germany.
- International exchange of experience and Know-How and drafting of best-practice guides help to avoid already known mistakes and to increase the speed of finding appropriate solutions. The cooperation of the 24 members of PRO EUROPE is a good example of an international network which is going beyond European borders to Canada.
- PRO EUROPE welcomes the Commission's pledge to actively promote the future Sustainable Resource Use Strategy in the new Member States. Our close cooperation with 9 member organisations from these countries shows that many of these countries still have enormous deficits as far as operational waste and resource management systems are concerned. The priority of many of these countries will, however, be to build up their economies and infrastructure. Therefore we welcome the EU's objective of increasing the support for environmental protection measures through structural and rural development instruments, plus the transitional institution building capacity.

Finally, PRO EUROPE welcomes the Commission Communication as a first step in the development of a new global framework leading to the environmentally sustainable use of resources. As experts in the organisation of the collection and recovery of materials from packaging waste, we look forward to sharing our knowledge and participating in an open and collaborative process with the EU institutions in the shaping of the new Strategies.