



**Local & Regional
Europe**

Circular Economy

Local and regional authorities: key partners to boost waste management

CEMR key messages
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Foreword

“A circular economy that makes the best use of our precious resources and fully exploits the potential of waste is crucial for local authorities who are driving this process at the closest level of government to the citizens. If we manage to rethink the full product cycle and raise awareness, we can not only improve waste management in Europe, but also generate growth and create new jobs.

Overall, we support the revision of the existing waste directives and welcome the new approach of the European Commission. The new package explores how to better balance the responsibilities between the different stakeholders involved, from the producer to the citizens, including national and local authorities. The new shared European objectives will help to deliver this ambition together and achieve real progress on the ground, provided it allows enough flexibility to implement it at the local level, with respect to the subsidiarity principle.”

Councillor Linda Gillham
CEMR spokesperson on environment
Runnymede Council, UK



Background

In Europe, support for the circular economy has been promoted as a key sector to boost competitiveness, foster sustainable economic growth and generate new jobs through “closing the loop” of product lifecycles. The circular economy concept stresses the importance of covering the whole life cycle of a product: from production and consumption through waste management and the market for secondary raw materials.

In December 2014, the Commission withdrew its draft legislative proposal on waste in order to integrate it into a wider and more ambitious package to be published one year after. On 2 December 2015, the Commission proposed a new circular economy package, a bundle of legislative and non-legislative proposals including a communication with a corresponding action plan.

This current document brings together the key messages representing the views of local and regional government on how EU waste legislation should be revised to increase resource efficiency in Europe and move towards a circular economy. Building on CEMR’s previous position paper: *“Waste: Creating a resource efficient society must be a shared responsibility”* ([hyperlink](#)), it focuses mainly on the proposed revision to the Waste Framework Directive.

CEMR key messages

1. CEMR welcomes that the proposal **recognises the key role that local and regional authorities play in achieving common EU objectives for waste management and developing a circular economy**. We call for a **European multi-level governance model, built on active and constructive co-operation between the different levels of governance, and to further develop this towards a ‘governance in partnership’ model**, where all relevant actors work together to find common solutions on policies and legislation. We therefore welcome the fact that the Commission’s proposal does not prevent member states from **establishing, maintaining or shifting the responsibilities of local public waste collection in municipalities**.
2. Overall, **we support the transition towards a circular economy and the revision of the existing waste directives**. We welcome the new legislative package, in particular the fact that the European Commission took note of our concerns about the previous directives and adopted a more realistic approach that considers the role and responsibilities of local and regional authorities.
3. We welcome the **new definition of municipal waste and the inclusion of comparable waste collected from other sources than households**. However in a majority of member states, the **reference to quantity in this definition** is irrelevant considering that nature and composition are sufficient to define waste and include it in the municipal waste. The quantity criteria would lead to ambiguities for implementing actors on the interpretation of comparable quantity and its calculation method. It would therefore risk to undermine EU harmonisation.
4. **We cautiously welcome the new targets for recycling and reuse in principle**. However, the definition of waste affects the achievability of targets – thus it is necessary to clarify the interconnection between definitions and set targets. We support the differentiated approach for under-performing countries in recycling and reuse, and call for specific actions to accompany their transition.
5. The minimum requirements for Extended Producer Responsibility (EPR) praised by CEMR in 2013 are included in the new proposal. In this respect, we suggest that the **full costs of waste management of the products are covered**, whether it is managed by a public or a private operator. We also call for a discussion with all stakeholders on **sharing the cost of littering management**.
6. CEMR is pleased that the Commission has proposed **financial support for the transition towards the circular economy, drawing upon** European funding sources such as the EFSI, the EU's cohesion policy and Horizon 2020. However, we request that **further clarification be provided regarding the use of structural funds to improve waste management** and contribute to achieving a circular economy. We call for an appropriate **and effective financial framework** to help local authorities to achieve EU targets and objectives.
7. While supporting the notion of separate collection, CEMR recommends a **resource-efficient collection of waste where separate collection measures are decided at the member state level**. We support the **flexibility and allowance for exceptions when technically, economically and environmentally practicable, including for biowaste**.

8. CEMR supports EU calls on member states to take action to **reduce food waste at each stage of the food supply chain.**
9. **CEMR is concerned about the significant number of delegated and implementing acts in the Directive** given the potential of interpretation at different levels. In respect of the subsidiarity principle, significant measures such as the definition of the list of waste and the methodology for measurement of food waste should not be subject to decisions by implementing acts.
10. Whilst we support the Commission's approach aiming at reducing the amount of landfill waste, **we believe that incineration remains an effective treatment method** for waste that can neither be prepared for reuse nor recycled.
11. We **welcome the encouragement to public authorities to use green and sustainable public procurement on a voluntary basis**, as mentioned in the Commission's communication "Closing the loop - An EU action plan for the Circular Economy" (COM(2015)614). To avoid inefficient cross-legislation it is important to treat public procurement questions within the framework of the Directive on public procurement (2014/24/EU).
12. We support the Commission's intention to **promote the market for secondary materials and improve the financial viability of recycling collection** through product and material specific requirements to use recycled content in product manufacture.
13. We welcome the inclusion of waste management as a significant resource for the transition towards a circular economy. However, we emphasise that municipal waste accounts only for about 10% of the total amount of waste generated in the EU. **Thus is also important that the legislators addresses the issue of waste more widely** by progressively targeting other waste sectors – such as industrial waste – in order to deploy all the resources of the circular economy and generate growth and jobs.

CEMR brings together over 50 national associations of municipalities and regions from 41 European countries. Together these associations represent some 150 000 local and regional authorities.

The recommendations set out above draw upon the experience of our national associations from across a diverse spectrum of national contexts.

Contact

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About CEMR

The Council of European Municipalities and Regions (CEMR) is the broadest organisation of local and regional authorities in Europe. Its members are over 50 national associations of municipalities and regions from 41 European countries. Together these associations represent some 150 000 local and regional authorities.

CEMR's objectives are twofold: to influence European legislation on behalf of local and regional authorities and to provide a platform for exchange between its member associations and their elected officials and experts.

Moreover, CEMR is the European section of United Cities and Local Governments (UCLG), the worldwide organisation of local government.

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