



The importance of a Strategic Approach for Biowaste Management - EEB comments towards the forthcoming working document on the Biowaste Directive

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Introductory remarks – the context

Recently, during the last Advisory Forum of the European Commission's consultation on the Soil Thematic Strategy, it was confirmed that a new Working Document will be prepared and issued shortly, in preparation towards a Directive on Biowaste Management to be issued, according to a mandate included in the European Commission's Communication on the Soil Strategy.

This mandate, which reads, "*By the end of 2004 a directive on compost and other biowaste will be prepared with the aim to control potential contamination and to encourage the use of certified compost*" reflects the need to:

- 1) boost recovery of organic matter in order to fulfil the various goals stressed by the Communication on the Soil Strategy itself (fight erosion and desertification, use soils as a "sink" of carbon, enhance biological fertility and biodiversity, etc.)
- 2) set quality standards for composted products in order to ensure safe long-term beneficial application, prevent any damage to the soil resource, preserve soil properties and its multifunctionality, with particular reference to croplands.

Recently the Parliament in the adoption of its resolution on the Towards a Thematic Strategy on the soil Strategy urged the commission to *draw up a directive on compost; stresses the need to ... bring together waste management and soil protection and enrichment.*

What is a Strategic Approach?

A *strategic approach to management of biowaste* is one that will include provisions for source separation, either through mandatory source separation and/or through separate collection and composting targets as the key element to achieving and respecting waste management, compost quality, soil improvement and climate change goals and policies. More concretely to contribute to:

- fulfil the targets of the Landfill Directive and the waste hierarchy (priority to be given to prevention and recycling)
- to comply with recommendations of the EU Soil Strategy (promoting the use of quality composted products while preventing contamination of soils)
- to help achieving the goals of the ECCP, as far as the role of Soil Organic Matter as a "sink" for carbon is concerned, and the possibility to replace mineral fertilisers, thereby avoiding emissions related to their productions and application

Rationale for a Strategic Approach – 3 key points

- 1) **The risk of large-scale diversion of valuable organic matter to incineration.** The Landfill Directive 99/31/EC calls for diversion of a major part of biodegradable waste in order to avoid the impacts of burying fermentable materials in landfills. This may be achieved through a combination of recycling and treatment of residual waste by means of Mechanical Biological Treatment (MBT) or incineration., however no strategic steering mechanisms exist among these options. Drivers are therefore required in order to steer decisions of local authorities in order that recycling be priorities and to promote activities by the recycling industry.

2) Providing long-term perspectives and investment security is essential for the biowaste recycling industry. So far, local initiatives for biowaste separation and quality composting, have to rely upon personal sensitivity of local authorities. Availability of equipment or of resources among local authorities or waste contractors is most often insufficient due to lack of confidence in long-term perspectives (the unwillingness to invest in collection infrastructure without security of continuity in policy). This in turn is linked to investment in treatment and compost production infrastructure, whereby the availability of minimum volumes separated (clean compost) is crucial. It is important that future *capacity* and *technological conditions* for treatment of residual waste should be designed according to the level potentially achievable by source separation of biowaste.

3) In those Districts and Countries where it is already well advanced, **source separation** (of biowaste, wood and paper) by itself **has shown to be capable of fulfilling the target of 65% diversion of biodegradable waste from landfill.** The remarkable paradox is, compost is less produced in those Countries (South and East Europe) which would most benefit from its application as a tool to fight desertification, erosion, etc. Also in pilot schemes – already widely diffused e.g. in North Italy, Catalonia – show that strategies already long implemented in Central Europe are viable and may be made even more cost- competitive through innovation. the fact that such “good practice” schemes are well distributed across Europe, shows that results of schemes depend much more on the TYPE of the scheme than on the local “cultural attitude”

To summarise, a Directive with a strategic approach to management of biowaste, diverting biowaste landfill and avoiding a massive shift to incineration, providing long-term perspectives for local authorities and the recycling industry and recognising the maturity of source separation experience and its ability to perform is needed.

In this respect, given the need to set such “drivers” for recycling of biowaste, **definition of quantitative targets for source separation and composting is a suitable approach.** Targets define long-term framework conditons for development of strategies for sustainable management of biowaste, while leaving up to Member States the definition of Domestic Implementation Programmes, which may consider a variety of strategies to fulfil those targets.

Proper attention should be given also to definition of common EU “standards” for composted products, so that a common market may be established and the mandate of the Soil Strategy to prevent soil contamination (avoiding eco-dumping) be fulfilled. However, these standards alone are not enough, indeed they can only be usefull if there is a supply of potentially good quality compost on which they can be applied.

EEB proposals for key elements of a Strategic approach

We would therefore particularly recommend the development of the following elements in the working document, as some key elements of a strategic approach to be reflected in the subsequent directive:

1. **Set quantitative targets** for organic waste to be separated and composted
2. **Outline programs in the short-, medium- and long term to implement schemes for source separation** of organic waste according to different situations
3. **Set common limit values for «high quality» composted products** stemming from source separated organic waste so as to allow their marketing across Europe
4. **Promote** – through supportive programs - **home composting and** – through simplification of permitting requirements - **community composting** as activities most consistent with the «proximity principle», the reduction of waste at source and the importance of direct involvement of populations
5. **Outline roles and technical features of biological treatment for mixed Municipal Solid Waste or «rest waste»** as a means that could further contribute to the reduction of biodegradable waste to be landfilled; this will require also the determination of conditions and permitting requirements for the use of these materials.

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