

**E U R O P E A N E C O N O M I C A R E A**  
**FORUM OF LOCAL AND REGIONAL AUTHORITIES OF THE EEA EFTA**  
**STATES**

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**THIRTEENTH MEETING OF THE EEA EFTA FORUM**

*Stykkishólmur*  
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**Opinion on the European Union Circular Economy Package and  
implications for local and regional authorities**

**Rapporteur:** Unnur Valborg Hilmarsdóttir

The EEA EFTA Forum of Local and Regional Authorities:

- A. Having regard to Annex XX of the EEA Agreement on Environment and Annex IV of the EEA Agreement on Energy;
  - B. Having regard to the European Commission's Communication: Closing the loop - An EU action plan for the Circular Economy COM(2015) 614 final and the legislative proposals on waste published on 2 December 2015;
  - C. Noting the reinforced subsidiarity principle set out in the Lisbon Treaty and its explicit reference to the local and regional dimension and self-government;
  - D. Noting the proportionality principle as laid down in the Treaty on the Functioning of the European Union;
  - E. Emphasising the key role played by local and regional authorities in the implementation of European policy and legislation;
  - F. Acknowledging the impact of European Union law and policy on local and regional authorities in the EEA EFTA States through the EEA Agreement;
  - G. Noting the role of the Forum as a body in the EFTA structure.
1. Welcomes the European Commission's Circular Economy Strategy as well as the legislative proposals on waste published on 2 December 2015;
  2. Underlines that the circular economy can be promoted by municipalities and regions, for example in their capacity as planning and community development authorities, through developing more efficient and greener transport systems, by providing the right kind of awareness raising, education and training, by local investment in sustainable energy production and distribution, and greening of

services in fields such as water supply, sewage, waste management, reduction of food waste and through 'green' procurement;

3. Emphasises that for the goals of the circular economy to be reached, it is paramount that consumers and citizens change their behaviour as regards e.g. waste reduction, recycling and reuse. The Forum therefore calls on the Commission to strengthen the emphasis on awareness raising and training in Circular Economy Package;
4. Emphasises that municipalities and regions face specific challenges and opportunities in relation to the circular economy as their circumstances vary greatly with regards to labour supply, natural resources, economic activity and infrastructure. It should be noted that regions with highly dispersed populations, low population densities and long distances to treatment facilities, may grapple with high waste management costs and there some of the targets will be hard to reach. This diversity needs to be kept in mind and drawn upon, flexibility and adequate financing ensured, and the exchange of best practices and experiences of the circular economy promoted;
5. Noting the targets for recycling of municipal and packaging waste and the reduction of landfill to maximum of 10% of municipal waste by 2030, as well as the ban on landfilling of separately collected waste, calls for landfilling of recyclable waste and biodegradable waste to be prohibited as soon as feasible. Such a ban would be effectively support waste prevention, reuse, recycling and other efficient ways of recovery. The Forum also calls for a new bio-waste recycling target to be introduced in the revised Waste Framework Directive;
6. Welcomes the fact that the Waste Framework Directive leaves it to the Member States and competent authorities to decide how the collection and recycling of waste should be organised. Thus, these services can be provided by public and private providers, and can also be returned to local authority control if privatised;
7. Welcomes the inclusion of waste management as a significant resource for the transition towards a circular economy. However, as municipal waste accounts for only approximately 10% of the total of waste generated in the EU, legislators should tackle the issue of waste in a wider context. Other waste sectors – such as industrial waste – should be addressed so that all the resources of the circular economy can be utilised fully and growth and jobs generated. The Forum also proposes that the Commission develop indicators to assess the environmental value of different waste streams to identify materials that must be specially addressed to improve the waste management and make it more environmentally friendly;
8. Welcomes the introduction of clear definitions into waste legislation (municipal waste, by products, end of waste status, backfilling etc.). In this context, the Forum welcomes parts of the revised definition of municipal waste which are in line with the definition in the European Waste Catalogue and the OECD definition from 2012. However, the Forum asks the Commission to remove the proposed quantity criterion as it is inconsistent with the OECD/Eurostat definition of municipal waste. Furthermore, a new quantity criterion could negatively impact on existing,

well-functioning public waste management systems. Allowing for an opt-out on the basis of quantity could increase costs for consumers and exclude waste streams from the scope of the waste directive and its recycling targets. This could entail significant reductions in the overall recycling efforts of the waste management sector in Europe. Similarly, the definition of bio-waste should also simply refer to its nature, property and composition – not quantity;

9. Welcomes that national monitoring and assessment of the implementation of waste prevention measures shall be based on appropriate qualitative or quantitative indicators but proposes that this shall also be done on the basis of absolute targets on waste prevention to be developed by the Commission by 2020;
10. Welcomes the introduction of minimum requirements for Extended Producer Responsibility schemes while leaving it in the remit of the Member States to decide on the use of this instrument. The Forum proposes that the EPR scheme also cover the entire cost of end-life of products, as well as the cost of take-back systems for used products, the cost of reuse systems, transport to sorting and treatment plants including transport from remote areas, cost of collection and treatment of non-separately collected waste from the products which are collected and treated as a part of the residual waste stream or end up as litter and are collected and treated by the public authorities. In addition, the schemes should cover any ancillary costs met by municipal or other public authorities in the event that the extended producer responsibility schemes fail. Finally, the provisions on EPR should obligate national governments to ensure that extended producer responsibility schemes contribute to litter prevention and collection, and support clean-up initiatives;
11. Welcomes the measures proposed for non-hazardous construction and demolition waste, which make up a significant proportion of all waste, but calls on the Commission to assess whether specific targets should be set for recycling of specific construction materials by 2020, to be met by 2025 and 2030;
12. Welcomes the proposed financial support from European funding sources such as Horizon 2020 but also calls on national authorities in the EEA EFTA states to ensure that an appropriate and effective financial framework is in place nationally so local authorities can achieve the circular economy targets and objectives;
13. Proposes that a platform where local authorities can showcase their progress on waste management and reduction of food waste be set up under the Covenant of Mayors for Climate and Energy;
14. Asks the EFTA Ministers to take into account the opinion of the Forum in discussions on the Circular Economy Package.