



# WASTE MANAGEMENT & SHIPMENT

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**ECRN VISION ON WASTE  
AS FEEDSTOCK FOR THE  
CIRCULAR ECONOMY**



## OVERVIEW

**Waste plays an important role in the transition to a circular economy.** The production and consumption of goods generate waste. Processing waste can cause odour and noise nuisance, as well as air pollution. In recent years, the role that waste plays in the circular economy has received increasing attention. Circular economy means: no more exhausting finite raw material stocks and completely re-using residual materials in the system. After all, raw materials are finite, and the production of consumer goods and the processing of waste also cause greenhouse gas emissions. Recycling and reuse mean less wastage and (finite) raw material reserves are less likely to be exhausted. Re-use of waste also reduces CO2 emissions.

It is important to underline that **not all forms of recycling contribute equally to the circular economy.** Forms of recycling that score well in terms of direct environmental impact (emissions from re-processing, avoided emissions by saving primary material) in the long term do not have to be so positive if the material is no longer suitable for recycling in a subsequent cycle. Recycling of the original material in an equal or in terms of the quality of the material similar application including mechanical recycling and chemical recycling in the form of 'monomer chemical recycling' and 'solvolysis' are the preferable forms from a policy point of view because in principle they contribute the most to the circular economy. However, recycling is, therefore, better than incineration or landfill under all circumstances.

**The European Chemical Regions Network (ECRN) is therefore striving for a circular economy.** A fully circular economy starts with smart design and the use of discarded materials for products with an equal or higher value. Waste flows are not limited to regional and national boundaries. That is why the waste policy should be developed and implemented at the European level to guarantee harmonized rules for all stakeholders and to protect the environment and human health against the adverse impacts that could be caused by the improper shipping or management of waste.

We call the European Commission to:

## **1. Speed up the adoption of harmonised definitions and indicators on waste as a feedstock in the circular economy across EU countries, with a special focus on:**

- Adopting generally accepted definitions and indicators at the European level for waste and processes used along the entire value chain to stimulate the market for circularity. A more harmonized approach will help improve and standardize key environmental performance data including circularity across economic sectors.
- Setting the regulations for assessment of whether a material is a waste or not, limitations of waste regulations expire when they are not necessary but remain applicable when this is desirable for flow management or environmental protection.
- Ensuring the standardized way of products' labelling as 'biodegradable' or 'compostable' that will not mislead consumers to dispose of it in a way that causes waste litter.
- Setting EU rules on whether biomass (residual) material flows can be seen as raw material or as waste. At this moment there is no uniform classification within the EU. This affects cross-border transportation of these substances, storage, and processing. A coherent and integrated policy is urgently requested.
- Removing regulatory obstacles in the EU legislation on waste, chemical substances, and fertilizers to make the use of recycled materials easier at the European level.
- Developing a specific policy for dealing with waste that contains 'substances of very high concern'. The approach must be based on a risk approach to find a good balance between eliminating such substances from the environment on the one hand and the importance of recycling raw materials related to the transition to a circular economy on the other. For the assessment of whether the shipment of waste materials containing 'substances of very high concern' can be allowed, an additional assessment framework applies.

## **2. Harmonise and simplify administrative procedures for shipments of waste and resources, make efficient use of digital solutions, and take concrete actions to support recycling industries to cope with the new requirements by:**

- Mapping and improving the quality of data of the current mass flow models and adopt the model for reporting on EU waste shipment policy targets, reduce delays in the processing of notifications for the shipment of waste and facilitate the exchange of information between the relevant authorities.
- Providing the minimum standards that indicate what is the minimum quality of the processing of a certain waste or category of waste.
- Setting the general rules for notification on import and export. For shipments within the European Union, the competent authorities of all Member States concerned take a decision on the notification. In principle, hazardous and non-hazardous waste cannot be combined in one general notification.
- Creating the European online platforms focused on the circular economy, recycling, and raw materials. Maximize the use of digitalisation to reduce administrative costs.

## ECRN PRIORITIES

### **3. Ensure that circular business models are incentivised considering their environmental benefits and facilitate a secure and high-quality supply of secondary raw materials by:**

- Strengthening the role of the chemical sector in the processing of waste and the high-quality use of renewable raw materials.
- Creating a stable and balanced tax regime in Europe for landfilling and burning of waste. Landfilling and burning cannot be still cheaper than reusing and recycling. Some exceptions can be accepted e.g., shipment for recovery from landfills if these waste materials are supposed to be used for a certain purpose or creating installations for thermal waste treatment, because thanks to this type of installations, the waste will be processed in an environmentally safe manner.
- Taking the appropriate measures that are needed, such as CO<sub>2</sub> taxation on a European scale. The introduction of a CO<sub>2</sub> tax is urgently requested. Moreover, an additional compensation for a recycler who reduces CO<sub>2</sub> production is even a greater incentive. So not only a negative impulse for the production of additional CO<sub>2</sub>, but also a stimulus for the reduction of CO<sub>2</sub>.
- Encouraging the recycling companies with certainty that their investments make sense, and they can have access to the standardized quality of waste.
- Providing EU financial support for scaling up and further development of research and innovations of the chemical waste recycling with a special focus on SMEs as the key players on the market that take the highest risk of the application of the new technologies.
- Supplementing the appropriate infrastructure for the management of the municipal waste streams such as the thermal waste treatment installations that are necessary to properly manage waste that is not suitable for recovery. It can help to ensure that thermal waste treatment with energy recovery complements the municipal waste management system, contributing to the reduction of the amount of waste sent to landfills.
- Increasing the capabilities of Member States and the Commission to reduce illegal shipments of waste. Actions against waste trafficking should be one of the priorities of the EU's overall policy. The estimated benefits linked to a better treatment of residual waste in the EU and to avoiding shipping this waste to third countries range between EUR 266-666 million a year.

### **4. Support regions in the definition and implementation of sound and environmentally sustainable strategies for circularity and waste management by:**

- Setting the comprehensive indicators for monitoring whether the regional policy for waste and the transition to a circular economy is successful and whether we are achieving the targets. The targets should be regularly verified and updated. Additional support should be provided to the frontrunners, as they deliver the most innovative solutions that can be replicated by other regional stakeholders. The decreasing of the share of landfilling can be a supportive indicator to monitor the progress of the re-using of the residual waste. To achieve these objectives, permits, supervision and enforcement are necessary.
- Involving citizens, companies and civil society organisations in the waste management and the way in which the circular economy is stimulated. In this sense, regional and local authorities play a vital bridging role to fill the gap between European and national policies on one hand and citizens and civil society on the other.

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## ■ ECRN PRIORITIES

- Promoting the use of Green Public Procurement, in particular by regional and local authorities, to drive circular solutions, with a specific focus on durability, repair, remanufacturing and recycling.
- Further developing and supporting the cross-border and interregional cooperation on a pan-European scale to up-scale and speed-up waste reuse and chemical recycling.

### **Cross-border transport of waste:**

Exporting EU waste for disposal must be prohibited, except for countries that are part of the European Free Trade Association (EFTA). This export can be allowed under certain conditions. The export of waste destined for recovery to countries to which the OECD decree does not apply, as well as overseas countries and territories, is prohibited for waste materials.

**We call the EU to establish and maintain a new framework for the export of green-listed waste from the EU to a non-OECD countries, especially the establishment and updating of a list of countries to which the export of such waste is authorised.** The export of waste, especially non-hazardous waste, from the EU represents a loss of resources for EU recycling industries. A general ban applies to export of waste to the Antarctic. Import into the EU of waste for disposal must be also prohibited, with excluding imports from countries with which the EU, individual Member States or the EU and its Member States conduct bilateral or multilateral agreements. Exceptions can also be made for crisis situations.