

TO:

Jean-Claude Juncker, President of the European Commission

Frans Timmermans, Vice-President for Sustainable Development, Better Regulation, Inter-Institutional Relations, Rule of Law and Charter of Fundamental Rights, European Commission

Brussels, 24 November 2015

Dear President Juncker, dear Vice-President Timmermans,

As the final preparations of the new Circular Economy Package are being made, we write to you to share our expectations and support for an ambitious approach on all aspects of the circle, fully covering the production phase and the waste phase, and to urge you to deliver on your political commitment to come back with a more ambitious proposal by the end of 2015.

Delivering on this commitment is both an economic opportunity as well as an environmental necessity for the EU. It will also be a first test case for the EU's commitments expressed in September this year through the adoption of the UN 2030 Agenda for Sustainable Development. In particular, the waste component of the package has the potential to deliver concrete results the fastest. It can become a cornerstone for Europe's future competitiveness, creating sustainable jobs and bringing about economic development. In light of the better regulation objectives, only a genuinely more ambitious proposal can justify the delay of some 17 months in the legislative process and the time and resources that have gone into the preparation of the new package.

The Commission's own impact assessment was clear that the higher the ambition, the higher the benefits. The combination of the highest recycling targets under consideration with landfill bans on recyclables/compostables could deliver by 2030 a net social cost saving of €29 billion, the net creation of more than 177,000 jobs, and the saving of 443 million tonnes of CO₂ equivalent between 2014 and 2030. The EEB has been advocating for ambitious EU waste legislation for years. In our report 'Advancing Resource Efficiency in Europe'¹ we confirm that by adopting 70% reuse and recycling targets for all Member States by 2030, the EU can unlock huge benefits in economic growth, job creation, the reduction of Greenhouse Gas (GHG) emissions and bring about economic savings. Reductions of food waste and increased reuse of textiles and furniture will also reduce Europe's land-use, water-use and fertilizer and pesticide use, while providing jobs for one in six of today's unemployed youth.

A range of policy instruments are needed across Europe to make this happen. It is essential to adopt the headline target of improving resource productivity by at least 30% by 2030, coupled with a set of targets and indicators for land, water, materials and GHG emissions reductions. The Commission should also put

¹ European Environmental Bureau, 'Advancing Resource Efficiency in Europe', March 2014.

forward waste recycling targets that are no weaker than the original ones and create conditions that will allow more prevention, reuse and high quality recycling. This should go along with a clear and harmonised calculation methodology to report on for Member States.

These expectations were supported by the European Parliament in July this year, which has called for an ambitious new package, including the 70% overall recycling target, binding 30% resource efficiency target, eco-design measures and food waste reduction targets. The European Parliament also supported an obligatory separate collection of biodegradable waste by 2020.

We believe that keeping the level of ambition of the July 2014 waste proposal is the very least, while expanding the scope and ambition on 'the other part of the circle' is the only and most appropriate way to deliver more ambition. We ask you to take these points into consideration during your final deliberations on the new Circular Economy Package.

Yours sincerely,



Jeremy Wates
Secretary General

CC:

Maroš Šefčovič, Vice-President for the Energy Union
Karmenu Vella, Commissioner for Environment, Maritime Affairs and Fisheries
Miguel Arias Cañete, Commissioner for Climate Action & Energy
Violeta Bulc, Commissioner for Transport
Elżbieta Bieńkowska, Commissioner for Internal Market, Industry, Entrepreneurship and SMEs
Tibor Navracsics, Commissioner for Education, Culture, Youth and Sport
Corina Crețu, Commissioner for Regional Policy
Phil Hogan, Commissioner for Agriculture & Rural Development
Vytienis Andriukaitis, Commissioner for Health & Food Safety