



## **Delaying Landfill Reduction target for 10 years will lead to Misdirected Investments and No Circular Economy**

A proposal to give Member States another 10 years to reduce landfilling to 10% of their total municipal waste generation in 2013 (Landfill Directive, Art 5.5) is being discussed. That would delay implementation to 2040: 20 years from the probable date of implementation. This will translate into national Waste Management Plans in the form of a continuation of landfilling, further investments into landfilling and treatment to prepare for landfilling and will divert investments away from infrastructure into techniques and technologies that promote reuse and recycling, with energy recovery solely used to treat any residual waste. The economic effect of such a proposal will be to prevent growth and jobs from being created in some of the European Union's most economically vulnerable countries and regions, further exacerbating the economic disparity between regions and Member States.

Triologue, the final stage in the negotiation procedure between the three EU institutions will soon begin and given the crucial nature of this issue to the success of a circular economy, we urge European decision-makers not to extend the time for landfill diversion any further. The EU28 still landfills more than 62 million tons of municipal waste every year and many more tons which are not municipal waste. Landfills do not stop producing leachate and methane when they are full and closed. This means that there are aftercare costs for a period longer than the 30 years actually indicated by the landfill directive and with these costs, landfill is by far not the cheapest waste management option.

There truly is no time to waste. Ambitious landfill diversion targets will bring multiple benefits to the European economy, environment and citizens.

Diverting waste from landfills has obvious environmental advantages: it helps to avoid potential soil and groundwater pollution through leachate, improves land-use (a sparse commodity in over-populated Europe), avoids light-weight plastics from being blown away from landfills to open water sources as well as avoiding the leaching of microplastics into bodies of water from this source. Diversion from landfill is also the main contributor to greenhouse gas mitigation from the waste management sector, of key importance given their role in climate change. Minimising landfilling is an easy win and a simple step to take towards implementing the Paris Agreement reached in December 2015.

As mentioned above, legal certainty that waste must be diverted from landfilling will boost investment into technologies higher up the waste hierarchy and closer towards achieving a circular economy. Only such a decision will ensure that valuable waste materials are not lost in landfills but are recovered, enabling growth, jobs and attracting investment.



Any time extension to ambitious diversion of valuable waste from landfill would be a missed opportunity for Europe.

To take account of the different ways in which Member States have chosen to implement the EU waste directives to date, we must bring the following to your attention: in order to achieve effective implementation of ambitious goals, all waste generated must be addressed by the landfill reduction targets (municipal as well as commercial and industrial waste). Also, municipalities, the waste management sector and society as a whole should not be faced indefinitely with non-recyclable waste. In other words, more focus on adopting and implementing eco-design is necessary to ensure that a greater proportion of the waste stream is recyclable.

In the intervening time, some Member States have insufficient treatment facilities and do not allow the shipment of residual waste to existing facilities in other regions or countries with available capacity. We recognise that an ambitious landfill reduction target by 2030 will be challenging for these Member States and advise the European institutions either to grant them a longer transition phase individually or to encourage and facilitate shipments to treatments higher up the waste hierarchy than landfill when the Member State does not have sufficient treatment capacity to divert those quantities from landfill. European funding mechanisms should take care to verify that the waste management decisions they fund are acting towards implementing the waste hierarchy, achieving agreed legislative targets and a circular economy, whether these are short-term or long-term investments; systems or installations.

We submit these reflections to you with the request that you give them your careful consideration,

#### Signatories

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