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ASSOCIATION
OF CITIES
AND REGIONS
FOR RECYCLING
AND SUSTAINABLE
RESOURCE
MANAGEMENT

ASSOCIATION
DES CITÉS
ET RÉGIONS POUR
LE RECYCLAGE
ET LA GESTION
DURABLE
DES RESSOURCES

ASOCIACIÓN
DE CIUDADES
Y REGIONES PARA
EL RECICLAJE
Y LA GESTIÓN
SOSTENIBLE
DE LOS RECURSOS

Brussels, 27 June 2016

Open letter regarding the discussion on the EP draft report on the Waste Package

To the ENVI Committee Members European Parliament

Dear Members of the ENVI Committee,

As an international network of cities and regions showcasing some of the most active waste and resource policies, ACR+ has been working on the promotion of a smart and efficient use of material resources for already more than 20 years. Following the publication of the draft report on the Waste Package by MEP Simona Bonafè, we thus would like to provide you our view on the matter.

First of all, ACR+ welcomes this ambitious draft report which echoes some of the elements addressed by ACR+ in its [position paper on the Circular Economy Package 2.0](#). Based on our experience and technical work as well as the best practices collected within our network, we would like to highlight important points in relation to the following amendments:

- **Prevention:** as the first level of the waste hierarchy, prevention is key in achieving resource efficiency. In this respect, ACR+ stresses the necessity of setting targets. This has already been implemented by some public authorities, for example in Spain or in the Belgian region of Flanders, with positive results. In addition, ACR+ welcomes the amendments related to re-use.
- **Legal and economic instruments:** they should be used and implemented in the best way possible as their effectiveness has been proved. More specifically, ACR+ believes that EPR should be considered as an EU principle and strongly supports minimum legal requirements. However, article 8 - paragraph 1 - subparagraph 3 as amended by MEP Simona Bonafè (“shall” instead of “may”) should be carefully interpreted to avoid any misunderstanding and make sure that EPR scheme and deposit refund system are both considered as a way to apply the EPR principle.



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- **Organic fraction:** ACR+ welcomes positively the new amendments regarding the organic fraction. Once more, based on its experience, ACR+ underlines the importance of the selective collection of the organic fraction. Targets should be set in order to better frame and control these policies.
- **Calculation method:** it is essential to work with a single harmonized method for the calculation of recycling rates, accepted and implemented in the same way by all Member States; otherwise, it will not be possible to control and compared the achievement of the targets set. ACR+ highlights the strong resemblance of the calculation method considering the output of the sorting plant bears with the Destination RECYcling (DREC) methodology developed by local actors in the framework of the [Regions for Recycling](#) project¹. The DREC methodology has already demonstrated its concrete applicability and thus should be the point of reference.
- **Industrial and commercial waste:** ACR+ warmly welcomes the amendments paving the way for the creation of a legal framework for the industrial and commercial waste and helping to clearly distinguish them from municipal waste.

This being simply a short summary of ACR+ views, we invite you to read [ACR+ position paper on the Circular Economy package](#) for further information. Should you wish to deepen the matter and discuss some of the points more in details, ACR+ remains at your disposal.

Yours sincerely,

On behalf of ACR+

Josep Maria Tost i Borràs
President

Françoise Bonnet
Secretary General

¹ Regions for Recycling (R4R) is a 3-year European project (2012-2014) funded by the INTERREG IVC Programme. It aimed to enable its partners to improve their recycling performance through consistent comparisons and an exchange of good practices. More information: www.regions4recycling.eu