Position paper on the Circular Economy Package targets in V4 countries

Member States of the European Union have to comply with certain waste management targets specified in the Waste Framework Directive as 50% household waste recycling and preparation for reuse by 2020. However, the Circular Economy Package first published in July 2014 and then in December 2015 contains amendments to the Directive visioning higher targets and other measurements by the year 2030. Even though the proposed numbers have decreased in 2015 compared to 2014, they still pose a great challenge to Member States already lagging behind the current legally binding targets.



Source: Ellen MacArthur Foundation

The Visegrad countries (Czech Republic, Hungary, Poland, Slovakia), hereinafter V4 countries, are situated in Central Europe. The countries joined the European Union in 2004 having more than 10 years to implement EU measurements and standards. However, regarding waste management, landfilling is still the main treatment method (76%-53%) in these countries with low recycling rates (6%-25%), based on Eurostat data. Interesting fact though is that V4 countries also produce much less waste than the European average (475 kg) having the lowest numbers in Europe (385 kg – 272 kg). Waste incineration is also quite low (10-19%).

	Generated,	Treated,	Municipal waste treated, %			
	(kg per person)	(kg per person)	Recycled	Composted	Incinerated	Landfilled
EU*	475	465	28%	16%	27%	28%
Belgium	435	439	34%	21%	44%	1%
Bulgaria	442	416	23%	2%	2%	74%
Czech Republic	310	310	23%	3%	19%	56%
Denmark	759	759	27%	17%	54%	1%
Germany	618	618	47%	17%	35%	1%
Estonia	357	303	31%	6%	56%	8%
Ireland**	586	531	34%	6%	18%	42%
Greece**	509	509	16%	4%	0%	81%
Spain	435	435	16%	17%	12%	55%
France	511	511	22%	17%	35%	26%
Croatia	387	374	15%	2%	0%	83%
Italy	488	455	28%	18%	21%	34%
Cyprus	626	626	13%	12%	0%	75%
Latvia	281	281	3%	5%	0%	92%
Lithuania	433	425	21%	10%	9%	60%
Luxembourg	616	616	28%	18%	35%	18%
Hungary	385	376	25%	6%	10%	59%
Malta	600	545	8%	4%	0%	88%
Netherlands	527	527	24%	27%	48%	1%
Austria	565	547	26%	32%	38%	4%
Poland	272	272	21%	11%	15%	53%
Portugal	453	453	16%	14%	21%	49%
Romania**	254	214	5%	11%	2%	82%
Slovenia	432	257	49%	12%	0%	39%
Slovakia	321	282	6%	6%	12%	76%
Finland	482	482	18%	15%	50%	17%
Sweden	438	438	33%	16%	50%	1%
United Kingdom	482	473	28%	17%	27%	28%
Iceland**	345	345	38%	7%	6%	49%
Norway	423	414	27%	17%	54%	3%
Switzerland	730	730	33%	21%	46%	0%
Montenegro**	508	451	1%	0%	0%	99%
FYR of Macedonia	370	370			T.	100%
Serbia	302	236	1%	0%	0%	99%
Turkey	405	363	0%	0%	0%	100%
Bosnia & Herzegovina	17.5	234	0%	0%	0%	100%

Municipal waste, 2014

The treatment operations may not add up to 100% due to rounding. Data for the Czech Republic, Germany, Spain, Cyprus, Luxembourg and Poland are estimated and may be revised.

Data not available
EU aggregate is estimated based on 2013 data for those Member States for which 2014 data are not available.
2013 data instead of 2014.

Source: Eurostat

Non-governmental organizations from V4 countries such as Arnika from Czech Republic, Humusz from Hungary, Polski Klub Ekologiczny from Poland and Sosna from Slovakia looked into the situation regarding their own nation's performance taking into consideration the potential new targets.

Recycling vs. incineration: concerns

The main concerns are the increasing preparation for reuse and recycling target (70% by 2030) and the cap on landfilling (maximum 5% by 2030). There is evidence that radical measurements, such as landfill bans or maximization, do not drive higher recycling levels, but a shift to waste incineration. Investing in waste incineration causes a so called lock-in effect, i.e. built capacities have to be used at maximum rate nonetheless the available waste amounts. Many countries today already face overcapacity (e.g. Denmark, Sweden, Germany) which lead to higher incineration rates than recycling.¹ Needless to mention that the waste hierarchy set in the Waste Framework Directive places recycling before energy recovery and places waste prevention on the top. Waste incineration not only poses a threat to recycling rates, but also to prevention. It is not surprising that nations with high incineration rate are usually the ones with the highest per capita waste generation. An inspiring example is Slovenia where they managed to increase recycling rates up to 49% and waste production less than the EU average.

The possibility of the 10% maximization on landfill has raised great concerns in V4 countries as the time frame is quite tight. This lead to discussions on investing into new incineration plants. For example in Poland they plan to build 11 more while in Hungary a Waste Incineration Strategy is under development. NGOs are concerned that while the measurement's intention is to help a shift towards recycling it will have an opposite effect driving V4 countries to the same fate as Western European countries struggling with incineration overcapacities. Moreover, if a landfill cap is considered, not only direct landfilling should be calculated, but residues from other options e.g. incineration, MBT.

NGOs propose an alternative way for achieving recycling targets where not the rate of recycling or landfilling is monitored, but the amount of residual waste produced. Residual waste is the waste that is landfilled and incinerated including energy recovery. These data are already monitored by Eurostat and it would have a positive impact as it would enable individual countries to adopt a flexible approach to achieve these targets. Moreover, it would help shifting waste management to higher levels of the waste hierarchy i.e. prevention and reuse activities. It would also reward countries with low waste generation such as V4. For example home composting is a long tradition in these countries which is the best solution for managing biowaste. However, current targets support the increase of sorted raw materials whereas the amounts of waste dealt through home composting do not enter the statistics. When aiming for targets regarding biowaste treatment calculation for home and community composting should be considered carefully.

Incoherent data, unequal possibilities

Another general concern that rose during the analyses is the incoherence of national and EU data regarding waste management. In many cases the difference is significant. This shows the great importance of clarifying which material flows should be used as the basis of monitoring waste production and management.

In V4 countries there are basically no pay-as-you-throw systems in operation, only exception in Czech Republic where 20% of the municipalities have introduced the system. In most cases the reason for not introducing them is the potential of illegal dumpings which are already posing huge problems. However, experience shows that this is only a myth. The main problem is that systematic approaches to eradicate illegal waste dumps are lacking and awareness raising is minimal narrowing it down to clean-up activities. Latter is known to have little or no effect as it does not address the ones dumping their

¹ Read more: ZERO WASTE TO LANDFILL AND/OR LANDFILL BANS: false paths to a Circular Economy, Zero Waste Europe, November 2015



wastes. NGOs working in the field of environmental education see that the citizens have limited access to information concerning waste management data or on proper waste handling and collection points. Unfortunately separate waste collection is still not accessible for everyone on the same level or at all in V4 countries. However, where introduced, the quantity and quality of sorted materials are nevertheless low coming from households suggesting a lack of public education. Focus on problematic waste streams i.e. WEEE, hazardous waste, C&D waste is also low and these are the typical wastes ending up in illegal dumpings. Therefore it is crucial to engage citizens as active participants in waste management through education – including all generations from children to adults.

Top of the hierarchy: more reuse, prevention and general education needed

All incentives regarding reuse and waste prevention are welcome. Small scale reuse activities as fleece markets, second-hand shops are already common in Visegrad countries, but reuse centers are non-existent or very rare. Therefore any measurement which encourages reuse and/or preparation for reuse should be included in the targets – while carefully taking into consideration current practices, calculation methodologies.

General remark from the countries are the lack of awareness raising and information on waste management which also leads to low recycling rates in areas where the system is already in place. Nonetheless, the greatest problem is the total lack of waste prevention measures: as long as they are not present somehow in the statistics, a real circular economy won't be realized.



Humusz Szövetség, Hungary



SOSNA, Slovakia



Arnika, Czech Republic



Polski Klub Ekologiczny, Poland

