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EUROPEAN UNION
EUROPEAN REGIONAL
DEVELOPMENT FUND



Final Conference

EcoPaperLoop Project

2nd December 2014 in Krakow, Poland

Recommendations for a regulatory framework

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Presentation



Policy guidelines to improve common strategy and framework on paper recycling loop to reach recycling targets and high quality raw material for the industry.

➤ Starting point

- Present body of rules
- Strategic objectives

➤ Consultation process

➤ Guidelines and recommendations.

Starting point



- **Present body of rules**
 - Overview of legislative requirements with regard to paper recycling
 - Comparative study on implementation of the waste legislation in the CE Region

- **Community strategic objectives (EU circular economy targets)**
 - Resource efficiency: reducing demand for scarce resources and thus contributing to the competitiveness of the economy
 - Community targets: legislative proposal to review recycling and other waste-related targets in the EU (ambitious targets, landfill ban, high quality recycling,..)

- **Industry perspective (CEPI, The Road to 2050, Position Paper)**
 - Long term sustainability of paper loop; ambitious recycling targets, improving collection and thus quality of paper for recycling
 - Ensuring quality fibre for the industry in Europe.

Consultation process



➤ Common questionnaire

- Paper recycling policy and goals
- Legislation regarding paper recycling
- Proposals for paper recycling policy.

113 responses from Austria, Germany, Hungary, Italy, Poland, Slovenia.

All relevant stakeholders, producers, waste management, authorities, civil society groups.

➤ Intl brainstorming sessions

- World Coffee Ljubljana, Slovenia
- Stakeholders 'Workshop Sopron, Hungary

Topics:

- Recyclability
- Collection strategies
- Public awareness
- Legislation.

➤ Stakeholders' dialog

- National conferences and seminars in partners' countries
- Dialog with project advisory and supporting institutions

Recommendations



1. **Change of focus of the overall policy regarding paper recycling is needed, prioritizing recycling and sustainability.**
2. **There is room for improvement in present regulation on paper products but no new bans or expand of legislation is expected. Education and promotion is more important and efficient to reach the targets.**
3. **Improved collection strategies are needed to ensure quality of paper for recycling.**
4. **Promote eco-design and recyclability - „Use product design to educate on the environment“.**
5. **Enforce use of recyclability criteria in green public procurement – „Recyclability of the product is more important than the content of recycled fibre in paper products“.**
6. **Ensure access to quality fibre for recycling in Europe.**

Recommendation No 1

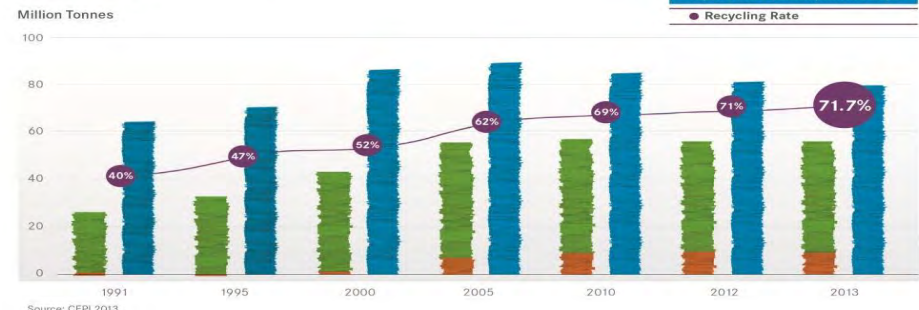


Change of focus of the overall policy regarding paper recycling is needed, prioritizing recycling and sustainability.

- Ambitious targets are achievable only if a comprehensive approach to policy design and implementation is ensured, following the objective to maintain the quality of paper for recycling and thus focusing on the key preconditions, being eco-design, better collection and sorting.

- EU reaching limits regarding recycling rates
- New consumption patterns and market trends

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Recommendation No 2



There is room for improvement in present regulation on paper products but no new bans or expand of legislation is expected.

Education, promotion and stimulation of all actors in the value chain is more important and efficient.

- Recycling is adequately placed in the waste hierarchy, but clear definitions and quality standards for determination of recyclability are needed at EU level, including certification methods and guidelines.
- Legislation is lacking comprehensiveness; more emphasis on the closed loop recycling management is needed with clear responsibilities of all actors involved.
- Better material flow traceability is to be ensured to stimulate improvement of the environmental performance of the products.

Recommendation No 2



- Ensuring implementation of existing legislation in all countries and consistency between EU and national/regional regulation shall be priority: higher transparency in the legislation is needed to ease the implementation at all levels.
- Higher awareness of the recyclability issues shall be achieved with more investment in promotion and education:
 - Improvement of general knowledge on the whole paper loop, most important preconditions for the quality of paper for recycling.
 - A more „life-cycle thinking“ approach, promoting sustainability targets among all actors involved, eco-design, higher collection and sorting levels.
 - Stimulating actors in the paper loop for more efficient recycling, strengthening policy measures i.e. rewarding schemes, market development initiatives, support for technological development.

Recommendation No 3



Improved collection strategies are needed to maintain and ensure the quality of paper for recycling.

- The key challenge to higher recycling rates and quality of paper for recycling lies in efficient collection systems.

Uniform collection strategies do not and cannot exist. Communal collection streams are subject of local regulation and also much more dependent on public awareness.

- EU legislation should lay out the basis for the common orientation to clean waste streams, efficient sorting and traceability.

Promoting separate collection, more investment in awareness raising and development of additional recommendations and guidelines is essential.

- Strengthening requirements in relation to recyclability in eco-design and producers responsibility to inform and guide consumers for proper collection.

Recommendation No 4



Promote eco-design and recyclability “Use product design to educate on the environment”

- Policies are more focused on the waste stage of the paper life cycle; eco-design is not promoted and encouraged sufficiently.

General rules for eco-design in regulation on EU level are needed. Eco-design should be stimulated and recommendations for product designers and producers developed.

- **Determination of recyclability**, including evaluation methods and criteria for certification is of high importance.

Recyclability tests should represent the umbrella and link to the existing standards and certifications. Use of eco-label and purchase of products with eco certification that include recyclability criteria should be encouraged stronger.

- Clear responsibilities of each stakeholder in the paper loop proportional to their range of influence on the quality of recycled paper.

Common approach to the operation of **producer responsibility** shall be implemented, with no disproportionate burden on the producers, covering aspects beyond their control.

Recommendation No 5



Enforce use of recyclability criteria in green public procurement.

“Recyclability of the product is more important than content of recycled fibre in paper products”

- GPP is important tool to stimulate recycling and should be imposed stronger. The criteria of the content of recycled fibre in the product prevails too much. GPP should focus on sustainability with more attention given to the recyclability of the product. Clearly defined common rules at the EU level, supported with the guidelines, exchange of good practices and education of the users is needed.
- GPP should be obligation for public authorities and at the same time part of the general policy promoting eco-design and recycling. Measures are needed to stimulate private sector to use the same principles and criteria.

Recommendation No 6



Ensure access to quality paper for recycling in Europe.

- End-of-waste regulation and criteria already announced in a new directive should also be discussed with the focus on sustainability and resource efficiency.
- Strict implementation of the waste shipment regulation needs to be ensured, with more practical supervision of actual shipments of paper for recycling from EU.
- Paper and packaging waste traceability all along until recycling has to be enhanced.

