



European Commission
Rue de la Loi 170
Brussels, Belgium

European Affairs Committee
Environment and Food
Committee

Christiansborg
DK-1240 Copenhagen K
Phone: +45 33 37 55 00
Fax: +45 33 32 85 36

www.ft.dk
ft@ft.dk

30 June 2016

Ref. 15-001382-2

Contact
Christian Willer/
Christine Margit Løvig Sidenius
EU Advisers

Direct lines: +45 3337 5526/
+45 3337 3356

Christian.Willer@ft.dk/
Christine.Sidenius@ft.dk

Political opinion submitted to the Commission on two proposals for Directives on a circular economy

The European Affairs Committee of the Danish Parliament and the Environment and Food Committee of the Danish Parliament submit the following opinion on the Directive on Waste COM (2015)595 and on the Directive on Packaging and Packaging Waste COM (2015)596 respectively, which form part of the Commission's Circular Economy Package.

In this connection, the European Affairs Committee and the Environment and Food Committee wish to make the following comments:

Objectives

The Committees recognise that the idea of a circular economy is right and necessary as it can strengthen the business community, respond to problems of scarce resources, and lead to environmental benefits.

Waste must be regarded as a resource to be used again and again. Therefore, it is necessary to reconsider the way in which we produce and consume goods. There is a need for production and consumption to be smarter – not just more efficient. We must consider the full lifecycle of products: from production to recycling. Better production design is key to fostering recycling and will contribute to the manufacturing of products that are more repairable or more durable.

Therefore, the Committees find in general that the Commission Communication on the circular economy as well as the proposals for amending the Directives on waste are important steps towards a circular economy. The Communication provides the framework for an absolutely necessary innovation of our approach to resources.

Reduce the amount of waste

The circular economy is a reflection of a move from waste to resource. Work on the circular economy and the objectives should, therefore, also relate to

the opportunities for reducing the amount of waste to be managed. It is very good to set targets for recycling, but it must at the same time be possible to assess the extent to which the amount of waste is reduced. In this connection, the focus is on the improvement of companies' production processes and industrial symbiosis, which implies that for example the waste fractions that can be used in another company as a resource are used. For the benefit of the company and of the environment.

Challenges to increased waste recycling

There are a number of barriers to increasing waste recycling. The Committees note in particular the following:

- *Product design*
Future products must be designed so as to promote durability, reparability and, eventually, recyclability.
- *New business models*
New business models to underpin a circular economy, for example a change from product to service, re-manufacturing, and industrial symbiosis must be examined more closely.
- *Demand for secondary raw materials*
Secondary raw materials and materials must be made more interesting, both in a technical and economic sense. Efficient markets for secondary raw materials must be supported and the demand for secondary raw materials as well as goods produced from secondary raw materials must be stimulated.
- *High quality recycling*
Steps must be taken to ensure increased and proper sorting of waste so as to boost high quality recycling of the resources.

Phase-out of hazardous substances

Today, recycling is made difficult in that a number of products contain problematic substances. The Committees find it crucial that the problematic substances from products manufactured in the past should not be recycled in new products. We must make a commitment to removing these substances from waste streams to ensure that consumers face no risk of encountering hazardous substances in recycled materials.

The marine environment and plastic waste

The Committees appreciate that the marine environment has been included in the strategy. An increasing amount of plastic waste ends up in our aquatic environment. The Committees find it essential to address the question of how we can reduce micro plastics in our environment, both by looking at

alternatives to the use of plastics and by strengthening the treatment of wastewater to remove micro plastics, etc.

Partnerships

The Committees call on the Commission to examine the opportunities for setting up industrial partnerships regarding some of the greatest challenges to recycling, for example plastic/packaging waste, textiles, food waste and other organic material.

International cooperation

Much of our waste derives from products that have not been manufactured in Europe. It is not sufficient that we make demands on ourselves – we must also make demands on our trading partners. The EU should work towards placing focus, also among our trading partners, on how products may re-enter the recycling cycle.

Yours sincerely,

Pia Adelsteen
Chair of the Environment and Food
Committee

Mette Gjerskov
Chair of the European Affairs
Committee