

# Clear definitions in a flexible hierarchy

A lot of associations are active on the topic of the Waste Framework Directive, EMPAC, European Metal Packaging manufacturers, is one of them. There has been widespread support for the 2nd reading report by Caroline Jackson as it is a positive step towards creating a forward thinking framework whilst at the same time keeping ambitious goals balanced with pragmatic, cost-effective solutions.

## A flexible waste hierarchy

A major discussion point within the directive has been **the waste hierarchy** and its implementation. EMPAC fully supports Dr Jackson's compromise (amendment 22) as this would leave the implementation process sufficiently flexible.

Each local situation and each product or waste stream is different. The best option for one waste stream, taking into account environmental, economic and social impacts, may be different to the best option for another. And as stated by much of industry and MEP's (such as Eija-Riitta Korhola) the obligatory use of extensive LCAs and cost-benefit analyses to derogate from this hierarchy would cause excessive bureaucracy with little or no environmental benefit.

## A clear recycling definition

The waste hierarchy does not stand alone within the directive. To be meaningful, it has to be supported by clear definitions which are in line with the spirit of the directive as a whole. EMPAC therefore supports APEAL's view on the **recycling definition**.

"True recycling" is much more than substituting waste to primary raw material; it not only saves resources, it leads to the original material again and again, preventing the discarding or destruction that the use of non-recyclable products would imply. Accepting Council's definition would jeopardize the recycling – concept and hence the 5 level waste hierarchy, since this definition would be misleading, allowing the classification of such recovery operations leading to the destruction of the material.

In first reading, European Parliament voted in favour of a stringent "material to material" definition. We are counting on the same persistence in the second reading.