# Public Consultation on the revision of the Waste Framework Directive (WFD)

Fields marked with \* are mandatory.

### Introduction

The Waste Framework Directive (WFD) lays down fundamental waste prevention and management principles based on the five-step "waste hierarchy". Its key objective is to protect the environment and human health. It provides key definitions as well as minimum rules on separate collection, waste management performance targets for several waste streams and permitting and reporting requirements. The WFD contributes to the EUs overarching objective to decouple waste generation and economic growth. This objective has yet to be achieved; total waste generation is actually increasing. In 2018, the EU produced on average 5 234 kg of waste per capita with the construction and mining sector (60%), manufacturing (10%) and household waste (8%) remaining significant generators of waste. 38% of this waste was recycled. Municipal waste amounts to 496 kg/capita of which 48% was recycled. Bio-waste is the largest component (34 %) and about 60 % of this is food waste.

Furthermore, measures to address specific waste streams such as waste oils and textiles remain fragmented. For example, textile consumption in the EU is high at 12.3 kg/capita in 2018 but it is estimated that less than 1% of all textiles worldwide are recycled into new textiles.

Considering the challenges above, the European Commission is conducting a targeted revision of the WFD. The general objective of the review is to increase the level of protection of the environment and public health from the impacts of waste management. The specific objectives are to reduce waste generation, increase re-use, and improve separate collection to promote preparing for re-use and quality recycling. The revision will also address several review clauses in the Directive linked to waste prevention, including prevention of food waste and lubricant waste oils management. It will be based on an impact assessment of the feasibility and the economic, environmental, and social impacts of different policy options. In line with the European Commission's Better Regulation Guidelines [1] This consultation of stakeholders is conducted to collect additional evidence.

It will take approximately 20 minutes to complete the questionnaire, and you will have the opportunity to upload relevant documents (max size 10 MB) at the end.

For technical questions regarding the questionnaire, please contact: ENV-WASTE-FRAMEWORK-DIRECTIVE-2023-REVIEW@ec.europa.eu

Your opinion matters and we are grateful to you for taking the time to complete this consultation. Note that a factual summary of the responses to this consultation will be published on Have your say and will later be included in a dedicated annex of the impact assessment that will provide an analysis of input received from all consultation activities.

You can find further information on the Waste Framework Directive on DG Environment's dedicate page: <u>ba</u> <u>ckground information</u>. Further information on food loss and waste prevention is available <u>here</u>, and on the initiative to propose food waste reduction targets can be found <u>here</u>. [1] Better Regulation Toolbox (2021). TOOL #52. See: https://ec.europa.eu/info/law/law-making-process /planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox\_en

# About you

- \* Language of my contribution
  - Bulgarian
  - Croatian
  - Czech
  - Danish
  - Dutch
  - English
  - Estonian
  - Finnish
  - French
  - German
  - Greek
  - Hungarian
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  - Italian
  - Latvian
  - Lithuanian
  - Maltese
  - Polish
  - Portuguese
  - Romanian
  - Slovak
  - Slovenian
  - Spanish
  - Swedish
- \* I am giving my contribution as
  - Academic/research institution
  - Business association

- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

#### \* First name

The Bioenergy Association

#### \*Surname

of Finland

# \* Email (this won't be published)

info@bioenergia.fi

### \*Organisation name

255 character(s) maximum

Bioenergia ry - the Bioenergy Association of Finland

### \*Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

### Transparency register number

#### 255 character(s) maximum

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

#### 174042620514-51

# Country of origin

Please add your country of origin, or that of your organisation.

Pleas	e add your country of orig	jin,	or that of your organisation	on.		_	
$\odot$	Afghanistan	$\bigcirc$	Djibouti	$\bigcirc$	Libya	$\odot$	Saint Martin
0	Åland Islands	0	Dominica	0	Liechtenstein	0	Saint Pierre and
							Miquelon
0	Albania	0	Dominican	0	Lithuania	0	Saint Vincent
			Republic				and the
							Grenadines
0	Algeria	0	Ecuador	0	Luxembourg	0	Samoa
0	American Samoa	0	Egypt	0	Macau	0	San Marino
$\bigcirc$	Andorra	0	El Salvador	0	Madagascar	0	São Tomé and
							Príncipe
0	Angola	0	Equatorial Guinea	a	Malawi	0	Saudi Arabia
$\bigcirc$	Anguilla	0	Eritrea	0	Malaysia	0	Senegal
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$\bigcirc$	Azerbaijan	۲	France	0	Mayotte	0	Solomon Islands
$\bigcirc$	Bahamas	0	French Guiana	0	Mexico	0	Somalia
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$\odot$	Barbados	0	Gabon	0	Monaco	0	South Korea
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0	Belize	0	Ghana	0	Montserrat	0	Sri Lanka
0	Benin	0	Gibraltar	0	Morocco	0	Sudan
0	Bermuda	0	Greece	۲	Mozambique	0	Suriname

Bhutan	© Greenland	Myanmar/Burma	Svalbard and Jan Mayen
Bolivia	Grenada	Namibia	Sweden
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Eustatius and			
Saba			
Bosnia and	Guam	Nepal	Syria
Herzegovina			
Botswana	Guatemala	Netherlands	Taiwan
Bouvet Island	Guernsey	New Caledonia	Tajikistan
Brazil	Guinea	New Zealand	Tanzania
British Indian	Guinea-Bissau	Nicaragua	Thailand
Ocean Territory			
British Virgin	Guyana	Niger	The Gambia
Islands			
Brunei	Haiti	Nigeria	Timor-Leste
Bulgaria	Heard Island a	nd <sup>©</sup> Niue	Togo
	McDonald Islar	ds	
Burkina Faso	Honduras	Norfolk Island	Tokelau
Burundi	Hong Kong	Northern	Tonga
		Mariana Islands	
Cambodia	Hungary	North Korea	Trinidad and
			Tobago
Cameroon	Iceland	North Macedonia	a <sup>©</sup> Tunisia
Canada	India	Norway	Turkey
Cape Verde	Indonesia	Oman	Turkmenistan
Cayman Islands	Iran	Pakistan	Turks and
			Caicos Islands
Central African	Iraq	Palau	Tuvalu
Republic			
Chad	Ireland	Palestine	Uganda
Chile	Isle of Man	Panama	Ukraine
China	Israel	Papua New	United Arab
-	-	Guinea	Emirates
Christmas Island	🔍 Italy	Paraguay	United Kingdom

<ul> <li>Clipperton</li> <li>Cocos (Keeling) Islands</li> </ul>	<ul><li>Jamaica</li><li>Japan</li></ul>	<ul> <li>Peru</li> <li>Philippines</li> </ul>	<ul> <li>United States</li> <li>United States</li> <li>Minor Outlying</li> <li>Islands</li> </ul>
Colombia	Jersey	Pitcairn Islands	Uruguay
Comoros	Jordan	Poland	US Virgin Islands
Congo	Kazakhstan	Portugal	Uzbekistan
Cook Islands	Kenya	Puerto Rico	Vanuatu
Costa Rica	Kiribati	Qatar	Vatican City
Côte d'Ivoire	Kosovo	Réunion	Venezuela
Croatia	Kuwait	Romania	Vietnam
Cuba	Kyrgyzstan	Russia	Wallis and
			Futuna
Curaçao	Laos	Rwanda	Western Sahara
Cyprus	Latvia	Saint Barthélem	y <sup>©</sup> Yemen
Czechia	Lebanon	Saint Helena	Zambia
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Democratic	Lesotho	Saint Kitts and	Zimbabwe
Republic of the		Nevis	
Congo			
Denmark	Liberia	Saint Lucia	

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. Fo r the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

#### \* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

# Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

# Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

# I agree with the personal data protection provisions

# Your opinion on waste related topics

#### QUESTIONS ON WASTE REDUCTION and PREVENTION

a) Regarding the volumes of wastes generated, please indicate to what extent are you concerned about the following.

	Very concerned	Concerned	Neither concerned nor unconcerned	Not concerned	Not concerned at all
Its impact on the environment	O	۲	O	O	0
The cost of managing it	0	۲	O	0	0
The amounts of municipal wastes (from households, commerces and offices)	0	۲	۲	0	۲
The amounts of textile wastes	O	۲	0	0	©
The amounts of food waste	0	0	۲	0	0

b) Concerning waste prevention, to what extent do you agree with the following statements (these questions are intended for individuals or households so please reply in your personal capacity)?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
I know what I can do to prevent waste	0	0	0	0	0
I have the information needed to help me generate less waste	0	0	0	0	0
I take on fewer waste prevention activities than I would like to due to the costs involved	0	0	0	0	0
I take on fewer waste prevention activities than I would like due to shortcomings in relevant infrastructure and services (e.g., proximity of reuse or repair services, effort required)	0	0	0	0	۲

c) Please indicate if and how frequently you do the following when you purchase and consume goods (these questions are intended for individuals or households so please reply in your personal capacity).

	Always (if possible)	Often	Sometimes	Never	Not applicable
I take waste generation into account when I buy goods (e.g., repairability, durability, quantity of packaging)	0	0	0	0	0
I plan my food shopping to avoid food waste	0	0	0	0	0
I prefer to buy used goods	0	0	0	$\bigcirc$	0
I share or sell my used products for re-use	0	0	0	0	0
I use rentals or shared services (e.g., sharing household tools, bikes, clothing)	0	0	0	0	0
I repair products when they are broken, faulty or worn out to continue their use	0	0	O	O	O
I change the engine oil, gearbox oil, etc. in my vehicle myself and know how to dispose of the waste oil in an environmentally safe way	0	0	0	0	0

d) Waste reduction efforts may be hampered by certain barriers. For each of the statements below, please indicate how important you consider these barriers to be.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Do not know
Prevention measures are not an explicit objective of commercial operations		۲	0	0	0	۲
Consumers are not used to taking prevention measure (e.g., trying to repair a broken item instead of replacing it)	0	0	O	۲	O	0
Giving or selling products for re- use is not convenient	0	۲	0	0	0	0
Prevention measures are economically unattractive (e.g., repair is too expensive compared to buying a new product)	۲	0	0	0	0	0
Legal barriers to waste prevention (e.g., liability, guarantees, re-used items considered waste)	0	0	O	O	O	۲
Waste prevention is technically difficult	0	۲	0	0	0	0
Ineffective cooperation between key players (e.g., waste collectors and reuse centres)	0	0	0	0	0	۲
Loss of convenience for consumers (e.g., possible reduction in choice of products)	0	۲	0	0	0	0
Lack of data to monitor and identify the most effective waste prevention actions	0	۲	0	0	0	0
Other	0	O	0	0	0	۲

# If other, please specify

Text of 25 to 1000 characters will be accepted

e) To what extent do you agree with the following statements?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Do not know
The EU has in place effective measures to prevent waste	0	0	0	۲	0	0
My country/local authority has in place effective measures to prevent waste	0	0	0	۲	0	0
My employer has in place effective measures to prevent waste generation in the workplace	O	0	۲	O	O	0

# f) To what extent do you agree with the following statements on possible EU measures to improve waste prevention?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Do not know
I am in favour of more detailed data collection in order to measure the impact of prevention measures	0	0	۲	0	O	0
I am in favour of increasing use of economic instruments to prevent waste generation (e.g., "Pay As You Throw" taxes)	۲	0	0	0	0	0
I am in favour of legally binding waste generation reduction targets (e.g., a maximum amount of kg of waste per inhabitant per year or a percentage reduction of current waste levels)	۲	0	۲	۲	۲	0
I am in favour of legally binding quantitative targets to increase reuse of products	0	0	0	۲	0	O
I am in favour of legally binding food waste reduction targets	O	0	O	۲	O	0

# If you have comments or information to provide, please enter them here.

Text of 25 to 1000 characters will be accepted

g) The EU's Farm to Fork Strategy seeks to enable the transition to a sustainable food system that is fair, healthy and environmentally-friendly. It aims in particular to reduce the environmental and climate footprint of the EU food system, to protect citizens' health and ensure the livelihoods of economic operators. Taking action to reduce food waste is critical to achieving sustainable food systems.

Please indicate if you agree that reducing food waste can lead to the following benefits:

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Do not know
Help mitigate climate change	۲	0	0	0	0	0
Help contain biodiversity loss	0	۲	0	0	0	0
Help reduce other environmental impacts (land use, water scarcity, etc.)	0	O	۲	0	0	0
Contribute to food security	۲	0	0	0	0	0
Reduce costs for food business operators	0	O	۲	0	0	۲
Bring savings for consumers	0	۲	0	0	0	0
Reduce costs for competent authorities (waste management)	0	۲	0	0	0	0
Other	۲	۲	۲	۲	0	۲

#### If other, please specify

Text of 25 to 1000 characters will be accepted

h) Fighting food waste requires action from multiple actors across the food supply chain and beyond. According to you, who needs to take more action to reduce food waste? (please select up to 5 actors from the list below)

at most 5 choice(s)

- producers (farmers, fishers, aquaculture producers)
- food manufacturers
- retailers and other distributors

- Mospitality and food services (hotels, restaurants, canteens, etc.)
- EU institutions
- national governments
- regional governments
- cities, local authorities
- food banks
- other non-governmental organisations
- investors, banks, or financial institutions
- education providers (schools, etc.)
- consumers
- other

i) Food waste reduction initiatives may encounter several challenges. For each of the items listed below, please indicate how important you consider these challenges to be.

	Very important	Important	Not so important	Not important at all	l don't know
Businesses need to make food waste prevention part of their business operations	0	۲	0	0	0
Consumers need to adopt new habits in order to reduce food waste (e.g. improved food management skills)	۲	0	0	0	0
Ineffective cooperation between key players (e.g. farmers and retailers)	0	۲	0	0	0
Consumers' acceptance of possible reduction in food choices (e.g. simpler menu options, less options available at store closure)	O	0	0	O	۲
Ensuring sufficient action is taken at the pace needed to reach global commitments (i.e. halve food waste by 2030)	O	0	۲	O	0
Ensuring no compromise on food safety	۲	0	0	0	0
Lack of evidence and best practice to identify the most effective actions	0	0	0	0	۲
Difficulty in collecting data on food waste levels and related impacts	O	0	O	۲	۲

Difficulty in monitoring compliance with food waste targets	0	0	۲	0	۲
Costs associated with food waste prevention	0	۲	0	0	0
Other	0	0	0	0	0

# If other, please specify

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Text of 25 to 1000 characters will be accepted

# j) Which measures do you consider to be the most effective in reducing food waste? Please indicate for each measure below, its possible level of impact.

	Very impactful	Moderately impactful	Limited impact	Not impactful at all	Do not know /no opinion
Best-practice sharing	0	0	۲	0	0
Measuring food waste to track progress	0	۲	0	0	0
Setting food waste reduction targets	0	۲	0	0	0
Facilitating donation of surplus food	0	0	0	0	۲
Using surplus food and by-products (e. g. for animal feed)	0	0	۲	0	0
Improving efficiency along the food supply chain (e.g. better management of supply and demand)	۲	0	0		0
Packaging innovation (e.g., to extend shelf-life)	0	0	0	0	۲
Clearer, more understandable date marking (e.g. "best before" and "use by" dates)	0	0	۲	0	0
Consumer-targeted campaigns	0	0	۲	0	0
Digital tools and apps (e.g., to facilitate redistribution of surplus food)	0	0	۲	0	0
Education and training (citizens, food business operators etc.)	0	۲	O	0	0
Public/private partnerships: voluntary agreements of food business operators to reduce food waste in the supply chain	O	0	0	0	۲

Fiscal incentives (e.g., corporate tax credits for food donation)	۲	0	0	0	0
Other regulatory initiatives	0	0	0	0	۲

#### If other, please specify

Text of 25 to 1000 characters will be accepted

#### QUESTIONS ON SEPARATE COLLECTION

In order to facilitate recycling the WFD requires separate collection of waste paper, metal, plastic and glass, and oils. From 2024, this also applies to biowaste and from 2025 for textile waste and hazardous waste fractions produced by households. Under other EU law separate collection is also required for the following household wastes: packaging, batteries, electronic and electric equipment. Some current collection systems allow collection of several waste types in the same container (such as metals, plastic and paper together and cardboard together with beverage cartons).

For the purposes of this questionnaire, all dry waste fractions that are collected separately from residual (non-recycled) waste and biowaste (wet waste) may be considered as separately collected. Food waste is considered to be separately collected if it is collected alone or together with certain other biowaste.

 k) Please indicate if you separate products for re-use and waste streams according to the available waste collection services and infrastructure in your municipality (these questions are intended for individuals or households so please reply in your personal capacity).

	Agree	Neither agree nor disagree	Disagree
I give goods for re-use directly to family and friends	0	0	0
I give goods for re-use through door to door collection or bring back points	0	0	0
I separate all the waste streams that are collected door-to- door	0	0	0
I separate some of the waste streams that are collected door-to-door	0	0	0
I do not separate waste and discard everything as mixed waste	0	0	0
I separate some waste streams that I have to take to a collection centre	0	0	0

I) I participate in the separate collection of the following waste fractions (these questions are intended for individuals or households so please reply in your personal capacity).

	Agree	Neither agree nor disagree	Disagree
Paper and cardboard	0	0	0
Metal	0	0	0
Plastic	0	0	0
Glass	0	0	0
Food	0	0	0
Garden materials	0	0	0
Cooking oils	0	0	0
Other oils (lubricating and industrial oils such as engine oil, gearbox oil)	0	O	0
Batteries	0	0	0
Electric and electronic equipment	0	0	0
Textiles	0	0	0
Bulky items (e.g., furniture, mattresses)	0	0	0
Hazardous household products (e.g., paints and varnishes, cleaning products, unused medicines)	0	O	O

# Please indicate any additional municipal waste fractions collected separately in your local area.

Text of 25 to 1000 characters will be accepted

m) I am satisfied with the waste collection system in place where I live to separately collect the following waste fractions (these questions are intended for individuals or households so please select not applicable if you are not replying as a citizen).

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	l don't know	Not applicable
Paper and cardboard	0	0	۲	0	0	0	۲
Metal	0	0	0	0	0	0	۲
Plastic	0	0	0	0	0	0	۲
Glass	0	0	۲	0	0	0	۲
Food	0	0	0	0	0	0	۲
Garden materials	0	0	0	0	0	0	۲
Cooking oils	0	0	۲	0	0	0	۲
Other oils (lubricating and industrial oils such as engine oil, gearbox oil)	0	0	0	0	0	0	0
Batteries	0	0	0	0	0	0	0
Electric and electronic equipment	0	0	0	0	0	0	۲
Textiles	0	0	0	0	0	0	۲
Bulky items (e.g., furniture, mattresses)	0	0	0	0	0	0	۲
Hazardous household products (e.g., paints and varnishes, cleaning products, unused medicines)	0		0	0	O	0	0

Any additional comments or information you would like to provide (for example, other waste fractions that should be separately collected for recycling).

Text of 25 to 1000 characters will be accepted

n) To what extent do you agree with the following statements on separate collection?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Do not know
The EU has put in place effective measures to separately collect waste	0	۲	0	0	0	0
My country/local authority has put in place effective measures to separately collect waste	0	۲	0	0	0	0
My employer has put in place effective measures to separately collect waste in the workplace	O	۲	O	0	O	0

o) Separate collection efforts may be confronted with several challenges. Please indicate which factors you think would increase participation in separate collection of municipal waste (please select up to 5 factors from the list below)

at most 5 choice(s)

- More information on why separate collection matters (safety of recycled products, contamination, impact on the environment)
- More information about what happens to my waste once it is collected and how it can serve a useful purpose
- Certainty that all the waste I separate would be prepared for re-use or recycled
- More information on how to separate waste for collection (e.g. which waste goes into which bin)
- More information about the different collection methods I can use (e.g. door-todoor, collection points, mobile collection units)
- Easy to find information about the location and opening hours of the closest collection points, civic amenity site, mobile collection point
- More convenient locations of street bins for separate waste collection
- More convenient locations of mobile collection units (e.g. for hazardous waste)

- More convenient locations of civic amenity sites
- More convenient opening hours of mobile collection units, civic amenity sites
- Better accessibility of the closest civic amenity site (in terms of access rights)
- More space in my household for several different waste bins
- Greater frequency of collection for separately collected waste compared to mixed waste
- Greater volume of street bins
- Street bins' surroundings for separate collection would be cleaner and safer (e.
   g. free of broken glass, putrefied waste)
- Waste containers would be labelled with clear instructions (e.g. pictograms or colours) on the accepted waste
- My municipality would reward me for my effort to separate different fractions of waste in different bins through financial incentives (e.g. if discarding mixed waste was more costly than discarding separately collected waste)
- Other

# If other, please specify

Text of 25 to 1000 characters will be accepted

p) With regard to overcoming challenges and improving separate collection activities, please indicate whether you agree with the following statements

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Do not know
I have information on how to separate waste at home	۲	O	O	O	O	۲
I have information on where and when to bring my separated waste (e.g. location, opening hours, accepted waste)	۲	O	O	O	O	0
Improved information on the products themselves about their composition and how to discard them in separate collection would be helpful	O	۲	©	©	O	۲

Improved information on waste bins and from waste collection service providers on how to correctly separate waste in different waste containers would be helpful	0	0	۲	0	O	0
I am in favour of sorting my waste into more separate bins in my household for door to door collection for an environmental benefit (to increase the efficiency and quality of recycling)	0	۲	©	©	©	0
I am in favour of sorting my waste into more separate bins to bring them to collection points outside my home for an environmental benefit (to increase the efficiency and quality of recycling)	0	۲	0	۲	۲	0
I am in favour of sorting my waste into more separate bins at home or bring them to collection points outside my home to reduce my waste bill	۲	۲	0	0	O	0

#### REGULATORY AND/OR ECONOMIC INCENTIVES

The WFD encourages Member States to make producers of products financially or organisationally responsible for their end-of-life products, i.e. separate collection and treatment of waste (known as "extended producer responsibility"). At the EU level this already applies to packaging, batteries, electronic equipment, some single-use plastic items, fishing gear and cars.

Member States are encouraged to apply also other economic instruments to create incentives for better waste management. One such measure is 'Pay-as-you-throw' whereby waste producers (e.g., households) are charged for waste management based on the volume and/or type of waste generated. This incentivises separation of recyclable waste and reduction of mixed waste.

# q) To what extent do you agree with the following statements on waste management costs?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Do not know
I know how much I pay for waste collection	0	0	۲	0	0	۲
'Extended producer responsibility' should be applied to more product categories (e.g. textiles)	0	0	0	0	0	۲

'Extended producer responsibility' should also cover waste prevention activities	0	۲	0	0	0	0
'Extended producer responsibility' should be better enforced for on- line sales	0	۲	0	0	0	0
'Pay-as-you-throw' systems should be applied more widely and strictly	0	0	0	0	0	۲
Citizens should pay more to discard mixed waste (that is unlikely recycled; is incinerated or landfilled) than to discard separately collected waste	۲	0	0	0	0	0

# r) Do you agree there are sufficient regulatory and/or market incentives for businesses to invest in the following activities?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Do not know
Prevention of waste generation	0	0	0	0	0	۲
Preparing for re-use	0	0	0	0	0	۲
Material recovery	0	0	0	۲	0	0
Sorting of waste	0	0	0	۲	0	0
Separate collection with a view to preparing for re-use and recycling (of own waste)	0	0	0	0	0	۲
Decontamination	0	0	0	0	0	۲
Recycling	0	O	0	O	0	۲

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#### **Waste Framework Directive**

The Bioenergy Association of Finland supports the objective to improve waste management by reducing waste generation including through re-use of products and mixed waste. Energy recovery must be conducted at the highest efficiency from sorted side streams not suitable for reuse and recycling (solid recovered fuels) i.e. what cannot be reused or recycled, should be incinerated at high efficiency waste-to-energy plants.

A proper waste incineration is an essential solution of waste management for the environment and human health. It is also contributing to circular economy and can play a significant role also in future hybrid energy networks. It is important, though, to follow the waste hierarchy and aim at more sustainable incineration of waste. To improve the efficiency, the R1 definition should be more ambitious. Requirement for higher efficiency should be inserted.

However, high efficiency energy recovery is not enough to ensure sustainability in waste incineration. Only sorted waste, deemed not suitable for reuse, preparation for reuse, or efficient material recycling, should be burnt. High efficiency energy recovery from appropriate waste streams that are not suitable for re-use, preparation for re-use or efficient material recycling should be considered as the preferred form of energy recovery in the waste hierarchy. Sustainable energy recovery from solid recovered fuels (SRF) must be recognized in the revision of the WFD.

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