

Arnika's Opinion Concerning Circular Economy Targets

The circular economy targets were published by the European Commission on its internet pages^{1 2}. The main and most discussed targets, which this Arnika's opinion concerns, include:

- Increase of the target regarding the rate of preparing for re-use and recycling to 65 % of municipal waste by 2030;
- Harmonised calculation methods for recycling rates throughout the EU;
- Gradual reduction of municipal waste landfilling down to the level of 10 % by 2030;
- Utilisation of economic tools (payments for waste landfilling).

The Ministry of Environment (hereinafter "the MoE") states, on its internet pages³, that the total municipal waste production is 5.3 million tons. This production has not changed in the long term. The figure is considerably higher than the data reported by the Czech Republic to Eurostat⁴. This is caused by different methodologies and by the fact that the MoE includes a higher number of waste streams into the calculation (for example, trade waste, even the one not included into the municipal systems; waste sold as a raw material out of the municipal systems etc.). The difference is approximately 2 million tons. The difference in these numbers shows the importance of clear specification of what material flows shall be used as the basis for monitoring waste production. It is also necessary to consider, for example, whether it is really feasible to monitor the selected waste streams. The same is true in the case of calculation of the amounts of recycled raw materials, too. In the Czech Republic, a considerable difference exists between data reported to Eurostat and data produced by the MoE. Concerning 2015, the MoE published the rate of municipal waste recycling of 36 %, whereas the municipal waste recycling according to Eurostat data is by about 10 % lower. Moreover, the both numbers are based on the amounts of the collected waste, not the actually materially recovered one. The numbers may be highly different, for example, in the case of plastics. Certain lines for final sorting of the collected material are able to achieve the level of material recovery of even less than 50 % of the collected plastics. The residue is used for production of alternative fuels and for energy recovery in incinerators, or is landfilled. All these methods cannot be regarded as recycling. To conclude, Arnika, as well as other NGOs, generally support higher recycling rates, but it is difficult to determine the levels without a more precise determination of waste streams. The target of recycling of 65 % of municipal waste by 2030 may be considered ambitious. Its importance resides especially in that it shall set limits for the amounts of waste to be used for energy recovery and to be landfilled. When taking into account data published by the MoE, it would mean diversion of about 1.5 million tons of mixed and bulky waste from landfills and incinerators, and material recovery of this waste. This can be hardly imagined. There is a big difference whether the results are to be achieved in a city, in a region, or on a nation-wide level. In the Czech Republic, there exist municipalities and cities showing recycling rates higher than 50 % already, but this rate is considerably lower (about a half) at the regional and nation-wide levels. The Czech Republic has adopted measures towards increasing recycling rates. It adopted a ban of mixed municipal waste landfilling since 2024. This year, the MoE introduced its proposal of a new Waste Act that intends to considerably increase the fees for landfilling (from the present ca 20 EUR to 80 EUR in 2024). It is not clear yet whether the new Act will be put through successfully. There exist concerns of massive construction of incinerators with the purpose of energy recovery of waste, because it is simpler to construct incinerators for 1 million tons of waste than to subject the same amount of waste to material recovery. Waste prevention and material recovery of waste requires higher efforts of individuals and interest groups than construction of incinerators. Concerning incentives for the inhabitants, the fees for waste disposal may be either per capita fees or fees based on the waste amounts produced (PAYT) in the Czech Republic. The municipality may choose which of the systems to use. The proposed Act strengthens the systems of fees providing the

¹ http://ec.europa.eu/environment/circular-economy/index_en.htm

² http://ec.europa.eu/environment/waste/target_review.htm

³ [http://www.mzp.cz/C1257458002F0DC7/cz/odpadove_hospodarstv%C3%AD_data_2015/\\$FILE/OODP-Souhrnna_data_2009_2015-20160930.pdf](http://www.mzp.cz/C1257458002F0DC7/cz/odpadove_hospodarstv%C3%AD_data_2015/$FILE/OODP-Souhrnna_data_2009_2015-20160930.pdf)

⁴ http://ec.europa.eu/eurostat/statistics-explained/index.php/Municipal_waste_statistics

incentives. Municipalities using PAYT generally produce significantly less mixed waste. A correctly set PAYT does not lead to more black deposits.

Arnika supports alternative ways for achieving the recycling targets. We mean that it is simpler to monitor amounts of landfilled and incinerated waste (with energy recovery, as well as without it) than the recycling rate. These data are monitored by Eurostat already. If such levels were set (as an alternative to percent recycling rate), it would have a positive impact in that it would enable the individual countries to adopt a more flexible approach to achieve the targets, and often even at a higher level of waste hierarchy. For example, a long tradition of home composting exists in the Czech Republic. The effort to increase the amounts of sorted raw materials goes against that. It is difficult to report amounts of waste diverted through home composting. There are more than 6000 municipalities and cities in the Czech Republic. They bear the main burden of municipal waste management. For small municipalities, it is much easier to meet the alternative target proposed by us than to achieve high recycling rates. This may be achieved with a lower consumption and with a lower environmental impact.

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