



l'agence
métropolitaine
des déchets
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NEW CIRCULAR ECONOMY ACTION PLAN

SYCTOM POSITION PAPER

22 April 2020

Syctom is a French local public authority and the leading European operator in domestic waste management.

It processes 2.3 million tonnes of domestic and related waste from around six million inhabitants of the Île-de-France region, including Paris, or almost 9% of the French population.

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Sycotom **welcomes the adoption by the European Commission of an ambitious New Circular Economy Action Plan**. Product durability and waste reduction are essential in making the European economy fully circular.

1. STRENGTHENING EDUCATION TO PROMOTE PREVENTION

Sycotom encourages the European Union (EU) to support long-term educational policies for all age groups to increase the possibility of gradual and continuous acquisition of knowledge in relation to sustainable development.

We support:

- The commitment by the Commission to strengthen **synergies between the circular economy and education** through investment in training and learning within the framework of the European Social Fund.
- The initiative for a European Climate Pact, in which we are keen to participate.

We propose:

- **Support by European funds**, beyond the ESF alone (LIFE, Erasmus +, ERDF, Interreg) for local educational programmes.

2. PROMOTING REUSE OVER RECYCLING

We support:

- The introduction of sustainability principles seeking to **improve the durability, reuse and reparability** of products while combatting planned obsolescence and single-use products.
- **The Commission's ambitious announcements regarding future waste reduction objectives** through revisions of the Waste Framework Directive and the directive on packaging and packaging waste.
- **The proposal to set an objective for the reduction of food waste** as part of the "Farm to Fork" strategy.
- The Commission's proposal to **harmonise waste collection systems** in the EU.



3. STRENGTHENING AND EXTENDING ECODESIGN

The Ecodesign directive having proven successful, Sycotom believes that ecodesign should now be extended to a large number of product groups, beyond those related to energy.

We support:

- **The strategy relating to durable products** seeking to expand the ecodesign principle to the widest possible range of products.
- **Strengthening the current Ecodesign directive.** We will contribute to reflections on the Ecodesign Working Plan 2020-2024.

We propose:

- **The creation of financial incentives** (bonuses/penalties, for example) offering greater encouragement to product marketers and manufacturers to undertake the transition towards ecodesign.

4. STIMULATING THE MARKET FOR SECONDARY RAW MATERIALS

Low demand for secondary raw materials is hampering the development of the circular economy. Waste can only become a resource through recycling under two conditions:

- If the products from which the waste originates have been appropriately ecodesigned.
- If demand in the market for secondary raw materials so allows.

Sycotom thus supports **all measures seeking to impose the incorporation of secondary raw materials into products and their packaging**, particularly where they are composed, wholly or partially, of plastic.

We support:

- The proposed introduction of a sustainability principle **seeking to increase the volume of secondary raw material originating from recycling** in the manufacture of certain products.
- The imposition of **compulsory recyclability requirements for products**, particularly where they contain plastic.



5. IMPROVING CONSUMER INFORMATION

To reduce the volume of non-recyclable waste, the consumer must be aware, at the moment of purchase, of the level of recyclability of the product and its packaging. This is a key factor in empowering consumers and marketers.

We support:

- The Commission's proposal to **more systematically include in the EU Ecolabel the criteria of durability, the use of secondary raw materials originating from recycling, and recyclability.**

We propose:

- Within the framework of the legislative proposal seeking to empowering consumers in the green transition, **to impose the obligation of environmental labelling for all manufactured products and their packaging where they are fully or partially composed of plastic.**

6. MAKING THE TAXONOMY REGULATION A TOOL TO PROMOTE CIRCULARITY AND COMBAT CLIMATE CHANGE

Realisation of the EU's sustainability objectives will require major investments.

As Sytom notes in its contribution to the consultation "*Sustainable finance: the EU classification system for green investments*"¹, **energy recovery today remains a necessary and transitional alternative to landfilling.** It is an integral part of the waste hierarchy, in accordance with Article 4 of the framework directive on waste.

Sytom underlines the absolute necessity of moving towards **abandoning the landfill disposal of waste, which currently represents 80% of greenhouse gas emissions from waste management.**

We support:

- The establishment of a framework for promoting sustainable investments.

¹ <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12302-Climate-change-mitigation-and-adaptation-taxonomy/F512697>

We propose:

- **To include waste-to-energy** as a sustainable environmental activity. The European Commission, in its Communication of 26 January 2017 on “The role of waste-to-energy in the circular economy”, noted that *“waste-to-energy processes [could] play a role in the transition to a circular economy provided that the EU waste hierarchy is used as a guiding principle”*.
- To recognise that investments intended to reduce the environmental footprint of incineration (measuring pollutants, treating flue gases, innovation with regard to new pollutants), in particular where it is a question of going beyond the standards in force, **can help in the fight against climate change, and may therefore be characterised as a sustainable environmental activity.**
- To consider **investments promoting carbon capture for recovery** (conversion into biomaterials, for example) as a sustainable environmental activity.