Leading federations representing the paper value chain call for the co-legislators to support the further increase of paper recycling and safeguard the “quantity” criterion in the definition of municipal waste.

The European Commission proposes to define municipal waste as mixed waste and separately collected waste from households and “mixed waste and separately collected waste from other sources that is comparable to household waste in nature, composition and quantity”1.

A lot of the debate has focused on the quantity criterion. We believe that this is the only objective and measurable criterion. The quantity criterion is needed to clearly distinguish between municipal waste on one hand, and commercial and industrial waste on the other.

While paper from commercial and industrial sources is already collected and recycled at high levels, an untapped potential exists for household paper collection and similar sources, for which the waste directive is setting targets. If the quantity criterion is removed, the target for municipal solid waste will unduly include commercial and industrial waste and affect the accuracy of statistical data.

Moreover, the collection of commercial and industrial waste should not be financed and cross-subsidised by public funds, ultimately resulting in additional costs for taxpayers. In the absence of the quantity criterion there is a genuine risk that the scope of municipal waste is widened and therefore the focus is diverted from areas where the need to increase collection is the most acute. In order to ensure that all streams remain open to competition, instrumental to preserving cost-efficient and innovative waste markets, we support two key actions:

- Maintaining the quantity criterion in the definition of municipal waste;
- Clearly stipulate into the definition of municipal waste that it is neutral with regard to the public and private status “The definition of municipal waste (…)

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1 The full definition of municipal waste according to the Commission proposal for amending Directive 2008/98/EC is as follows: “a. "municipal waste" means
(a) mixed waste and separately collected waste from households including:
– paper and cardboard, glass metals, plastics, bio-waste, wood,
textiles, waste electrical and electronic equipment, waste batteries and accumulators;
– bulky waste, including white goods, mattresses, furniture;
– garden waste, including leaves, grass clipping;
(b) mixed waste and separately collected waste from other sources that is comparable to household waste in nature, composition and quantity.
(c) market cleansing waste and waste from street cleaning services, including street sweepings, the content of litter containers, waste from park and garden maintenance.
Municipal waste does not include waste from sewage network and treatment, including sewage sludge and construction and demolition waste;"
neutral with regard to the public or private status of the operator managing waste and
to the ownership of the waste”.

**CEPI – The Confederation of European Paper Industries**
The Confederation of European Paper Industries (CEPI) is a Brussels-based non-profit organisation regrouping the European pulp and paper industry and championing the industry’s achievements and the benefits of its products. Through its 18 member countries (17 European Union members plus Norway) CEPI represents some 505 pulp, paper and board producing companies across Europe, ranging from small and medium sized companies to multi-nationals, and 920 paper mills. Together they represent 23% of world production.

**EuRIC – The European Recycling Industries’ Confederation**
is the umbrella organisation for recycling industries in Europe. Through its Member Federations from 19 EU and EFTA countries, EuRIC represents today across Europe over:
- 5,500 companies generating an aggregated annual turnover of about 95 billion €, including large companies and SMEs, involved in the recycling and trade of various resource streams;
- 300,000 local jobs which cannot be outsourced to third EU countries;
- An average of 150 million tons of waste recycled per year (paper, metals and beyond);
- Recyclers play a key role in a circular economy. By turning wastes into resources, recycling is the link which reintroduces recycled materials into the value chains again and again.

**FEAD – The European Federation of Waste Management and Environmental Services**
FEAD is the European federation representing the European waste management industry. FEAD’s members are national waste management associations covering 18 Member States, Norway and Serbia. They have an approximate 60% share in the household waste market and handle more than 75% of industrial and commercial waste in Europe. Their combined annual turnover is approximately € 75 billion. FEAD represents about 3,000 companies with activities in all forms of waste management. These companies employ over 320,000 people who operate around 2,400 recycling and sorting centres, 1,100 composting sites, 260 waste-to-energy plants and 900 controlled landfills. They play an important role in the determination of the best environmental option for waste management problems.