Public Consultation on the Functioning of Waste Markets

Public Consultation on the functioning of Waste Markets in the European Union

Part 1 - Identification of stakeholder or expert

Please enter your country of residence/establishment

- [ ] BELGIQUE-BELGIË
- [ ] DANMARK
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- [ ] OTHER COUNTRY (non-EU)
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If relevant, please specify the non-EU country of your residence/establishment:

Your name or organisation:

Member State the Netherlands

Please provide your EU Transparency Register ID number (if you have one)

If your organisation is not registered, you can register now (please see the introduction to this consultation under 'How to submit your contribution').

Can your reply be published? Please tick the box of your choice.

- (●) With your name or that of your organisation
- ( ) Anonymously

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I am replying to this consultation as...

- ( ) an individual
- ( ) a private enterprise
- ( ) a non-governmental organisation (NGO)
- ( ) an organisation or association (other than NGO)
- (●) a government or public authority
- ( ) a European institution or agency
- ( ) an academic/research institute
- ( ) other

If you are replying on behalf of a company, please specify in which of the following markets you predominantly operate:

- [ ] The whole EU market
- [ ] In one or several Member States, please indicate which one in the list below:
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- [ ] MAGYARORSZÁG
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- [ ] POLSKA
- [ ] PORTUGAL
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- [ ] SUOMI / FINLAND
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If relevant, please specify the non-EU country in which you predominantly operate:

If you are replying on behalf of a company, please indicate the number of its employees:

- ○ Between 1 and 49
- ○ Between 50 and 249
- ○ 250 and more

Part 2 - Questions

A. Identification of the main perceived regulatory failures

For the purpose of this consultation, regulatory failures are defined as situations in which the regulatory environment hampers the efficient functioning of the waste markets (i.e. where waste meant to be recycled or recovered can move freely within the EU, without unjustified restrictions) and fails to ensure optimal implementation of the waste hierarchy (according to Article 4(1) of the EU waste framework directive, the following waste hierarchy shall apply as a priority order: prevention; preparing for re-use; recycling; other recovery, e.g. energy recovery; and disposal).

1. Do you think there are any regulatory failures or obstacles currently affecting the functioning of EU waste markets?

- ◉ Yes, a large amount
- ○ Yes, but limited
- ○ No (go to Section B)
- ○ Don't know (go to Section B)

2. What do you think is the most important aspect of policy and/or legislation that creates distortions in the waste markets or creates unjustified obstacles to the proper functioning of waste markets in the EU?

Most important aspects:
a. No level playing field for (end of) waste
b. Competition between waste treatment options among Member States
c. Unintended effects of legal provisions and other targets (lock-ins)
d. Waste policy versus chemicals policy
e. Insufficient demand for secondary materials

Furthermore, in our view, the following aspects need to be addressed sufficiently:
1. The possible impacts of handling wastes on health or environment;
2. The potential value of waste as a resource.

Most important aspects explained:

a. No level playing field for (end of) waste:

In many cases it is up to Member States to give an opinion on the end of waste (EoW) status of materials. In practice art. 6 of the Waste Framework Directive is not easily applicable, leading to varying interpretations between Member States.

Therefore The Netherlands prefer to change art. 6 in such a way that it becomes clear that both the Commission as well as Member States can define EoW criteria, based on the same conditions proposed below. Criteria set by the Commission on an EU-level are preferred, thus creating a level playing field. But when criteria aren't set for a certain waste stream on an EU-level, Member States should be able to create national criteria or decide in a case by case situation using the same conditions.

The following conditions are proposed:

a. Further use of the substance or object is certain;

b. Further use is lawful, i.e. the substance or object fulfils all relevant product, environmental and health protection requirements for the specific use and will not lead to overall adverse environmental or human health impacts.

c. Further use of the substance or object reduces overall impacts of resource use and improves the efficiency of such use.

Besides a uniform application of EoW, the question if a material is waste or not is answered rather differently between Member States leading to an unclear situation without legal certainty on the status of a material -> see for more info the answer to 10.d.

b. Competition between waste treatment options among Member States:

Waste is not always treated in a similar manner in all Member States. In practice, processors who are aiming for high-quality processing options contributing to a circular economy have to deal with competition from other (cheaper) processing options. European legislation still lacks a more detailed elaboration of the waste hierarchy for different waste streams for example by formulating minimum standards. This can be done in many ways (landfill bans, incineration bans, expansion of BREF documents [currently largely about emissions / process restrictions / end of pipe techniques] with more attention to the level of waste hierarchy waste streams or industrial residues have to be treated, etc.).

c. Unintended effects of legal provisions and other targets (lock-ins):

In a full circular economy nothing will become waste. New business cases and revenue models are rapidly developing, creating new products and applications from materials and substances which used to be disposed or

burned. A circular and biobased economy stimulates an increasing variety of sources. Bioplastics are made from residues of grass, sugar beets or potatoes, while phosphates, a vital element for our food production is retrieved by refining waste streams such as sludge and manure. Networks in production are shifting through innovation and cross-sectorial collaboration; raw material/feedstock is cascaded, both down and up-grading. As an example, Dutch tomato producers sell their plants after harvest to a local paper and cardboard industry, which makes boxes out of them in which the tomatoes are transported all over the world. EU frameworks lack the flexibility and coherence to stimulate these trends and sometimes even create institutional barriers. The Commission could strengthen the internal market for recovered and recycled materials and stimulate synergy between legal frameworks regulating waste on the one hand and product design and markets on the other.

Answer continued under question 4.

3. Could you provide an example of such a regulatory failure/obstacle? Please describe it briefly.

a. No level playing field for (end of) waste:
Many notifiers and consignees claim that the processing of waste results in a product. Often treatments only consist of filtering to take out sediments, of gravitational separation to get rid of (a part of) the water and sometimes of fractioning and or distillation. A uniform distinction between a recovery operation or normal industrial practice is hard to make, based on the current Waste Framework Directive. This can lead to a different conclusion on the status of a material, waste or not.
When the competent authority of the country of origin considers material a product and the competent authority country destination considered it as waste (or vice versa) debates arise whether a notification procedure is in place or not.
Problem is that the question if a material is waste or not is answered rather differently between Member States. There is also a big difference between the amount and application of national end-of-waste criteria.

b. Competition between waste treatment options among Member States:
An example of different views on the desirable treatment of waste is tar asphalt. The Netherlands' policy objective is to destroy the poly aromatic hydrocarbons (PAHs) by means of thermal treatment of the asphalt, thus protecting the environment and road workers' health and enabling unrestricted use of the cleaned material. In practice part of the obtained tar asphalt is exported, without destruction of the PAHs, for various uses as construction material. Based on the limit value for

benzo(a)pyrene as established in Annex V of the European Waste shipment regulation (entry B2130) the export of tar asphalt is usually liable to the green list regime (no requirement to request a permit), hence cannot be stopped.
Another example is gypsum, where recycling is possible, but for which in some Member States backfilling is considered as an acceptable option.

c. Unintended effects of legal provisions and other targets (lock-ins):
In order to comply with the Batteries Directive, car-batteries have to be recycled. However, innovative technology enables the re-use of car-batteries that are no longer suitable for their original purpose for other purposes (temporary storage of excess renewable energy). Thus the batteries have a 'second life use' before being recycled. However, since re-use does not contribute directly to the realization of the recycling targets, and because of the requirement set in the Batteries Directive, the original producer is not stimulated to put the batteries on the market for re-use.

A second example are car-windows. In the Netherlands they are no longer removed before shredding the car-wreck because they have a favorable effect on the composition of shredder residue and the applicability of this residue. For the recycling rate of the wreck as a whole this is beneficial - and necessary to meet the targets - but from the perspective of optimum glass recycling this is less positive, because car-windows can also be reused as a whole. Problem is that the European targets only focus on quantity rather than quality.

Regarding the use of resources, the Netherlands favor a policy that stimulates the cascading use of materials up and down value chain. High value recycling can be achieved through a combination of binding and non-binding measures which ensure a minimum degree of recycling on the one hand, and which stimulates and challenges business to innovate and close supply chains on the other. For instance, substances should only be used as energy source after the moment that they are technically no longer suited for reuse or recycling to avoid a shift from recycling to incineration. Another example is the reuse of biomass originating from the food- and drinks industry. The production of high quality foods and drinks involves waste and losses at every stage of its lifecycle. Losses should be prevented or reused in high quality products. Yet, these goals are hampered by the lack of synergy between the EU frameworks on waste and marketing of food and feed. Central questions are the extent to which biomass such as former foodstuffs may be upgraded to feeding stocks for animal nutrition or food production, and the ways authorities should steer biomass towards the best available option in favour of high value cascading. On the other hand waste cannot be upgraded to feed, let alone food, unless the health and environmental risks are properly addressed.

Answer continued under question 5.

4. What do you think this regulatory failure/obstacle is linked to? (multiple answers possible)

- [x] EU legislation or policy
- [x] National policy, legislation or administrative decisions
- [ ] Regional policy, legislation or administrative decisions
- [ ] Local policy, legislation or administrative decisions

Please briefly describe which specific policy/policies, legislation(s) or decision(s) is/are to blame for this:

Continuation answer to questions 2:

d. Waste policy versus chemicals policy:
Both policies, of chemicals as well as waste management, are equally valid and need both to be respected. However the approaches in both policy fields are different. Chemicals policy is quality based, aims to ensure a high level of protection of human health and environment and focuses amongst others on the reduction or substitution of Substances of Very high Concern (SVHC). Waste policy also aim to protect human health and environment, and often adds quantitative targets like percentages of waste that should be recycled. Although the objectives of chemicals and waste policies coincide, in cases where waste streams contain SVHC's a dilemma rises: should we give preference to maximize recycling or to minimize the (further) use of SVHC's? The integrating question is how to balance between both policy fields?

Before answering the question the following differences in approaches should be kept in mind. The classification of SVHC's (substances of very high concern) as well as other mixtures and substances is based on hazard characteristics. This hazard based approach in classification as SVHC leads ultimately to listing of substances on Annex XIV of REACH, making them subject to authorization. On the other hand, waste management has a risk based approach, which requires appropriate measures to reduce the risks for human beings and environment. Besides other principles and criteria, technical feasibility and economic viability should also be taken into account. The mere presence of a hazardous substance in a waste stream does not take away the need to make a risk analysis, in order to obtain the best overall environmental outcome.

In answering the integrating question above the Netherlands would support the development of EU wide criteria in the determination of criteria for wastes containing SVHC's. Such criteria should include a case by case approach in which it should be assessed if recycling will be without risk for human health or environment. These criteria should look at the overall impact of recycling versus incineration or landfill. If recycling is possible without unacceptable risks and with a positive

overall impact, this should be the preferred option. Also certain conditions for recycling of waste streams containing SVHC's should be considered, for example labeling or registration obligations or prohibition of certain applications.
Finding a balance could result in a bridging policy approach, that is credible and tenable for both policy fields. The Netherlands is considering to elaborate this issue in a separate paper.

e. Insufficient demand for secondary materials:
It appears that supply and demand in many cases do not converge due to insufficient transparency. Entrepreneurs have expressed concerns regarding the availability of sufficient secondary materials to keep their investments (i.e. in recycling) profitable. In this regard both quantity as quality of the needed material are regarded a problem. Other entrepreneurs, on the contrary, point out that there is enough supply of secondary raw materials, also quality wise, and that sufficient demand is lacking. If supply and demand remain disconnected relevant actors on both side may choose to change their business activities away from circular solutions leading to a smaller market for secondary materials.

More transparency is needed in supply and demand to create a well-functioning market for secondary raw materials. Both in terms of the required and offered quality of materials, as well as in terms of their quantity. Various tools can facilitate this including standardized quality specifications. Standardized quality specifications for secondary materials would improve the transparency and comparability of supply and would help to create a language in which trading can occur. Although such standardized specifications should be a private sector initiative, where necessary this process would benefit from government coordination and assistance, for instance through, for example, private-public cooperations or sustainable public procurement. The quantity of supply and demand can be further stimulated by setting targets and objectives that ensure optimal application of the waste hierarchy and high-value reuse, for instance by phasing out land filling.

5. Which of the following impacts do you think such regulatory failure/obstacle has within the EU? (multiple answers possible)

- [x] Reduces reuse or recycling
- [x] Reduces recovery, including energy recovery
- [x] Increases waste generation
- [x] Leads to increased environmental impacts
- [x] Leads to reduced resource efficiency
- [ ] Other
- [ ] None

If relevant, please provide additional information in relation to your above reply.

Continuation answer to questions 3:

d. Waste policy versus chemicals policy:
PVC waste containing cadmium and/or lead compounds as an additive. The restriction for cadmium use in REACH Annex XVII provides for a safe use of cadmium containing recycled PVC in sewage pipes. However, the waste status could hamper the marketing of the recycled PVC. In particular the qualification of the recycled PVC as 'hazardous waste' could render the marketing and use of the recyclate liable to certain requirements under the waste legislation which imply costs that make the use of recyclate unprofitable, while these requirements are not necessary for the protection of the environment or the human health.

Another example is the possible recycling of expanded polystyrene (EPS) containing HBCDD, a brominated flame retardant, in building applications. There is no risk in recycling this EPS into new insulation for building applications.

e. Insufficient demand for secondary materials:
The Dutch government consults companies on a regular basis about how recycling can be brought to a higher level, how innovation can be stimulated, etc. In almost all cases market parties highlight the stimulation of the market for secondary materials. If the sale of products is certain, innovations and more recycling will be a natural result. In The Netherlands an example is known where a PVC waste sorting company and a producer of PVC products have agreed on quality and quantity of secondary materials. However, this seems to be a positive exception. In many cases market parties indicate that stimulating a market for secondary material is the way to follow in order to develop a circular economy. Many parties also expect governments to play an important role here.

6. How did you become aware of this regulatory failure/obstacle? (multiple answers possible)

- [ ] Reported by members of your organisation
- [x] Through complaints reported to the authority
- [ ] From literature
- [x] From own market analyses
- [x] Own experience
- [ ] Other

If relevant, please provide additional information in relation to your above reply.

An example is our national programme Smart Regulation for Green Growth. Innovative investment is a prerequisite for green growth in such domains as climate, energy, water, biobased economy, construction, food, mobility and waste (recycling). The Dutch government supports the transition towards green growth. The programme Smart Regulation for Green Growth is a government initiative that aims to remove the barriers to investment in green innovation caused by legislation and regulations.

Another example is the Green Deal approach. In the Netherlands the Green Deal approach has proven to be a very useful instrument to promote front-runners and to encourage multi-stakeholder alliances that are aimed at economic growth and at improving the environment. It is a strong and useful instrument for applying the principles of better regulation: it facilitates the process of improving existing regulation, the process of introducing effective new regulating and in some cases can be an alternative instrument for regulation.

7. What actions are you aware of that could solve or mitigate this problem? (multiple answers possible)

- [ ] Not aware of any actions
- [x] Legislative changes
- [x] Changes in the policy or decision-making by authorities
- [x] EU guidance on waste legislation or policy
- [x] Co-operation between authorities in different Member States
- [ ] Co-operation between authorities in the same Member States
- [ ] Other

If relevant, please provide additional information in relation to your above reply.

8. Are there other important aspects of policy and legislation that distort the waste market or create obstacles to the functioning of waste markets? If yes, please describe these taking into account the previous questions.

Transboundary movements of waste can support the formation of new markets and stimulate innovative new treatment options. At first sight it therefore seems logical to expand the green list of the European waste shipment directive. However, The Netherlands finds that the present green-list procedures make it impossible to discriminate between various types of recovery. For waste on the green list unlimited transboundary transport for all recovery operations is allowed, making it possible that waste that could be recycled is exported for energy-purposes or backfilling abroad. In practice this does not always mean that the most circular recovery operation is chosen but the cheapest.
The Netherlands sees a growing need to be able to steer transport via the green list procedure towards the for the circular economy most optimal recovery operation. We therefore suggest to make this possible at European level. In any event, for a number of cases green list

transboundary shipment for the purpose of energy or backfilling should no longer be allowed when recycling is possible. This could be done by making a distinction within the existing green list in forms of recovery. However, we would also like to be able to discriminate between forms of recycling when one form of recycling evidently contributes more to the circular economy than the other form. This probably requires a more structural adjustment of the existing green list system making it possible to distinguish case by case for which treatment options shipment as green list waste is allowed.
In summary, we can imagine that simplifying cross-border transport by expanding the green list may be positive for the realization of a circular economy, but we ask the Commission also to ensure that green list transport indeed always supports the circular economy by creating a distinction between different forms of recovery.

Besides this we see other opportunities to make transboundary shipments support the circular economy
First it would help to refine the waste hierarchy, in particular to distinguish between types of recycling that contribute little to the realization of a circular economy and forms of recycling that really support the realization of the circular economy. Forms of recycling that (in theory) can be repeated infinitely are more highly rated than forms of recycling can be performed once and are to be followed by disposal (or use as fuel).
Another option is to concretize article 12, sub 1, line (g) of the European waste shipment directive by establishing a relationship with the circular economy. At this time objection to transboundary shipment is possible when the amount of recovery does not justify the shipment. It seems desirable that objection is also possible if the intended form of treatment / recycling contributes less to the realization of a circular economy than possible.
In both cases the Netherlands is willing to think along when the Commission sees these as interesting options.

Above (previous answers), we already mentioned to support end-of-waste criteria at a European level. For the remaining national decisions we think it makes sense to have an overview. The Netherlands therefore suggests the Commission to establish a database at European level where the national EoW criteria from all Member States are collected.

B. Obstacles to the functioning of waste markets connected to the application of EU waste legislation or other EU legislation

9. Do you consider that there are any obstacles to the functioning of waste markets connected to the application of EU waste legislation or other EU legislation?

- (●) Yes, many
- ( ) Yes, but limited
- ( ) No (go to part C of the questionnaire)
- ( ) Don’t know (go to part C of the questionnaire)

10. What are the drivers/causes of these regulatory failures or obstacles to the efficient functioning of waste markets?

(Rate in a scale of 0–5, with 0 not important, 5 very important)

a. Application of the system of notification- and consent requirements under the Waste Shipment Regulation (Articles 4-17 and 26-33 of the Waste Shipment Regulation).

between 0 and 5

3

b. Application by national authorities of the provisions concerning waste shipments through transit countries (Waste Shipment Regulation).

between 0 and 5

3

c. Other controls imposed on waste or waste shipments by application of EU waste legislation.

between 0 and 5

5

d. Different interpretations of the definition of ‘waste’ according to the Waste Framework Directive.

between 0 and 5

5

e. Diverging classifications of waste as ‘hazardous’ or 'non-hazardous' (Waste Framework Directive).

between 0 and 5

5

f. The distinction between ‘recovery’ and ‘disposal’ (Waste Framework Directive).

between 0 and 5

1

g. Application of the 'proximity principle' resulting in an outcome which is inconsistent with the waste hierarchy (Waste Framework Directive and Waste Shipment Regulation).

between 0 and 5

3

h. Divergent application of the so-called 'R-codes', i.e. the recovery operations listed in Annex II to the Waste Framework Directive.

between 0 and 5

3

i. Application of national end-of-waste criteria established in accordance with the Waste Framework Directive, see further Article 6(4) of the directive.

between 0 and 5

i. Application of national end-of-waste criteria established in accordance with the Waste Framework Directive, see further Article 6(4) of the directive.

3

j. Application of the grounds for reasoned objections to shipments of waste for recovery, as listed in Article 12 of the Waste Shipment Regulation, or the requirement for environmentally sound management (ESM), see further Article 49(1) of the regulation.

between 0 and 5

0

k. Other obstacles not listed above.

between 0 and 5

If relevant, please provide additional information in relation to your above reply.

Ad. d
When discussing the opportunities of the circular economy, it is crucial to understand the legal status of the resources: are these resources product or waste?
In legal terms waste – as described in the Waste Framework Directive –

is any substance or object which the holder discards, intends or is required to discard.
Remarkably the Waste Framework Directive does not hold a definition of the word 'to discard'.
As a consequence the distinction between product and waste remains highly unpredictable. Decisions by the national competent authorities and judgments by the national courts can be very different – between member states, and even within one member state.
Especially the lack of a definition of the key element in the definition of waste – the word 'to discard' – leads to a situation where there is no legal certainty for investments in circular economy initiatives, and where there is no level playing field between member states.
Therefore we propose a definition of 'to discard', exempting cases fulfilling three conditions (as mentioned under 2.a.) which are explicitly based on the twofold aim of the WFD to both protect human health and the environment and to improve the efficient use of resources.
Besides this the application of the end of waste status should also become more clear as mentioned under 2.a. Decisions on end of waste (both for setting criteria or case by case) should made on the same uniform conditions in the EU by the Commission as well as the Member States.

Ad. e
It is often difficult for companies to determine which List of Waste -code for their waste applies. In practice it is often difficult in case of mirror entries to decide which hazardous substances might be present in a waste stream, what that means for the analyzes to be performed and for relevant HP-phrases that apply, etc. The present system is based on the chemical-regulations and a large number of components can make a waste stream hazardous. Unlike for commercial chemicals neither the exact history of a waste stream nor the potential pollutants are well known. Moreover, for many components the relation with HP-phrases requires expert knowledge that many waste treatment operators lack. The Netherlands favor a major simplification of the system of hazardous waste / non-hazardous waste classification by defining an exhaustive (if necessary comprehensive and if necessary including sum parameters) list of components and associated limit values as the basis for the distinction between hazardous and non-hazardous. A simpler system is good for the rapid and uniform classification of waste.

Ad. f
Discussions about the distinction between recovery and disposal sometimes arise. These are often very specific cases and we do not have the impression that these discussions form a major limitation for the waste markets

11. Please provide qualitative or quantitative evidence of the impacts of these distortions (e.g. in terms of additional costs for businesses, missed new job opportunities, environmental impacts etc.)

C. Obstacles to the functioning of waste markets arising from national, regional or local rules or requirements and decisions which are not directly linked to EU legislation

12. Do you consider that there are any distortions created by waste policy, requirements or decisions taken at national, regional or local levels?

- Yes, many
- Yes, but limited
- No (go to question 15)
- Don't know (go to question 15)

13. What are the drivers/ causes of these market distortions?

(Rate in a scale of 0–5, with 0 not important, 5 very important)

a. Differing taxes or fees leading to internal or cross border 'shopping behaviour', i.e. waste is transported to locations where it is cheaper to manage to the detriment of more environmentally sound management options which are locally available.

between 0 and 5

b. Distribution of roles and responsibilities for municipal authorities and private companies in waste management.

between 0 and 5

c. Development of waste treatment networks leading to local overcapacities or under-capacities for different types of waste treatment (e.g. incineration) to the detriment of higher positioned treatment steps in the EU waste hierarchy.

between 0 and 5

d. Inefficient use of available capacity in recycling or energy recovery in a neighbouring country or within the country itself.

between 0 and 5

e. Regulatory barriers that lead to shipments of waste in spite of facilities existing nearer to the source that could treat the waste in an equivalent or better manner in terms of environmentally sound management and the waste hierarchy.

between 0 and 5

f. Design and implementation of extended producer responsibility schemes leading to competition distortions or market access problems for producers and waste operators.

between 0 and 5

g. Permits and registrations which are not linked with EU legislation, requested from companies established in other Member States, even if they have fulfilled similar requirements in their home Member State.

between 0 and 5

h. Excessive controls on waste or waste shipments by national/regional/local policy, decisions and legislation that go beyond EU requirements ('gold plating').

between 0 and 5

i. Distribution of roles and responsibilities for municipal authorities and private companies in waste management.

between 0 and 5

j. Other obstacles not listed above.

between 0 and 5

If relevant, please provide additional information in relation to your above reply.

14. Please provide qualitative or quantitative evidence of the impacts of these distortions (e.g. in terms of additional costs for businesses, missed new job opportunities, environmental impacts etc.)

15 a. Please rank the three most important drivers of market distortions and obstacles according to their importance with respect to being tackled first to improve the efficient function of waste markets. Please indicate the relevant number and sub-letter from 10a)-k), 13 a)-j).

15 b-c.

- 15 b. Cannot rank them. They are all equally important.
- 15 c. Not enough knowledge to rank them.

16. What do you feel are the negative impacts within the EU of such obstacles? Please rank them between 0 (no impact) to 3 (high impact).

a. Increased waste generation or less reuse

between 0 and 3

16. What do you feel are the negative impacts within the EU of such obstacles? Please rank them between 0 (no impact) to 3 (high impact).

b. Less recycling

between 0 and 3

c. Less recovery, including energy recovery

between 0 and 3

d. Less environmentally sound management of waste

between 0 and 3

e. Less resource efficiency

between 0 and 3

f. Lack of market access

between 0 and 3

g. Other

between 0 and 3

If relevant, please provide additional information in relation to your above reply.

D. Final questions

17. Do you consider that there are large differences between the Member States in the way their waste markets function?

- Yes, very large differences.
- Yes, but the differences are small.
- No differences.
- Don’t know.

18. Please briefly describe the differences between Member States, perceived as obstacles to the functioning of waste markets:

19. What solutions would you propose in order to address the regulatory failures or obstacles you have identified above?

Part 3 – Follow-up activities

20. Would you be interested in participating in a stakeholder meeting on these issues that will be held on 12th November 2015?

- (●) Yes, I would like to attend.
- ( ) No, I'm not interested.

My contact details are (optional):

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Contact

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