ISWA Position Paper to the EU Commission on the Communication on the Thematic Strategy on the Sustainable Use of Natural Resources

10 February 2005

ISWA welcomes the strategy and is looking very much forward to its positive effects on the future environment in EU and also outside the EU. ISWA would like the final strategy to include the three key issues for a sustainable use of natural resources in the future:

- The decoupling target has to include the impact placed on countries outside the EU, especially those in developing countries
- The strategy should have the target of an absolute decoupling rather than relatively
- Also the strategy should focus on getting the pricing of raw materials right and applying fair trade principles.

1 October 2003 the Commission released a communication, “Towards a Thematic Strategy on the Sustainable Use of Natural Resources” stating that within the next 25 years such a strategy should be developed and fully implemented.

ISWA issued our first position paper on the communication 7 November 2003, stating that ISWA supported and welcomed the strategy since the resource aspect of the total material flows through the economic system had previously not been paid much attention. We noted that especially for the recycling sector as the environmental impacts related to the recycling processes are rarely – if at all – compared to the environmental impacts related to the extraction and handling of virgin materials.

After the release of the Communication the Commission formed two Working Groups to further develop the strategy; one on the supply of resources and one on the use of resources.


In December 2004 the Commission launched an online consultation, which runs from 6 December 2004 until 30 January 2005, and will influence the forthcoming extended impact assessment currently being prepared by the Commission and which will guide the final Strategy, which should be adopted in summer 2005.

1. ISWA Comments on the Working Group reports

ISWA welcomes both of the reports and believes that these are very important for the future work on developing the strategy. ISWA would like to stress our support for some particular points mentioned in the two reports:

The report from Working Group 1- on supply of resources:

- A real greening of the EU economy and sustainable development will require that EU growth and way of life to be decoupled from negative social and environmental impacts,
not only within the EU, but also in the countries extracting resources and producing goods exported to the EU, **especially those located in the developing world** (p.3)

- That EU Development policy should pay attention to **building the capacities** of the developing countries to better manage their resources, including soils, minerals and renewable energy (p.3)
- That there is a need for a progressive **integration of externalities in resource prices**, including the externalities generated by the inputs needed for their production and for resources related to their transport (p.8).
- ISWA believe that the Chairman is right when he states the need for the **application of “fair-trade” principles** on resource imports from low-income countries, to finance aid instruments in support of capacity building and institutional strengthening; information and knowledge development and support actions to those populations affected by resource production activities.
- There is a need for focussing future research (forthcoming 7th Research Framework Programme) on developing more energy and resource efficient processes, renewable energies, **waste minimisation and re-use** (p.9).

**Report from Working Group 2 - Use of resources:**

- That they **prefer the use of Total Material Requirement (TMR)** as the measurement unit rather than aggregated Domestic Material Consumption (DMC), as TMR better reflects the overall material need including sourcing of materials from outside the EU and would allow consideration of the global environmental impacts of EU Consumption (p.8).
- Development of an EU-wide waste management infrastructure, offering environmentally friendlier alternatives to landfill **for recovering resources**, should be encouraged (p. 23).
- To recycle is a priority but as the working group states that **Developing markets for recyclables** and ensuring their viability should be given priority since collecting for recycling is not an end in itself (p.24).
- Some wastes which, after sorting, can not be efficiently recycled may be used to **recover energy**, and would thereby offer an alternative to the use of fossil fuels energy, and would thereby offer an alternative to the use of fossil fuels (p.24)

2. ISWA’s answers to the questions posed by the Commission in the online consultation

Since ISWA is a NGO working only in the waste sector ISWA is not able to answer all of the questions asked by the Commission. However, some of the questions are relevant to answer:

- **Question 2.3.2. p. 9:** “**Would your organisation be willing to further highlight the content and purpose of the Strategy at the national level to your members?**”.
  
  **Answer:** ISWA is willing to work with the Commission in highlighting the strategy to our members in Europe and ask our national members in Europe to do the same at the national level.
• Question 3.3.1. p. 11: “Would the development of a weighted indicator or a set of indicators of material flows to reflect environmental impacts gather support from your organisation/business?”

Answer: ISWA supports and finds that there is a need for developing such an indicator, but ISWA believes that it is very important to have both indicators mentioned by the Commission 1. Material per GDP and 2. Impact per GDP. Furthermore, ISWA finds that concerning both of the indicators it is important to look at the overall material use and impact use including what is left behind in countries outside of Europe.

• Question 4.3.3. p. 13: “Is the voluntary development of these national plans sufficient to solve the identified problem?”

Answer: ISWA finds that it is very important to introduce resource national resource management plans covering the use of raw materials. However, ISWA finds that it is important that these plans are mandatory and that the existing waste management plans are integrated into these new resource management plans.

In the online questionnaire the Commission suggests forming an international panel on decoupling. In the questionnaire the Commission asks whether this should be an ad-hoc network or a multidisciplinary team with permanent membership. ISWA very much welcome both models and find that this is a very good initiative. ISWA especially supports the suggestion of this panel or network to discuss “export of waste and products that no longer meet developed world standards to developing countries, or how to promote awareness of resources issues amongst global supply chain”. Since these are key issues for ISWA we very much welcome this idea and are also willing to take part in this work with the Commission.

3. Further comments that are not covered by the working group reports or the questions asked by the Commission

As ISWA has indicated in our above comments and in our first position paper it is very important that the strategy aims at an absolute decoupling of environmental impacts from economic growth. Numerous examples are given in the communication that relative decoupling could lead to a higher environmental impact due to growth in economy. To ISWA it seems obvious that absolute decoupling will be the only sustainable way for the future.

In the Communication it is stated that the Commission believes that 25 years is the most appropriate time scale for archiving the strategy’s objectives. As ISWA has stated in our first position paper to the Commission, we believe that probably not many actions will take place until the very end of this long period. Therefore ISWA recommends setting a shorter time-scale or at least some targets to be achieved in the meantime – i.e. 5, 10 and 15 year periods, would be appropriate. Otherwise it could be foreseen that businesses would not react, as it is important that all actors should meet the same requirements at the same time.