



ORGALIME

Shaping EU Waste Policy: Appeal to secure an enforceable waste framework law

Brussels, 12 February 2007

Dear Member of the European Parliament,

In its plenary session this week, the European Parliament will be voting in first reading on the proposal for a waste directive.

Orgalime¹ industries are currently experiencing the implementation of directive 2002/96/EC on Waste Electrical and Electronic Equipment (WEEE) and directive 2005/32/EC on Eco Design of Energy Using Products (EuP), which covers the integration of environmental aspects into product design over the product's whole life cycle, including the waste phase.

Against this background, Orgalime believes that the draft waste directive must aim at establishing a **truly harmonised directive where waste policy constitutes product policy** and a **consistent and mature waste policy framework with clear and coherent requirements** that enables Europe to lead by example on waste management to the benefit of the environment, consumers and the competitiveness of European industry alike.

European producers of metalworking, mechanical and electrical/electronic engineering products consider the following priorities as fundamental for arriving at a well balanced and well defined directive:

1. **Waste policy, and waste prevention measures more particularly, must not upset the functioning of the internal market**, notably through the erroneous incorporation of eco design aspects under waste management legislation.
2. **Better Regulation equals legislation that is enforceable**: Some amendments on the draft waste directive strongly disturb legal certainty by introducing ambiguous and/or multiplying requirements, i.e.: regarding producer responsibility, or an unworkable „one size fits all“-targets for recycling levels or parallel waste collection/treatment schemes to existing waste stream specific systems.
3. Industry needs a **sufficiently flexible waste hierarchy** to continue operating competitively in Europe.
4. The draft waste directive should introduce **more transparency** and especially a more **structured continuous dialogue with stakeholders**.

Orgalime therefore requests you to finally adopt amendments 5, 15.1, 15.3, 15.4, 31, 39.3, 65, 79, 80, 101, 114, 117.

Orgalime request you to reject the following amendments since they run counter the above listed essential principles: 8, 10, 19, 21, 35, 37, 58, 60, 69, 103, 106, 120, 140, 141, 144, 157, 158, 178, 180, 182, 183.

Orgalime urges you to use this opportunity to **shape Europe's waste management framework in a sustainable manner** that would secure the competitiveness of European engineering industries instead of adding on additional layers of overlapping requirements that cannot be enforced and therefore contradict the institutions own principles of Better Regulation and Simplification while at the same time remain without environment benefit.

Yours sincerely,
(electronically signed)
Adrian Harris, Secretary General

¹ **Orgalime, the European Engineering Industries Association**, speaks for 36 trade federation representing some 130,000 companies in the mechanical, electrical, electronic and metalworking industries of 24 European countries. The industry in 2005 accounted for some €1,598 billion of annual output. The industry does not only represent more than one quarter of the output of manufactured products but also a third of the manufactured exports of the European Union. It is the largest manufacturing sector in Europe. It is also the largest industrial employer in the EU27, providing some 10 million jobs.