

# RREUSE response to Public Consultation on the Evaluation of the 7th Environment Action Programme

July 2018

[RREUSE](#) represents social economy enterprises active in re-use, repair and recycling. We want the EU and national governments to move from promoting just recycling and waste management to putting second-hand first. Our members employ people at risk of socio-economic exclusion and help bring them back into work. In addition, they bring products back to the market at affordable prices providing essential household items to low income groups.

RREUSE welcomes the opportunity to comment on the implementation of the 7<sup>th</sup> Environment Action Programme which has had a positive influence on the environmental legislative framework of the European Union, including the EU Commission's Circular Economy Package proposals. In particular, priority objective 2 "To turn the Union into a resource-efficient, green and competitive low-carbon economy" has been a source of inspiration for the legislator.

The update of the Waste Framework Directive, for example, resulted in the inclusion of provisions promoting the activities of social economy enterprises active in re-use, repair and recycling, and therefore pushing the European Union, at least partially, towards a "smart, sustainable and inclusive economy". These provisions include:

1. Social economy enterprises are recognised as key actors in the implementation of an inclusive circular economy
2. Member states must take a quantitative approach to monitoring both re-use and preparation for re-use activities from 2020 onwards with potential future EU-wide targets by the end of 2024
3. Measures will have to be taken to help facilitate access to discarded re-useable goods for organisations who can prepare them for re-use rather than letting them be prematurely recycled, buried or burned

However, the objective for the Union to become a "smart, sustainable and inclusive economy by 2020" is unlikely to be reached. Firstly, the delays concerning the agreement of the Circular Economy package did not help in achieving these targets, four years after initial Commission proposals in 2014.

In addition, RREUSE identified several missed opportunities to improve the implementation of the waste hierarchy, decouple economic growth from resource use, and make the EU's economy more inclusive.

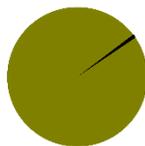
Whilst waste prevention and preparing for re-use activities are the most effective and beneficial waste management related activities in terms of local job creation and resource savings<sup>1</sup>, RREUSE regrets that recycling activities remain the primary focus point of EU legislation on waste and that the EU waste hierarchy is far from being implemented at national level. Most, if not all, of the waste prevention related actions suggested in the Waste Framework Directive are non-binding, with Member States simply encouraged to apply them. The possibility to set up waste prevention and preparing for re-use targets will be investigated by the Commission in the future, but it could and should have been done earlier. Financial measures to help the re-use sector also need to be more binding, which is not yet the case.

Finally, the EU institutions also missed an opportunity to further strengthen the role of the social economy enterprises active in waste management, even though they are historical actors applying circular economy principles before the concept even existed. The cross-cutting nature of social economy enterprises active in the field of re-use, repair and recycling allows to tackle social exclusion and over-consumption of resources at the same time.

The reasons why social economy enterprises active in re-use should be prioritised are explained in the following diagram:

### Environmental and social benefits of re-use

**1/3** of goods collected at waste recycling centres are **still re-usable** and could be sold second-hand instead of being recycled or landfilled<sup>1</sup>



**200 000 local jobs** could be created if **1%** of municipal waste in Europe was prepared for re-use<sup>2</sup>



**12 000 €** net return to government and society for the reintegration of **one unemployed person** through working at a social enterprise<sup>3</sup>

1 rx3 (2013) All Island Bulky Waste Reuse Best Practice Management Feasibility Study  
2 RREUSE (2015) Briefing on job creation potential in the re-use sector  
3 SST (2015) Sociale tewerkingstelling insynergie met de reguliere economie



RREUSE remains hopeful that EU institutions will keep on working towards achieving the goals included in the 7<sup>th</sup> Environment Action Programme. RREUSE is especially happy about the efforts made by the European Commission concerning the update of the Directive on Ecodesign, aiming at including resource efficiency requirements into energy related products, making them more repairable and re-usable. This is particularly welcome knowing that “annual global waste arising from electrical and

<sup>1</sup> EPA (2002) Resource conservation challenge: campaigning against waste: Estimates that for 10,000 tonnes of waste products and materials, 1 job can be created if incinerated, 6 jobs if landfilled, 36 jobs if recycled, and up to 296 if refurbished and re-used

electronic equipment alone will have increased from 33.8 to 49.8 million tons between 2010 and 2018”<sup>2</sup>. We also urge the Commission to work on the Ecodesign of other waste streams such as textiles and furniture.

Concerning the next Environment Action Programme, the RREUSE network would appreciate to see the following policies being included in the EU legislation:

- **Greater support for waste prevention, such as re-use and repair as well as preparing for re-use activities in the context of a Circular Economy.** Whilst support is needed to boost recycling, more effort and binding measures must be placed on supporting options above recycling in the waste hierarchy, with more concrete measures than what is included in the recently revised Waste Framework Directive.
- **Eco-designed electronics, textiles, furniture, etc.** Every product placed on the market should be designed in a way which facilitates re-use and repair. This would help save resources and create more local jobs in the repair sector which is currently going through a major crisis, in particular because it is simply becoming more expensive to repair than replace.
- **Stronger links to the European Commission’s employment agenda, in particular the European Pillar of Social Rights**<sup>3</sup>, which sets out to tackle poverty and social exclusion. In line with policy coherence and the outcomes of the 2012 United Nations Conference on Sustainable Development (Rio +20) concerning the importance of poverty eradication, the 8th Environment Action Programme should support the goals of social inclusion and poverty reduction by better recognising the role of social economy enterprises as key actors in helping implement the EU’s social and environmental agenda.

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<sup>2</sup> [Columnist Johanna Neumann: Protecting consumers’ right to repair](#)

<sup>3</sup> The European Pillar of Social Rights was proclaimed on 17 November 2017 and aims to reinforce social rights and deliver a positive impact on people’s lives by addressing certain challenges, such as long-term and youth unemployment and risk of poverty.