

HELLENIC PARLIAMENT

**ELSA PAPADEMETRIOU**  
**VICE PRESIDENT**

Athens, 13 March 2009

**To:**

Mr Stavros DIMAS

*Member of the European Commission  
Responsible for the Environment*

*Dear Mr Commissioner,*

I am sending this letter to let you know that the Hellenic Parliament and myself, in my capacity as Chairperson of the Special Standing Committee for European Affairs, deem your initiative to launch a consultation on bio-waste management to be of primordial importance. In that regard, we decided to initiate a thorough discussion on the "Green Paper on the Management of Bio-Waste in the European Union" and participate in the pertinent consultation.

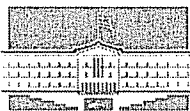
In that context, on March 10<sup>th</sup> 2009, the Special Standing Committee for European Affairs and the Special Permanent Committee for the Protection of the Environment, held a joint meeting with the participation of officials from the Ministry for Environment, Spatial Planning and Public Works as well as of specialists in environmental issues. The vast majority of the participating members of the Committees approved the hereby attached document.

As Chairperson of the Committee for European Affairs of the Hellenic Parliament, I intend to exhaust the institutional capabilities of the Hellenic Parliament regarding its proper participation both in public consultations and in shaping EU legislation.

In that context and taking note of the determinations, persistence and imagination that we all need to show and prove in combatting climate change en route to the Copenhagen Conference, I intend to have the Committee for European Affairs further involved in environmental issues.

*Elsa Papademetriou*  
*Vice President of the Hellenic Parliament*  
*President of the Committee of European Affairs*





Hellenic Parliament

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Contribution of the Hellenic  
Parliament to the  
Consultation on the  
Green Paper on the Management of Bio-  
waste in the EU  
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## **1. Better waste prevention**

### **1.1. Waste prevention is at the top of the EU's waste treatment hierarchy. From your experience, what could be specific bio-waste prevention action at EU level?**

Specific bio-waste prevention action at EU level should be the clear classification and categorization of bio-waste, the assessment of produced quantities, the examination of consumer behavior characteristics and proposals towards its change, the evaluation of benefits resulting from bio-waste prevention as compared to current waste management in what concerns energy, operational cost and substantial outcome for fulfilling the goal of maximum material recovery through solid waste treatment.

Bio-waste prevention is directly associated with the human factor, as well as behavior and habit models. Therefore, preventive action should focus on behavior change and consumption models mainly through information and education. Further to that, it is associated with the ability of governments and local authorities to draft and implement a system of motives and counter-motives for citizens and households, so as to limit household waste.

## **2. Limiting landfilling**

### **2.1. Do you see benefits or disadvantages of further restricting the amount of biodegradable waste that is allowed on landfills beyond the targets already set in the EU Landfill Directive? If yes, should this be done on EU level or left to decide by Member-States?**

Restriction maximization of the amount of biodegradable waste that is allowed on landfills may guarantee a very reliable process (which will include separate collection at the source, creation of motives for household waste utilization, subsidy for household compost systems e.t.c.) for tackling the problem of solid waste, given the fact that landfills, further to the requirements and targets set in the EU Landfill Directive continue to create environmental problems. This is a more costly, disciplined and consistent approach and should be implemented at the community level and not by member-states themselves, as certain of them are falling behind regarding implementation of relevant community directives. Further restricting amounts than these described in Directive 99/31 on Landfilling is a decision for member-states to make and depends on the one hand on their organization level and on the other hand on the management cost they are willing to pay.

### **3. Treatment options for bio-waste diverted from landfill**

#### **3.1. Which options for the treatment of bio-waste diverted from landfills would you prefer to see strengthened and what would you see as their main benefits? Do you think that the choice of the treatment of bio-waste diverted from landfills should benefit from a wider and more consistent use of life-cycle assessment studies?**

It is evident that processing options (further to landfilling) already used for waste biodegrading are preferable and should be upgraded so as to ensure bigger material and energy recovery. Similarly, specialized studies for analyzing bio-waste life-cycle should be conducted and implemented accordingly.

Choosing bio-waste treatment method is the object of scientific research and study. We deem imperative the establishment of a special community multi-criteria cost-benefit analysis guide, which will take into account the special features of the area, the basic characteristics, the qualitative and quantitative waste composition, thus allowing for the choice of the best option in each case.

### **4. Improving energy recovery**

#### **4.1. Do you think that energy recovery from bio-waste can make a valuable contribution to sustainable energy resource and waste management in the EU and meeting the EU's renewable energy targets in a sustainable way and if so, under which conditions?**

Under certain conditions concerning bio-waste composition and the infrastructure for their processing, in each member-state energy recovery from bio-waste may partially contribute to sustainable energy resource and waste management within the EU.

Energy recovery from bio-waste, on condition of their separate collection, contributes to sustainable energy resource and waste management and to the increase of renewable energy resource use, on condition that bio-waste is processed by biological methods or by incineration.

### **5. Increasing recycling**

#### **5.1. Do you see a need for promoting bio-waste recycling ( i.e compost production or use on land of composted material ) and if so, how? How can synergies be achieved between bio-waste recycling and energy recovery? Please provide the necessary evidence.**

Bio-waste recycling should be promoted by the use of compost production on conditions already mentioned above regarding quantities, composition and possibility for full separation of the acceptable percentage during recycling, as

well as by providing motivation for setting up bio-processing plants. Synergies between bio-waste recycling and energy recovery can be achieved by anaerobic digestion and composting producing biogas for combustion. However, synergies between bio-waste recycling and energy recovery require extended research for ascertaining feasibility regarding cost and efficacy.

To this end, it is necessary to examine the supply of motives for implementing compost production and bio-waste recycling methods and their promotion to households ( i.e in the form of domestic compost production in each household).

## **6. Contributing to Soil Improvement**

### **6.1. In order to strengthen the use of compost/digestate:**

- i. Should quality standards be set for compost as a product only or also for compost of lower quality still covered by waste regime ( e.g. for applications not linked to food production)?***

Community quality standards should be set for compost as a product only, provided that during all processing and recycling stages product quality conditions and corresponding limit stability specified have been safeguarded. Quality standards should be linked to the quality of incoming waste, prescribed use and soil features where the product will be applied.

- ii. Should rules for the use of compost/digestate ( e.g. limits on the pollutant concentration in compost/digestate and land on which compost/digestate is applied) be set?***

Rules should be set ( and , consequently, control processes) in order to secure land quality. Community rules on the use of compost/digestate should be included in quality standards registering the land category where the respective compost produced by various plants is to be applied.

- iii. Which pollutants and concentrations should these standards be based on?***

Emphasis should be given to toxic pollutants, but also to all those pollutants of which increased concentrations create problems of quality disturbance and impact on soil parameters.

- iv. What are the arguments for/ against the use of compost ( digestate) from mixed waste?***

The lack of quality stability of the final product and its possible containing dangerous ingredients due to the waste origin deprive the advantage for the use

of compost (digestate) from mixed waste. In any case the final product from mixed waste is of considerably lower quality than the product of bio-waste separate collection.

A serious parameter is the insecurity of the compost's ( digestate's) final users concerning the rational and quality dimension of required processes ( from waste to compost/digestate). The credibility of competent agents involved in waste management must be won and consolidated by the society of citizens.

## **7. Operational (treatment) standards for small plants**

### **7.1. Is there evidence of gaps in the existing regulatory framework concerning the operational standards for plants which do not fall under the IPPC scope, and if so, how should this be addressed?**

The total of plants involved in bio-waste treatment, regardless of size/ productivity or field must be subject to rules. For cases not falling under the revised directive on integrated pollution prevention and control ( IPPC), respective rules should be set at a national level.

## **8. Other uses of bio-waste.**

### **8.1. What are the advantages and disadvantages of the abovementioned bio-waste management techniques? Do you see regulatory obstacle preventing the further developments and introduction of these techniques?**

In any case, both the scheduled and the exercised research activity require on the one hand encouragement of innovation and research through the establishment of a regulatory frame and on the other hand resources' availability. In addition, investing on model/experimental procedures and, by extent, plants, constantly involves a degree of risk which should be undertaken both at a national and a european level. However, the greatest challenge lies in cultivating respective consumer behavior and public sensitivity and awareness concerning the implementation of bio-waste management techniques.