

Opinion
of the European Union Affairs Committee of the Senate of the Republic of Poland
on the proposal for a Directive of the European Parliament and of the Council amending
Directives 2008/98/EC on waste, 94/62/EC on packaging and packaging waste,
1999/31/EC on the landfill of waste, 2000/53/EC on end-of-life vehicles, 2006/66/EC on
batteries and accumulators and waste batteries and accumulators, and 2012/19/EU on
waste electrical and electronic equipment
COM(2014)397
adopted on the basis of an opinion of the Environment Committee of the Senate of the
Republic of Poland
at the meeting held on 24th September 2014

1. The European Union Affairs Committee of the Senate of the Republic of Poland (EUAC) acknowledges the importance of reducing waste production and increasing the rate of waste recovery and recycling, however it believes that the stability of legal framework constitutes an important element in achieving assumed targets.
2. In the EUAC's opinion greater emphasis should be put on achieving the already binding targets instead of setting new ones, since achieving the new targets will require major investments from some states, including Poland. The EUAC believes that waste re-use and recycle preparation levels as put forward by the European Commission are too high in view of the proposed new methods of accounting for the already existing targets. Due to substantial differences in waste recovery rates among the Member States, meeting new targets will entail visibly higher costs for those Member States where the waste recovery and recycling rate is currently at a lower level.
3. The EUAC does not support setting long-term targets. The proposal to increase the preparing for re-use and recycling target to 70% by 1st January 2030 does not have technological, economic or environmental justification.
4. The EUAC fears that meeting the 30% quantitative target of preventing food waste production in the whole production and distribution process, as well as at the end user level, will mainly affect the food sector and result in an increase of food prices.
5. The EUAC emphasises the necessity of linking waste management policy to industrial policy. Long-term goals with regard to environmental protection should be implemented in proportion to economic potential and foster economic development; otherwise any new and more stringent goals and requirements will only deepen the gap between the EU Member States.
6. The EUAC believes that the scope of delegated acts issued by the European Commission is too wide, for instance when setting criteria for classifying a given item as a by-product, or with regard to the end-of-waste criteria, or defining hazardous waste. Each of these issues has considerable impact on businesses and industry, so it is difficult to consider them as "non-essential" elements.
7. The EUAC proposes extending time for transposition of this vast legislative package due to the necessity to amend a large number of existing acts.