1.0 Summary of Recommendations

Recommendations for Cyprus can be summarised as follows.

- 1) Consider the introduction of a landfill tax
- 2) Revisions to the EPR scheme
- 3) Establishment of a framework of monitoring of performance and sanctions
- 4) Consider mandating the introduction of organic waste collections
- 5) Capacity building for LAS (including training and development of local expertise and capacity) in order in order to support the LAs in relation to their responsibility to develop the separate collection schemes and fulfil the respective targets,
- 6) Establishment of a reliable data collection and processing system
- 7) Activities to support waste prevention and re-use
- 8) Introduce PAYT systems

2.0 Potential Issues with approach to Waste Management

Number	Potential issue	Description	Reasons for the issue
1	Lack of technical and financial capacity of the Local Authorities to implement and operate separate collection systems	The new legislation that will be adopted foresees that Local Authorities (LAs) are responsible for developing separate collection systems for paper, metal, plastic glass and organic material. Since this responsibility for the local authorities to develop separate collection systems and to meet targets is clearly introduced for the first time, the authorities will need support and time in order to adapt to the new systems.	Until today LAs were generally responsible for waste collection within their territories but without specific requirements and targets to be met. Most of them have never implemented such systems, since the organization of the separate collection of packaging waste was previously the responsibility of Green Dot.
2	Difficulty in ensuring compliance with LFD in relation to the targets for diversion of biodegradable waste from disposal	According to the data reported by the authorities, the Country is already well behind meeting the targets for diversion of biodegradable waste from landfill. These targets were not met for the years 2010 and 2013 and are unlikely to be met in the next target year (2016).	The plan introduces targets on separate organic waste and treatment (e.g. more than 30% of the organic waste needs to be separately collected and treated), relying equally on separate collection and mixed waste treatment in order to meet the respective targets. Without the achievement of the targets on separate organic waste and treatment, there will be a problem in reaching the landfill directive targets. The plans do not require local authorities to introduce systems for the separate collection of biowaste and services for the separate collection of organic material have yet to be implemented.

Number	Potential issue	Description	Reasons for the issue
3	Lack of motivation to increase waste recycling	There are no legal (e.g. landfill tax), financial (e.g. PAYT systems) or administrative (e.g. sanctions) arrangements in place that will provide strong incentives to increase waste recycling. The current system is currently based on the voluntary willingness of the waste producers to recycle. Without proper motivation of the waste producers, or waste managers, recycling targets cannot be met.	The plan foresees the adoption a landfill tax, but there is no specific timeline for its introduction and no detail on the level of the tax is provided. Local authorities will be responsible for meeting the targets under the revised plan but no sanctions appear to be in place if the targets are not met. Pay-as- you -throw systems are foreseen in the new plan although a widespread roll-out of these schemes is not anticipated.
4	Waste management full cost not covered by original waste producer	Waste charges are not directly connected with the actual waste generated (e.g. in households or stores) or with the actual waste management cost associated with each type of product	Waste fees for households are not directly connected to the quantities and consequently to the full costs associated with the generated waste by each polluter In the EPR schemes fees paid by producers / distributors are connected with the quantity and type of material put on the market and not on the actual waste management cost associated with the product. Also the cost for managing packaging waste that is not separately collected is borne by the LAs while the producers / distributors are responsible only for the PW separately collected PAYT systems or extension of EPR is foreseen but not on full scale.
5	Low environmental and cost efficiency of separate collection	There are no common quality standards and requirements for separate waste collection	At present each local authority (or group of authorities) sets the collection practices to be implemented within their territory, either using their own staff and equipment or in some cases via contract with the private sector. There is no common standard determining how waste should be separated and collected, and this results in costs variations between LAs and poor environmental performance, related also to the quality of the recovered material

Number	Potential issue	Description	Reasons for the issue
6	Unreliable data	Current data on waste generation (quantity and composition) are unreliable especially in the Districts of Nicosia and Limassol where no facilities exist to weigh the waste. This may result in improper dimensioning of the waste collection system and waste management facilities or miscalculation of the waste management targets that need to be met	The data for the districts of Larnaca and Pafos are considered to be reliable as it derives from actual weighing of the waste in the facilities or by Green Dot, the data of Nicosia and Limassol are based on general estimates (trucks entering the dumpsites, assumptions on per capita generation etc) being associated with a significant level of uncertainty. The new plan intends to tackle this issue via the new facilities and weighbridges installed in Nicosia and Limassol as well as via the establishment of a reliable, operational and flexible system for data collection and processing including the development of a database. however this will also require clear procedures for waste reporting to be developed very quickly along with appropriate tools for data processing

3.0 Recommended Measures

Measure	Type of instrument	Responsibility	Estimated costs and available EU funding	Anticipated impact
1) Make a firm commitment to introduce a landfill tax The new plan foresees the introduction of a landfill tax. A specific timeline for the introduction of the landfill tax should be established and the level of the tax set appropriately. The tax needs to be sufficiently high to act as a motivational factor for waste diversion, particularly given the relatively low gate fees for landfill of around 20€/tonne. As an example, Greece has set a tax of 35€/tonne, along with an escalator of €5 per year until the tax reaches €60. A differential (lower) rate for pre-treated biowaste is also recommended. If it is considered that RDF might be produced for export, then a tax on the export of RDF for incineration might be appropriate. It is proposed to increase the tax progressively to allow businesses to plan for the changes. It is proposed to have a no more than 2 years of transitional period until the tax becomes valid, in order to allow the affected stakeholders. The legal act that will implement the landfill tax should also include specific provisions for monitoring and sanctions.	Fiscal	MANRE	Waste producers will bear the costs Funding from EU not available	This measure is expected to contribute significantly in the diversion of waste from disposal, as well as result in higher recycling rates and the fulfilment of the respective waste management targets (issues 2 and 3)

Measure		Responsibility	Estimated costs and available EU funding	Anticipated impact
2) Extension of EPR Extend EPR to material other than packaging waste, which would require the				
 Establish timeline for expansion of EPR system Inclusion of additional streams to EPR (printed paper, plastics, metals, etc) Make sure that the EPR systems covers the full cost for the management of the separately collected waste (ideally the costs of collecting the non-recycled fraction would also be covered for all streams) Establish fees corresponding to the management cost of each material or product Establish proper system of monitoring and enforcement system for EPR Inform the public for EPR and corresponding fees Ensuring proper monitoring and enforcement in order to identify and punish potential free riders. The collective schemes should support the authorities in identifying the free-riders and appropriate sanctions should be imposed by the authorities 	Administrative /Legal/ Information and educational campaigns	MANRE	Cost to be borne by producers Funding from EU not available	Promote recycling and implement the principle of full cost coverage by waste producers helping to gather the necessary funding for separate collection (issues 2 and 4)
3) Establishment of a framework of monitoring of performance and sanctions for not meeting waste management targets It is proposed to establish a clear process for the monitoring of the performance of the local authorities and other stakeholders responsible for meeting the targets. In this framework, specific sanctions should be introduced at appropriate levels for failing to meet waste management targets. This measure will be particularly important if the cost of disposal remains low (i.e. if no landfill tax is introduced).	Legal/Adminis trative	MANRE in consultation with LAs	To be borne by LAs and other responsible for meeting the targets Funding from EU not available	Ensure the reaching of waste management targets (issue 2)

Measure	Type of instrument	Responsibility	Estimated costs and available EU funding	Anticipated impact
4) Consider mandating the separate collection of organic waste streams from waste producers The plan foresees the restriction of certain material from disposal, such as green waste. Experience from other European countries indicates that it is more effective to mandate the introduction of separate collection schemes if the aim of the policy is to divert waste from landfill and into recycling services. Such a policy would be expected to be particularly beneficial in Cyprus as the current plan does not impose a requirement on local authorities to introduce organic waste collections.	Administrative /Legal/ Information and educational campaigns	MANRE	Cost to be borne by producers Funding from EU not available	Promote recycling and diversion of waste from disposal (issues 2 and 3)
5) Establishment of data collection system The plan foresees the development of a database for collection and processing of waste management data. It is foreseen that waste management data will be imported in the database directly by the waste producers / managers via web An administrative order (or other legal act) should be adopted which will set clearly the responsibilities and procedures for reporting, deadlines, type of data to be reported and sanctions for non-reporting, rules/frequency for monitoring of enforcement	Legal	MANRE	No costs	Collection of reliable data that will allow the monitoring of the waste management activities and the level of fulfilment of the waste management targets

Measure	Type of instrument	Responsibility	Estimated costs and available EU funding	Anticipated impact
 6) Support for and capacity building within the Local Authorities Put in place a programme to support local authorities, to provide guidelines and support on the efficient operation of kerbside collections at the local level, including: Materials to be collected Frequencies of collection Good practice when issuing contracts for collection services including the interface with the EPR system Good practice on minimising collection costs Information campaigns aimed at both local authorities and waste producers It is important that the programme makes use of knowledge from the private sector and waste services operating in other countries. The remit of the programme should also include provision of advice to government on the appropriate level of support required by local authorities to deliver the services, including the provision of sufficient financial and human resources at a local level to ensure appropriate service operation. 	Administrative	MANRE and LAs	Structural Funds or ERDF funding may be available	The measure is expected to support the LAs in fulfilling their responsibilities in relation to the development of the separate collection system, thereby tackling issue 1. Will help with standardization of the separate collection system, helping to address issue 5 and will support tackling issue 6. The implementation of proper separate collection system as a result of the guidelines will also ensure the fulfilment of waste management targets (thus tackling issue 2)
7) Actions to increase re-use and waste prevention activities Government should consider integrating re-use activities into the existing EPR scheme. Other activities that should be reflected in the forthcoming waste prevention plan include actions tackling plastic bottles and food waste. Croatia could also consider developing re-use centres – such as those introduced in Slovenia, supported by developing a system of re-use credits helping to finance the activities of the third sector.	Administrative / fiscal	MANRE	Funding available for capital items	Will assist in the achievement of future targets, as well as contribution to landfill directive and waste framework directive targets.

Measure	Type of instrument	Responsibility	Estimated costs and available EU funding	Anticipated impact
8) Introduce PAYT systems in an organized manner PAYT systems should only be introduced once the appropriate revisions have been put in place to improve the efficiency and operation of separate collection. It is recommended that this is only rolled out to municipalities once the other activities in the roadmap have taken place, and when it can be confirmed that the door to door collection systems are working effectively at a local level.	Administrative /Legal/ Fiscal	MANRE in consultation with LAs	Dependent on the system to be implemented. Maybe be able to use structural Funds	Improve waste charging, which will be directly connected with waste generation. This way recycling will be promoted while at the same time waste producers will cover full cost for the management of the waste they generate. This measure will help tackling issues 2, 3 and 4. Moreover, more reliable data on waste generation will be collected, thus addressing issue 6

3.1 Timeline for introducing the Proposed Measures

	2015	2016	2017	2018	2019	2020
Introduction of a landfill tax		Announcement		In place		
Revisions to the EPR scheme		Announcement		In place		
Framework for monitoring		Announcement	In place			
Mandate organic waste collection		Announcement		In place		
Capacity building for LAs		Announcement	In place			
Introduce data collection system		Announcement	In place			
Actions to increase re-use / prevention		Announcement			In place	
Introduce PAYT systems				Announcement		In place