

Circular Economy - SEPAN's positions and proposals

Circular Economy (C.E.), a new economic growth model, is at the core of the EU's and Greece's choices. It essentially concerns the shift from the traditional linear product production and disposal model to a circular model where the materials remain in the market by way of re-use, recycling, use, for as long as possible, thereby saving resources and maximizing their value.

The EU's adoption of the C.E. model strengthens sustainable development, competitiveness, employment, the EU's independence from imported raw materials and the best use of energy and natural resources. It also brings about significant benefits to the environment such as the reduction in waste production and greenhouse gas emissions, thereby significantly improving the environmental footprint.

C.E. is a standard model of economic growth and not an environmental or social policy. The adoption of the C.E. actions entail the active participation of the private sector through entrepreneurship, simultaneously benefiting society and the environment, employment, while saving natural and energy resources.

The C.E. model entails the growth of investments that encompass advanced technologies, innovations and entrepreneurship, factors that co-exist in the private sector.

The C.E. model is not provided for the growth of state-run operational activities that are subsidized by the state budget aimed at monopolization, such as the former well-known and unsuccessful waste management models of natural and energy resources. However, the State plays a significant role given that it regulates and controls the market by providing incentives for the implementation of conditions for developing the C.E.

SEPAN represents almost all the Greek and multinational companies with industrial activity in the recycling and re-use of waste, by-products and secondary raw materials, namely companies that are actively involved in Circular Economy. To this end, SEPAN plays a leading role in the promotion of Circular Economy in Greece.

SEPAN actively participates in promoting Circular Economy and sound waste management with the creation of positions & proposals with respect to:

- The enactment of incentives for the promotion of products and services that are compatible with the C.E. principles.
- The standardization of management procedures for waste and produced products.
- The enhancement of recycling in Greece as a first waste management priority.
- The promotion of green public procurements.

- The waste-to-energy process and secondary fuels.
- The simplification of environmental licensing & optimization of environmental inspections.

SEPAN participates in the public consultation regarding the C.E. by proposing a set of measures, and crystallizing its members' long-term experience in this sector.

Specifically:

With respect to the standardization of management procedures for waste and produced products, it proposes:

- ✓ The waste recovery measurement based on the end use.
- ✓ Complete harmonization with European standards for use of the generated SRF/RDF.
- ✓ The ability to monitor legislation implementation with inspection mechanisms, on the basis of detailed and fixed requirements.
- ✓ The ability to accurately cost the management services for transparency, public interest and the consumer purposes.
- ✓ The determination of end-of-waste criteria.

With respect to enhancing recycling, it proposes:

- ✓ The establishment of a recyclability rating with respect to product recycling/re-use - Subsidizing products with a high recyclability rating.
- ✓ The imposition of an escalated recycling duty to the manufacturers of non-recyclable-friendly products.
- ✓ Where applicable, financial support should be given to the re-user and not the collector so as to ensure the completion of the waste "management cycle" while ensuring that the recyclable materials will be used in Greece.
- ✓ The consistent implementation of the EWR (Electronic Waste Registry) for the objective registration and documentation of the recycling results.

With respect to the adoption of the principles of free competition with emphasis on the promotion of Circular Economy, it proposes:

- ✓ The obligatory inclusion of a minimum percentage of recycled materials in Public Procurements, based on specifications.
- ✓ The establishment of technical specifications, regardless of whether the materials are primary or recycled.
- ✓ The inclusion of environmental criteria in the procurement procedures, with the adoption of green criteria during the assessment of the bids, but also for the procurer.

- ✓ The adoption and implementation of eligibility or assessment criteria during the tendering of works, supplies and services that concern the candidate suppliers' environmental performance, the proper waste management and the implementation of certified procedure and/or waste management systems.

With respect to the waste-to-energy process & secondary fuels, it proposes:

- ✓ NON-recyclable waste must:
 - be used through R processes, including the recovery/waste-to-energy process within the country.
 - be used to recover secondary raw materials.
- ✓ The State must:
 - Impose disincentives for landfilling.
 - Completely harmonize national and European legislation (requirements - standardization).
 - Organize a communication campaign to inform citizens.

With respect to the simplification of the environmental licensing procedures, it proposes:

- ✓ The adoption of general and specific requirements and standards, aimed at simplifying the procedures.
- ✓ The harmonization of activities that fall under the environmental impact assessment with EU legislation.
- ✓ The implementation of the submission/notification instead of the issuance of a permit on a cases-by-case basis.
- ✓ The use of electronic means and web-based platform for processing the procedure.
- ✓ The creation of independent inspection mechanisms.
- ✓ Strict adherence to the processing time schedule by the Authorities.

SEPAN's aforementioned positions and proposals are submitted as part of the public consultation on the Circular Economy and summarize the good Greek and international practices as well as its members' significant experience. Our Association will contribute in the effort of developing the C.E. model on its merits, as an economic model that addresses the private sector, which brings about significant benefits to the economy, society and the environment.