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POSITION PAPER: EMMAUS EUROPE ON THE CIRCULAR ECONOMY PACKAGE

THE EMMAUS MOVEMENT

Emmaus was created in France by Abbé Pierre in 1949. This international solidarity movement is based on an original ethos: rather than working *for* the most deprived, it works *with* them, to help them regain their dignity and help others in need. For more than 60 years, the Movement has endeavoured to create a more humane society, by fighting all forms of exclusion and discrimination – whether of social, racial, political, economic, religious, or philosophical nature – as well as by ensuring that the rights of the poorest members of society are upheld and respected. Emmaus seeks to fight extreme poverty and the causes of extreme poverty, by offering concrete alternatives to our current society based on profit. Today, Emmaus Europe consists of close to 300 groups over 16 European countries, 14 of which within the European Union. Emmaus Europe’s main tasks are to coordinate the groups at regional level, as well as to engage in advocacy before European policymakers to defend the founding values of the Movement.

For further information: http://emmaus-europe.org/?lang=en_us
<http://droitshumains.emmaus-europe.org>

EMMAUS: A KEY PLAYER IN THE WASTE MANAGEMENT AND RECOVERY SECTOR

Sustainable development is a core component of Emmaus’ work in Europe, especially in the waste management and recovery sector. The traditional activity of Emmaus’ “ragmen” has now evolved to cover the sectors of textile, WEEE and furniture waste. According to their values of simplicity and solidarity, Emmaus companions and employees give a new life to used goods, by preparing for reuse and recycling the ever-increasing volumes of waste our consumerist society produces. Over the years, the Emmaus groups across Europe have build up technical know-how and knowledge of the grassroots issues in the preparing for reuse and recycling sectors, which now makes Emmaus a key stakeholder in the field. Furthermore, the specificity of Emmaus’ work resides in its social impact: its waste management and recovery activities allow social bonds to develop, through job creation and reinclusion of marginalized persons within the world of work.

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This work enables men and women to make a decent living from their work, while being proud of helping those who suffer most. **In this way, solidarity is at the heart of Emmaus' waste management work. We do not sell all of the goods that we collect: some are donated to the most disadvantaged and vulnerable people, the homeless, and migrants. This intensive form of solidarity aims to put into practice Emmaus' core values, while endeavouring to address the current social and environmental crises.** Emmaus should be involved in the discussions about the Circular Economy Package, as a legitimate contact with invaluable expertise and a unique insight.

EMMAUS' VIEWS ON THE COMMISSION'S PROPOSAL FOR THE CIRCULAR ECONOMY PACKAGE

Emmaus Europe salutes the progress made in the Commission's proposal, in terms of implementing a comprehensive approach to waste, which addresses all the lifecycle of a product, from conception and production to consumption, waste management and the market for secondary raw materials. These proposals will contribute to actually "closing the loop" and consequently attain a higher level of environmental protection.

Furthermore, Emmaus Europe welcomes the setting up of more ambitious objectives in terms of preparing for reuse and recycling targets, as well as the progressive ban on landfilling. These objectives will allow the European Union to continue to enhance the level of environmental protection it affords to its citizens – but Emmaus Europe want to reiterate the fact the Union's environmental policies must also work to create a more inclusive society affording the same level of protection to all.

However, Emmaus Europe is concerned that the proposed Package might create a system conducive to large private sector stakeholders driven by a profit ethos, to the detriment of social stakeholders. This capitalist approach could jeopardize Emmaus' work in the field of waste management and recovery, and hinder the potential social benefits of the circular economy. The circular economy should not be considered as a mere economic tool used for profit. It is in fact a key component of the Social and Solidarity Economy, and as such the role of social stakeholders should be recognized and consolidated.

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EMMAUS' MAIN PROPOSALS FOR THE CIRCULAR ECONOMY PACKAGE

1. Inscribe the Social and Solidarity Economy within the proposed Package

The social aspect of circular economy is not mentioned anywhere in the Commission's proposal. Emmaus considers that the Circular Economy should not be considered as a mere economic tool used for profit, since it is in fact a key component of the Social and Solidarity Economy

Therefore, Emmaus demands that the Social and Solidarity Economy is inscribed within the Circular Economy Package, so that Member States are bound to take social factors into account when implementing their objectives in terms of waste prevention and management.

2. Recognize and consolidate the role of social stakeholders in the waste management and recovery sector

The role of social stakeholders – such as Emmaus – in the waste management and recovery sector is crucial, both in environmental and social terms. Emmaus groups across Europe strive to achieve both a higher level of environmental protection and the promotion of an equitable and cohesive society. The work carried out by Emmaus groups in terms of re-use and preparing for re-use is not only positive for the environment, but it also allows social bonds to develop, through job creation and reinclusion of marginalised persons back into the labour market.

Therefore, Emmaus demands that its role and that of other social stakeholders is recognized and consolidated, and that their ability to continue their activities under the new regulatory framework is protected.

3. Maintain the distinction between non-waste and waste products

The Commission proposes a new definition of “preparing for re-use” (Article 3-16), which opens the scope of activities qualifying as “preparing for re-use” to include non-waste products. This new definition could have detrimental consequences to Emmaus activities, because structures like charity shops would qualify as waste management operators and would therefore need to obtain waste management permits. This increased administrative burden would have a negative effect on Emmaus' sales operations.



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Therefore, Emmaus is calling for a return to the previous definition, as enshrined in the 2008 Waste Framework Directive. Emmaus welcomes the approach taken by the ENVI Committee in its Draft report to present an amendment providing for a clear distinction between preparing for re-use (which only concerns waste products) and re-use (which only concerns non-waste products).

4. Ask for compensation, or other type of financial support for Emmaus' collecting, sorting, preparing for re-use and re-use activities

Through their collecting, sorting, preparing for re-use and re-use activities, Emmaus groups implement the waste hierarchy and play a useful role for society. Their role should be valued and recognized.

The Circular Economy Package should therefore provide that recognized re-use networks from the Social and Solidarity Economy, such as Emmaus, are entitled to a compensation, or an other type of financial support, to cover for the costs incurred by collecting, sorting and preparing for re-use.

5. Protect the revenues derived from the sale of prepared to re-use goods

Article 8a paragraph 4 of the Commission's proposals provides that the financial contribution paid by the producer to cover its Extended Producer Responsibility obligations will take into account "the revenues from re-use or sales of secondary raw materials from their products". This provision would threaten the profitability of Emmaus groups' preparing for re-use activities.

Therefore Emmaus demands that the amount of funds Emmaus groups receive as a compensation for collection and sorting costs does not take into account the revenues from re-use or sales of secondary raw materials.

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6. Demand a take-back obligation for final waste produced by preparing for re-use activities

The preparing for re-use activities undertaken by Emmaus groups generate final waste. Emmaus groups should not bear the costs of the treatment or disposal of this final waste. The Extended Producer Responsibility provided for by the Commission's proposal should include obligations regarding the final waste generated by preparing for re-use activities.

Therefore, Emmaus Europe demands that a take-back obligation for final waste is imposed upon operators implementing Extended Producer Responsibility obligations on behalf of producers or, alternatively, that Emmaus groups are compensated for the costs incurred by the management of this final waste.

7. Limit recourse to the Commission's delegated acts

Articles 6(2), 11a, and 27 provide that the Commission is empowered to adopt delegated acts on certain matters: the establishment of detailed criteria on the application of the conditions for the end of waste status (article 6(2)); the establishment of minimum quality and operational requirements for the determination of recognized preparing for re-use operators (article 11a); and the setting out of minimum technical standards for treatment activities which require a permit or registration (article 27). Emmaus criticizes the use of delegated acts because it makes the exact content and scope of the Circular Economy Package uncertain and opaque, which goes against the principle of transparency. The delegated acts provided for in the aforementioned articles will have consequences for Emmaus' activities, and therefore Emmaus would like to be able to position itself on their requirements. Furthermore, since the circular economy field is a very specific and technical one, Emmaus should be associated in the drafting process, because its expertise and know-how could help ensure these provisions are adequate and consistent with reality.

Therefore, Emmaus demands that the use of delegated acts in the Circular Economy Packaged is reduced to a minimum, so as to allow relevant stakeholders, and especially Social and Solidarity Stakeholders, to effectively carry out their advocacy work.

