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From: Secretary-General of the European Commission,  
signed by Mr Jordi AYET PUIGARNAU, Director

date of receipt: 24 September 2018

To: Mr Jeppe TRANHOLM-MIKKELSEN, Secretary-General of the Council of  
the European Union

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Subject: COMMISSION STAFF WORKING DOCUMENT  
The early warning report for Greece  
*Accompanying the document*  
REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT,  
THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL  
COMMITTEE AND THE COMMITTEE OF THE REGIONS on the  
implementation of EU waste legislation, including the early warning report  
for the Member States at risk of missing the 2020 preparation for re-  
use/recycling target on municipal waste

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Delegations will find attached document SWD(2018) 418 final.

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[...]

## COMMISSION STAFF WORKING DOCUMENT

### The early warning report for Greece

#### *Accompanying the document*

### **REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS**

**on the implementation of EU waste legislation, including the early warning report for the Member States at risk of missing the 2020 preparation for re-use/recycling target on municipal waste**

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## 1. Introduction

This early warning report is part of the Commission's overall implementation report and aims to assist Member States at risk of failing to meet the 2020 target of 50 % preparation for re-use/recycling of municipal waste set out in Article 11(2)(a) of Directive 2008/98/EC. It builds on previous support provided by the Commission to help Member States comply<sup>1</sup> with EU law in the area of municipal waste management. This resulted in country-specific roadmaps<sup>2</sup> being drawn up for the relevant Member States.

The assessment underpinning the early warning report is based on a collaborative and transparent process involving the Member States concerned and an in-depth analysis of their most recent policy developments. This also involved extensive consultation with the authorities in charge of waste management.

The possible actions identified during this process are based on the existing best practices and aim to help Member States in meeting the 2020 municipal waste preparation for re-use/recycling; they therefore focus on policy measures that can be taken forward in the short term. These actions should be seen as complementary to those recommended in the roadmaps that were drawn up as part of the preceding compliance promotion activities and to the recommendations made in the Environmental Implementation Review<sup>3</sup>.

## 2. Key findings

In 2016, Greece's municipal waste recycling rate (including composting) reported to Eurostat was 17 %, while its landfilling rate was 82 %. Based on an analysis of existing and firmly planned policies in the area of waste management, Greece is considered at risk of missing the 2020 target of 50 % preparation for re-use/recycling of municipal waste.

The assessment<sup>4</sup> that underpins the early warning report concludes that Greece's poor performance in waste management is due to:

- the absence of the infrastructure needed for source separation of recyclables;
- the general public's low level of awareness;
- a lack of financial incentives; and
- the absence of relevant economic instruments, e.g. landfill tax.

The economic recession and subsequent financial crisis in Greece have affected the waste sector, leading to a decrease in waste generation but also to a sharp increase in informal recycling in recent years.

The table below lists possible actions to support Greece's efforts to improve its waste management.

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<sup>1</sup> [http://ec.europa.eu/environment/waste/framework/support\\_implementation\\_1st\\_phase.htm](http://ec.europa.eu/environment/waste/framework/support_implementation_1st_phase.htm)

<sup>2</sup> Roadmap for Greece: [http://ec.europa.eu/environment/waste/framework/pdf/GR%20Roadmap\\_FINAL.pdf](http://ec.europa.eu/environment/waste/framework/pdf/GR%20Roadmap_FINAL.pdf)

<sup>3</sup> [http://ec.europa.eu/environment/eir/country-reports/index2\\_en.htm](http://ec.europa.eu/environment/eir/country-reports/index2_en.htm)

<sup>4</sup> Eunomia Research & Consulting et al. (2018), 'Study to identify Member States at risk of non-compliance with the 2020 target of the Waste Framework Directive and to follow-up phase 1 and 2 of the compliance promotion exercise. The early warning report: Greece.'

## OVERVIEW OF POSSIBLE ACTIONS TO IMPROVE PERFORMANCE

### Economic incentives

- 1) Implementation of the landfill tax (set to apply from 2018).
- 2) Introduction of pay-as-you-throw schemes as a means to reduce waste sent for disposal and to enhance public participation in the separate collection of waste.

### Accurate and internally consistent reporting

- 3) 'Resetting' the reported packaging figures so that they are consistent and accurate. Data provided by Greece on the quantity and composition of municipal waste suggest that the quantity of packaging waste (as represented by data on the packaging placed on the market) is well below that indicated by the municipal waste data.
- 4) Introduction of systematic audits on companies that provide data on the amount of packaging placed on the market (producers or producer responsibility organisations – PROs).
- 5) Conducting statistically representative composition analysis of municipal waste and subsequent reconciliation between the datasets on municipal waste and packaging waste.

### Separate collection

- 6) Reconfiguration of the interaction between the PRO for packaging (Hellenic Recovery Recycling Corporation – HERRCO) and municipalities. HERRCO should ideally only be a conduit for funds for the collection service, while the municipalities should have their own obligations regarding separate collection. With this set-up in place, the system would be more responsive to a landfill tax.

This can be done either:

- a. by setting mandatory recycling targets for municipalities and imposing sanctions for failing to meet them; or
- b. by setting a minimum service standard for waste collection (e.g. the frequency of collection, the type and volume of containers, while taking into account the type of housing stock, how rural the area is, typical climate, etc.) that municipalities must meet.

In either case, HERRCO should fund, in full, delivery of the part of the collection service as regards the packaging waste in line with an agreed funding formula.

## **EU funding**

- 7) Better use of EU funds by ensuring that they support:
- a. activities in the upper tiers of the waste hierarchy, in particular recycling and prevention;
  - b. capacity building at municipal level to support the development of high-quality recycling services (see action 9);
  - c. the delivery of high-quality recycling services by local authorities, and convenient door-to-door collection systems for food waste;
  - d. the delivery of treatment for separately collected bio-waste (to be integrated with the development of collection systems, with municipalities working together as necessary);
  - e. the provision of green points designed to promote re-use (through ‘up front’ re-use shops) and recycling of bulky material, including garden waste.
- 8) Less emphasis is necessary on investments in capacity for the treatment of residual waste.

## **Technical support to municipalities**

- 9) Development of a system at national level that provides technical support to municipalities, specifically in the following areas:
- a. choosing collection services;
  - b. services procurement;
  - c. service management;
  - d. awareness-raising campaigns;

coupled with active sharing of good ideas and practices that can improve efficiency in terms of cost reduction and improvement in performance.

## **Communication and awareness-raising**

- 10) Development of a set of national communications materials addressed to the public for use at local level, with clear and consistent messages. These materials should be used as part of awareness-raising campaigns, in leaflets, and at green points.