



## Finnish Biocycle and Biogas Association Position paper on Commission Proposal for a targeted revision of the Waste Framework Directive

Finnish Biocycle and Biogas Association welcomes the Commission Proposal for a targeted revision of the Waste Framework. The Finnish Biocycle and Biogas is a national Association interested in nutrient recycling and biogas promotion and correspond the production of recycled fertilizers. With this paper, we would like to take a position on the proposed amendment to the directive on food waste.

According to the waste hierarchy, the prevention of food waste is top priority, but also, it is particularly important to recycle and utilize the nutrients in the food waste. According to Analysis of Seattle, USA, phosphorus and nitrogen in food waste could supply around 10% of nutrients needed for crop production.

### ACHIEVEMENT OF THE GOALS

#### **Along with food waste, the collection and recycling of bio-waste must be increased.**

Finland likely don't reach the municipal waste recycling target of 55 w% set for the year 2025 (January 1, 2025); set in the waste directive. Therefore, we see that the 65 w% goal set for the year 2035 (January 1, 2035) may also be very difficult to achieve. The national waste act does not set goals for the recycling rate, but in the national waste regulation, the goals for municipal waste are consistent with the waste directive.

No legally binding recycling target has been set for bio-waste. Only the national waste plan has set an unofficial goal according to which 65 % of bio-waste will be recycled by 2030 and the recycling of other biodegradable waste will be promoted. Finland will hardly achieve this unofficial goal, because no rising trend in biowaste recycling has been observed; in 2021 the biowaste recycling rate was only 36%.

Reasons: Finland has not invested enough in the separate collection of bio-waste. Now, according to the national waste regulation, municipalities are obliged to organize separate collection of bio-waste for all residential properties in agglomerations with more than 10,000 inhabitants no later than July 19, 2024. There are not enough incentives for the separate collection of bio-waste. As the separate collection obligation expands, it will become expensive for some municipalities. A transition phase is now underway. Probably, and we hope that the bio-waste collection rate will increase in the coming years when the separate collection obligation comes into force. **If recycling does not**



**become more efficient for bio-waste after 2024, then by 2027 at the latest, more efficient means must be introduced and binding obligations must be considered.**

## COMPARIOSON YEAR AND REPORTING

Finnish Biocycle and Biogas Association would appreciate the flexibility of the proposal to allow an earlier reference year (than 2020) for the target of cutting food waste. This way, the efforts made before 2020 to curb food waste can be recognized, at least partially.

Finnish Biocycle and Biogas Association want to emphasize the importance of monitoring and creating a comprehensive situation assessment. Thus, we see it is important to ensure that the data on food waste from different member countries are comparable, as there is no consistent trend data available and the methods and practices of measuring and reporting food waste vary widely among the member states.

We appreciate the proposal's requirement for the Commission to reassess the reduction targets in 2027, based on more accurate and consistent data on food waste across different Member States. However, we are concerned about the possible reduction targets for primary production in the reassessment, as the loss of primary production is largely influenced by factors beyond human control, such as weather, diseases and pests.

## CLARIFYING TERMS

We want to point out, that there is no definition of once edible food waste, which refers to the part of food waste that was once edible, in EU legislation. In the proposal, the Commission mainly refers to food waste, but the proposal does not make it clear in all aspects when it once edible means food waste and when it means food waste. The English terminology for food waste and food waste partly uses the same term "food waste".

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