



Council of the
European Union

Brussels, 12 June 2023
(OR. en)

10478/23
ADD 5

ENV 672
COMPET 608
MI 508
AGRI 314
IND 308
CONSOM 225
ENT 131

COVER NOTE

From: Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director

date of receipt: 8 June 2023

To: Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

No. Cion doc.: SWD(2023) 182 final

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 identifying Member States at risk of not meeting the 2025 preparing for re-use and recycling target for municipal waste, the 2025 recycling target for packaging waste and the 2035 municipal waste landfilling reduction target

Delegations will find attached document SWD(2023) 182 final.

Encl.: SWD(2023) 182 final



Brussels, 8.6.2023
SWD(2023) 182 final

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

identifying Member States at risk of not meeting the 2025 preparing for re-use and recycling target for municipal waste, the 2025 recycling target for packaging waste and the 2035 municipal waste landfilling reduction target

{COM(2023) 304 final} - {SWD(2023) 175 final} - {SWD(2023) 176 final} -
{SWD(2023) 180 final} - {SWD(2023) 181 final} - {SWD(2023) 183 final} -
{SWD(2023) 184 final} - {SWD(2023) 185 final} - {SWD(2023) 186 final} -
{SWD(2023) 187 final} - {SWD(2023) 188 final} - {SWD(2023) 189 final} -
{SWD(2023) 195 final} - {SWD(2023) 196 final} - {SWD(2023) 197 final} -
{SWD(2023) 198 final} - {SWD(2023) 199 final} - {SWD(2023) 200 final}

1. Introduction

The early warning report aims to assist Member States at risk of failing to meet: (i) the 2025 target of 55% for the preparing for re-use and the recycling of their municipal waste (this target is set out in Article 11(2)(c) of Directive 2008/98/EC); and (ii) the 2025 target of 65% for the recycling of their packaging waste (this target is set out in Article 6(1)(f) of Directive 1994/62/EC). It also provides an update on how Member States are performing against the 2035 target to send no more than 10% of their municipal waste to landfill (this target is set out in Article 5(5) Directive 1999/31/EC).

This report builds on previous support provided by the Commission to help Member States comply with EU law on municipal waste management, including, where relevant, the early warning report from 2018¹.

The assessment underpinning the early warning report identified 18 Member States at risk of missing the 2025 preparing for re-use and recycling target for municipal waste, 10 of which are also at risk of missing the 2025 recycling target for all packaging waste.

This assessment is based on a collaborative and transparent process involving the Member States concerned, the European Environment Agency², and an in-depth analysis of the most recent policy developments in the Member States. This process also involved extensive consultation with the Member State authorities in charge of waste management. The possible actions identified during this process are based on existing best practices and aim to help Member States meet the 2025 targets, and as such they focus on policy measures which can be taken in the short term. These actions should be seen as complementary to those recommended in the roadmaps which were drawn up as part of preceding compliance-promotion activities and to those recommended in the Environmental Implementation Review³.

2. Key findings

Based on the analysis of collected data and existing policies in the area of waste management, Greece is considered to be at risk of missing (i) the 2025 target of 55% for the preparing for re-use and the recycling of its municipal waste and (ii) the 2025 target to recycle 65% of its packaging waste. The gap between the current situation and the 2035 target of landfilling 10% of municipal waste is also of concern.

Municipal waste generation in Greece (524 kg/cap) was slightly above the EU average (501 kg/cap) in 2019. However, packaging waste generated in 2019 was less than half of the EU average (81 kg/cap vs 177 kg/cap). This might indicate that significant quantities of packaging placed on the market, which is considered as the amount of generated packaging waste, are not reported.

In 2019, the municipal waste recycling rate reported by Greece was 21% (34 percentage points below the 2025 target), while the landfill rate was 77.7% (over three times the EU average). The situation is also of concern in terms of general trends, as the recycling rate has been growing very slowly: from 15.8% in 2015 to 21% in 2019), and the landfill rate decreased only marginally, by about 4 percentage points over those 5 years.

¹ An early warning report was issued for Greece in 2018 (SWD(2018) 418 final). In total, 10 recommendations were drafted within the assessment. According to the Greek authorities five recommendations therein are considered implemented, four partially implemented and one not implemented.

² EEA and ETC/CE (2022). Early Warning Assessment Related to the 2025 Targets for Municipal and Packaging Waste (<https://www.eea.europa.eu/publications/country-profiles-early-warning-assessments>)

³ European Commission (2022). Environmental Implementation Review 2022. COM/2022/438 final. (https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=comnat%3ACOM_2022_0438_FIN)

A low rate of composting and digesting is considered one of the main reasons for this performance. The current separate collection and treatment capacity for biowaste is such that only a small share of total biowaste generated in Greece can be collected and processed. The amount of municipal waste sent to landfill also remains too high.

In 2019 the overall packaging recycling rate reached 60.1%, which is quite close to the 2025 target (65%). However, there are data quality issues with regard to packaging. For instance, there is a notable discrepancy between the low recycling rate for municipal waste and the quite high recycling rates for packaging waste, which are likely due to underreporting of packaging placed on the market. The datasets on municipal waste and packaging waste appear inconsistent, given that a large share of packaging waste is generated by households and is thus part of municipal waste.

Significant improvements are needed to bring Greek waste management into line with the EU waste hierarchy. Some of the main challenges facing waste management in Greece include:

- High reliance on landfilling, in the context of low landfill tax and high illegal dumping rates.
- Insufficient biowaste treatment capacity. Even with plans to increase capacity, less than 30% of total biowaste generation would be covered.
- Data quality issues, particularly concerning the reported amount of packaging waste generation.
- Poor separate collection services for non-household municipal waste and biowaste.

3. Key recommendations

Among the measures deemed necessary to support Greece's efforts to improve its performance in waste management, three main recommendations are listed below:

1. Support preparing for re-use of municipal waste and re-use systems for packaging
2. Extend at national level separate collection at the source (especially for biowaste) and improve citizen awareness as regards waste segregation and prevention. Implement economic instruments such as pay-as-you-throw and increase landfill tax to incentivise separate collection at source and minimise landfilled waste.
3. Further develop waste treatment infrastructure associated with the higher steps of the waste hierarchy (in particular, increasing treatment capacity for biowaste and supporting home-composting) and establish a quality management system for compost/digestate from biowaste.
4. Improve the data management system in order to present coherent and verifiable data sets (e.g. packaging waste).

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

4. Good practices

The following measures implemented by Greece are considered good practices that could be replicated and could help Member States in attaining the above-mentioned targets:

- '[Circular Economy Implementation in Greece](#)' LIFE project⁴ – This country-wide project aims to reduce the amount of municipal waste sent to landfill and to promote waste prevention and re-use.

⁴ https://webgate.ec.europa.eu/life/publicWebsite/index.cfm?fuseaction=search.dspPage&n_proj_id=7404

The project includes demonstration activities such as the installation of re-use centers in three urban municipalities, the promotion and monitoring of food waste prevention, building stakeholder capacity, and information and awareness-raising events aimed at changing the behaviour of citizens and local communities.

- Waste recycling and prevention program in a small island⁵ – This recycling and prevention program called ‘Just Go Zero’ was launched in December 2021 on Tilos island. Although it involved a small community (about 800 inhabitants), it triggered a major cultural change in the field of waste prevention and in terms of citizen participation. After less than one year, more than 85% of municipal waste was recycled or composted. Furthermore, the project has helped raise the awareness of the local population on the importance of sound waste management.
- Establishing ambitious national targets – Greece has included in national legislation a mandatory target of 10% landfilled waste by 2030⁶. This ambitious target anticipates the relevant EU target and sets a very clear commitment towards all relevant actors.

⁵ <https://www.justgozero.com/tilos-the-first-zero-waste-island/>

⁶ Ministerial Decision 39 (Gazette 185 A/2020) - Approval of the National Waste Management Plan, Official Gazette 185/A/29-09-2020.

OVERVIEW OF POSSIBLE ACTIONS TO IMPROVE PERFORMANCE

Governance

- 1) Address data quality issues, especially in relation to generated packaging waste and related recycled quantities. Ensure swift and effective integration between the National Register of Producers and the General Commercial Register.
- 2) Ensure the closure and rehabilitation of remaining substandard landfills and take action against illegal landfills and fly tipping. Increase enforcement capacity in order to inspect, control and discourage uncontrolled dumping.
- 3) Set mandatory indicators and targets for separate waste collection to be achieved by the bodies in charge of the collection of municipal waste (e.g. municipalities) in order to monitor, enforce and achieve higher capture rates. This could be complemented with a system of financial rewards and penalties dependant on the performance of the bodies against the targets. Information on the performance of those bodies could also be made available to the general public to raise awareness (e.g. on a website).

Prevention

- 4) Take measures to increase re-use and to prevent the generation of non-recyclable municipal waste
- 5) Ensure proper monitoring of the implementation of waste prevention measures. In the light of the specific characteristics of the territory of Greece, further support the expansion of successful small-scale waste-prevention pilot projects to more densely populated regions. Foster coordination between central government level and local level in reaching EU waste-prevention objectives.

Separate Collection

- 6) Develop, enforce and monitor minimum national service standards for separate waste collection (including for biowaste). This could include specifying, for example, the type and volume of containers, minimum and maximum frequency of collection and type of vehicle used, taking into account the type of housing stock, climate and seasonality, etc. Ensure that the necessary separate collection infrastructure is put in place.

Waste treatment

- 7) Support preparing for reuse of municipal waste and develop waste-treatment infrastructure in a way that focuses on the higher steps of the waste hierarchy. Firm plans and concrete actions are needed, such as supplementing centralised biowaste treatment with decentralised composting solutions such as home composting and community composting.
- 8) Support preparing for reuse of municipal waste and develop waste-treatment infrastructure in a way that focuses on the higher steps of the waste hierarchy. Firm plans and concrete actions are needed, such as supplementing centralised biowaste treatment with decentralised composting solutions such as home composting and community composting.
- 9) Develop waste-treatment infrastructure associated with the higher steps of the waste hierarchy. Firm plans and concrete actions are needed, such as supporting home-composting and stepping up treatment capacity for biowaste in order to fully cover the biowaste generated.

- 10) The capacity for sorting and recycling of separately collected packaging waste needs to be increased. This could be achieved by increasing the number of new recycling material sorting centres established across the country and by improving the capacity of existing ones.

Communication and awareness raising

- 11) Maintain and reinforce awareness-raising activities specifically tailored to different target groups (e.g. households and commercial waste generators, schoolteachers and students, tourists) to enhance participation in separate collection. A set of national communication materials with clear and consistent messages, and with particular focus on biowaste, home composting and sound management of waste (e.g. sorting) should be developed. Consider preparing communication materials (e.g. leaflets) in English as well as in Greek to help tourists contribute to waste separation.

Extended producer responsibility and economic instruments

- 12) Implement economic instruments (e.g. landfill tax of a sufficient magnitude) to incentivise waste management associated with the higher steps of the waste hierarchy, to make re-use, preparation for re-use and recycling economically attractive and reduce the dependency on waste landfilling. The economic incentive should be designed and made strong enough to develop a steering effect. Ensure that the newly adopted higher landfill tax regulations are applied to all municipalities. Consider anticipating the landfill tax increase currently planned by 2027.
- 13) Implement a pay-as-you-throw system for both businesses and households to attain higher capture rates for recyclable fractions and reduce residual waste. Local authorities could be supported through guidance on the design of the incentive mechanisms and through the introduction of or learnings from pilot projects.
- 14) Stepping up efforts to establish re-use systems for packaging will bring environmental benefits and help Member States in complying with the EU packaging recycling targets.