

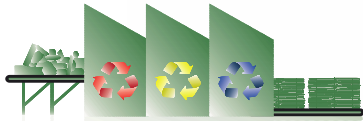


Fédération Européenne des Activités de la Dépollution et de l'Environnement
European Federation of Waste Management and Environmental Services
Europäische Föderation der Entsorgungswirtschaft



3,000
companies

320,000
employees

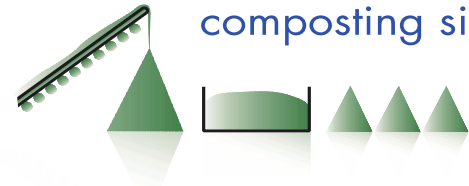


2,400
recycling and
sorting centres



20
national waste
management
federations
from EU

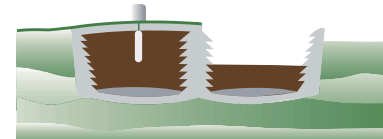
1,100
composting sites



260
waste-to-energy plants



900
controlled landfills



They play a key role in the transition to a circular economy by producing resources which can be re-injected in the economy and by supplying energy. Our companies add value through innovative and cost-efficient collection, sorting, and recycling of secondary raw materials. In doing so, they play a key role in achieving the best economic and environmental outcomes.

Regulatory challenges to plastics recycling

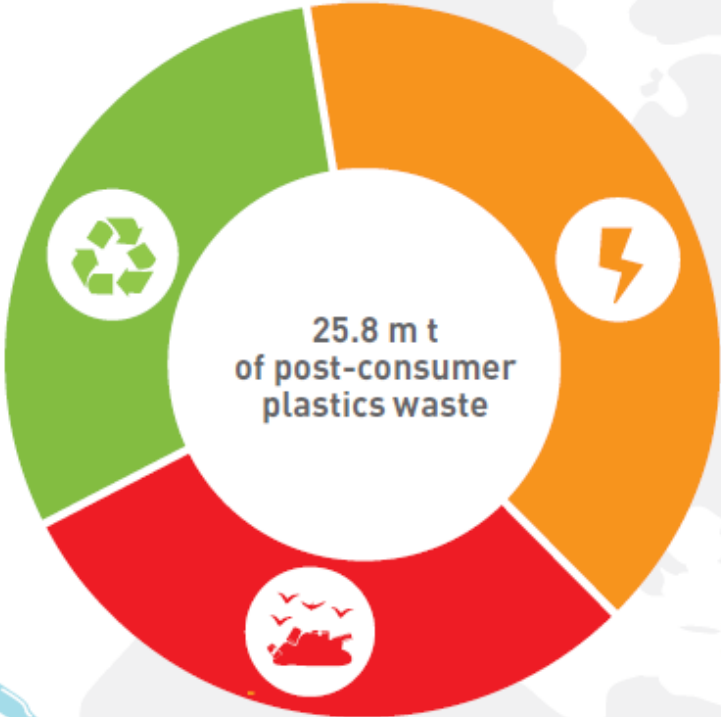
Plastics Recycling Show Europe
30 March 2017

Introduction: plastics recycling in the EU

In 2014 plastics recycling and energy recovery reached 69.2%

In 2014, 25.8 million tonnes of post-consumer plastics waste ended up in the waste upstream. 69.2% was recovered through recycling and energy recovery processes while 30.8% still went to landfill.

Recycling
29.7%



Energy recovery
39.5%

Landfill
30.8%



Treatment for post-consumer plastics waste in the EU28 + Norway and Switzerland
Source: Consulitic

Source:
Consulitic for Plastics Europe



Regulatory context in the EU

- CLP
- Waste classification: Annex III of the WFD on hazardous properties
- End-of-waste criteria/ quality standards for plastics
- REACH
- **Circular Economy Package**

Circular Economy Package – FEAD position

- There is a need for pull measures in order to create demand for recycled plastics:
 - **Ensure fair competition between virgin and secondary raw materials by financially rewarding the benefits of recycling**
 - **Minimum recycled content for selected products**
 - **Green public procurement requirements at EU level**
 - **Ecolabelling to incorporate indications on recycled content and recyclability**
 - **Fiscal measures, such as a lower or zero VAT rate on SRM and on products with recycled content**
- The external environmental cost of using primary raw materials needs to be taken into account

Circular Economy – Action Plan

- Plastic Strategy: low rates of plastic recycling, notably due to weak **economic incentives** for a market for secondary plastic materials
- Analysis of the interface between chemicals, products and waste legislation
- We need to strike the right balance between recycling/recovery policy as proposed by the CEP and the aims of chemicals/ products legislation

Compliance with REACH – Opportunities offered by the REACH REFIT Evaluation

- Compliance with REACH is more constraining for recyclers than for manufacturers of virgin substances/articles.
- A recycling process has to deal with a wider range of (unknown) input compositions, especially when dealing with post-consumer waste.
- The main problem are legacy substances put on the market before restrictions were put into place.

REACH REFIT Evaluation – Actions needed

- Promote eco-design
- Better cooperation between manufacturers and the waste management sector
 - Possibility for group of substances to be assessed together and to apply for multiple substances in a single dossier
- The use for which a substance is recovered should be taken into account as an existing principle of REACH.

What do we do in the meantime?

- Until eco-design and the phase out of hazardous substances in primary production processes is a fact, recycling companies will have to continue to deal with legacy substances.
- Long term goal: toxic free material cycles.
- Transitional phase: Adequate risk assessment to control impact of recycling and environment and human health.

Conclusions (1/2)

- A level-playing field between virgin and recycled plastics is crucial to make sure plastics recycling remains economically viable.
- During a transitional period, a step-by-step approach needs to be adopted for recycling activities dealing with legacy substances.

Conclusions (2/2)

Measures recommended by FEAD:

- **Promotion of eco-design**
- **Pull measures to increase market demand for secondary raw materials**
- **Internalization of the true cost of raw materials extraction and processing**
- **A better alignment of EU waste and product/chemicals policy**
- **A REACH Regulation better fit to recycling activities**

➤ We need to have a coherent approach taking into account the whole value chain.

Thank you very much for your attention!

FEAD - European Federation of Waste Management and Environmental Services

Rue Philippe Le Bon, 15
1000 Brussels, Belgium
Tel.: +32 2 732 32 13
E-mail: info@fead.be

SAVE THE DATE

Wednesday, 21 June 2017

Paris, France

FEAD Biennial Conference

Driving Circularity in Europe's Industries

