

## Options to address the interface between chemical, product and waste legislation

### EuRIC position on the Communication and Commission Staff Working Document

#### Introduction

EuRIC welcomes the publication of the Communication and Staff Working Document proposing different options to address the interface between chemical, product and waste legislation.

These documents rightly frame the main issues hindering the transition to a circular economy.

However, some of the solutions - proposed in the form of options - to those issues are not ambitious enough to foster circular material flows.

#### Executive summary

As previously expressed in our [response](#) to the targeted stakeholder consultation in July 2017, the Commission has rightly identified the main issues on this interface between the chemical, product and waste legislations. Some of the solutions proposed however fall short of solving the issues or run against the very objective to move towards a more circular economy since they would hamper circular material flows.

On the issue of tracking substances, there is a need for a deeper analysis of what would each proposal for a definition of 'substances of concern' entail, as there will be consequences to defining certain substances as 'substances of concern', a term with no regulatory meaning or value. This definition, which is too narrow, cannot be limited to SVHCs, but widening the scope also carries some drawbacks. We regret however that the reflection on substance tracking, with a feasibility study announced in the Communication, has been bypassed by the development of the ECHA database on SVHCs in articles.

The Communication and Staff Working Document set two main objectives which are: i) to increase recycling and ii) to promote "non-toxic material cycles". Beyond the need to further qualify what "non-toxic" means in recycling and use phases, the proposal is clearly insufficiently ambitious in tackling legacy issues, which is a pre-requisite to achieve these objectives. Proposed solutions to avoid that in the future "waste contains substances that are no longer allowed in products" are weak. When restricting the use of a substance, especially when it is widely used in articles, a strategy to phase it out should be introduced systematically. That issue can also not be solved solely through the Ecodesign Directive, whose scope only covers energy related products. In addition, for product specific Ecodesign Regulations, measures encouraging design for circularity should be much more ambitious than what is currently witnessed. We are therefore very much looking forward to the introduction of an integrated EU Product Policy. We also consider that the rules on primary materials should be derogated for secondary materials, under strictly defined conditions and for a fixed period of time. We consider it essential to ensure that substances are phased out smoothly, and this has to be integrated much more consistently in the future REACH restriction proposals or POP listings (under the Stockholm Convention).

Improving the harmonization of end-of-waste provisions is needed at EU level and as a fallback option decided by the operators on the basis of clear criteria and recognized by competent authorities throughout the EU.

Concerning the classification of waste, the alignment between rules applicable to waste and rules applicable to chemicals is important but should not be the only priority. **The absolute priority should be to reduce and ultimately annul the different interpretations of waste classification rules throughout the EU, leading to different classifications of the same waste stream between Member States (MS), and sometimes within a MS.** Different waste classification have far-reaching impacts including for example on applicable waste shipment procedures.

Overall, certainty, workable rules to operate efficiently in an industrial manner and leveling the playing field are equally important as streamlining the interface between waste and chemical legislations.

Even though, conceptually, it makes sense to align the rules for waste and products in a circular economy, it is not necessarily needed. Even in a circular economy, materials go through a waste phase, where they are processed according to clear operational rules in facilities permitted to treat them. There can be an efficient protection of the human health and environment across the EU without a full alignment of the rules to classify waste and chemicals.

**Bioavailability and bio-accessibility need to be taken into account when classifying waste. Waste is usually a complex blend, and chemical analysis is not suited to fully characterize its properties. Our view is that tests, notably on the ecotoxicity, give a more accurate evaluation of the risks.**

Concerning the challenges laid out in the Staff Working Document, we would favor the following proposed options:

<b>Challenge 1</b> Defining substances of concern	Option 1B	The preferred option is 1B, but a larger reflection needs to be carried out.
<b>Challenge 2</b> Tracking substances of concern	Option 2B	Only <b>sector specific tracking solutions</b> can be useful to recyclers. Tracking all substances is unrealistic, and voluntary tracking will not help.
<b>Challenge 3</b> Level playing field between 1 <sup>ary</sup> and 2 <sup>ndary</sup> material	Option 3B	The rules for primary materials <b>should be derogated</b> for secondary materials, under strict conditions, and on the basis of a sound cost-benefit analysis.
<b>Challenge 4</b> Level playing field between EU-produced and imported articles.	Options 4A & 4B	<b>Promoting the use of restrictions</b> , especially to level the playing field between EU produced and imported articles, is crucial, and so it is the <b>enforcement</b> of the chemicals and products legislation at EU borders.
<b>Challenge 5</b> Design for circularity	Options 5A & 5B & 5C & 5D	<b>All four options are complementary</b> and should be pursued, even though these fall short of meeting the challenge posed by legacy substances. We welcome the larger reflection brought by the EU Product Policy Framework Roadmap.
<b>Challenge 6</b> Improving certainty in implementation of end-of-waste provisions	Options 6Ai&6Aiii - Option 6Bii	<b>EU wide harmonisation</b> is preferable (Options 6Ai&6Aiii) and should be favored. If no EU-wide criteria exist, the operator should make the assessment (Option 6Bii).
<b>Challenge 7</b> Approximating the rules for classification of chemicals and waste	Option 7B	<b>Waste classification rules should not be fully aligned with the rules of the CLP.</b> The rules of the CLP are tailored to products, and waste has very different characteristics.
<b>Challenge 8</b> Classifying waste taking into account the form in which it is generated	Option 8A	Waste should be classified <b>taking into account the bioavailability</b> of substances it contains. If only the concentrations are taken into account, the risk to human health and the environment is overestimated.

## Issue 1: Information on presence of substances of concern is not readily available to those who handle waste and prepare it for recovery

### Questions:

- *What would be the added value of introducing a compulsory information system in the Union that informs waste management and recovery operators of the presence of substances of concern?*
- *How should we manage goods imported to the Union?*

The fact that recyclers currently do not get information on the substances of concern contained in the waste they treat is indeed a problem. However, we must be very careful to implement the right solutions, because some could be very burdensome for producers and will not bring any added value for recyclers. A key priority in this respect is to ensure that any compulsory information system is designed in a way which is practical both for stakeholders in charge of providing information (manufacturers) and for end users (recyclers). Hence the way information is provided very much depends of its objectives and end use. The feasibility study on the “use of different information systems, innovative tracing technologies and strategies which could enable relevant information to flow along article supply chains and reach recyclers” announced in the Communication is a positive step and it should have been carried out before the introduction of a mandatory requirement for ECHA to set up a database on Candidate List substances in articles.

Recyclers (end users) treat tons of waste per day. Any information system needs to provide practical information in a format which can be used by operators in every day treatment operations. This information should also be used to separate the items containing hazardous substances at the point of disposal.

Harmonized labelling for products or components containing the highest amount of hazardous substances (e.g. batteries) is also a practical and direct way to provide information on the presence of substances of concern. Such simple solutions can be more effective in conveying the information than a complex database, and this should not be forgotten.

Tracking is especially important for substances that should not be perpetuated into waste streams but are very difficult to analyze (e.g. surface agents), and especially if there is no detection technology allowing the separation at industrial scale. The substances that should be tracked in priority are those that do not need to be removed at depollution stage, but for which the concentration should remain under a certain threshold in recovered materials.

### Challenge 1: Defining substances of concern



**Option 1A:** substances of concern are all substances identified under REACH as substances of very high concern ('candidate list substances') or listed in Annex VI to the CLP Regulation for classification of a chronic effect.



**Option 1B:** substances of concern are those identified under REACH as substances of very high concern, substances prohibited under the Stockholm Convention (POPs), specific substances restricted in articles listed in Annex XVII to REACH as well as specific substances regulated under specific sectorial/product legislation.

It is difficult to make a choice between these two options not having the full grasp of what concrete consequences the definition of “substances of concern” would entail, as this definition will likely not be used only to set the scope of the substances to be tracked. What would be interesting for recyclers is to be aware of the presence of the substances that have regulated concentrations in products (e.g. SVHCs, restricted substances [Annex XVII of REACH], POPs, substances that would classify the material as hazardous as a product). In this context, it could also be interesting to envisage tracking some of the substances included in the Annex VI of the CLP. We therefore favor the option 1B but call for a deeper reflection on this definition.

## Challenge 2: Tracking substances of concern



**Option 2A:** all substances of concern should be tracked by a set date, for example 2030.



**Option 2B:** sector-specific tracking solutions: information on relevant substances of concern should be available to recyclers in a form commensurate to what is required.



**Option 2C:** tracking of substances of concern should remain voluntary.



**Option 2D:** tracking of substances of concern is not necessary or suitable because information on chemicals is obtained directly by analytical means (incoming waste batches, including imported waste, and outgoing recycled or recovered materials).

Tracking all substances of concern is not realistic and would not bring any added value to recyclers, especially since the list of “substances of concern” is growing every year and technological progress allows to detect ever lower concentration of substances.

What could be useful are the **sector-specific tracking solutions** envisaged by Option 2B, provided these would be developed in close collaboration with recyclers, so as to ensure that the information is displayed in a format that can – and will - be used in practice. The fact that only “relevant” substances of concern should be tracked is also important, and a prioritization work will also be needed.

Concerning the database on Candidate List substances that ECHA has to set up according to a new requirement from Article 9 of the revised Waste Framework Directive, we refer to our [position](#). In a nutshell, while we welcome the initiative, which will allow to centralize the information on substances in articles in just one database and will potentially improve the safety of workers in recycling plants, we have a certain number of reservations:

- The database will not be retroactive and recyclers will not get information on articles containing the substance and put on the market before the substance was included on the Candidate List.
- No information on the concentration of the substances will be available in the database.
- Information on substances could be detailed at the level of the components of complex articles, which is likely to become overwhelming.
- The database will be designed to inform both the consumers and waste treatment operators, but the ultimate use of the information for these two categories is fundamentally different.

## Issue 2: Waste may contain substances that are no longer allowed in new products

### Questions:

- o *How do we reconcile the idea that waste is a resource that we should recycle and, at the same time, ensure that waste that contains substances of concern is only recovered into materials which can be safely used?*
- o *Should we allow recycled materials to contain chemicals that are no longer allowed in primary materials? If so, under what conditions?*

The fact that ‘waste may contain substances that are no longer allowed in new products’ is the biggest issue hindering the transition towards a circular economy. In clearer words, legacy issues are one of the problems - if not the biggest one –to be tackled in the context of this initiative.

Recyclers are fully aware of the reputational damages that could arise should a major concern for human health or the environment be linked with recycled materials. Our position on the matter of legacy issues is very clear:

1. **Ambitious measures are urgently needed to avoid legacy issues in the future:** lessons need to be drawn from the mistakes that have been made in the past (how fast and efficiently have substances been finally phased out? What else could have been done?).
2. **Phasing out substances of concern while preserving a sound recycling industry within the EU and ensuring an optimal level of protection of the human health and the environment is possible.** The rules for secondary materials should be, for a definite timeframe and within strict conditions, different from the rules for primary materials. It can be ensured that recycled materials containing chemicals no longer allowed in primary materials are only used in safe applications. Sensitive applications (food contact materials, toys, medical devices) are strictly regulated with specific sectorial legislation, and the use of recycled materials for these applications is subject to strict, specific rules. For instance, for recycled plastics used in contact with food, the recycling process must be assessed for safety by the EFSA and authorized by the European Commission. However, there are other, less sensitive applications, for which the presence of legacy substances in the material do not pose a risk for the human health or the environment. The conditions under which it is acceptable to allow a higher concentration of regulated chemicals in recycled materials than in primary materials should be the following:
  - Said recycled material is used in specific applications where the substance it contains does not pose a risk for the human health or the environment (limited/absence of exposure). The absence of risk should be assessed by scientific committees, such as the Committee for Risk Assessment of ECHA.
  - Traceability is ensured, and the articles/products in which this recycled material is included are properly disposed of at end-of-life.It is unrealistic to expect a transition to a Circular Economy and a simultaneous elimination of all the legacy substances that have been widely used in products for decades. Recycling is a key element in this transition, but large investments are needed and these cannot happen in the current context, where new rules can suddenly disrupt the entire value chain. This is the case with the proposal to set an “unintentional trace contaminant” concentration limit of 10ppm for the brominated flame retardant decaBDE in plastics, within the Annex I of the EU POP Regulation (EC/850/2004). As explained in our [position paper](#), this limit automatically excludes recycled plastics. Eliminating POPs from material streams is obviously an important goal to achieve, but for the sake of coherence and consistency, it cannot be achieved at the expense of the goal to achieve a Circular Economy for plastics.
3. **Circular Economy must not remain a concept, but its principles have to be embedded in product design in order to tackle legacy issues at source.** We understand the need for exemptions for manufacturers when some substances are restricted, in order to be able to find suitable alternatives and adapt to the new rules. However, every time an exemption is granted for a substance, the time needed to phase out this substance is increased.

### Challenge 3: Level playing field between secondary and primary material



**Option 3A:** all primary and secondary raw materials should be subject to the same rules. For example, under REACH, restrictions and authorisation conditions imposed on primary substances should apply equally to recovered materials. Materials not meeting such requirements cannot be recycled and can only be destined to energy recovery, final disposal or to destructive chemical recycling (feedstock recycling).



**Option 3B:** rules on primary materials could be derogated from for secondary materials, subject to conditions and to review within a defined time period. Such decisions should be substance-specific and based on overall costs and benefits to society according to an agreed methodology. The methodology includes considerations of risk, socioeconomic factors and overall environmental outcome based on life cycle thinking. Such analysis could lead to derogations resulting in closed-loop or controlled loop uses or other specific use restrictions. This is also applicable to products containing legacy substances where, in some cases, a careful analysis will have to be made, for example, on the trade-off between allowing reparability with spare parts containing substances of concern versus early decommissioning or obsolescence of equipment.

As stated before, we are strongly in favor of having rules for secondary materials that are different from those for primary materials, under strict, clearly defined conditions. We believe that there can be specific applications for secondary materials containing higher amounts of substances of concern than primary materials posing no risk to the environment or human health. The example of the REACH restriction proposal for lead stabilisers in PVC articles<sup>1</sup> shows that it is possible to define specific, safe applications for which a higher concentration limit can be allowed in order to safeguard a recycling system.

These derogations are needed for a certain period after regulatory measures are taken for primary materials, because the substances are **not intentionally added** in recycled materials, and because developing technologies allowing to detect and separate the contaminated material at industrial scale takes time and investments which have to be economically viable and industrially feasible.

In this context, we welcome the ongoing development of a decision-making methodology to support decisions on the recyclability of waste containing substances of concern. We hope that this methodology will increase predictability for recyclers and that finally this issue will be addressed in a consistent way in all pieces of legislation, as it is the case for the preparation of restrictions under REACH. The guidelines to ensure that the legacy issues are taken into account as early as possible when choosing risk management measures are also a good development. In general, the communication towards recyclers, especially concerning risk management measures for chemicals, should be improved.

### Challenge 4: Level playing field between EU-produced and imported articles



**Option 4A:** promoting the timely use of restrictions. Ensure the timely use of restrictions in REACH and other product legislation so that EU produced and imported products are subject to the same rules. In the case of REACH, restrictions are the only means to address the favourable treatment that imported articles (incorporation of substances of very high concern in imported articles is not subject to authorisation) have vis-à-vis EU produced articles (subject to authorisation).



**Option 4B:** promoting enforcement of chemicals and product legislation at EU borders.

Both options need to be implemented. Without proper enforcement at EU borders, especially for REACH restrictions, the issue of legacy substances will never be solved. Additionally, it is urgent to tackle the issue of imported articles containing substances listed in Annex XIV of REACH. For each substance added on the authorisation list, a restriction addressing the main uses of the substance in articles should enter into force at the sunset date.

<sup>1</sup> See RAC and SEAC opinion <https://echa.europa.eu/documents/10162/86b00b9e-2852-d8d4-5fd7-be1e747ad7fa>

## Challenge 5: Design for circularity

-  **Option 5A:** use of the Ecodesign Directive, or of other dedicated product specific legislation as appropriate (for example, WEEE or ROHS), to introduce requirements for substances of concern with the purpose of enabling recovery.
-  **Option 5B:** make use of the extended producer responsibility requirements under the Waste Framework Directive to promote the circular design of products. This could be implemented through the guidelines on the application of fees modulation.
-  **Option 5C:** make use of voluntary methods of environmental performance certification (e.g. national or EU Ecolabel of green public procurement) to introduce rules for substances of concern.
-  **Option 5D:** promote voluntary approaches such as value chain platforms for exchange of good practice in the substitution of materials in the design phase.

The options that are proposed are far from being up to the task of avoiding perpetuating legacy issues, and much more ambitious measures should be explored.

**The scope** of the Ecodesign, WEEE and RoHS Directives is limited to electrical and electronic appliances, or energy related products, which is far from covering the full range of articles placed on the market.

Moreover, design requirements can facilitate the mandatory depollution step, by imposing design features helping recyclers to remove the components listed in the Annex VI of the WEEE Directive, or to clearly label the products. But less convincing is the proposal to use the listed regulatory tools (Ecodesign Directive, extended producer responsibility schemes...) to prevent the use of certain substances of concern. What we observe in practice when discussing ecodesign regulations proposals during stakeholder consultation forums is that the level of ambition of the proposals for basic material efficiency requirement is remarkably low, which leaves little hope for this tool to be effective in preventing the use of substances of concern. The right tool to address this issue of substances of concern for electronic equipment is the RoHS Directive, but the amount of exemptions currently granted under that Directive contradicts this objective.

Concerning the **eco-modulation of fees** that could be introduced by EPR schemes, we do not believe that these could prevent the use of certain substances. However, when a substance of concern is banned and in order to avoid legacy issues, EPR schemes could play an interesting role in closely following the average concentrations of the substances in the waste streams to monitor if the substance is effectively phased out and to set simplified, workable rules for recyclers.

The **voluntary approaches**, especially the EU Ecolabel, can set up a good example, drive responsible consumption and in general reduce the amount of hazardous substances in material streams. However, at the end-of-life stage, operators deal with all WEEE in the same way, regardless of the ecolabel, the brand or the model.

Ambitious measures are needed, because legacy issues can last for decades, depending on the lifespan of the articles in which the substances of concern are included and on the exemptions that are granted in parallel.

A wider reflection on the interplay between the chemical legislation and the Ecodesign tools is needed, and ambitious measures need to be taken to avoid creating legacy issues in the future and to limit their impacts on recyclers and the Circular Economy as much as possible (i.e. managing the issue so it does not affect recyclers for decades, while defining simplified rules for waste operators). We therefore welcome the reflection recently initiated with the roadmap on an EU Product Policy Framework contributing to the Circular Economy.

### Issue 3: EU's rules on end-of-waste are not fully harmonised, making it uncertain how waste becomes a new material and product

**Questions:**

*How and for which waste streams should we facilitate more harmonisation of end-of-waste rules?*

The rules on end-of-waste clearly need to be harmonized at EU level. We welcome the proposal for an online EU repository for national and EU adopted end-of-waste and by product criteria, which is a very positive first step. Removing the registration exemption for recovered substances under REACH is however clearly not a solution.

#### Challenge 6: Improving certainty in the implementation of end-of-waste provisions

**Option 6A:** take measures at EU level to bring about more harmonization in the interpretation and implementation by Member States of end-of-waste provisions laid down in the Waste Framework Directive. This option could include:

-  i. radically stepping up work on the development of EU end-of-waste criteria. This would therefore ensure that more waste streams are covered by clear EU-wide rules specifying which conditions need to be met to exit the waste regime and introducing support measures that would enable Member States to check compliance by recyclers with the exemption from REACH registration; or
-  ii. removing the registration exemption for recovered substances provided in REACH thus requiring that all recovered substances should be registered under REACH and thereby achieving end-of-waste status; or
-  iii. where other specific product legislation provides different instruments laying down conditions that ensure the safe placing on the market of a substance or mixture, recognize these conditions as effective end-of-waste criteria and, where justified, introduce a specific exemption from REACH registration.

**Option 6B:** take measures to ensure more consistency of practices at Member State level. This option could include:

-  i. End-of-waste status can only be achieved following an ex-ante decision by a Member State competent authority;
-  ii. A recovery operator can make the assessment of whether end-of-waste status is achieved (in combination with an ex-post checking regime by competent authorities); or
-  iii. A combination of these approaches, e.g. distinguishing on the basis of the nature of specific waste streams.

The preferred option is 6Ai. EuRIC is clearly in favour of EU wide end-of-waste criteria, which allow a level playing field between operators and greatly facilitate the shipment of waste. Removing the REACH registration exemption for recovered substances is however not a viable solution as it would create additional administrative burden for recyclers and be counterproductive vis-à-vis the current effort to smoothen the interface between the different pieces of legislation.

If no EU-wide end-of-waste criteria exist, the recovery operator should be entitled to make the assessment (Option 6Bii). Recovery operators from different countries should be able to agree between each other, and the burden of proof should be reversed: whoever challenges the compliance of a given waste stream with end-of-waste criteria should prove that the assessment that was made is incorrect.

In general, we believe that polymers could benefit from more harmonised end-of-waste rules. REACH rules state that monomers and other components should be registered, not the polymers. This is an issue when incorporating a recycled polymer in a new product, because it is impossible to detect from which monomer and components the polymer was made from in the first place (the same polymer can be made using different monomers and other components). The “sameness” is therefore almost impossible to prove.

#### Issue 4: Rules to decide which wastes and chemicals are hazardous are not well aligned and this affects the uptake of secondary raw materials.

**Questions:**

*Should we further align the rules on hazard classification so that waste would be considered hazardous according to the same rules as products?*

The alignment of the rules for hazard classification of waste and products/articles makes sense in a Circular Economy. The full alignment of these rules is however neither needed nor appropriate, for several reasons:

- Even within a Circular Economy, the distinction between a product phase and a waste phase still exists.
- The rules for product classification and waste classification have the same purpose: protecting the environment and the human health. Products are put in direct contact with the general population and can potentially be discarded and/or disseminated in the environment. Waste however is managed by professional operators, who have to comply with strict permitting rules, set (for the facilities falling in its scope) in the Directive 2010/75/EU and the Waste Treatment BREF, which aims at reducing the industrial emissions linked to their activities. Rules for workers' health and safety are set in dedicated regulatory instruments. Moreover, waste is subject to traceability requirements.
- The rules of the CLP legislation are designed to be applied to substances or mixtures. Waste is made up by a mix of discarded articles and the rules that can be applied to mixtures are not workable when it comes to waste, which consists of a blend of solid elements of complex composition (heterogeneous by nature).

We do not believe that the fact that the same material is classified as a non-hazardous waste but bears a hazard classification as a product is necessarily a problem, as long as the obligations arising from the CLP harmonized classification are fulfilled when the material returns to product stage.

#### Challenge 7: Approximating the rules for classification of chemicals and waste



**Option 7A:** the rules for classifying waste as hazardous or non-hazardous in Annex III of the Waste Framework Directive should be fully aligned with those for the classification of substances and mixtures under CLP. This should enable a smooth transition and placing on the market of secondary raw materials in full knowledge of their intrinsic properties.



**Option 7B:** hazardousness of waste should be inspired by the classification of substances and mixtures under CLP, but not fully aligned with it. Specific considerations of each waste stream and its management may allow wastes to be considered as non-hazardous even if the recovered material will be hazardous when placed on the market as secondary raw material.

Option 7A is profoundly unworkable. As previously expressed, the rules of the CLP Regulation are designed to classify substances and mixtures. Waste however does not fit into any of these definitions. Depending on

the stage of the process, it is a mix of discarded articles or a mix of polymers. The existing rules for waste classification are currently based on the type of waste, its origin, how it has been processed, but usually not on the chemical composition.

Additionally, waste operators need to operate under fixed, constant, predictable rules that do not change too often, while the Annex VI to the CLP is amended several times each year with the publication of each ATP. Recyclers should not need to follow the developments of the CLP legislation, which has secondary impacts on their operations, that are difficult to grasp, anticipate and ultimately communicate to the authorities. If there is a strong will to move towards a circular economy, a more integrated approach should be taken, looking at the impacts of CLP classification for waste operators, while improving the certainty for recyclers regarding the rules applying to them. We are therefore strongly in favor of option 7B.

### Challenge 8: Classifying waste taking into account the form in which it is generated.



**Option 8A:** once the rules have been established under CLP, waste should also be classified taking into account the form in which it is produced, taking account of the bioavailability/bio accessibility of the substances it contains, subject to reliable scientific information to support claims for reduced hazard classification.



**Option 8B:** under Annex III of the Waste Framework Directive, waste should be classified exclusively based on the concentration of hazardous substances it contains, without further consideration of bioavailability or bio accessibility.

**Bioavailability of the substances of concern has to be taken into account for waste classification.** A classification purely relying on the concentrations of the substances present in the waste is very likely to lead to misclassifications. Waste is usually a complex and heterogeneous blend for which the exact chemical composition, including the speciation of the compounds, is very difficult to assess. Some assumptions have to be made, usually exploring the “worst case scenario”, which can lead to the classification as hazardous of a waste stream that should not necessarily be considered as such. We are therefore strongly in favor of option 8A.

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Through its Member Recycling Federations from 20 EU and EFTA countries, EuRIC represents today over:

- ✓ 5,500+ companies generating an aggregated annual turnover of about 95 billion €, including large companies and SMEs, involved in the recycling and trade of various resource streams;
- ✓ 300,000 local jobs which cannot be outsourced to third EU countries;
- ✓ An average of 150 million tons of waste recycled per year (metals, paper, plastics, glass and beyond).

Recyclers play a key role in a circular economy. By turning wastes into resources, recycling is the link which reintroduces recycled materials into the value chains again and again.