Fédération Européenne des Activités de la Dépollution et de l'Environnement

European Federation of Waste Management and Environmental Services

Europäische Föderation der Entsorgungswirtschaft

SCIP Workshop

ECHA

Helsinki

12/11/2019

21
National Waste Management Federations

3,000
Companies

320,000
Employees

1,100
Composting Sites

FEAD

The voice of the private waste & resource management industry

900
Controlled Landfills

260
Waste-to-Energy Plants

2,400
Recycling and Sorting Centres

5 Billion
Euros in Investments per year

FEAD Position on SCIP Database

There is currently a lack of information

Information is essential for:

SAFETY (workers and environment)

COMPLIANCE with requirements on traceability

PROPER waste treatment

QUALITY of recovered material

PRIVATE WASTE MANAGEMENT NEEDS

- **Reliable information** in order to produce risk-free recycled materials

- **Clear, simple and usable information** regarding the presence or absence of substances of concern

- **Compliance withlegal thresholds (<u>Improve compliance with legislation</u>** like the POP's regulation or restriction / authorisation in REACH)

A complete information flow is attainable by:

- **Improving cooperation** between manufacturers and the waste management sector

- **Supporting the use of digital solutions** for improved information flows

- **Providing a clear and simple methodology** to indicate the presence of substances of concern in waste flow types.

What are your current issues when dealing with the sorting and recycling of substances of concern contained in the waste that you process?

- **Depends on the flow and the type of waste**.
- Normally: **collect separately and track hazardous components**. Then separate the hazardous component from the article.
- Waste origin is important.
- Waste classification level: the **need to check** presence of specific substances.
- Without data: **time and money** to analyse.

- Today, waste treatment and recycling operators **use both scientific and practical knowledge gained during day-to-day operations** to remove waste fractions that contain hazardous or legacy substances. E.g.:
  - Characterized plastic waste streams with phthalates (based on previous analyses) are separated from recyclable materials.
  - ELV waste management, certain car models are known to contain persistent organic pollutants more than others and can be separated before dismantling and shredding.

Do you currently have enough information about the presence of such substances of concern?

- At the moment, the waste management industry **needs more/better information** in a **useable** form. Now, the information we have is limited and it costs a lot of time/money to get it. So worth it to improve the system.

- The **usability** of information is a key issue to be addressed

What are the additional information needs?

- Information on waste articles or grouped in waste streams that can be utilized to decide **if recycling is possible either directly or after decontamination**.
- Also hazardous waste can be recycled/recovered, under permitting conditions depending on further use
- Waste recycling industries need to know **what to search for**
- Ensure that **recycled materials contain no SVHC** submitted to restriction or authorisation.

What would be the right level of reporting for your sector or for waste operators in general?

- **Depends on the type of waste**
  - Article-based information vs. product category/waste stream based information

For hazardous waste: **Article level** is the right level. A broader level (object, product family, waste stream) will imply dilution of the contaminated part of equipment or articles

Article level – Need for additional EU guidance (characterisation of waste flows; waste management rules) based on risk assessment, if the total level of SVHC supersede a certain defined threshold

For NON hazardous waste:

ECHA asks: Which search functions/query possibilities would be useful and which type of features (e.g. alerts/tracking certain SVHCs in certain waste streams/product categories)?

- **Information** on SVHC presence in a specific waste article

- **Alerts** advicing on presence on a certain article superseding a certain defined threshold of SVHC. Followed by **EU Guidelines** on what to do!

What concrete use cases do you see for the SCIP database to improve your work?

- **End-of-life vehicles**: only part of the vehicle contains articles that are contaminated by SVHC: dashboard, bumpers.

  Nevertheless, dashboards or bumpers are not all contaminated by SVHC (BFR), it depends on the year of production.

Other Issues

- With better information from the manufacturers **testing waste can be targeted** efficiently
- It's important to have **more information about the concentration**, especially regarding SVHC.
- Identify **which** substances are to be declared
- Need for common EU Guidance for downstream users , based on risk assessment, and on how to recycle/manage waste streams in bulks

Problems/Worries

- Legacy stocks/surplus
- We do not know which substances will be considered of high concern in **5-10 years** when those products become waste
- Can companies become **liable** for not having used the database to its full extend on a daily basis?
- Can a single waste management and recycling company be held **legally accountable** in case the respective company missed out on relevant information inside this database for its operation?
- How can a single company dealing with waste in bulks **become liable** to check millions of entries?

Remarks

- The database should be **only one** and if other databases or datas provided by the producers exist, then they should be grouped.
- We would like to **reduce or phase out SVHC**
- **Article** is the balanced level of information in order to group information if needed
- We ask, for specific waste streams, EC to develop **Guidance** on the use of the database based on **Risk Assessment**
- We would like recycling to be **boosted not penalized** by the database
- Circular economy needs **purer and reliable** secondary raw materials

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