



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

FEAD feedback to update of concentration limit values of Persistent organic pollutants in waste

7th August 2020

FEAD, the European Federation for Waste Management and Environmental Services, representing the private waste and resource management industry across Europe **welcomes** amendments to the annexes of Regulation (EU) 2019/1021 on Persistent Organic Pollutants (POPs), in the context of the Green Deal and the new Circular Economy Action Plan aiming to achieve a toxic-free environment.

FEAD believes that addressing and revising new values for different substances is crucial in order to limit the presence of certain POP substances in waste and in material that could be recovered through it.

As FEAD's members deal with all types of POPs concerned by the amendments, we believe that more comprehensive information should be provided by manufacturers, in order for the waste management industry to treat waste in a way that preserves individuals' health as well as biodiversity.

In particular, FEAD would like to stress the relevance of the following elements:

- **Good practices should be increased and promoted, in order to enable the limitation of POPs as fast as possible.**
- To achieve this objective, **the waste management sector needs more information on POPs' presence in different products**, in order to adapt treatment accordingly. Information from manufacturers must follow during the life cycle of materials until waste phase to ensure the separation of recyclable and non-recyclable wastes.

Concerned substances are present in many products used and disposed of in our daily lives. For instance, this is the case of HBCDD which are widely used as a flame-retardant additive in textiles, electrical and electronic appliances and insulation materials in the construction industry or PFOA widely used in textiles and leather industries. This lack of information from the manufacturers' side creates **significant difficulties** in waste treatment processes.

For many years, our sector has been demanding a true improvement of the information on products. To date, we have not observed enough changes. We think this is a crucial step for a safe and quality waste management. It is also a first step to ensure the **phasing out** of as many hazardous

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substances (SVHC/POP) as possible in the manufacturing processes, also for imported goods.

- **Legacy substances:** A great concern is expressed for durable goods which do not become waste immediately, but only after 5, 10 or more years, and waste managers do not have suitable information about these products. Information on a product should also be updated during the whole life-span of it.
- **New pieces of legislation for products could lead to:**
 - a better knowledge of the POPs contents
 - a better segregation between uncontaminated parts and POP containing parts
 - the production of risk free recyclates
 - a certain increase of the contaminated plastic waste fractions to be disposed of and therefore a decrease in recycling rates
 - an increase in recyclates prices.
- **Incentives should be provided for specific decontamination** in view of recycling. As already mentioned, information regarding the presence of POP is missing in most cases, thus there is no sufficient market for innovation and investment in dedicated recycling facilities. **Public support should also be considered to foster new investments related to separation and decontamination**, allowing for more recycling.
- To properly detect and treat products containing harmful substances, the waste management sector calls for **harmonisation at EU level in the existing analysis methods** as well as **a broadened scope of the SCIP database, to include POPs other than SVHCs**, if the ECHA SCIP database is considered as the main source of information from producers to waste management sector.
- Regarding the idea mentioned in the roadmap that “potential increase in environmental emissions of hazardous substances associated with waste disposal (e.g. via incineration or landfill)” we would like to stress that a **proper hazardous waste management** does not lead to environmental emissions which could cause hazard to people or environment. State-of-the-art hazardous waste treatment installations are **safe, continuously monitored and properly controlled** in all steps.

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Finally, FEAD highlights that EU policies for a “toxic free environment”, and for more recycling, often result in contradictory regulatory directions. In the worst case, none of the objectives are reached, while waste operators are put in a situation where rules are not predictable, nor always practicable. Proper implementation of existing rules should be a priority on the agenda.

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