

Joint statement on the draft Correspondents' guidelines on the new plastic waste entries

4 December 2020 - In the context of the current drafting of the Correspondents' guidelines on the implementation of the revised Waste Shipment Regulation, **FEAD and EuRIC** express their concern on certain provisions included in the draft guidelines, in particular:

- A **one-size-fits all 2% threshold of non-hazardous impurities/components to be classified under entry B3011**, applicable to all plastic waste (including waste that has undergone a very first sorting operation) raises solid concerns with regards to our operations. We deem that the above-mentioned 2% threshold is **too low** to ensure the correct functioning of the EU plastic recycling market. This is because:
 - The plastic recycling market and the entire plastic value chain in Europe relies on intra-EU shipments of plastic waste. Currently, **many Member States do not have the capacity to process internally the wide variety of polymers used in products**. Having no or very limited plastics waste recycling capacity, transboundary movements play a crucial role to ensure that plastic waste collected in one Member State is safely shipped to another one for material recovery purposes.
 - Adverse effects can also be expected with regard to a larger share of shipments subject to the notification procedure. **The proposed 2% threshold de facto qualifies most plastic waste sorted in the EU as subject to the prior-consent and notification procedure for intra-EU shipments**. The latter entails significant administrative burden, delays and costs, while bringing limited additional environmental benefits within the EU. With an entry into force by 1 January 2021, we will not be able to ensure the current shipment schedule, entailing significant economic damage for our sector, already seriously hit by the current crisis.
- On a procedural note, we question the very short consultation period during which the draft guidelines have been subject to our consultation. Given their pivotal importance on the whole recycling sector, any threshold must result from a robust assessment of their feasibility and impact. This needs to be done keeping in mind the goal of the guidelines, which is not directly to protect the environment, but to set up clear rules for intra-EU waste shipments. Our industry welcomes rules, provided they are applicable and fit-for-purpose. Therefore, **EuRIC & FEAD urge the Commission to conduct more in-depth consultations on the matter, together with a proper assessment of the potential effects of the measures proposed**.

In conclusion, **we call the Commission to revise the relevant paragraphs in the draft guidelines** (par.19-24) referring to the introduction of the new 2% threshold. Moreover, we stress that the waste management and recycling sector remains at the complete disposal of the Commission, to provide concrete specifications and elaborate thresholds that would suit the current needs of plastic shipments/recycling market within the EU, as a key condition for circularity.

For further information, please contact info@fead.be or euric@euric-aisbl.eu.

FEAD is the European Waste Management Association representing the private waste management and resource industry across Europe, covering the whole waste management chain. Our members are national waste management associations covering 20 EU and EFTA countries.

EuRIC is the Confederation representing the interests of the European recycling industries at EU level. EuRIC, through its various Branches covering the vast majority of waste streams, brings together National Recycling / Resource Management Federations and Companies in lieu from more than 23 European countries active locally and globally.