

Reinventing plastics – closing the circle

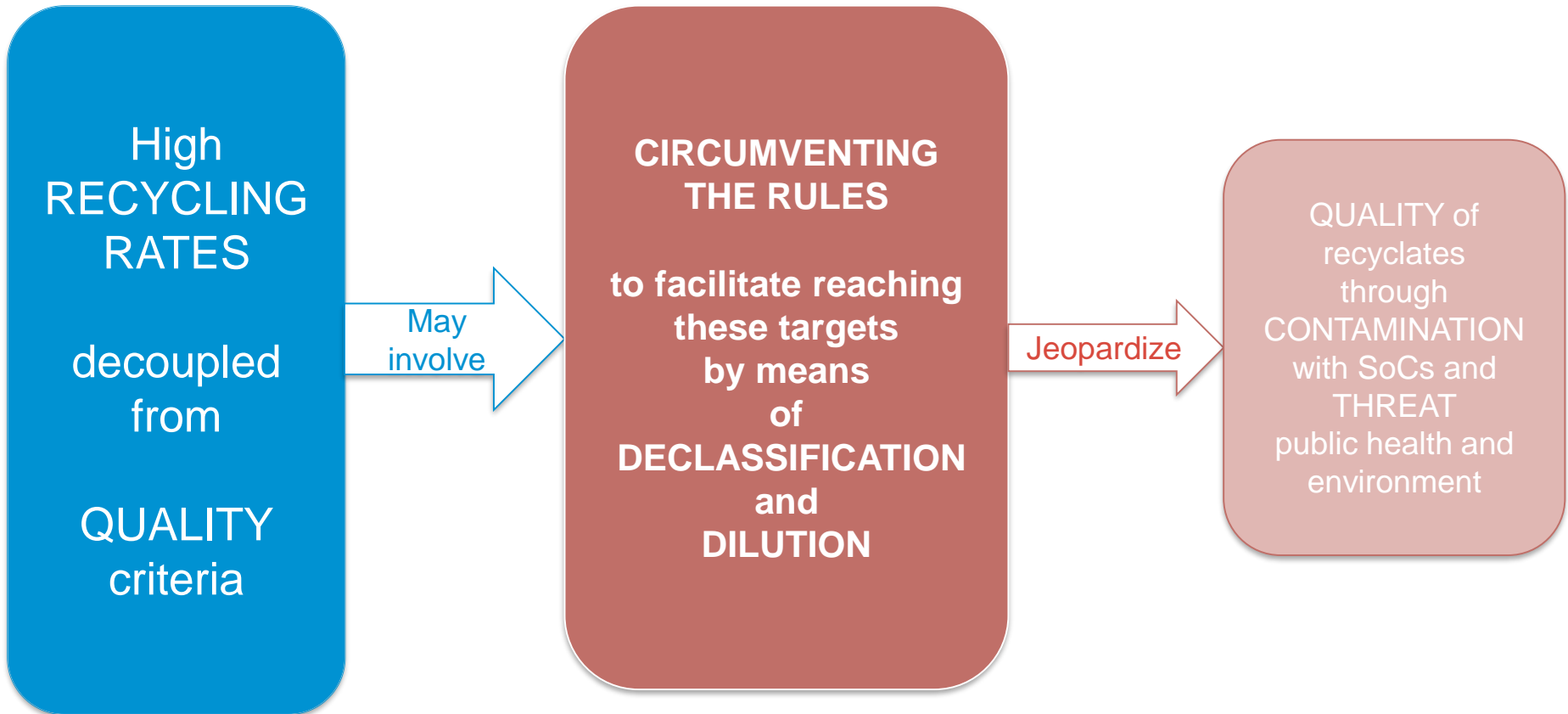
Interface between products, waste and
chemical policy: how to balance phasing out
legacy substances with higher recycling rates?

Findings

High recycling rates decouple from quality criteria involve, sometimes or under certain circumstances, circumventing the rules in order to facilitate reaching these targets by means of declassification and dilution which jeopardize the quality of recyclates through contamination with SoCs and threat public health and environment.

This is what we want to avoid!

Findings



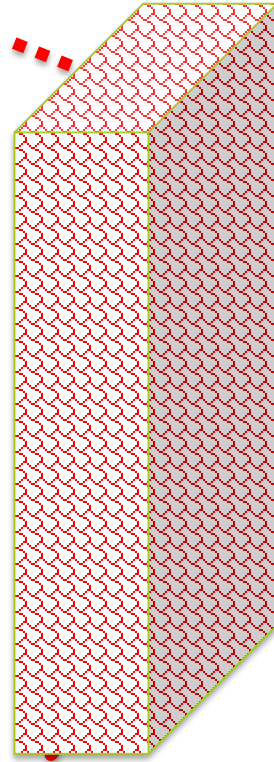
This is what we want to avoid!

No Declassification

WASTE

Hazard-based approach

We can never ensure
what the fate of the waste
will be



PRODUCT

Risk-based approach

Products are always
intended for defined uses

Keep the border clear!
Declassification is not an option

No Dilution but Decontamination

- If plastic streams containing SoCs are diluted with other plastic streams without taking into account:
 - POP-SoCs levels (ex POP-BFR)
 - Restrictions or Authorisations in REACH
 - Or any other legislations with limitation on SoCs concentration

THEN

- Recycling bans in POP regs are not followed
- SoCs are kept into the loop
- Get ride of SoCs is compromised on the long term
- Clean plastic waste streams are contaminated (depending on the uses)

**In order to avoid contamination of the loop by SoCs,
dilution should not be a solution, but decontamination must be the rule!**

How can we solve the issue?

- In order to address the challenges of circular economy for plastic streams (and many others) without endangering public health and environment, we should:
 - Favour recycling only in:
 - Closed loop, or
 - Controlled loop
 - For allowed uses (regarding POP regs, REACH, ROHS, ...)

Requirements for the controlled loop:

- Separate upstream fractions not allowed for recycling (POP and other bans)
- For SoCs restricted through REACH, SoCs levels in the plastic waste to be recycled must comply with the threshold defined in REACH (get rid of legacy substances as fast as possible and avoid dispersion)
- Perfect traceability with certification schemes for all actors of the management chain to ensure that the recyclates will end-up only in the allowed uses
- No declassification: it will ensure that if the waste does not follow the recycling route, it will be treated properly in the appropriate installations



Thank You for your attention

Nicolas Humez, Chairman

n.humez@hazardouswasteeurope.eu