PlasticsEurope
Association of Plastics Manufacturers

PlasticsEurope: Our View on the First Reading of the Waste Framework Directive

- **PlasticsEurope calls for a broad recycling definition to stimulate continued development of innovative recycling technologies. Many plastic applications are suitable for recycling – either as mechanical or feedstock recycling – and this must be fully explored. Others will become viable as new technologies emerge. The fact that plastics, as a unique material, offer different levels of recycling needs to be reflected in legislation.**

- **PlasticsEurope welcomes the recognition that energy recovery from residual waste contributes to maximising the use of natural resources. Plastics are in principle "solid oil", and waste plastics can therefore substitute fossil fuels in a range of recovery operations.**

- **PlasticsEurope stresses that there must be freedom to apply the waste hierarchy flexibly to ensure the most sustainable, eco-efficient waste management option is chosen in every situation.**

PlasticsEurope represents the plastics manufacturers in Europe. The association has more than 60 member companies, producing over 90% of polymers across the EU's 27 member states plus Croatia, Norway, Switzerland and Turkey. The plastics chain in Europe - including converters and machinery manufacturers - employs over 1.6 million people. The combined turnover of our industry is in excess of 160 billion euro per annum. PlasticsEurope operates from six decentralised offices: one in Brussels and five regional centres located in France, Germany, Italy, Spain and the UK.

The following pages explain in more detail our views on the **recycling and recovery definitions** adopted by the Environment Committee in their report on the Waste Framework Directive (28th November 2006).

We would be very happy to discuss the contents with you in greater detail. Please contact:

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PLASTICS: ECO-EFFICIENT USE OF NATURAL RESOURCES

In order to optimise use of resources and minimise landfill, the plastics industry advocates a policy of waste management that makes use of all options. Plastics can be recovered through a range of operations – reuse, recycling and energy recovery techniques. Plastics*Europe* advocates a flexible approach to the waste hierarchy, to ensure that the most sustainable waste management option can be used in every situation.

Plastics contribute significantly during the use phase to energy and resource efficiency through specific tailored characteristics e.g. lightweight packaging or insulation foams. Plastics also contribute to waste minimisation through increasingly resource-effective solutions for both the plastics material and the products that plastics contain.

Many plastic applications are suitable for recycling – either as mechanical or feedstock recycling – and this must be fully explored. Others will become viable as new technologies emerge. The fact that plastics, as a unique material, offer these two levels of recycling needs to be reflected in legislation, and Plastics*Europe* therefore calls for a wider recycling definition to stimulate innovation.

However even after having fully explored the recycling route there are remaining streams of plastics for which recycling is not environmentally or economically-viable. There can be many reasons for this, for example because the lightweight characteristics of plastics require only a small quantity of material for a particular use, or because the numerous different tailor-made types of plastics often lead to mixed waste streams which are difficult to source-separate and recycle.

Contrary to many alternative materials, plastics have a high calorific content – plastics are in principle "solid oil" – and waste plastics can therefore substitute fossil fuels in a range of recovery operations. However the legislative agenda has for a long time discriminated against this approach. While for many alternative materials disposal is the only alternative to reuse and recycling, plastics offer a range of recovery options which call for novel thinking and a flexible legislative agenda.

Plastics make a significant contribution to society and deserve a flexible legal framework in order to promote innovation and the development of more sustainable recovery options and business opportunities across the EU.

RECYCLING DEFINITION

Plastics*Europe* takes the view that, in line with the principle of substitution of resources, the term 'recycling' should be broad enough to encompass feedstock as well as mechanical recycling. This is **not** the case with the definition adopted by the ENVI Committee (compromise amendment 5).

Plastics*Europe* supports the definition originally laid out in Article 3 of the Commission's original, *Proposal for a Directive of the European Parliament and European Council on Waste* (COM(2005)667). This definition states that recycling is "the recovery of waste into products, materials or substances whether for the original or other purposes".

This is consistent with the recycling definition laid out in Article 3 of the *Directive 94/62/EC on packaging and packaging waste*: "recycling shall mean the reprocessing in a production process of the waste materials for the original purpose or for other purposes including organic recycling but excluding energy recovery".

Plastics are suitable for both mechanical and feedstock recycling. Polymers can be recycled into polymers again without fundamentally changing the chemical structure of the polymer: this is called mechanical recycling. Contrary to alternative materials plastics offer an additional level of recycling by breaking down the polymer into its elementary chemical building blocks (monomers), which can be used to either produce new materials similar to the original or for other purposes.

Feedstock recycling is an integral part of many vital industrial processes, for example in the production of iron in blast furnaces. Waste plastics can be used as a substitute for coke as feedstock in this process, where they act as a reducing agent to produce iron from iron ore.

Industry has invested considerably over many years in innovative, eco-efficient waste management technologies. Narrowing down the recycling definition would take away the most important incentive to stakeholders to keep on utilising and investing in these environmentally-beneficial technologies.

RECOVERY DEFINITION

Plastics*Europe* believes that, from a life-cycle perspective, energy recovery from the remaining fraction of municipal waste after having explored the recycling options, is often the most environmentally-sustainable option. Plastics*Europe* therefore strongly supports the Commission's proposal to re-classify incineration as recovery within the recovery definition (in Article 5 the Commission defines recovery as "operations that result in it [waste] serving a useful purpose in replacing, whether in the plant or in the wider economy, other resources which would have been used to fulfill that function").

This recovery definition will establish a link between raw materials and energy supplies, as it is based on the notion of substitution of resources. Energy recovery operations which contribute to resource and energy efficiency in this way should be recognised in the legislative framework. It is therefore crucial to maintain a broad definition of 'recovery' that allows any recovery process that yields materials, objects, fuels or energy.

Plastics*Europe* supports moving the recovery definition into article 3, as proposed by the ENVI Committee. However it is concerned by the inconsistencies between the various amendments adopted regarding recovery across articles 3, 5 and 19 and Annex II. There is a threat that this could create a legal framework that endangers eco-efficient recovery techniques, including energy recovery, and runs the risk of increasing the quantity of waste going to landfill.