



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

19<sup>th</sup> September 2010

## **Public Consultation on the preparation of a new Communication on Raw Materials – FEAD input**

**27. In your view, and beyond measures already being taken (e.g. the recast of the WEEE Directive), what practical measures can be taken by the EU and by Member States to prevent the illegal shipment of obsolete end-of-life vehicles and electronic equipment?**

In our view, the main action that should be taken at European level to prevent illegal shipments in general, and the illegal shipment of obsolete ELVs and WEEE in particular, is to improve inspections and controls (eg. by increasing the number of inspectors and inspections). Inspections and controls are needed to ensure the proper application of the Waste Shipments Regulation.

FEAD supports the development of IMPEL (European Union Network for the Implementation and Enforcement of Environmental Law) or the setting up of a Waste Implementation Agency at European level, so as to ensure that sufficient resources are allocated to enforce the Waste Shipments Regulation and therefore to combat illegal shipments of ELVs and WEEE.

In order to prevent illegal shipments, we feel there is a need for a better clarification of export procedures. An example of such would be the use of Annex VII with reference to the information intended to ensure waste traceability up to the recycling plant. In this regard, efforts shall be made to identify and/or to monitor and/or to register brokers and traders.

**28. In what ways should statistics on trade in, and recycling of, products containing secondary raw materials be improved?**

FEAD agrees that statistics on trade in, and recycling of, products containing secondary raw materials need to be improved. As a first step in creating an EU policy framework for raw materials stewardship, Member States should measure and record their material flows into and out of their economies, and to this end the EC should develop common methodologies (just as they have done with LCA). This type of data will not only show how much of the critical metal is being exported (say, in WEEE), but will also show how efficiently we are using these materials in our production and manufacturing processes. This type of data will furthermore show how effective we are in capturing the waste products containing these materials (eg are they going to landfill rather than being collected separately and recovered?)

Individual Member States should keep a record of mass flows into and out of their economy (including both virgin and waste flows), from which EUROSTAT can then be asked to prepare and maintain a composite EU-wide mass balance for each of the critical metals (or groups of metals).

**29. Have you identified major problems with recovered paper? What are the main issues that need to be further analysed?**

JRC and the European Commission are currently in the process of elaborating criteria for end-of-waste for recovered paper. FEAD is welcoming the work of the JRC and the European Commission and is actively contributing. Mid-July 2010, the JRC presented their revised report on end-of-waste for recovered paper. This report also touches upon the impact that end-of-waste criteria will have on the export of recovered paper (pages 68-69):

APOH, Slovakia  
ARS, Romania  
ASEGRE, Spain  
BDE, Germany  
CAOH, Czech Republic

DWMA, Netherlands  
ESA, UK  
EWMA, Estonia  
FEBEM-FEGE, Belgium  
FISE, Italy

FLEA, Luxembourg  
FNADE, France  
IWMA, Ireland  
KSZGYSZ, Hungary  
LASUA, Latvia

PASEPPE, Greece  
PIGO, Poland  
SRI, Sweden  
VÖEB, Austria  
YYL, Finland

*"Impacts outside the EU*

(...)

*End-of-waste will likely imply a shift of reject waste disposal, but for the better: by more systematically controlling sorting and cleaning to meet EoW material quality criteria, there would be a reduced export of non-paper components in waste paper, as exported end-of-waste paper will be on average less polluted than waste paper exported today for production outside the EU. This would imply additionally the avoidance of cases of camouflaged waste export, export for cheap labour sorting purposes, and the avoidance of the unknown disposal of the non-paper fraction in the destination country. Marginal energy savings may also result by not unnecessarily transporting for long distances the unusable materials in waste paper."*

Therefore, FEAD would suggest to first await what impacts end-of-waste criteria will have on the trade of recovered paper before suggesting further measures at EU level.

*FEAD is the European Federation representing the European waste management industry. FEAD's members are national waste management associations covering 20 Member States. They have an approximate 60% share in the household waste market and handle more than 75% of industrial and commercial waste in Europe. Their combined annual turnover is approximately € 54 billion.*

*FEAD represents about 3000 companies with activities in all forms of waste management. These companies employ over 295000 people who operate around 1800 recycling and sorting centres, 1100 composting sites, 260 waste-to-energy plants and 1100 controlled landfills. They play an important role in the determination of the best environmental option for waste management problems.*