Interface Chemical/product/waste

a narrow path between the devil and the deep blue sea

Circular Economy Stakeholder Conference
20-February 2018
VEOLIA ACTIVITIES

WATER
- 100 million people supplied with drinking water
- 2,928 wastewater treatment plants operated
- 4,052 water production plants managed
- 61 million people connected to wastewater systems

WASTE
- 764,477 business customers
- 45 million metric tons of treated waste
- 591 waste treatment facilities operated
- 40 million people provided with collection services on behalf of municipalities

ENERGY
- 37,339 Heating installations managed
- 551 heating and cooling networks operated
- 44 million MWh produced
- 2,086 Industrial sites managed
1. Moving from quantity to quality recycling

2. Principles

3. How to solve the information conundrum?

4. How to deal with legacy substances?

5. How to avoid market fragmentation?
MOVING FROM QUANTITY TO QUALITY RECYCLING

1. **PETROLEUM PRODUCTS**
   - Additives

2. **POLYMERISATION**
   - **Virgin Plastics**
   - Additives

3. **CONVERTERS/MOULDERS**
   - **Hybrid Plastics**

4. **FINAL MARKET CLIENTS BRAND BOTTLERS**
   - **Pre-sorting**
   - **Collection**
   - **Sorting**

5. **PLASTICS 100% RECYCLED**
   - **Extrusion**
   - **Compounding**
   - **Washing/Drying**
   - **Plant Procurement**
   - **Sorting**
   - **Shredding/Grinding**
We operate under the existing regulatory framework for hazardous and non-hazardous waste (Waste hierarchy, non-dilution) and are impacted by REACH and other product-related legislation.

In the medium/long run, the overall goal is to achieve a non-toxic, risk-free material cycle: as a general rule, SVHCs should not be found in virgin materials and/or SRM above the regulatory threshold, otherwise: need for decontamination.

In the short term, the recycling industry needs:

- Relevant information on SVHCs
- A practicable, temporary case-by-case approach to:
  - avoid disruption of recycling processes until toxic substances are completely phased out;
  - provide certainty to trigger much needed investments in treatment capacities;
- A level playing field between secondary and primary material and between EU-produced and imported articles

SVHCs should be understood as substances identified under REACH, which does not include POPs and specific substances regulated under sectorial/product legislation.
INFORMATION CONUNDRUM
Current R&D on SVHC identification and tracking (analytical) but not ready yet.

Recyclers need to have enough relevant information on SVHCs: what are the SVHCs and how should it be treated?

Information about SVCHs should be made available to the whole value chain (from product manufacturers to recyclers), including the waste stage.

- Improving cooperation between manufacturers and waste management through eco-design and product specification;

- Keeping records of the information throughout the value chain, possibly by using digital solutions (feasibility/practicability),
DEALING WITH LEGACY SUBSTANCES IN THE SHORT TERM

**SVHC** under consideration for authorization/restriction or already on the list

- Can be safely used for pre-defined, specific uses and below a pre-defined threshold:
  - Identified use;
  - Risk-based assessment (taking into account exposure/leakage);
  - Some form of traceability.

- Recycling for those specific uses

- Cannot be safely recycled or recovered for any specific use

- Other appropriate treatment options such as: waste-to-energy or disposal
The current EoW procedure (European/national *ex-ante* or *ex-post*) creates legal uncertainty and affects cross-border movements of SRM, which leads to market fragmentation.

- EU detailed criteria on the uniform application of the conditions for EoW;
- cooperation among MS + an online tool to facilitate information sharing on EoW;
- *EoW decisions taken by MS (general or on a case-by-case basis) should be duly notified to the EC.*
- *Ex-ante decisions at MS level should be the preferred option;* 
- *individual decisions taken by MS should not represent a significant threat to the smooth functioning of the internal market.*
THANK YOU FOR YOUR ATTENTION

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