

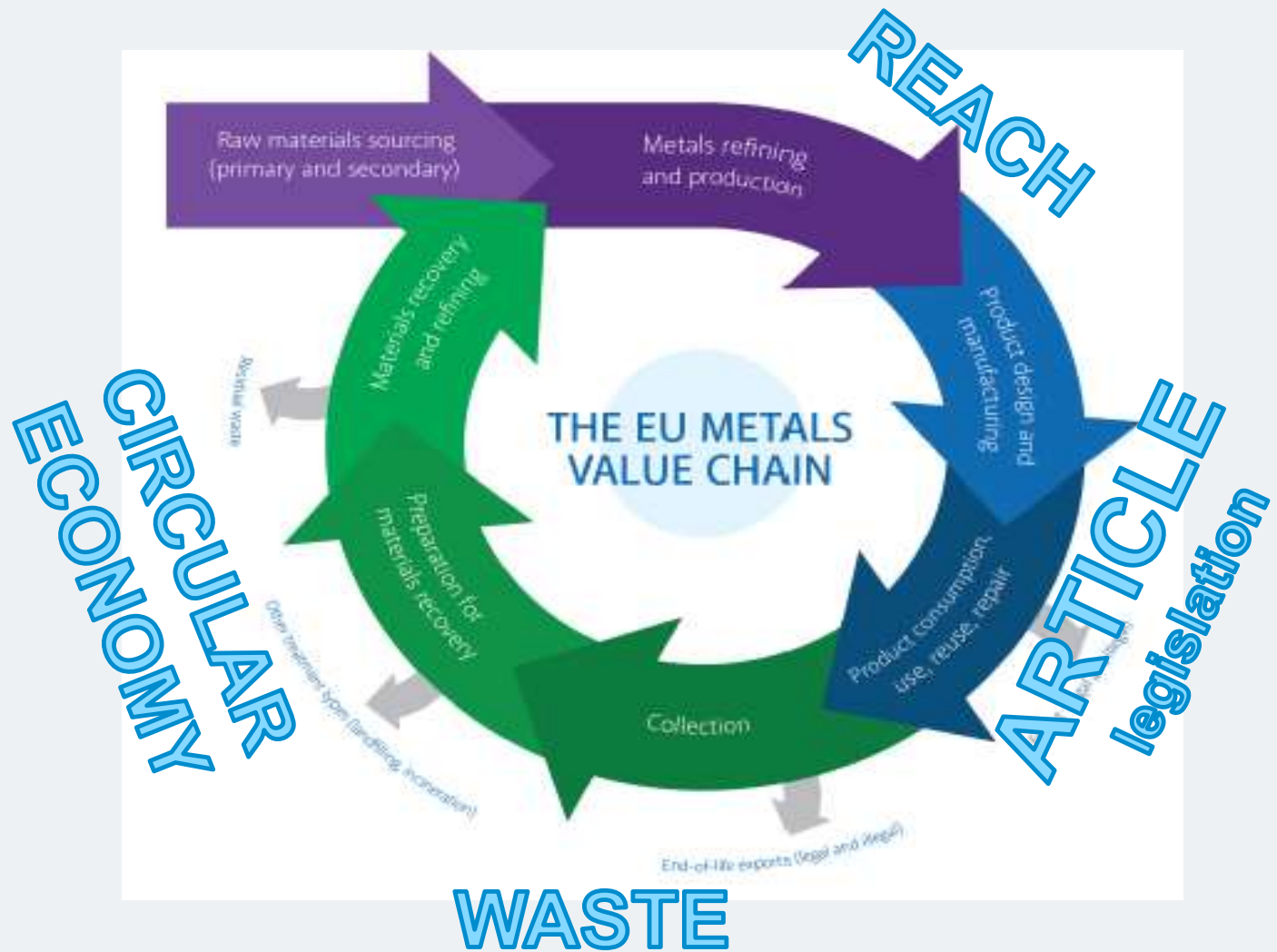


REACH, Circular Economy (incl. Waste Framework dir.)

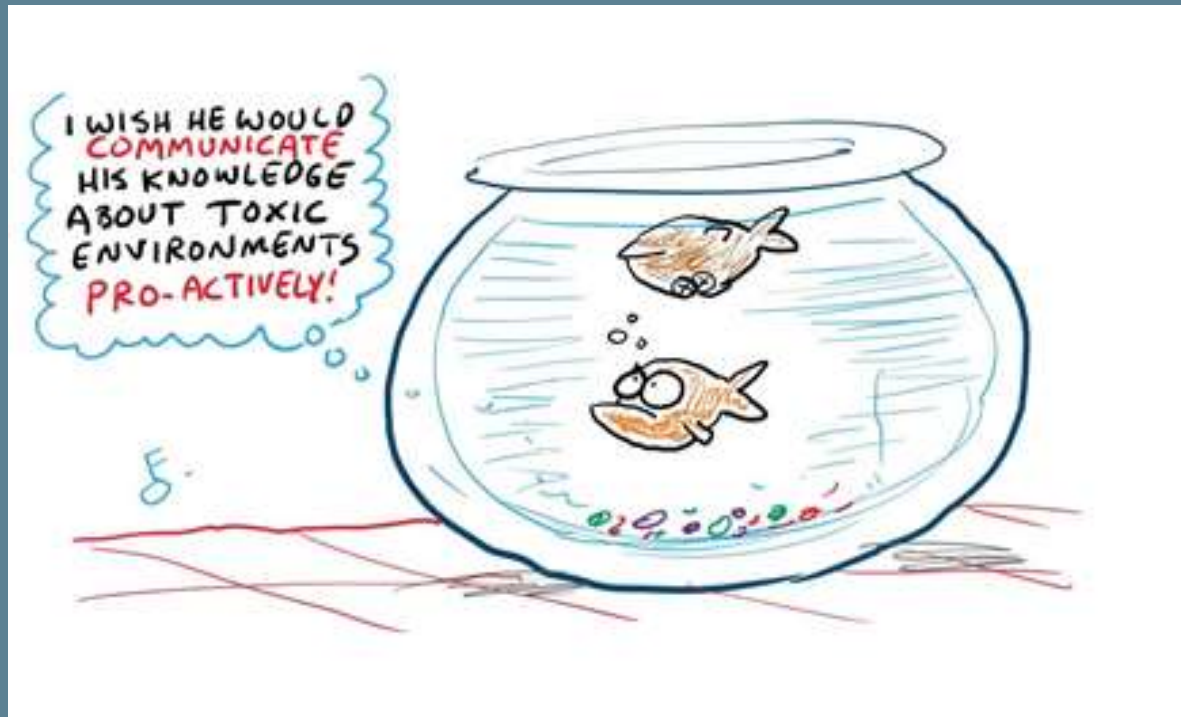
Hugo Waeterschoot and Violaine Verougstraete, 4 September 2018



Closing the loop



- Closing the loop through **reuse or materials recycling** improves the performance of substances exponentially !



Non Toxic Environment

Al Aluminum	Cu Copper	Ni Nickel	Pb Lead	Zn Zinc	Au Gold	Ag Silver	Pt Platinum	Sb Antimony	Be Beryllium	Si Silicon	Co Cobalt	Mo Molybdenum	V Vanadium	Sn Tin	Pd Palladium	Ru Ruthenium	Re Rhenium	Os Osmium	Ir Iridium	W Tungsten	Ta Tantalum	Ge Germanium	Se Selenium	Ga Gallium	Cr Chromium	Mg Magnesium
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BUT how to resolve this for metals & inorganics?

Promotion of a “risk-controlled environment”

‘Our vision is of a fully risk-controlled Europe, where hazardous substances are used only when certain they will not harm human health or the environment’



Defining the Non-Toxic Environment

4 PILLARS OF A RISK-CONTROLLED EUROPE

The EU will finalise its strategy for a Non-Toxic Environment by 2018, as part of delivering on 2020 international goals for sustainable chemicals management.

The European non-ferrous metals industry has a shared objective to minimise problematic uses of essential hazardous substances. Our vision is of a fully risk-controlled Europe, where hazardous substances are used only when certain they will not harm human health or the environment.

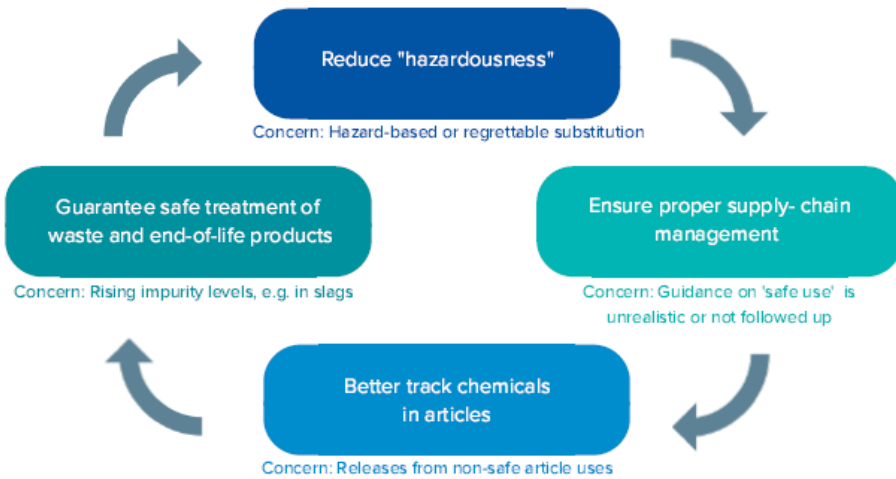
A Non-Toxic Environment Strategy solely aiming to 'replace dangerous substances' is a missed opportunity. Wherever possible, we should instead secure the safe management of essential hazardous substances across their lifecycle, by reducing the risk from exposure to humans and the environment.

By taking a risk-management approach to the Non-Toxic Environment, the EU will achieve its sustainability objectives at the same time as safeguarding jobs and competitiveness.

Non-Toxic Environment Strategy: What is Europe aiming to achieve?

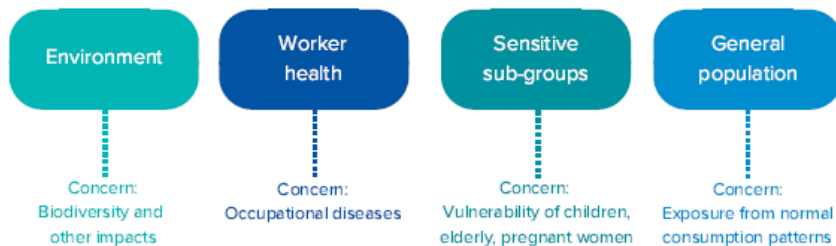
1. Supply Chain

Address all concerns with chemical substances



2. Wider Society

Protect all groups from harmful toxicity



We are making continuous improvement to control risk across all areas. Our speed of progress depends on how much we can agree on proactive and collaborative actions, before regulatory pressure

Non-Toxic Environment Strategy: Where can industry take action?

1. Supply Chain Address all concerns with chemical substances



2. Wider Society Protect all groups from harmful toxicity





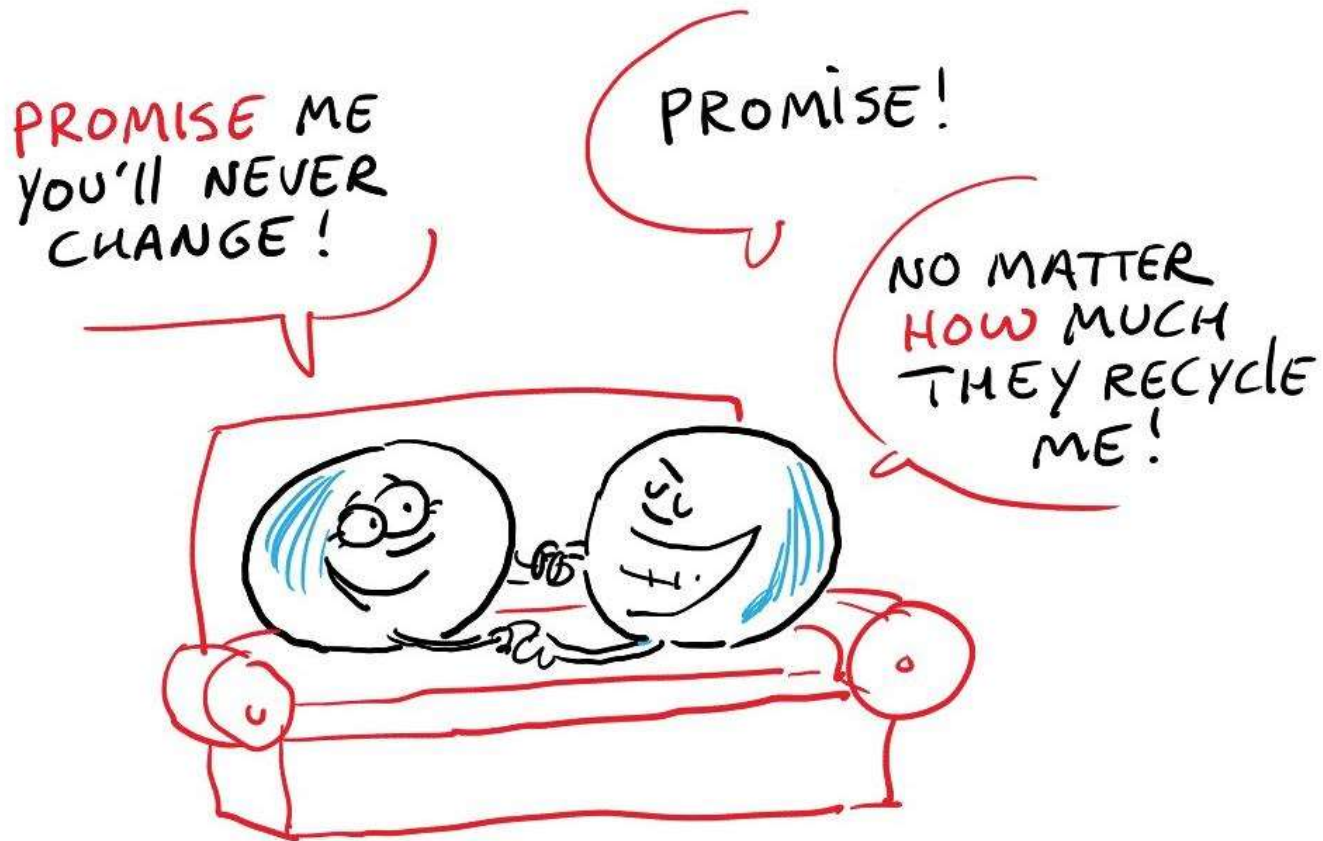
Chemicals/Waste/products Interface

Al Aluminium	Cu Copper	Ni Nickel	Pb Lead	Zn Zinc	Au Gold	Ag Silver	Pt Platinum	Sb Antimony	Be Beryllium	Si Silicon	Co Cobalt	Mo Molybdenum	V Vanadium	Sn Tin	Pd Palladium	Ru Ruthenium	Re Rhenium	Os Osmium	Ir Iridium	W Tungsten	Ta Tantalum	Ge Germanium	Se Selenium	Ga Gallium	Cr Chromium	Mg Magnesium
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Aims of the Chemicals/Waste/interface

"Closing the loop - An EU action plan for the Circular Economy" the intention to undertake an *"Analysis and [prepare] policy options to address the interface between chemicals, products and waste legislation, including how to reduce the presence and improve the tracking of chemicals of concern in products"* as a means to develop policies that can deliver circular economy through a seamless flow of materials recycled from waste as suitable raw materials back into the economy.

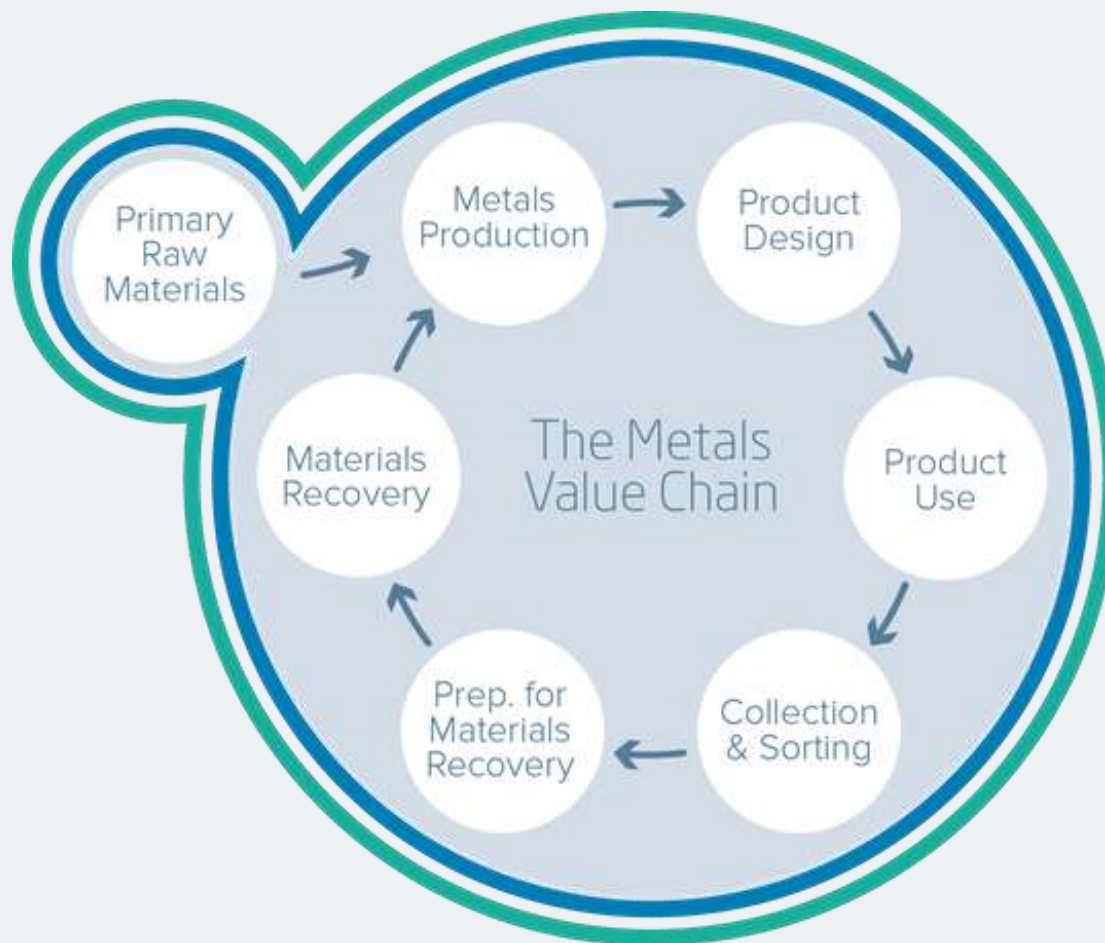
How to keep Materials in the Societal/Industrial cycle in a safe way



.. NON-FERROUS METAL ROMANCE ..

Chemicals – Product – Waste Interface

In practice for inorganics



CHEMICALS POLICY

Focus on handling materials safely

- Safe use
- Safe manufacturing
- Safe recycling
- Article legislation

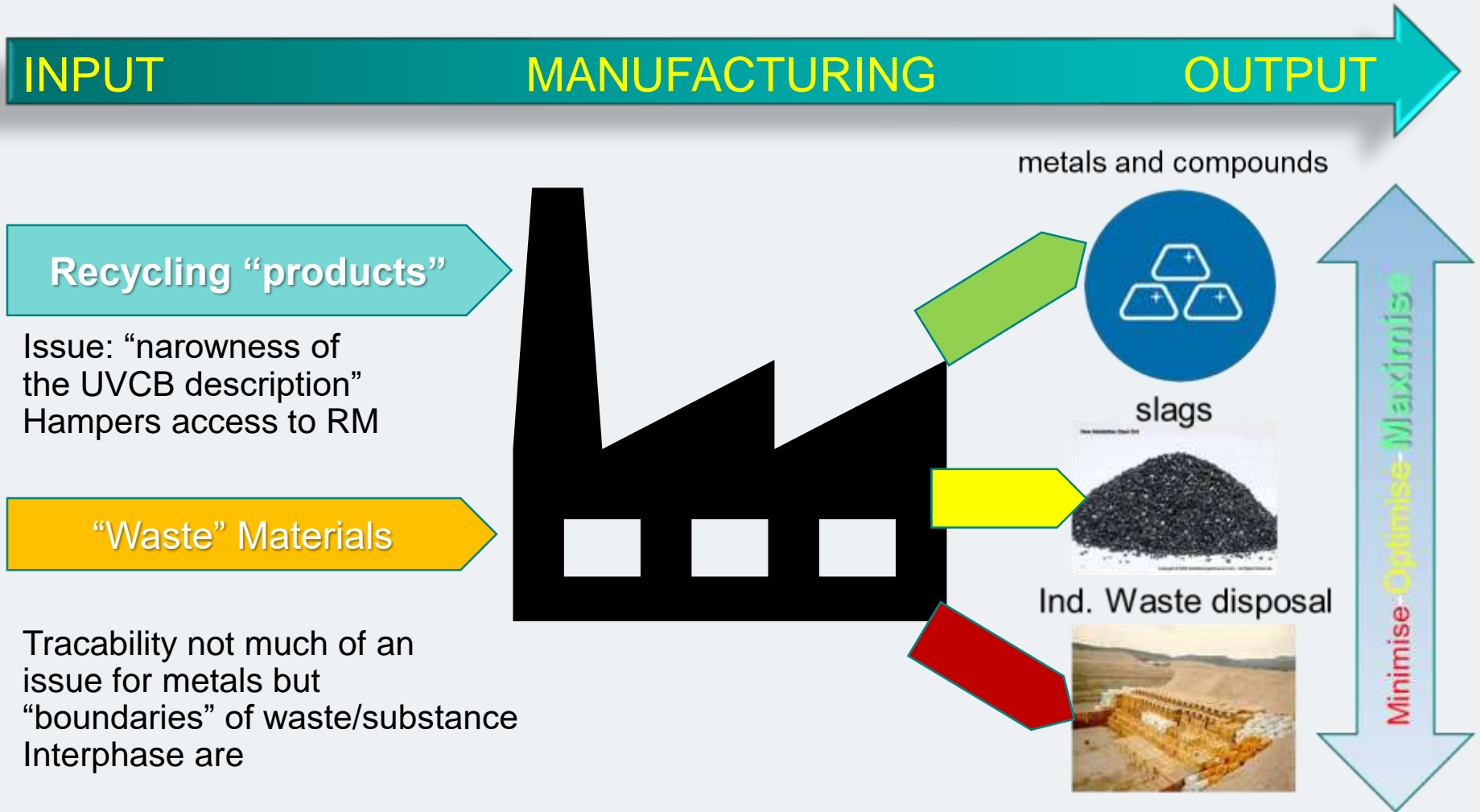


CIRCULAR ECONOMY POLICY

Focus on keeping materials in the loop

- Industrial Symbiosis
- Ecodesign
- Waste management
- Secondary raw materials markets

Closing the loop: from a MATERIALS PERSPECTIVE



Recycling of metals: how does it work?

Whatever enters the flowsheet...

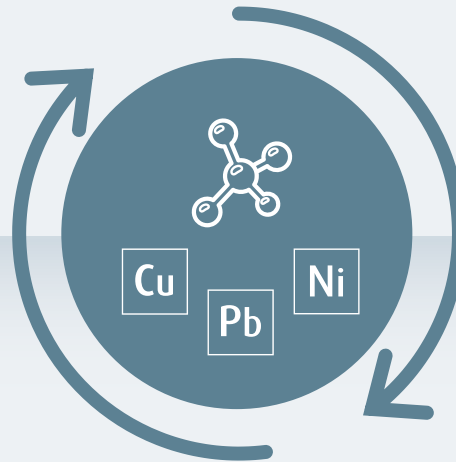
leaves as refined metal, final slags or waste material...

Recyclables



Industrial
by-products

Collector metals



different metals and
metal compounds



slags



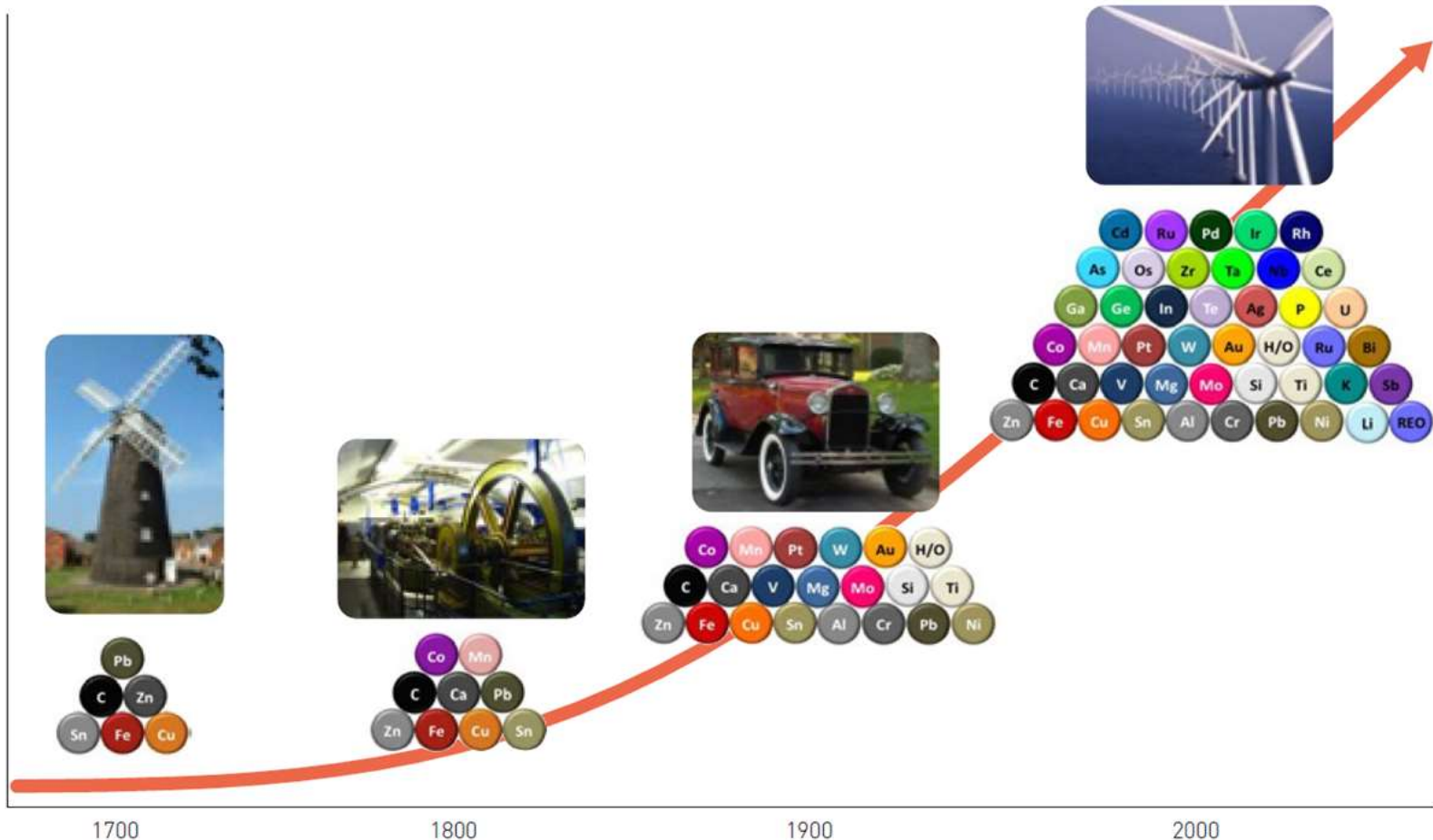
Ind. Waste disposal



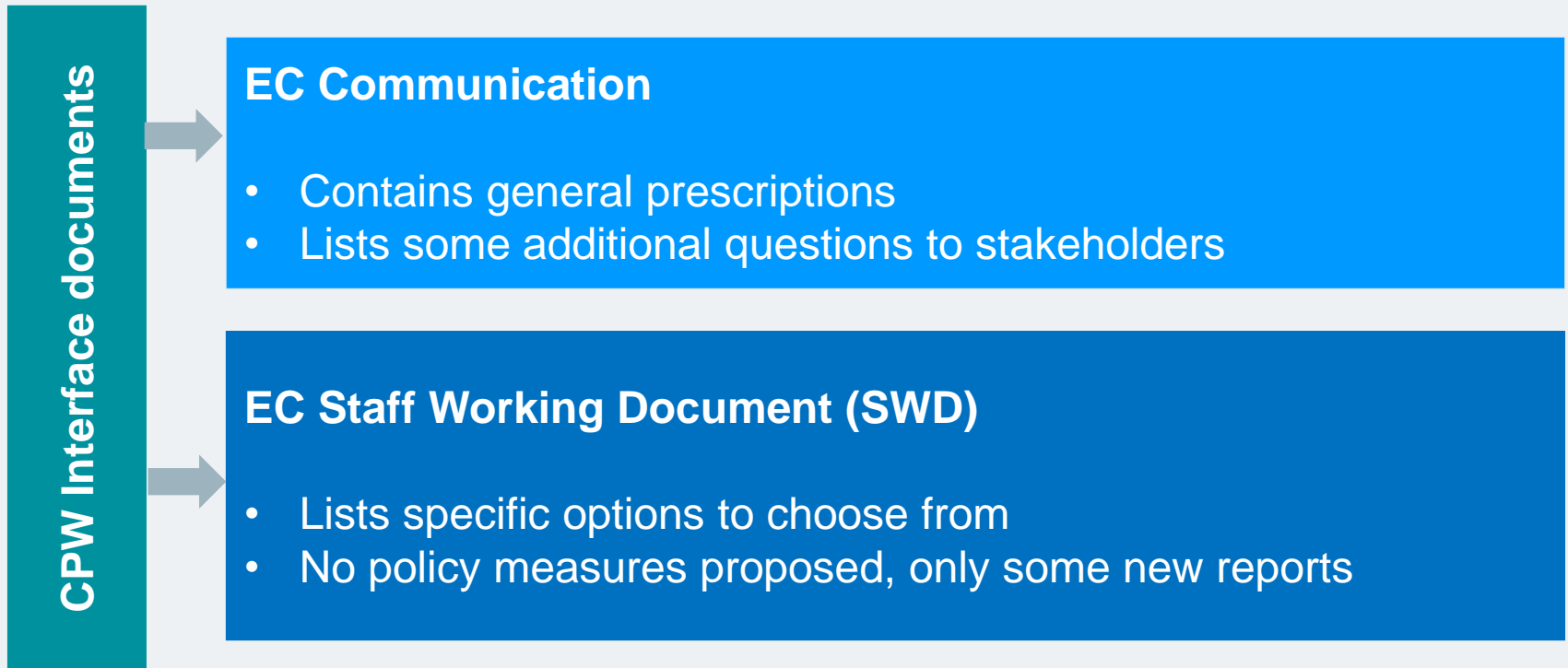
Minimise-Optimise-Maximise

Closing the loop is more and more important but also more and more difficult

Metal/Element Use Intensity in Products



Chemicals/Products/Waste (CPW) Interface



PUBLIC CONSULTATION is RUNNING until 29 October 2018

https://ec.europa.eu/info/consultations/public-consultation-addressing-interface-between-chemical-product-and-waste-legislation_en

CPW Interface – 4 areas and 8 challenges

Insufficient info about substances of concern in products and waste

- **Challenge 1:** Defining substances of concern
- **Challenge 2:** Tracking substances of concern

Addressing the presence of substances of concern in recycled materials

- **Challenge 3*:** Level playing field between secondary and primary material
- **Challenge 4:** Level playing field between EU-produced and imported articles
- **Challenge 5*:** Design for circularity

Uncertainties about how materials can cease to be waste

- **Challenge 6*:** Improving certainty on the implementation of EoW provisions

Difficulties in the application of EU waste classification methodologies & impacts on the recyclability of materials (secondary raw materials)

- **Challenge 7*:** Approximating the rules for classification of chemicals and waste
- **Challenge 8*:** Classifying waste taking into account the form in which it is generated

Challenge()* = SUS COM (incl. SRM WG) expertise will be sought

CPW Interface: feedback from the Circular Economy Stakeholders Conf. (02/2018)

Main issues identified in the public consultation (2017):

1) Limited information on substances of concern used in articles

- EC action: develop a specific methodology for calculating costs and benefits of using recycled material

2) End of Waste issue

- EC action: develop a platform to facilitate online interaction and a more consistent interpretation of EoW across the EU

3) Lack of consistency across the EU in application & enforcement of classification of waste streams containing substances of concern

- EC action: publication of a guidance document for a common approach to be applied by the MS Competent Authorities

CPW Interface: feedback from the Circular Economy stakeholders consultation

Additional aspects raised in the discussion:

- Improvement of **data flow** (from substances to articles; from articles to waste)
- **Collaboration** between producers and recyclers already at the design stage
- Introduce **authorisation** for imported articles containing substances of concern
- Closer alignment between CLP classification and waste legislation



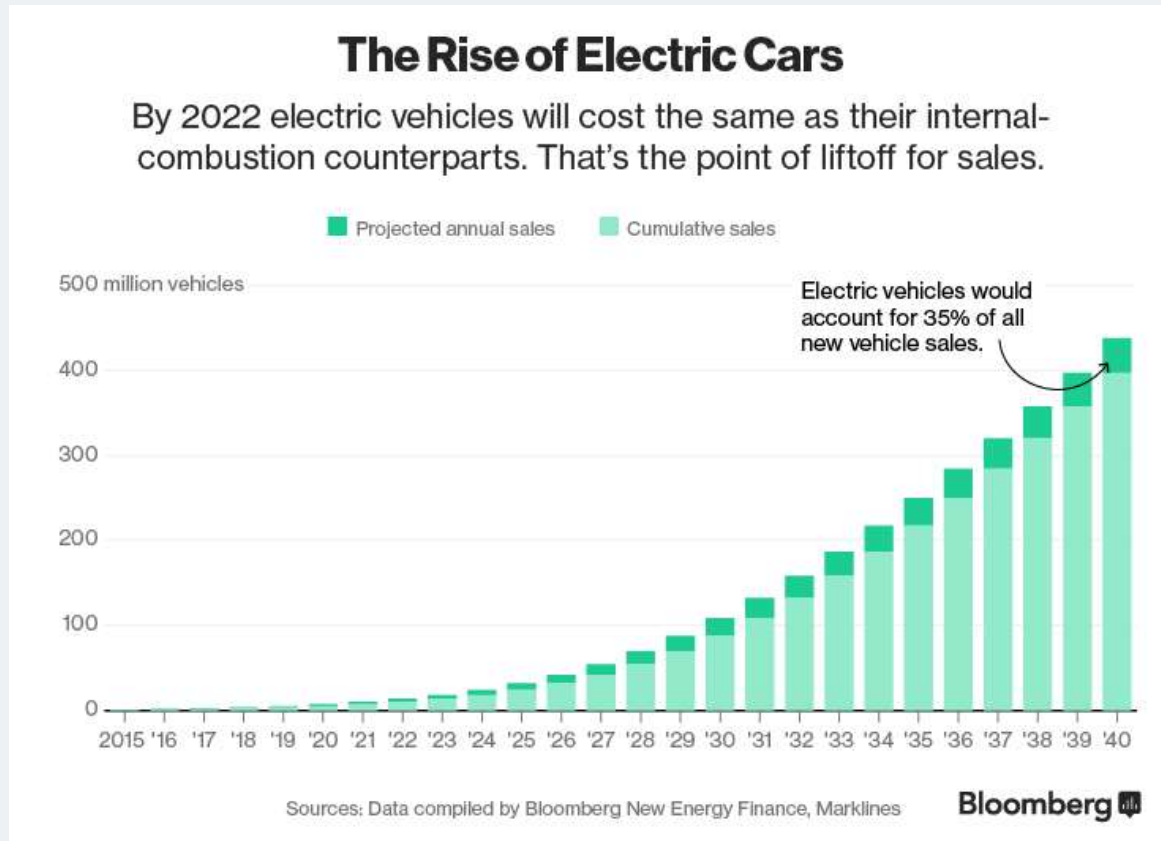
Conclusions: the CWP interphase, should:

- Demonstrate safe use independent the status (subst./product/waste)
- start from the industrial/economic reality
- be careful in stating generic recommendations/actions given the organics, inorganics and other material flows are very different and require different attention
- promote a level playing field to ensure an open market
- help eliminating incorrect practices (e.g. products considered as waste thereby restricting their demonstrated safe use)

Do we (really) need a trade off ?



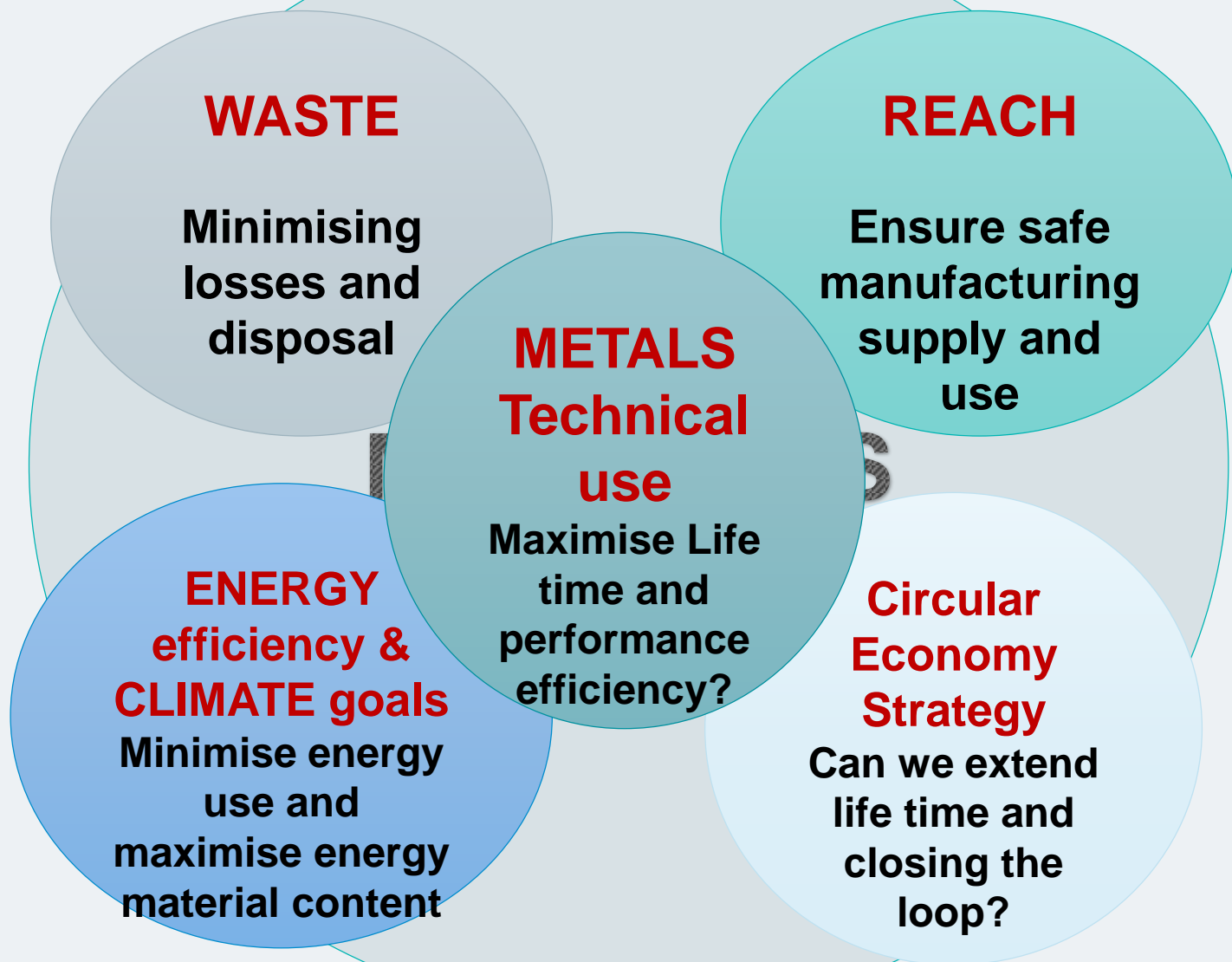
Large economic/societal trends.... Will they be influenced by REACH or the Circular Economy?



But what about product safety: Co, Ni, Li, Al, ... = REACH

But what about the end of Life : Battery (recycling) Directive

CONCLUSION: think more holistically eg by integrating 4 important EU policy perspectives



THANK YOU

but especially



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