



Brussels, 29th September 2011

Recovery and Recycling Industry Chain (RRIC)

The European recycling and recovery industry's voice on REACH

Several major European recovery and recycling associations have decided to formalise RRIC, the Recovery and Recycling Industry Chain, as the platform to more strongly voice the positions of this industry regarding the implementation of the REACH Regulation. RRIC was formerly known as WRIC which had originally been set up in 2008 with the goal to coordinate the work of the recycling and recovery industry on the elaboration of the ECHA guidance on "Waste and Recovered Substances" and "Safety Data Sheets". The aim of this platform now is to make REACH workable for the recycling and recovery industry at the same level as for other industrial players. In an initial phase, RRIC members have identified three priority topics.

Firstly, the most urgent task for this platform will be to assess together with the EC and ECHA the feasibility of developing a standardised exemption request procedure for the authorisation of materials for recycling containing restricted substances. Recyclers are often processing wastes that are containing legacy substances. Without such an exemption, the recycling of a number of streams will be rendered extremely difficult. We fear that this could result in recyclable waste being incinerated or landfilled. Therefore, we call upon decision-makers at EU level to elaborate practical rules for the recycling of materials containing restricted substances.

Secondly, RRIC will also continue contributing to the work already accomplished by ECHA on the REACH Guidance on Safety Data Sheets (SDS). Due to REACH's complexity, the obligations of the recycling industry with regards to the SDS are still not totally clear. Over the past two years, RRIC has been working with various stakeholders of the recycling and recovery industry on developing standardised and practical safety guidelines for the different recycling streams. We are convinced that ECHA and Member States will be able to find workable solutions soon and hope that the final guidance document will be published in due course.

Concerning the hazardous substances that waste management and recyclers may be faced within their normal working day, RRIC members believe that neither confidentiality nor copyright should be used to hide basic safety information from workers and the public. Safety information should, by definition, be freely available to any user/handler of such substances potentially exposed to safety hazards.

Finally, in the longer term, RRIC members plan on contributing to the review of the REACH Regulation. The aim of RRIC members is in that regard to ensure that the REACH Regulation takes more strongly into account EU waste legislation in order to improve legal clarity for our sector.

In conclusion, RRIC members are looking forward to continuing our close cooperation with the European Commission and ECHA. We hope that through this cooperation we can make REACH better workable for recyclers and recoverers and that, hence, Europe can make further progress towards a recycling society. For more information on RRIC please contact Anna Maroszek (anna.maroszek@eupc.org).



EUROMETREC



The RRIC members are:

- ESGR - European Solvent Recycler Group.
- EuPR - European Plastics Recyclers.
- EUROMETREC - European Metal Trade and Recycling Federation.
- FEAD - European Federation of Waste Management and Environmental Services.
- GEIR - European Re-refining Industry association.

ESGR is the EUROPEAN SOLVENT RECYCLER GROUP – was founded in 2004 comprising a group of over 25 professional members engaged in a wide range of solvent recovery activities. Its aim is to promote the safe and economic management of post-use solvents. Used chemicals, such as contaminated solvents, are potential hazardous waste and should therefore be fully recovered and reintroduced into reuse underpinned by the REACH Regulation and only be disposed of in another manner under exceptional cases. The goal is to re-use solvent waste as production material and not to unjustifiably dispose of it. This is also the philosophy behind the recycling and waste disposal legislation of the European Waste Framework Directive (2008/98/EC).

EuPR represents National Associations and Individual Member Companies covering 80% of the European market. We focus on the promotion of plastics recycling and the creation of conditions which enable profitable and sustainable business. Furthermore we try to help business development by initiating recycling projects and promote the use of recycled plastics. By means of a service platform we can offer you information on machinery suppliers and business contacts.

EUROMETREC is the European Metal Trade and Recycling Federation. Its members are national federations in the EU Member States representing the interests of commercial firms that are primarily involved in the collection, trade, processing and recycling of non-ferrous metal scrap. In the E.U. Member States, more than two thousand large companies and SMEs are represented through EUROMETREC.

FEAD is the European Federation representing the European waste management industry. FEAD's members are national waste management associations covering 20 Member States and Norway. 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 € 75 billion.

FEAD represents about 3000 companies with activities in all forms of waste management. These companies employ over 320000 people who operate around 2400 recycling and sorting centres, 1100 composting sites, 260 waste-to-energy plants and 900 controlled landfills. They play an important role in the determination of the best environmental option for waste management problems.

GEIR (Groupement Européen de l'Industrie de la Régénération) is the European Re-refining Industry association. Used lubricating oils represent the largest amount of liquid, non-aqueous hazardous waste in the world.

GEIR member companies are active throughout Europe in supporting the collection of used oils and re-refining these back to valuable lubricant base oils. Today the European waste oil recycling industry is comprised of 28 plants and employs between 1000-1200 in re-refining and 2000-2500 people in the collection of waste oil. Seventeen of the plants produce base oils. The industry has a total nameplate capacity of 1.300.000 tonnes/year, total lube oil production of 400.000t/y and produces 500.000 t/y of other products including fuels, asphalt, gasoil, flux oil etc. It has an approximate total turnover of between € 200-250 million/year.