

The European Electronics Recyclers Association (EERA) is a non-profit trade organisation and is the voice of Waste Electrical and Electronic Equipment (WEEE) recovery in the continent of Europe, being the professional Association for the re-use, recycling, and re-processing industry. Our members represent the leading recovery, recycling, and reprocessing industries with over 800 facilities in twenty-two countries, and with a combined 2.25 million+ tonnes of WEEE received per annum. This is over half of the current estimates of WEEE arising in Europe.

EERA Members want MORE E-Waste plastic to be recovered from WASTE!

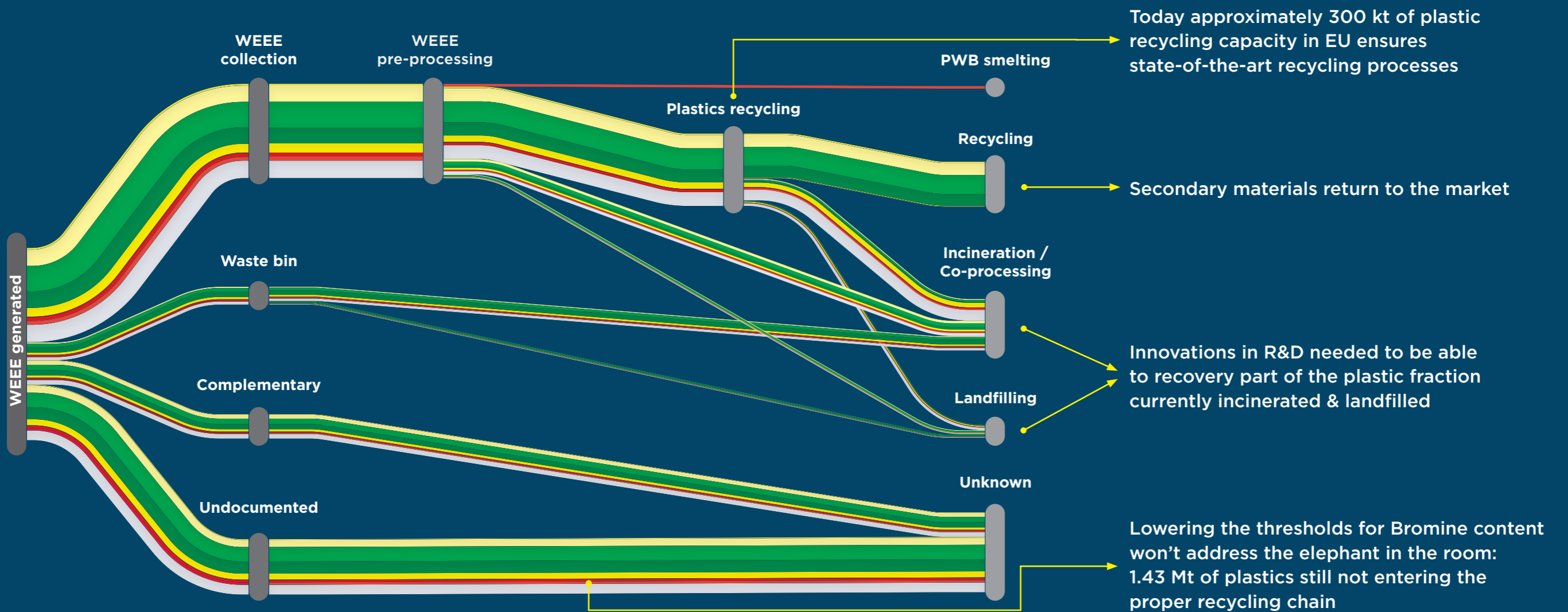
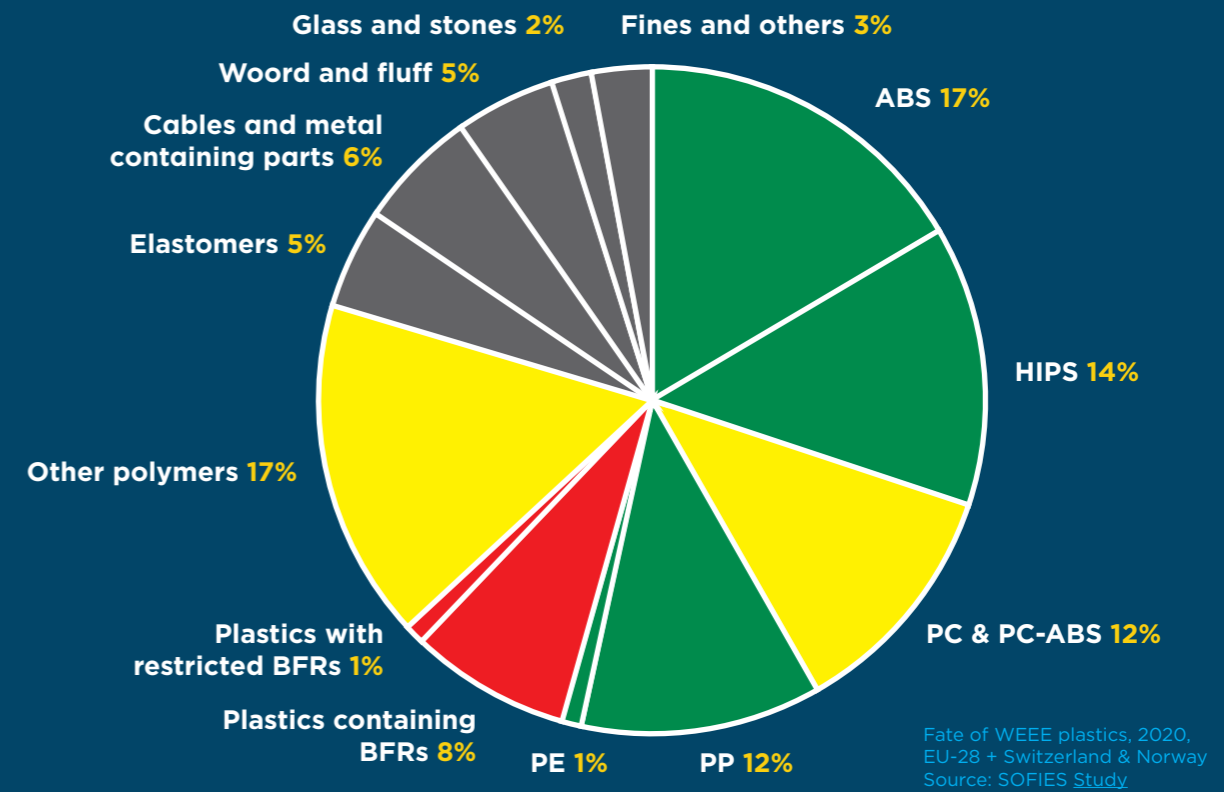
Why?

- A robust and integrated market for secondary raw materials to be reintroduced in the production of new products is a cornerstone of a well-functioning Circular Economy!
- To improve the internal European single markets for plastics - where more controls and environmentally sound technologies are in place!
- To reduce Carbon Emissions - producing plastics from secondary materials consumes 90% less energy, representing savings of 4 tonnes of CO2 emissions for every 1 tonne produced!
- To retain resources for the industrial eco-systems within the Union, reducing dependence on the use of primary raw materials, and improving the security of production!

EERA Members want the recovery of plastic to continue, to be environmentally sound, and also to be TECHNICALLY POSSIBLE!

- Screening technologies at the moment detect the presence of bromine in the plastic fraction to meet RoHS thresholds - currently 1000 ppm!
 - » Reaching 500 ppm is possible with the correct incentives: a long-term business environment and ongoing support from the European Commission
- 98% of plastics collected, that contain BFRs above the 1000 ppm RoHS limit, can be currently separated and disposed of through official WEEE recycling channels!
- 55% of the plastic entering fully compliant, well-managed and innovated European WEEE plastic facilities is properly recovered and turned into regranulates for re-use! The remainder is sent for energy recovery or as a fuel substitute. The capacity to increase the recovered percentage needs to be motivated by long-term strategies!
- Even at today's state-of-the-art installations, lowering the threshold limit for POPs - both as Low POP Content (LPC) AND Unintentional Trace Contaminants (UTC) - will increase the percentage of plastics incinerated / landfilled - which EERA believes are an unnecessary lost resource!





EERA Members are asking for:

- Barriers and burdens that currently hinder the smooth circulation of secondary raw materials within the Union should be relaxed so that recoverable resources can be received at European pre-consented treatment facilities that have quality processes in place!
 - » It is imperative that if the POPs threshold are reduced to 500 ppm, this should be the same for Low POP Content (LPC) AND Unintentional Trace Contaminants (UTC), with sufficient time allowed for changes in plastic management processes!
- Recognition that recycling techniques require investment in both time and innovation by recyclers – this provides the security to build a strong and resilient circular economy!
 - » Requirements must be harmonized to underpin and incentivise those willing to step up and be at the forefront of environmental safeguarding!
 - » The limit of 500 ppm once set, should stay for at least seven years with future potential changes happen only after detailed risk assessments!

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EERA Members urge MEPs and other stakeholders to consider these unintended consequences for thresholds below 500 ppm:

- Accurate measurements of bromine concentration is complex, if not impossible at an industrial scale using current laboratory technologies!
- Reduced availability of compliant secondary plastic materials in the Union will impede the recycled plastic content aspirations by producers
- Undocumented streams will increase - which already accounts for around half of the total plastic waste generated in Europe. EERA believes this is an unnecessary lost resource!

EERA Members are strong supporters of the European Commission's Circular Economy Action Plan. We believe that managing the risks will secure the resources needed in the Union, and provide for a high level of environmental protection.

The **elephant in the room** needs to be addressed and considered!

Whatever the limits, unless the Union stops the export of waste plastics (estimated at 55% of the EU plastic flow) to non-compliant overseas facilities who do not have the capacity or capability to work to the same environmentally sound standards – then no matter what happens in Europe with the thresholds, it is going to have little impact to the overall global environment.

Don't let perfect get in the way of good!

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