

Statement EERA regarding WEEE plastic recycling containing deca-BDE

The recycling industry is confronted with proposals to add deca-BDE to the list of POP's. Deca-BDE has been used intensively in EEE products in the past and the recycling industry has to deal with this legacy of PBDE's. This innovative industry has proven that it is possible to produce RoHS and REACH compliant Post-Consumer-Recycled plastics from these complex mixes of plastics from WEEE material.

The recycling of durable products such as End-of-Life Electronics follow a process, that is described in the guidance document Annex II and article 6.1 of 2002/96:

“Substances, preparations and components may be removed manually, mechanically or chemically, metallurgically with the result that hazardous substances, preparations, and components and those mentioned in Annex II are contained as an identifiable stream or identifiable part of a stream at the end of the treatment process. A substance, preparation or component is identifiable if it can be (is) monitored to prove environmentally safe treatment.”

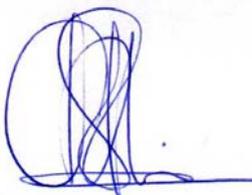
Following this concept detailed chemical analyses of input material for recycling do not make any practical nor economic sense, as long as worker safety is safeguarded. Shredder residues from WEEE are treated to recover a plastics mix from these residues which WEEE plastics mix is treated by specialized plastic recycling plants. The “target plastics” without substances of concern are recycled into PCR plastics that in Europe need to be REACH and/or RoHS compliant and the non-target plastics - which may contain substances of concern embedded in the plastic matrix today are incinerated thus discarding these substances of concern (it can be debated whether it would not be better to have special and controlled material outlets for these BFR containing plastics).

If these plastic mixes from WEEE will be defined to become hazardous waste as a consequence of deca-BDE becoming a POP substance with a low threshold, the plastics recycling will come to a halt, as plastic recycling operations are not permitted to treat hazardous wastes.

The recycling industry is perfectly capable to reduce the legacy of PBDE's to low levels such are defined by the current REACH and RoHS directives. However if product legislation is going to be faced with threshold levels that are going to be lower than these, plastics from WEEE might become unrecyclable and need to be discarded as a whole as a consequence.

This would make it impossible for the recycling industry to match the recycling and recovery targets set for WEEE in Europe, it would be in complete contradiction with the objectives of the development of a circular economy and it would result in immensely increased CO₂ emissions.

EERA therefore calls for derogation for the recycling of WEEE plastics mixes that might contain PBDE's, in order to continue allow the future recycling of these WEEE plastics. Similar exemptions have in the past been agreed for Penta- and Octa-BDE.



Chris Slijkhuis
Board Member



Norbert Zonneveld
Executive Secretary

Arnhem, 17th February 2017.



About EERA

The European Electronics Recyclers Association (EERA) is a non-profit organization that promotes the interest of recycling companies who are treating waste from electrical and electronic equipment (WEEE) in Europe. EERA members include the largest electronics recyclers in Europe who, together process over 1.5 million tons of WEEE.

www.eera-recyclers.com