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Eurima considerations to the revision of the Waste Shipments Regulation

Eurima welcomes the intention of the European Commission to revise the Waste Shipments Regulation in order to embrace the principles of circularity.

Today's challenge for the broader construction industry is the recovery of "post-consumer" waste generated during renovation or demolition/deconstruction projects, in order to stop landfilling valuable resources and to use these resources as secondary raw materials to substitute virgin non-renewable materials. The mineral wool industry is actively working on technical solutions to answer this challenge and supports the mid-term ambition of banning landfilling for recyclable materials like mineral wool waste. It is crucial though that such requirement shall not lead to benefits for non-recyclable materials. It is evident that this will require an enabling regulatory framework that will stimulate the economics of waste recycling, address/take away barriers to increase circularity while safeguarding the protection of workers. Eurima members are continuously cooperating within the value chain to address existing barriers and obstacles in a solution oriented approach.

Today, as can be expected with an average renovation cycle of 30-years, most mineral wool post-consumer waste from renovation or demolition projects have been manufactured and installed prior to 1997. The European Waste catalog classifies mineral wool waste containing classified fibers in the code 17 06 03*: "Other insulation containing hazardous substances". This situation leads to misunderstandings and diverging interpretations across Member States specifically due to the fact that there is currently not a practical methodology to quickly distinguish "old" and "new" mineral wool waste at the building site. At member state level, there are different interpretations when it comes to the waste management of mineral wool waste. These are aspects that are not only inherited in the Waste Framework Directive but also in the shipments of this waste. Mineral wool is 100% recycle product for indefinite times when it becomes waste.

It is divided into two categories, glass wool and stone wool products. The plants that could process such waste in order to transform it into a valuable secondary raw material do not exist in every Member State and not for both types of technologies, and the installation of such processing equipment requires substantial investments. This is why; the waste has and will have to be transported to another country in order to be processed. This is a very important parameter that should be taken into account for the shipments.

How could the Waste Shipments Regulation help?

- a. By considering the destination of the shipment, whether it is destined for landfill or recovery/recycling. In case of recycling, the procedure should be EU wide, simplified and fast. In any other case, there should be clear guidelines between Member States on the treatment of these shipments;
- b. Long lasting shipment permits to recycling plant destinations with commonly across EU wide criteria;
- c. Fast track permits for cross border-transportation;
- d. Same for sorting and storage of such waste;

- e. EU Harmonization of the criteria on Shipments Financial guarantees, allowing better terms when the waste is destined for recycling;
- f. Any proof/documentation needed should be require a digital format that will be easy to be tracked down by the authorities/stakeholders;
- g. A database of certified/permitted recycling plants for the operations of recyclable materials including mineral wool waste;
- h. In the context of the further development of circular economy across EU, recycling projects with pilot phase will need to be set-up. The legislation (EU & national) should support such development through a temporary (pro-rata of a defined pilot phase plan) minimized procedure for cross border transportation of waste. The principle would be that this is only valid for a limited quantity and time period; both to be defined in advance.