

## **Paper Recycling Conference – Europe: Updating the Waste Definition**

*Speakers at Paper Recycling Conference – Europe provided an update on the EU's end of Waste legislation.*

Speakers at the 2011 Paper Recycling Conference – Europe, which was Nov. 7-9 in Barcelona, Spain, discussed the European Union's End of Waste legislation and how it could affect recyclers.

David Barrio, recycling director of ASPAPEL (Spanish Association of Pulp and Paper Manufacturers), and Ross Bartley, environmental and technical director of the Bureau of International Recycling (BIR), Belgium, spoke about the legal ramifications of the E.U.'s End of Waste legislation.

Barrio said he thought a clear framework for the legislation would have been available by November, adding, "Unfortunately, this is not the case, and we still have the draft that was issued in the end of May."

The European Union's Waste Framework Directive in 2008 established a new procedure designed to remove the administrative burdens of waste legislation for specified materials to aid in recycling. Certain "waste" materials that have undergone a recovery operation and that comply with specified criteria cease to be defined as waste, according to the directive. Barrio said legislators were now trying to determine how to define the recovery process.

Article 6 in the framework directive specifies the following conditions for determining end of waste: the material is commonly used; a market or demand exists for the material; the material meets technical requirements, legislation and standards; and no overall adverse environmental or human health impacts result from using the material.

"Basically it seems very clear that paper embodies one of the best candidates," Barrio said. "And that was the case when the paper industry went to the commission and said, 'We want to be the first material to be in this process.'"

Barrio added that regulations for iron and steel scrap and aluminum scrap have already been established and enacted.

The JRC (Joint Research Center) and IPTS (Institute for Prospective Technological Studies), Seville, Spain, had prepared background studies to establish the criteria, Barrio said. This work resulted in technical documents that were submitted to the commission in July 2010 for use in preparing the regulation.

Barrio said the goal of the commission was to improve the quality of recycling in general. "The quality of recycling goes together with the quality of the materials that are going to be recycled."

Specific criteria for each material take into account acceptable input materials, quality control measures, information that must accompany the load of recyclables and allowable processing techniques, he added.

As of the current draft legislation, Barrio said, recovered paper must be graded in accordance to the EN-643 standard for recovered paper and board grades, which gives a general description of 57 standard paper grades by defining qualitatively their constituent fibers and to a lesser extent the allowable

nonpaper components. The draft legislation sets a limit of 0.5 percent for nonpaper components, excluding multi-layer packaging, that can be sorted using dry techniques, he added. The commission is considering an additional limit of 0.5 percent for nonpaper components that cannot be sorted through dry sorting techniques.

Recovered paper suppliers also would need to add a quality control step at the end of their processes to ensure their recovered materials comply with the regulation, Barrio said. "That is quite a new approach for the paper loop."

In addition, suppliers would be required to sign a statement of conformity with the end-of-waste legislation for every consignment of material they ship under the draft legislation, Barrio said.

Bartley said the key objectives of the end of waste provision were to establish a high environmental standard, to distinguish between clean and dirty recycled products, to provide regulatory relief for low-risk products and to facilitate the internal market.

"I don't think we should lose at all these key reasons of why this is being done," he added.

Bartley pointed out that while there are differences of opinion among the EU member states regarding the end of waste, he asked, "What is not to like for EU countries?"

Bartley continued, "There shouldn't be a hindrance to moving this legislation on and making it work for EU industries on EU territory with an EU regulation."

The BIR has produced a guide titled "Tools for Quality Management," designed to help recyclers prepare for the end of waste legislation. The free publication can be downloaded from the BIR website, [www.bir.org](http://www.bir.org). Bartley said the guide explained the ISO 9000 quality management system and included documented procedures referenced in the EU regulations.

He added that there were commercial advantages to the end of waste legislation, including economic advantages in intra-EU shipments by cutting out administrative costs, even though recyclers would have to invest in a quality management system.

The Paper Recycling Conference – Europe was Nov. 7-9 at the Barceló Sants Hotel in Barcelona.