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Handel Recycling Produktion

VDM international report

In recent months the pollution of our environment through plastics has been of increasing importance in news coverage. Within the scope of the non-ferrous metals recycling industry plastics are also accumulated, for example during the recycling of cables or old electrical devices.

We are now observing with concern that the recycling of plastics is partly subject to stricter rules than the placing of these materials on the market. This holds especially true for chemical value limits. That does not make sense.The person who places a product on the market can specify which substances are processed in this product (product design). The recycling industry, however, has to deal with materials which were placed on the market years ago.

People who want to recycle have to accept that the available scrap material in part conforms to earlier legal standards and therefore have to leave the recycling industry some room for their work. Tightening the regulations' corset further ultimately only prevents recycling! This cannot and should not be the aim of politics. For this reason the VDM created a position paper on the topic of plastics recycling.

Organising plastics recycling sensibly and protecting the environment in the process

The VDM welcomes the creation of an EuRIC Plastics Division and will actively contribute to its work in the future. In the framework of the discussion about recycling we have to differentiate between

- Packaging plastics with cycle times of up to one year
- Plastics from cables, electronic devices, cars, construction plastics, etc. with cycle times of more than one year up to fifty years

In a professional capacity both areas have to be evaluated differently. The necessary consequences of the recycling can also be very different. The topic which concerns the VDM is the second group.

Environmental protection with plastics has to start at the beginning of the life cycle (product design). That means:

==> with the production of plastic, and products which contain plastic

==> with the import of plastic, and products which contain plastic

- Recycling happens at the end of the life cycle. Recycling has to correct “the mistakes in the product design” through environmentally responsible recycling methods.
  Example: In earlier years PCB and DecaBDE were used in cable coatings or in plastics of the automobile industry. This was legal and the current state of the art. Nowadays this kind of plastic has to be recycled according to the current, rapidly changing law and the limit values in effect today, while these rules did not yet exist at the time of the production of the product.
  The recycler therefore de facto bears the responsibility for the product, which usually lies with the manufacturer.
- Waste which gets recycled today therefore can’t conform to the limit values which are supposed to be set currently. For this reason it has to be possible for the recycler to handle and recycle material, which doesn’t conform to the strict limit values that are in effect right now or in the future. Someone who does not accept this prevents recycling.
- Sensible, environmentally friendly distribution channels are important. Recycled plastics have to be marketable because the European waste legislation places recycling before disposal. In order to meet these recycling targets, recycled plastics which show higher limit values have to find a market. We recognise that for certain uses, like for example food packaging or toys, recycled plastics are not suitable. On the other hand there are numerous possibilities how to use recycled plastics sensibly. It has to at least be possible that recycled plastics are used in products which are not assumed to be health threatening. Here the manufacturers as well as politics are being called upon to make exceptions possible.
- Due to the globalisation, more and more products which contain plastics reach the EU. These plastics often do not conform to the applicable EU law, but have to be recycled according to the applicable EU criteria and reused in the form of new products. This is one of the reasons why it is necessary that exceptions are made for the recycling of plastics concerning limit values. If one does not want this to be permitted, the final consequence would be to prohibit the import of products with value limits which exceed the EU standard.
- Plastics recycling is important because recycling protects our environment. It is therefore imperative to support the recycling of plastics. If recycling is hampered by too narrow value limits or the incorrect restriction of markets, it has massive repercussions for the environment. The consequences would also be counterproductive for the Co^2 savings and the Co^2 balance, which is shown by examples from Austria:

  Solely in Austria the recycling of plastics, glas and metals from old electronic devices, old cars and cables leads to a saving of Co^2 of 251.013.710 kg (when 100 % of plastics are recycled). That is on par with the Co^2 emission from the annual power consumption of a city with about 290.000 residents (about as big as Graz).

  If, due to the POP Regulation, only 20 % of plastics are still allowed to be recycled, 59.513.810 kg Co^2 less are being saved. That is on par with the Co^2 emission from the annual power consumption of a city with about 70.000 residents (like Vilach).

  If plastics are no longer recycled because of the POP, CLP and Reach regulations, 74.392.270 kg Co^2 less are being saved. This corresponds with the Co^2 emission from the annual power consumption of a city with about 86.000 residents, or the Co^2 equivalent of 1.014 tank trucks with diesel fuel.

VDM Executive Committee
Berlin, November 23rd 2018