

“Chemicals Risk Management and Assessment of Alternatives: Tools and best practices to support circularity, create more sustainable products and avoid regrettable substitution — LIFE FitforREACH-2”

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Summary report from the workshop on waste with external actors

07.11.2024, Bellevue Park Hotel (Riga)

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Participants: 44 participants, including waste management experts, processors, ministries, and industry stakeholders from the Baltic States and Poland.

Goal of the meeting: to gain a clear understanding of the legal requirements related to waste and hazardous substances, explore practical examples of managing hazardous substances in waste treatment operations, plan FFR2 project activities with waste treatment companies, and discuss the involvement of practical ("light") case studies.

Detailed agenda

Reflection on a meeting proceeding, discussion topics

Introduction to the aims of the FFR2 project regarding work in the waste sector from Ingrida Bremere (BEF Latvia). Followed by a brief introduction of the parties and of companies in the waste treatment sectors in the Baltic States, also partners in Poland and in Hungary (Tour de Table). The workshop was divided into blocks with different presenters.

Waste workshop presentations

Some points highlighted and/or actions agreed:

- End-of-waste regulations and issues on the implementation of the end-of-waste criteria. Criteria may vary from country to country and in certain cases, responsible authorities are allowed to take a case-by-case approach when deciding end-of-waste status. Representatives of the ministries present provided a brief overview of the respective legal acts of the countries. Antonia pointed out that new end of waste criteria for plastics is coming



- The question arose about the problems related to international waste transport - shipments to other countries and waste movement makes HS in waste difficult to control. How to solve the problem when regulations on waste shipments and their control exist? Are they sufficient? What additional information is needed in shipment documents?
- Dealing with legacy hazardous substances in the recycling of WEEE - You must have control over your waste movements till the end of waste and if it is not known whether a waste is hazardous, it should be treated as hazardous - This has not been a general approach, but Weerec follows this principle. Historic waste is soon to be over. Again issues with shipment of waste – most of the product goes to Asia. We want circularity, but there are flows which go directly to incineration.
- Producing high quality secondary materials from textile wastes - In Baltic States textile is mostly incinerated or landfilled. Discussion on what practical actions can or should be taken? With new regulations, a change can be expected from 2025, when at least in Estonia, the obligation to separately collect textile waste within the municipal waste collection system. Suggestion from Mecki Nashe - concentrate on natural fibers not synthetics, e.g. polycrylic is not recyclable. Lithuanian Gov representative asked, if there is demand to fiber-to-fiber outcome? Need further discussion.
- The classification of hazardous and non-hazardous waste is outdated. We need a new distinction, as many non-hazardous wastes contain materials and substances that still remains hazardous when recycled. What can be done in the national level to make the lifecycle of construction waste and construction products circular?
- EU regulations push/force recycling of waste, but there is no certainty that recycled products are safe.
- A lot of products are coming to the market outside the EU and there is no control over them.
- Higher quality material should not be reprocessed into a product of a significantly lower category.
- There are many risks in recycling mixed packaging, as it includes both food packaging and packaging for substances contaminated with chemicals.

Presentations followed by discussion in groups about whether the project's assessment of possible intervention points in the recycling chain are correct, and what particular aspects of working on hazardous substances in wastes and secondary materials would be attractive for Baltic and Polish companies. The first group consisted of participants from Latvia, the second group consisted of participants from Estonia, and the third group consisted of the remaining participants from Lithuania, Poland and presenters from Germany.



Discussion results from Latvian working group

- Discussed several issues in the working group as interests from participating companies be involved in the project activities, needs for testing and analyzing waste materials, current developments in country according to possibilities for testing, recycling options, end of waste status, hazardous substances in waste flows.
- Representative from Ministry of Climate recommends closer cooperation with LIFE IP Waste to resource project where main focus is material circularity and waste as potential resource (lead partner Ministry of Climate in Latvia). <https://wastetoresources.kem.gov.lv/en> Several activities planned in this project also regarding waste testing. There are plans in the near future to make and maintain a laboratory for plastic analysis in way to detect recyclable and non-recyclable parts of plastic (more targeting to packaging waste).
- Suggestion to look at waste recycling companies in national level and contact for cooperation. Packaging as possible option. Currently there is only 1 plastic recycling company Iterum - <https://iterum.lv/> (recycling PET, LDPE, HDPE).
- As potential company for cooperation is company BAO from Latvia (Recycling of hazardous waste) who is interested in plastic recovery for recycling, here focus is put on electronic waste.
- There was representation from Getlini in seminar – largest waste landfill operator in Latvia. They are more interested in construction waste although works with specific qualitative mono-flows as for example reinforced concrete, bricks, asphalt where content is quite clear. The company themselves do not analyze materials on hazardous substances. Interested to analyze mechanically separated biowaste material from unsorted household waste as there are several pre-testing made showing a lot of hazardous substances in biowaste. Getlini is open for cooperation with FFR2.
- Group members talked also about possible substances for analyzing and these potentially could be brominated flame retardants, plasticizers in plastic, heavy metals.
- Clean R Verso recycling construction waste – could be potential candidate for cooperation.
- One of the conclusions from the meeting is that these issues should be discussed with LASUA members (waste management companies).
- According to the participants, mixed construction waste (insulation materials) could also be one of the priorities worth analyzing.

Discussion results from Estonian group:

- Discussion on the transboundary movement of waste, including the fact that Weerec purchases half of its materials from Latvia, while most of the final product is shipped to Asia. At the same time, Europe imports a large amount



of uncontrolled products (the case of TEMU). Need better regulations and better control.

- End-of-Waste criteria and case by case approach – There are 7 national regulations in Estonia, but case-by-case instances are rather rare. If a product falls under the REACH regulation, the corresponding requirements must be met. The problem is that many companies are unaware of REACH requirements, making it necessary to raise awareness. The FFR2 project is doing valuable work.
- Discussion on how to "sell" the FFR2 project to engage more stakeholders – companies need to be given the opportunity to make themselves visible via project.
- Discussion on textile waste management and potential solutions, considering that Estonia currently lacks any capacity for textile waste processing. First, it is necessary to ensure proper collection so that this waste stream does not end up in incineration or landfill.

Discussion results from Poland/Lithuanian working group

- The challenges of getting companies interested in the work - need to have a business case for them (e.g. consulting on workers health issues regarding chemicals during recycling or market opportunities for better secondary materials).
- Some discussion about returning pesticides containers for recycling (and then contaminating the plastics waste stream). Discussion about batteries collection and recycling (recycling working but collection not – not directly FFR2 case).



Photo 1. Andrzej Tonderski from Pommlnno talking about end-of-waste issues.

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Ministry of
Environment
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Photo 2. Hans Talgre from OÜ Weerec talking about dealing with legacy hazardous substances in the recycling of WEEE

The seminar was organised as part of WP7 (Supporting Waste Management Companies on treating wastes containing hazardous substances) and Task 10.3 (International experience exchange and networking).

