



WATER

100 million people supplied with drinking water

2,928 wastewater treatment plants operated

4,052 water production plants managed

61 million people connected to wastewater systems

WASTE

764,477

business customers

45 million metric tons of treated waste

591 waste treatment facilities operated

40 million people provided with collection services on behalf of municipalities

ENERGY

37,339

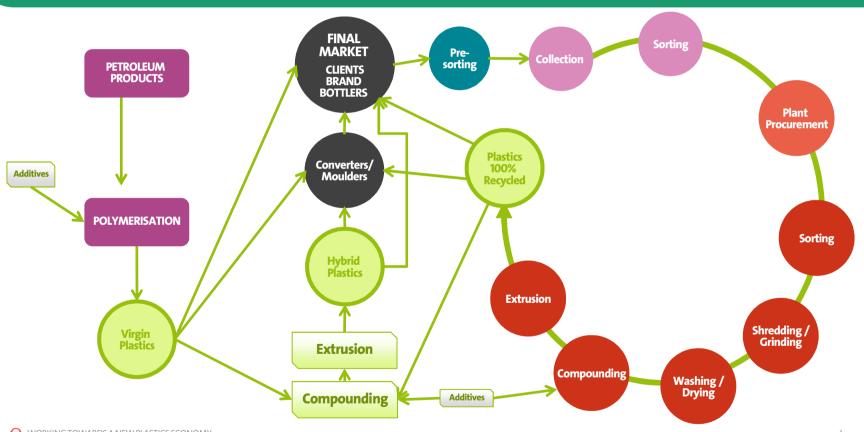
44 million MWh

2,086



- 1. Moving from quantity to quality recycling
- 2. Principles
- 3. How to solve the information conundrum?
- 4. How to deal with legacy substances?
- 5. How to avoid market fragmentation?

MOVING FROM QUANTITY TO QUALITY RECYCLING

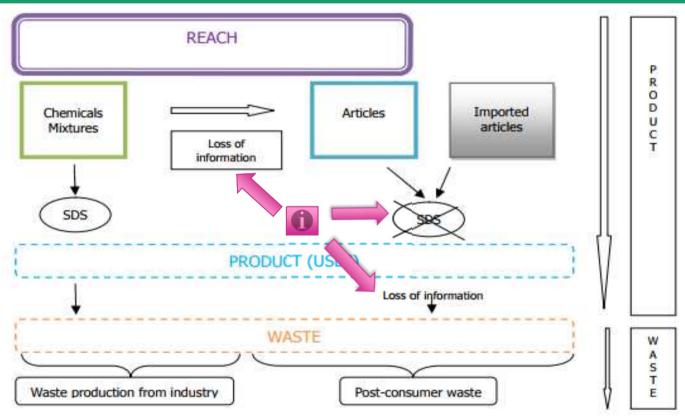


PRINCIPLES

- We operate under the existing regulatory framework for hazardous and non-hazardous waste (Waste hierarchy, non-dilution) and are impacted by REACH and other product-related legislation.
- In the medium/long run, the overall goal is to achieve a non-toxic, risk-free material cycle: as a general rule, SVHCs should not be found in virgin materials and/or SRM above the regulatory threshold, otherwise: need for decontamination
- In the short term, the recycling industry needs:
 - Relevant information on SVHCs
 - o a practicable, temporary case-by-case approach to:
 - o avoid disruption of recycling processes until toxic substances are completely phased out;
 - provide certainty to trigger much needed investments in treatment capacities;
 - A level playing field between secondary and primary material and between EU-produced and imported articles

SVHCs should be understood as substances identified under REACH, which does not include POPs and specific substances regulated under sectorial/product legislation.

INFORMATION CONUNDRUM



TRACKING / INFORMATION FLOW / ECO-DESIGN

- Current R&D on SVHC identification and tracking (analytical) but not ready yet.
- Recyclers need to have enough relevant information on SVHCs: what are the SVHCs and how should it be treated?
- Information about SVCHs should be made available to the whole value chain (from product manufacturers to recyclers), including the waste stage.
 - Improving cooperation between manufacturers and waste management through eco-design and product specification;
 - Keeping records of the information throughout the value chain, possibly by using digital solutions (feasibility/practicability),

DEALING WITH LEGACY SUBSTANCES IN THE SHORT TERM

SVHC under consideration for authorization/restriction or already on the list

Can be safely used for pre-defined, specific uses and below a pre-defined threshold:

- Identified use;
- Risk-based assessment (taking into account exposure/leakage);
- Some form of traceability.

Cannot be safely recycled or recovered for any specific use

Other appropriate treatment options such as: waste-to-energy or disposal

Recycling for those specific uses

AVOIDING MARKET FRAGMENTATION (EOW)

The current EoW procedure (European/national *ex-ante* or *ex-post*) creates legal uncertainty and affects cross-border movements of SRM, which leads to market fragmentation.

- EU detailed criteria on the uniform application of the conditions for EoW;
- cooperation among MS + an online tool to facilitate information sharing on EoW;
- EoW decisions taken by MS (general or on a case-by-case basis) should be duly notified to the EC.
- Ex-ante decisions at MS level should be the preferred option;
- individual decisions taken by MS should not represent a significant threat to the smooth functioning of the internal market.





THANK YOU FOR YOUR ATTENTION

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