

## **European E-Waste Recyclers' position UTC POP content limit for Deca-BDE.**

### **Summary position paper**

The total amount of plastics used in Electronic applications in Europe amounts to some 3 Mio MT's per annum. With the Waste of Electronic and Electric Equipment (WEEE) some 1.2 Mio MT's of plastics are separately collected in the EU. Only a small percentage of these collected WEEE plastics contain POP BFRs, which are embedded in a structure of solid plastics. The recycling technology of these complex EEE products has developed over the last 15 years, whereby the plastics with substances of concern such as BFRs are separated into an identifiable fraction that is monitored to prove environmentally safe treatment. These plastics are incinerated to destruct the embedded BFRs.

The recycling industry is confronted with POPs as legacy substances and although the recycling industry has technology to separate and eliminate plastics containing POP flame retardants, this industry cannot provide for the certainty to reduce the levels of deca-BDE close to or below detection levels. A UTC level at or below detection limits of analyses implies a de-facto prohibition for recycling of plastics from WEEE. It is not possible to produce recycled plastics containing deca-BDE on an industrial scale at concentrations below 10 ppm. Furthermore is not possible to reliably measure such a threshold in a specialized laboratory, let alone in an industrial recycling process. Therefore a derogation at the level of the REACH Regulation is the only way to preserve the recycling option of plastics from WEEE in Europe. The EU REACH Regulation listed Deca-BDE with a threshold of 1000 ppm only one year ago and this concentration was then considered appropriate for both the environment and human health.

A UTC limit value for deca-BDE in recycled plastic of 10 ppm would completely undermine the targets set for WEEE (and ELV) recycling, it would be in contradiction with the objectives of the Circular Economy and the objectives of the EU plastics strategy.

With regards to the proposed re-cast of the EU POP Regulation regarding Deca-BDE, the European Recyclers of E-Waste see two options to prevent a total stop of E-Waste Plastic recycling and these are:

1. To include deca-BDE in the Annex I of the POP Regulation under the present recast, including a derogation for articles and mixtures produced from recycled materials containing concentrations below 0.1% by weight (1000 ppm), or,
2. To refrain from setting any concentrations limit for decaBDE and await the end of the discussions at the level of the Stockholm and Basel Conventions to align the POP Regulation via the procedures it lays down to align it to forthcoming changes.

A derogation for Deca-BDE would be fully in line with the provisions with the EU REACH Regulation.

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