

Public Consultation on the Functioning of Waste Markets

Public Consultation on the functioning of Waste Markets in the European Union

Part 1 - Identification of stakeholder or expert

Please enter your country of residence/establishment

- BELGIQUE-BELGIË
- DANMARK
- DEUTSCHLAND
- EESTI
- ESPAÑA
- FRANCE
- HRVATSKA
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- OTHER COUNTRY (non-EU)
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- UNITED KINGDOM
- ÖSTERREICH
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- ΚΥΠΡΟΣ (ΚΎΠΡΟΣ)
- БЪЛГАРИЯ (BULGARIA)

If relevant, please specify the non-EU country of your residence/establishment:

Your name or organisation:

Eurogypsum

Please provide your EU Transparency Register ID number (if you have one)

26369367005-58

If your organisation is not registered, you can register now (please see the introduction to this consultation under 'How to submit your contribution').

Can your reply be published? Please tick the box of your choice.

- With your name or that of your organisation
- Anonymously

For information on how your personal data and contribution will be dealt with, please refer to the privacy statement in the introduction to this consultation.

I am replying to this consultation as...

- an individual
- a private enterprise
- a non-governmental organisation (NGO)
- an organisation or association (other than NGO)
- a government or public authority
- a European institution or agency
- an academic/research institute
- other

If you are replying on behalf of a company, please specify in which of the following markets you predominantly operate:

- The whole EU market
- In one or several Member States, please indicate which one in the list below:
- BELGIQUE-BELGIË
- DANMARK
- DEUTSCHLAND
- EESTI
- ESPAÑA
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- ITALIA
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- БЪЛГАРИЯ (BULGARIA)

If relevant, please specify the non-EU country in which you predominantly operate:

If you are replying on behalf of a company, please indicate the number of its employees:

- Between 1 and 49
- Between 50 and 249
- 250 and more

Part 2 - Questions

A. Identification of the main perceived regulatory failures

For the purpose of this consultation, regulatory failures are defined as situations in which the regulatory environment hampers the efficient functioning of the waste markets (i.e. where waste meant to be recycled or recovered can move freely within the EU, without unjustified restrictions) and fails to ensure optimal implementation of the waste hierarchy (according to Article 4(1) of the EU waste framework directive, the following waste hierarchy shall apply as a priority order: prevention; preparing for re-use; recycling; other recovery, e.g. energy recovery; and disposal).

1. Do you think there are any regulatory failures or obstacles currently affecting the functioning of EU waste markets?

- Yes, a large amount
- Yes, but limited
- No (go to Section B)
- Don't know (go to Section B)

2. What do you think is the most important aspect of policy and/or legislation that creates distortions in the waste markets or creates unjustified obstacles to the proper functioning of waste markets in the EU?

As far as gypsum wastes are concerned, the EU waste market is far from being perfect, for two main reasons:

- Not observing the waste hierarchy according to the Art. 4 of the Waste Framework Directive. In several MS the priority order “recycling should be preferred to other recovery” is not or insufficiently implemented. That means that recyclable plaster board waste is not recycled to secondary raw material to increase resource efficiency but used e. g. for re-cultivation with the consequence, that the usable gypsum (> 90 %) in gypsum waste cannot be transformed to raw material.
- The Waste Framework Directive included sum targets for C&D waste recovery and recycling at > 70%, what may stimulate an higher overall use of waste but may also hamper high quality recycling if recovery routes are more attractive by volume and prices.

For the Deconstruction side, we face in summary the following picture: Gypsum Products are strictly regulated by the Construction Product Regulation (CPR) with basic requirements for construction works and standardized product characteristics. At the moment there are no basic requirements for sustainable use of resources (BWR 7) implemented in member states for construction works that may influence construction material waste markets.

3. Could you provide an example of such a regulatory failure/obstacle? Please describe it briefly.

Please see answer to question #2 above.

Another specific example is the OK project-recultivation of sludge beds in Mydlovary (Czech Republic) and its negative environmental impact on plasterboard waste recycling.

a) Background

Eight uranium sludge ponds situated in Mydlovary are being recultivated (total area approx. 300 ha). The Owner is the state-owned DIAMO. The restauration and recultivation work is carried out by OK Projekt, s.r.o., Okružustr. 665, 37001 České Budejovice, Czech Republic and is financed via funds from the state budget and EU funds (around € 20 million). When it comes to recultivation of sludge ponds, the used waste substitutes the “traditional recultivation materials”. Recultivation is

associated with Recycling Method R 10 "Land treatment resulting in benefit to agriculture" as defined in Annex II B of the European waste framework directive 2008/98/EC.

b) The Problem

1. Plasterboard waste mixed with biodegradable waste produces toxic hydrogen sulphide (H₂S)

62 types of waste are listed in the operation regulation (Annex 2) with their corresponding EWC codes. Those wastes can be used and mixed for the purpose of production of recultivation material and backfilling the uranium sludge ponds.

Gypsum-based waste is listed among the following EWC codes:

- 10 01 05 "Calcium-based reaction waste from flue gas desulphurization in solid form"
- 17 08 02 "Gypsum-based construction materials other than those mentioned in 17 08 01".

In the 62 types of waste, we have organic waste, such as 03 03 11 and 10 12 13 (sludge from on-site effluent treatment), 17 03 02 (bituminous mixtures), 17 05 06 (dredging spoils), 19 08 12 (sludge from biological treatment of industrial waste water), 19 09 02 (sludge from water clarification), 20 02 01 (biodegradable waste) etc.

As mentioned above, the 62 types of waste can be mixed in different mass contents. Gypsum based waste is thus mixed with organic waste produces hydrogen sulphide, a hazardous toxic gas..

For this reason, the decision of the Council 2003/33/EG of 19 December 2002 concerning the EU-Landfill Directive in point 2.2.3 (gypsum waste) stated that:

"Non-hazardous gypsum-based materials should only be disposed of in landfills for Non-hazardous waste in cells where no biodegradable waste is accepted".

First conclusion: Whenever there is a mixture of organic waste with gypsum-based waste, there is an infringement of EU laws (i.e. landfilling), whereas for other recovery operations, in this case recultivation, no adequate EU law exists.

2. Patent does not mention the use of organic waste.

The underlying patent indicates that the aim of the project is the conditioning of waste water with an "inert fixed component in particle shape and a calcium component" whereby "bulk material in mud drums or sludge bed solidifies".

The patent does not mention the organic materials accepted in the recultivation and backfilling operations together with gypsum waste (Annex 5).

3. Water solubility of calcium sulphate

The recultivation project carried out in Mydlovary aims at preventing the penetration of surface water in sludge and thus contamination of groundwater by uranium.

The use of high amounts of gypsum-based waste is counter-productive due to its water solubility.

The EU best practices and regulation show that impermeable material should cover the sludge. With the arguments above it can be argued against the use of gypsum-based waste in the Czech Republic for

recultivation purposes.

c) The Solution

Eurogypsum asked the European Commission to claim for the prohibition of the use of gypsum-based waste for recultivation and backfilling purposes in the a.m. project for the three above-mentioned reasons.

In addition to those reasons, the Commission should be aware that these activities are counter-productive both for our “GtoG Life + project - First steps towards gypsum circular economy” and EC resource efficiency strategy. Moreover the use of gypsum waste (other recovery) for recultivation does not meet the waste hierarchy as recycling should be preferred. The first negative impact is that the first German recycling plant for plasterboard waste near Leipzig could not yet recycle the plasterboard waste as the waste has been shipped to the Czech Republic. It is indeed less costly to use the plasterboard waste in the a.m. project than recycle it in this plant. The costs for recycling are between 30-40 Euro/ton. In contrast the gate fee for the recultivation and backfilling in the Czech Republic amounts to 5-10 Euro/ton As a consequence, the recycling of plasterboard waste in Leipzig stopped and additional plans to build new recycling plants also stopped.

4. What do you think this regulatory failure/obstacle is linked to? (multiple answers possible)

- EU legislation or policy
- National policy, legislation or administrative decisions
- Regional policy, legislation or administrative decisions
- Local policy, legislation or administrative decisions

Please briefly describe which specific policy/policies, legislation(s) or decision(s) is/are to blame for this:

5. Which of the following impacts do you think such regulatory failure/obstacle has within the EU? (multiple answers possible)

- Reduces reuse or recycling
- Reduces recovery, including energy recovery
- Increases waste generation
- Leads to increased environmental impacts
- Leads to reduced resource efficiency
- Other
- None

If relevant, please provide additional information in relation to your above reply.

Gypsum waste used in recultivation/backfilling cannot be kept in the market, whereas gypsum waste recycling delivers a raw material for the production of plasterboard, that could be kept in the market for more than one additional lifetime. Therefore resource efficiency is clearly damaged by recultivation/backfilling of recyclable gypsum waste.

6. How did you become aware of this regulatory failure/obstacle? (multiple answers possible)

- Reported by members of your organisation
- Through complaints reported to the authority
- From literature
- From own market analyses
- Own experience
- Other

If relevant, please provide additional information in relation to your above reply.

Additional information available on request at Eurogypsum.

7. What actions are you aware of that could solve or mitigate this problem? (multiple answers possible)

- Not aware of any actions
- Legislative changes
- Changes in the policy or decision-making by authorities
- EU guidance on waste legislation or policy
- Co-operation between authorities in different Member States
- Co-operation between authorities in the same Member States
- Other

If relevant, please provide additional information in relation to your above reply.

Legislative improvements could be foreseen in the EU regulation on transborder movement of waste (waste shipment regulation) together with a further development of OECD rules, as those correspond to each other. The "Green List" offers well-functioning European waste markets with appropriate bureaucracy excluding disposal operations. On the other hand

the possibilities of authorities to control and influence waste hierarchy onto the point of waste designation, f.e. between recovery and recycling, are today close to zero and should be further developed. The Gypsum Industry is a global industry but produces and consumes locally. Its activities cover the whole value chain (from the extraction of gypsum to the recycling of products). Therefore, the Gypsum Industry is a good example of a holistic industrial approach for clean and smart manufacturing of construction products and building solutions. Based on our practical knowledge and experience of industrial symbiosis, the following principles should be taken into account for effective EU wide policies on resource efficiency in view of the future Circular Economy.

a) Construction Products Supply side:

Strengthen in practice the life cycle thinking when shaping new policies. Indeed, when thinking of environmental impact reduction, the whole value chain of a product should be duly and effectively considered.

1. LCA and EPDs = basis for clear and harmonized communication.

Consider that environmental impact assessment for a construction product should be based on LCA (Life Cycle Assessment) data (from cradle to grave). For construction products, LCA methodologies have already largely been harmonized on the EU level, and a communication format has been established: the Environmental Product Declaration. Inside the LCA the "antimony (Sb) - equivalent" is the indicator for measuring mineral resource efficiency and positive effects of waste management.

Communication on the environmental profile of construction products should therefore be based on this EPD, following the European standard EN 15804 (Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products).

2. Core Indicators.

The development of core indicators foreseen in the Communication¹ to be commonly used on a voluntary basis by the builders should be done cautiously:

- Core Indicators should preferably be based on, or in accordance to, existing Life Cycle Assessment methodologies, which have already been standardized by CEN.
- Core Indicators should be part of a policy, clearly defining the agreed objective between the supply side and demand-side: what and how do we want to communicate? For which purpose?

3. Recycling and minimisation of landfill.

Objectives related to recycling and landfilling should be considered with caution and should be linked to a feasible pathway for the value chain to adopt. It should be acknowledged that today's recycling market is not perfect, and will need some time to develop. More in particular, terms like recyclable C&D waste, backfilling, recovery, recycled C&D waste, recyclable gypsum waste, recycled gypsum, recycled content, demolition, deconstruction, selective demolition, renovation should be clearly and legally defined before a regulatory decision is taken banning any type of landfilling.

For addressing recycling and minimization of landfill Eurogypsum

proposes a construction material pass for construction works to identify all construction materials in a building (comparable to an “energy pass” in some European countries). The knowledge about materials used and associated volumes are the first step to promote the recycling market from the waste source upwards.

b) Construction Products Demand-side.

1. Promote the Life Cycle View on Sustainable Construction.

The shift of the construction industry towards a path parallel to the overarching sustainable development movement is what we call sustainable construction. Also this effort addresses the entire life cycle of buildings: their planning, design, construction, operation, modifications, renovation, retrofitting, and end-of-life waste management.

According to the Conseil International du bâtiment, sustainable construction could be defined as: “the creation and operation of a healthy built environment based on resource efficiency and ecological principles”.

2. Develop tools for design calculation and simulation.

LCA data at the product level are necessary as a basis, but in order to be meaningful, sustainability as such should be assessed at the building level. It should be considered that a holistic approach requires good tools for design calculation and simulation, allowing decision makers in the design phase to optimise the factors that affect building sustainability. The Gypsum Industry therefore welcomes the emergence of tools such as software for the assessment of building environmental performance or Building Information Modelling (BIM).

8. Are there other important aspects of policy and legislation that distort the waste market or create obstacles to the functioning of waste markets? If yes, please describe these taking into account the previous questions.

Please see answer to question #2 above.

B. Obstacles to the functioning of waste markets connected to the application of EU waste legislation or other EU legislation

9. Do you consider that there are any obstacles to the functioning of waste markets connected to the application of EU waste legislation or other EU legislation?

- Yes, many
- Yes, but limited
- No (go to part C of the questionnaire)
- Don't know (go to part C of the questionnaire)

10. What are the drivers/causes of these regulatory failures or obstacles to the efficient functioning of waste markets?

(Rate in a scale of 0–5, with 0 not important, 5 very important)

a. Application of the system of notification- and consent requirements under the Waste Shipment Regulation (Articles 4-17 and 26-33 of the Waste Shipment Regulation).

between 0 and 5

b. Application by national authorities of the provisions concerning waste shipments through transit countries (Waste Shipment Regulation).

between 0 and 5

c. Other controls imposed on waste or waste shipments by application of EU waste legislation.

between 0 and 5

d. Different interpretations of the definition of 'waste' according to the Waste Framework Directive.

between 0 and 5

e. Diverging classifications of waste as 'hazardous' or 'non-hazardous' (Waste Framework Directive).

between 0 and 5

f. The distinction between 'recovery' and 'disposal' (Waste Framework Directive).

between 0 and 5

g. Application of the 'proximity principle' resulting in an outcome which is inconsistent with the waste hierarchy (Waste Framework Directive and Waste Shipment Regulation).

between 0 and 5

h. Divergent application of the so-called 'R-codes', i.e. the recovery operations listed in Annex II to the Waste Framework Directive.

between 0 and 5

3

i. Application of national end-of-waste criteria established in accordance with the Waste Framework Directive, see further Article 6(4) of the directive.

between 0 and 5

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2

j. Application of the grounds for reasoned objections to shipments of waste for recovery, as listed in Article 12 of the Waste Shipment Regulation, or the requirement for environmentally sound management (ESM), see further Article 49(1) of the regulation.

between 0 and 5

5

k. Other obstacles not listed above.

between 0 and 5

1

If relevant, please provide additional information in relation to your above reply.

The recycling market is far from being perfect, for several reasons:

- Lack of financial interest for main actors: Clients' lack of visibility on waste management, especially on construction projects (no dedicated contractor). Lack of financial interest for construction / demolition companies.
- Transaction costs in secondary material markets: Arises from the diffuse and irregular nature of waste generation. May also arise from the heterogeneous nature of secondary materials.
- Information failures related to waste quality: Arises from producer with a quality of the recycled gypsum less than the required by internal specifications.
- Consumption externalities and risk aversion: Perceived production costs associated with the quality of the final products derived from secondary materials.
- Discontinuity in the volume of raw material received and discontinuity in the quality of the recycled material received
- Technological externalities related to products: Innovations costs of the recycling technologies to process currently non-recyclable gypsum waste.

Market power in primary and secondary markets: substitution between primary and recyclable materials may be restricted due to imperfect competition and strategic behavior on the part of the firms.

- Not observing the waste hierarchy according to the Art. 4 of the Waste Framework Directive. In several MS the priority order “recycling should be preferred to other recovery” is not or insufficiently implemented. That means that recyclable plaster board waste is not recycled to secondary raw material to increase resource efficiency but used e. g. for re-cultivation with the consequence, that the usable gypsum (> 90 %) in gypsum waste cannot be transformed to raw material.

11. Please provide qualitative or quantitative evidence of the impacts of these distortions (e.g. in terms of additional costs for businesses, missed new job opportunities, environmental impacts etc.)



C. Obstacles to the functioning of waste markets arising from national, regional or local rules or requirements and decisions which are not directly linked to EU legislation

12. Do you consider that there are any distortions created by waste policy, requirements or decisions taken at national, regional or local levels?

- Yes, many
- Yes, but limited
- No (go to question 15)
- Don't know (go to question 15)

13. What are the drivers/ causes of these market distortions?

(Rate in a scale of 0–5, with 0 not important, 5 very important)

a. Differing taxes or fees leading to internal or cross border 'shopping behaviour', i.e. waste is transported to locations where it is cheaper to manage to the detriment of more environmentally sound management options which are locally available.

between 0 and 5

5

b. Distribution of roles and responsibilities for municipal authorities and private companies in waste management.

between 0 and 5

3

c. Development of waste treatment networks leading to local overcapacities or under-capacities for different types of waste treatment (e.g. incineration) to the detriment of higher positioned treatment steps in the EU waste hierarchy.

between 0 and 5

4

d. Inefficient use of available capacity in recycling or energy recovery in a neighbouring country or within the country itself.

between 0 and 5

5

e. Regulatory barriers that lead to shipments of waste in spite of facilities existing nearer to the source that could treat the waste in an equivalent or better manner in terms of environmentally sound management and the waste hierarchy.

between 0 and 5

5

f. Design and implementation of extended producer responsibility schemes leading to competition distortions or market access problems for producers and waste operators.

between 0 and 5

1

g. Permits and registrations which are not linked with EU legislation, requested from companies established in other Member States, even if they have fulfilled similar requirements in their home Member State.

between 0 and 5

h. Excessive controls on waste or waste shipments by national/regional/local policy, decisions and legislation that go beyond EU requirements ('gold plating').

between 0 and 5

i. Distribution of roles and responsibilities for municipal authorities and private companies in waste management.

between 0 and 5

j. Other obstacles not listed above.

between 0 and 5

If relevant, please provide additional information in relation to your above reply.

The recycling market is far from being perfect, for several reasons:

- Lack of financial interest for main actors: Clients' lack of visibility on waste management, especially on construction projects (no dedicated contractor). Lack of financial interest for construction / demolition companies
- Transaction costs in secondary material markets: Arises from the diffuse and irregular nature of waste generation. May also arise from the heterogeneous nature of secondary materials.
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Market power in primary and secondary markets: substitution between primary and recyclable materials may be restricted due to imperfect competition and strategic behavior on the part of the firms

- Not observing the waste hierarchy according to the Art. 4 of the Waste Framework Directive. In several MS the priority order “recycling should be preferred to other recovery” is not or insufficiently implemented. That means that recyclable plaster board waste is not recycled to secondary raw material to increase resource efficiency but used e. g. for re-cultivation with the consequence, that the usable gypsum (> 90 %) in gypsum waste cannot be transformed to raw material

Municipal authorities intend to have cheap disposal in cases where they are in parallel:

- a) landfill site owners;
 - b) producers of waste (f.e. construction/demolition waste from public works)
- creating a “win-win-situation”, that may restrict private recycling activities.

14. Please provide qualitative or quantitative evidence of the impacts of these distortions (e.g. in terms of additional costs for businesses, missed new job opportunities, environmental impacts etc.)

In Berlin the owners of the landfill site are the Countries Berlin and Brandenburg. They offer 15 € / ton for the disposal of gypsum waste, whereas economic recycling starts from 30-40 €/ton. In Berlin, nearly all gypsum waste is disposed instead of being recycled.

15 a. Please rank the three most important drivers of market distortions and obstacles according to their importance with respect to being tackled first to improve the efficient function of waste markets. Please indicate the relevant number and sub-letter from 10a)-k), 13 a)-j).

15 b-c.

- 15 b. Cannot rank them. They are all equally important.
- 15 c. Not enough knowledge to rank them.

16. What do you feel are the negative impacts within the EU of such obstacles? Please rank them between 0 (no impact) to 3 (high impact).

a. Increased waste generation or less reuse

between 0 and 3

16. What do you feel are the negative impacts within the EU of such obstacles? Please rank them between 0 (no impact) to 3 (high impact).

b. Less recycling

between 0 and 3

c. Less recovery, including energy recovery

between 0 and 3

d. Less environmentally sound management of waste

between 0 and 3

e. Less resource efficiency

between 0 and 3

f. Lack of market access

between 0 and 3

g. Other

between 0 and 3

If relevant, please provide additional information in relation to your above reply.

D. Final questions

17. Do you consider that there are large differences between the Member States in the way their waste markets function?

- Yes, very large differences.
- Yes, but the differences are small.
- No differences.
- Don't know.

18. Please briefly describe the differences between Member States, perceived as obstacles to the functioning of waste markets:

Across Europe, the plasterboard market maturity differs, as the plaster consumption and recyclability rates change very much. Moreover, the market is only one of the factors that influence the recyclability of plasterboards. In fact, the recycling of plasterboards production, construction and demolition waste highly depends on a macro-environment formed by different elements that vary very much country by country.

Therefore, a fit-for-all solution might not be the most adequate. We, thus, suggest that the proper setting up, establishment, development and support of the plasterboard value chains should be done at country level, with a constant and significant exchange of best practices all around Europe.

19. What solutions would you propose in order to address the regulatory failures or obstacles you have identified above?

Recommendations for the national authorities

- Across Europe, the plasterboard market maturity differs, as the plaster consumption and recyclability rates change very much. Moreover, the market is only one of the factors that influence the recyclability of plasterboards. In fact, the recycling of plasterboards production, construction and demolition waste highly depends on a macro-environment formed by different elements that vary very much country by country. Therefore, a fit-for-all solution might not be the most adequate. We, thus, suggest that the proper setting up, establishment, development and support of the plasterboard value chains should be done at country level, with a constant and significant exchange of best practices all around Europe.

Recommendations for the EC

- There is a need for detailed and reliable statistics on materials available in “the urban mine”. The volume of plasterboard waste stemming

from renovation activities is unknown but could offer potential. Current-day statistics on plasterboard waste generation are inexistent or too approximate due to the lack of data. Moreover, the statistics at European level are not harmonised which slows down the incentives to recycle effectively. It is recommended to include the breakdown of the different streams in the Eurostat database, differentiating at least among: plastics, metals, concrete and rubble, plasterboard, roofing and wood. This could be easily done for countries where deconstruction is a common practice, such as Belgium, France, the Netherlands and the UK.

- Deconstruction (dismantling and sorting on site) is essential for recycling and should become the focus of European regulatory and non-regulatory measures in the future. In that sense, an audit of the materials in the buildings prior to deconstruction is a step towards a dismantling culture, at least for building above 1000 square meters. A detailed report about the quantity, quality and recyclability of the products should be a result of the audit.

- The design for disassembly is one of the issues where the EC could focus his attention. This will increase the materials recyclability and will promote a mentality of waste prevention.

A construction materials pass for buildings could be a good starting point to develop waste management from the source.

The EU shipment of waste regulation should be developed further in co-operation with the OECD with the target to introduce effective waste hierarchy control on the designation site for waste treatment. This could be done by a common and public register of waste recovery or recycling installations, with their waste codes permitted, and the type of operation foreseen.

Recommendations for the actors in the recycling chain

- One of the main lessons learnt from this project is that “closing the loop” cannot be limited to a single operator responsibility.

Construction and demolition companies, waste collectors, recyclers and manufacturers have to collaborate intensively in order to achieve this goal. In any case, achieving a sustainable value chain does not happen overnight, and we suggest for the actors to get involved in a long-term and clear plan with the following objectives.

- o To apply real selective demolition of plasterboard systems.

- a) A better definition of the recyclable plasterboard waste and waste acceptance criteria at European level. The current document created in the frame of the GtoG project can serve as a basis for further discussions.

- b) Enhancement of the reference catalogue on gypsum-based systems built 20-30 years ago. Within the project framework, this catalogue covers Belgium, France, Germany, and the UK. It should be enriched in 2016 with other countries, such as Nordic countries, Austria and the Netherlands.

- c) Dissemination of the best practices to dismantle plasterboard systems via the national gypsum associations and the national demolition associations.

- d) Enhance the cooperation with the European Demolition Association to increase the uptake of plasterboard dismantling, bearing in mind that high volumes coming from this source are not currently available.

- o Set up a collaborative platform between the recyclers and the

manufacturers spread all around Europe to exchange best practices and to decide on common actions regarding the development of R&D&I processes for increasing the recycling rate of currently non-recyclable plasterboard systems and other gypsum waste, the definition of the product status for the recycled gypsum, and the monitoring of the waste legislation at EU and national level with the creation of dissemination tools such as bi-annual newsletters.

Part 3 – Follow-up activities

20. Would you be interested in participating in a stakeholder meeting on these issues that will be held on 12th November 2015?

- Yes, I would like to attend.
- No, I'm not interested.

My contact details are (optional):

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