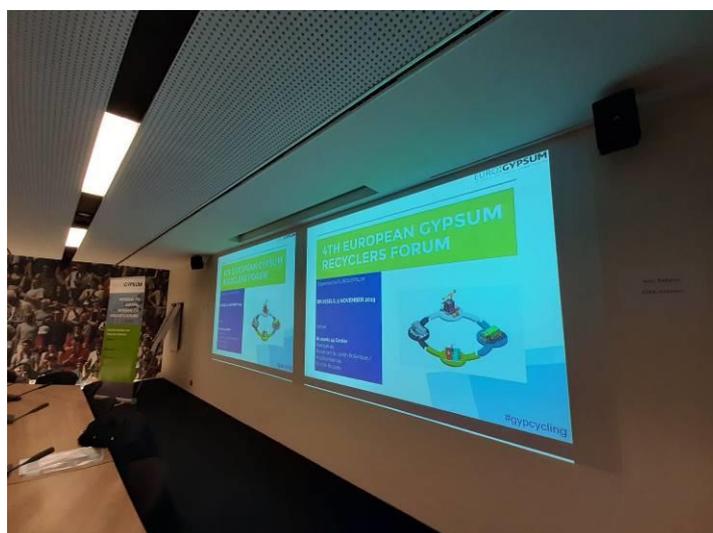


4th European Gypsum Recyclers Forum Brussels – 5 November 2019

Summary note

DATE: 5 NOVEMBER 2019



Eurogypsum, the European Manufacturers Association for Plaster and Plasterboard Products, held its **4th European Gypsum Recyclers Forum in Brussels on 5 November 2019.**

36 people participated in the Forum, representing various companies and organisations along the gypsum recycling chain, as well as the European Commission (see final list of participants in annex).

Tristan Suffys, Eurogypsum's Secretary General, welcomed

participants in the fourth edition of the Forum, which has taken place on an annual basis to take stock of progress with the recycling of gypsum and plasterboard, following the three-year project "Gypsum to Gypsum (GtoG)" under the EU Life+ programme, which ended in 2015.

Gwenole Cozigou, Director for Industrial Transformation and Advanced Value Chains at the European Commission's DG GROW, pointed out the economic and social relevance of the construction sector in Europe and named climate change and digitalisation as the key challenges for this sector. A sustainable and circular management of resources will be indispensable to achieve the climate objectives. Mr Cozigou presented the main features of EU circular economy policy, as well as past achievements to



address construction and demolition waste. He insisted on the combined objective of limiting the environmental impact and promoting sustainable economic activities, as well as the joint works of Commission's DGs GROW and ENV. Circular economy has been identified as a priority for the incoming Commission under President-elect Ursula von der Leyen. A second Circular Economy Action Plan will be put forward as part of the EU Green Deal within the first 100 days of the new Commission. It will address priority sectors, including construction. An industrial policy will be developed in parallel, to support the Green Deal's objectives. A strategy for a sustainable built environment will take an integrated approach, linking sustainability, socio-economic objectives and quality of life. These policies will also consider the new Commission's "zero-pollution ambition". Mr Cozigou also praised the gypsum sector for the efforts made to demonstrate and realise closed loop recycling. He called for accelerating these efforts in light of the upcoming challenges and invited participants to contribute to EU policies' implementation.

Xavier Meyer, Circular Economy Leader at Saint-Gobain and Eurogypsum's Recycling Working Group Leader, briefed the audience about the lengthy uptake of gypsum recycling in practice, stressing that less than 5% of potential accessible gypsum resources are currently in a closed loop. Nevertheless, he welcomed the positive results in the 2018 data collection exercise, showing an increase from 382 to 573,000 t of recycled waste outside production. This positive trend should be continued and accelerated.

Participants pointed out the competing uses of recycled gypsum, mainly for cement production and agriculture which are diverting the gypsum resources from a circular economy model. We should have better visibility about the volumes going to other applications as well as those 'disappearing' from the closed loop model. The audience also discussed key drivers for recycling; the main ones appearing to be first the price of landfill and then the cost of raw materials. It is also important to distinguish between recyclable gypsum waste (e.g. from plasterboards or plaster blocks) and currently non-recyclable waste (e.g. thin plaster layers on bricks). Further research and development should be encouraged to address the currently non-recyclable volumes.



Fernando Pardo, representing the Spanish gypsum association ATEDY, showed the very low recycling rates for plasterboards in Spain, mainly due to low landfilling and natural gypsum costs. Increasing energy costs, population awareness and stricter regulations on circular economy may help rising these rates. A major challenge in Spain is the competence of autonomous regions (and sometimes provinces) in measures relating to circular economy; the risk of fiscal competition across regions usually prevents regional administrations from taking such initiatives. A coordinated approach on

this matter would simplify the use of levers (e.g. increasing landfilling taxes) to promote circularity.

Patrik Lidholm, representing the Swedish recycling company Gyro, reported on the recycling process, particularly regarding quality checks. He mentioned a positive development encouraged by the government's Energy Authority, with the drafting of a "common sorting guide" expected by mid-2020, to improve the circularity of gypsum.

Participants discussed the need for common standards or quality parameters to avoid contamination of the waste. Under the Nordic Green Building Council, Nordic countries are considering a labelling system to promote sustainable building materials, which would be useful to promote plasterboard including recycled content.

Maarten Hendriks from NW Gypsum insisted on the perceived problem of potential contamination of the gypsum waste with traces of asbestos. Several approaches can be taken to detect possible contamination; the exact features (e.g. sampling intervals) currently vary widely according to the customers' demand. We should bear in mind that these measures have a cost impact on the recycled product. Excessively stringent requirements can have a deterring effect and redirect the volumes to non-gypsum applications. The existence of real-world contamination, unrelated to the presence of asbestos traces in the recyclable waste, should also be taken into account, as it is part of the perceived problem of contamination. Participants discussed the relevance of landfilling costs as a key driver for recycling.

The specific issue of demolition waste containing asbestos traces was discussed in detail. While EU legislation clearly bans the manufacture, placing on the market and use of asbestos fibres added *intentionally*, it remains questionable whether the *incidental* contamination of recycled materials produced from demolished products containing a very low concentration of asbestos fibres would qualify as an intentional addition. This unclear situation is reinforced by the somewhat different interpretations in national legislation. Furthermore, authorities are often scared with the simple possibility of fibre presence in the material, even if in insignificant quantities. This matter is even more important when national authorities are working on extended producer responsibility schemes. The European Commission could help by setting a clear detection limit or threshold in association with a standardized control methodology, under which a product would be considered asbestos-free.

Xavier Meyer stressed that the risk of asbestos presence in recycled materials was not a gypsum-specific issue but a joint matter for all construction product manufacturers using recycled content and concerns more than 500 million tons of demolition/renovation waste in Europe. Action should be coordinated with all the other construction product manufacturer associations, as well as with the other actors of the value chain (demolition companies, waste management companies and sorting companies).



He insisted on the importance of promoting traceability throughout the recycling chain and having quality control management systems in place.

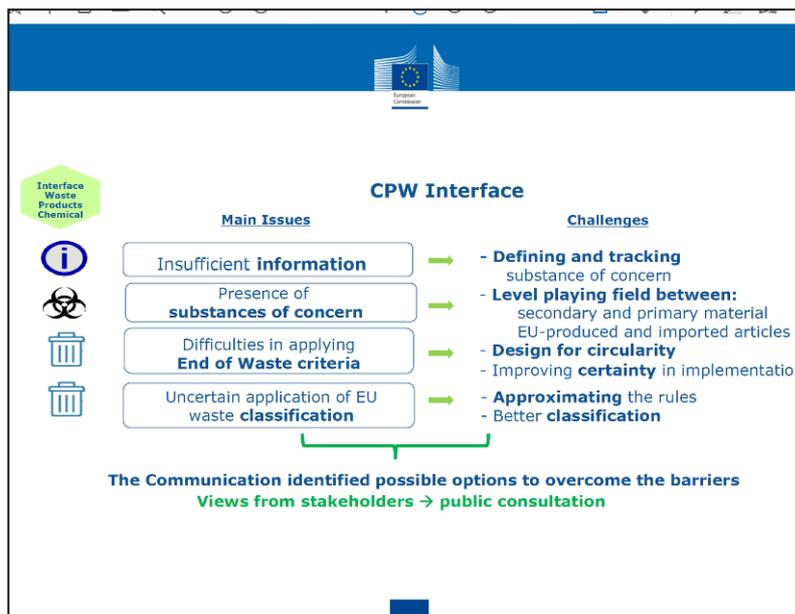
Jörg Demmich, representing the German Gypsum Association BV Gips, presented the EU legal framework relevant for recycling gypsum as regards the presence of dangerous substances, with the CLP and REACH Regulations. He presented the specific example of Germany, which has taken a strict interpretation of these rules. Some German

authorities consider that there should be absolutely no asbestos fibre in the recycled material, while others accept the 0.1% limit value included in the CLP Regulation. Due to the unclear situation, discussions have been going on to define the concept of “asbestos-free” and provide legal certainty to manufacturers. Some progress has been made but it is slow. A recommendation from a special waste technical committee is expected in early 2020. Participants pointed out the risk of spill-over effects: Member States other than Germany could take a similar approach, which would stop progress on gypsum recycling.

Hans-Jörg Kersten, from BV Gips, presented his critical review of the German Federal Environment Authority’s Life-Cycle Assessment of plasterboards. He mentioned several shortcomings in the approach, comparing recycled gypsum with natural and synthetic (FGD) gypsum, in particular regarding transport and disposal. His conclusion was that, from an environmental point of view, the use of the domestic natural gypsum and recycled gypsum is better than imported gypsum.

Enrique Garcia John, a policy officer in charge of waste management and secondary materials at the European Commission’s DG ENV, presented the EU’s 2015 Circular Economy Action Plan and its ambition to achieve that secondary materials are as close as possible to raw materials. In this regard, the communication on the interface between chemical, product and waste legislation (CPW Interface Communication) in January 2018 looked at ways of ensuring the viability of secondary materials while guaranteeing their

safety. An important question was the possible presence of substances in the secondary materials when those substances are now banned from primary materials.



The communication identified the most important challenges and possible solutions to overcome them. A major field of action relates to information flows on substances of concern. The variety in the end of waste criteria across the EU remains an issue, which the next Circular Economy

Action Plan may tackle. There is also some uncertainty on the application of EU waste classification in the Member States. A public consultation on the communication was carried out in 2018 and the results published in March 2019.

The feedback will be used on follow-up actions in the near future. In the meantime, several studies have been launched or already concluded, regarding the recyclability of waste containing substances of concern, the management of information flows from product supply chains to waste operators, or Member State practices on by-products and end-of-waste. Other upcoming challenges include the precise definition of “substances of concern”, the possible setting of targets for recycling / preparing for reuse of construction and demolition waste and its material-specific fractions by end-2024. Early warning reports against Member States failing to implement landfill or waste legislation may also be considered. By 2025 Member States will also have to have separate

collection of household hazardous waste. In the context of the new Commission's Green Deal, waste prevention policies may be addressed in the new Circular Economy Action Plan and the zero-pollution ambition.

Participants discussed the importance of having end-of-waste status to promote recycled gypsum.

Tristan Suffys concluded the Forum, thanking speakers and noting down the key following messages:

- The industry is committed to promote a sustainable management of resources and gypsum recycling is a crucial part thereof;
- There is a continued increase in the volumes of recycled gypsum but the positive trend needs to be sped up;
- Several industry and policy initiatives are carried out at EU level and in many countries to promote the further uptake of secondary materials;
- The low cost of landfill in many countries remains the major economic deterrent to recycling;
- The industry is engaged to strive for the highest quality level for secondary materials;
- However, the possible presence of dangerous substances in secondary materials is a reality for all construction product manufacturers using demolition waste as source and must be addressed jointly with other product manufacturers, other actors and policy-makers;
- The absence of legal certainty on the definition of "asbestos-free" in Germany is a major obstacle to actual recycling and might also spill over other Member States;
- Clear and more harmonised standards or limit values would be useful to detect possible contamination in recycled materials;
- There is a lack of information as to where the volumes of recycled materials are going;
- 'Downcycling', the use of recycled materials for applications other than gypsum, is a threat to our model's circularity;
- End-of-waste criteria would help clarifying the situation; the case for EU criteria was demanded by many stakeholders and might be considered under the next EU Circular Economy Action Plan ;
- Life-cycle assessment tools and consumer labels may help promote the benefits of products with recycled content on the market; and
- The industry should use the favourable policy agenda for circular economy to engage with policy-makers and request the necessary legal tools to boost recycling.
