

CHEMICALS STRATEGY FOR SUSTAINABILITY

Eurogypsum's remarks on the planned Chemicals Strategy for Sustainability

An enabling strategy is needed to boost sustainable and circular practices in a toxic-free environment

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Eurogypsum, the European manufacturers association for plaster and plasterboard products, welcomes the European Commission's ambition to present a chemicals strategy for sustainability. The example of gypsum demonstrates the importance of having an appropriate approach to chemicals in order to promote sustainable and circular practices.

Our contribution to a toxic-free environment

Gypsum-based materials are mineral products with extremely **low emissions** of volatile organic compounds into the indoor air. They contribute to a toxic-free environment in houses.

Furthermore, the processing of gypsum in manufacturing facilities complies with very strict **health and safety protection** rules for our workers.

Chemicals policy's relevance for a sustainable and circular economy

Gypsum is a fully recyclable and a "**closed loop**" material. The gypsum industry has been a pioneer in promoting circular business models since the 1980s with the use of FGD gypsum, a secondary material produced from the flue gas desulphurisation of coal-fired power plants, which enabled the industry to reduce the need for primary raw materials considerably. We have also engaged for many years to facilitate and boost the actual recycling of gypsum-based products such as plasterboards. A Life+ project "G to G – Gypsum to Gypsum", completed in 2015, demonstrated the feasibility of producing plasterboard with up to 30% recycled gypsum content, based on current available technologies and high-quality recycled gypsum.

A major obstacle in the quick uptake of circular practices in the construction sector are the uncertainties about the quality of the waste coming from demolition of older buildings. Deconstruction, not demolition, and separate collection of different construction and demolition (C&D) waste should be the first steps enabling circular practices. This is particularly true as regards **potentially dangerous substances in demolition waste** used for recycling. A typical example for such dangerous substances in C&D waste is asbestos. When recycling gypsum-based C&D waste, cross-contamination of recycled gypsum with asbestos resulting from other waste materials cannot be avoided in principle. Some Member States require 0% asbestos fibre content in recycled gypsum, others implemented different limits and measurement methods for the presence of asbestos. Nevertheless, 0% content of any dangerous substance in recycled material is impossible to guarantee, as even in primary raw materials there are (very low) concentrations of heavy metals for example.

Our demands for the EU's Chemicals Strategy for Sustainability

1. Move towards toxic free environment

In health-related matters, we hope the strategy will:

- Accelerate the implementation of Europe's ambition to **move towards a healthier and zero-pollution environment**
 - When reporting on product hazards, as in the case of poison centre notifications, account should however be taken of the nature of mineral products, the exact composition of which can vary depending on the extracted material. Pragmatic solutions should be sought, as long as the safety of all users is adequately guaranteed.
- Support more **transparency** on products and substances
 - A European approach for content disclosure would enable a level-playing field in the sector, given the increasing demand regarding product content declaration and associated hazard for the health and the environment.

2. Move towards circularity

In this respect the strategy could help to make progress on the **avoidance of dangerous substances in demolition waste** used for recycling, to avoid any risks for product and building users while allowing for circular practices. This requires a **clear, consistent, supportive and harmonised framework between chemical and waste legislation**, and an engagement and action of all players in this important raw material stream, including the demolition sector.

Meanwhile, further efforts will be needed to:

- Achieve progress on the issue of the end-of-waste status for recycled gypsum, which practically hampers recycling efforts on the ground;
- Support the acceleration and mainstreaming of deconstruction practices, instead of demolition, as well as other circular design practices (e.g. design for deconstruction, modularity, new business models facilitating the leasing of systems); and
- Implement building passports and construction policies that encourage the future separation and reuse of construction materials, enabling better recycling of building materials to boost the circular economy.

Eurogypsum thanks the Commission in advance for taking our contribution into account and looks forward to further exchanges on this major initiative for Europe.

Eurogypsum is a European federation of national associations of producers of gypsum products (i.e. plaster and plasterboard). It is one of the few fully integrated industries (from cradle to cradle) within the construction products field. The companies which mine gypsum also process it and manufacture the value-added products and systems used extensively in construction and other industries.
With a turnover of EUR 7 billion, the European gypsum and anhydrite industry operates some 160 factories and 154 quarries and generates employment directly to 28,000 persons and indirectly for 300,000 persons. The Gypsum industry provides jobs to 1,100,000 plasterers and plasterboard installers. It trains around 25,000 persons per year across Europe.

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