



## Ecodesign: Durability, Reparability & Recyclability

March 2019

*FEAD is the representative body of the private waste management and resource industry in the European Union. A passionate advocate of the circular economy; FEAD's members have a strong track record of turning wastes into new commodities. Ecodesign requirements are an excellent opportunity to ensure the successful transition towards a circular economy.*

*It is of the utmost importance that durability, reparability and recyclability requirements are established and that relations between the manufacturing and the waste and resource industry are facilitated and intensified.*

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Ecodesign will play a significant role in the success of the transition towards a circular economy. **Indeed, 80% of the environmental impact of products is determined at their design stage, and design choices “directly impact the complexity and economics of after-use processes”.**

Given the increasing complexity of consumer goods, **FEAD members identify an urgent need to link the impact of ecodesign choices to the complexity and cost-efficiency of their end-of-life treatment.** For instance, if technical and economic considerations are taken into account, not all plastic waste is fully recyclable. Having that in mind, there is still an abundance of plastic which is difficult to recycle (e.g. mixed polymers, contaminated plastics, and black plastics). Plastic waste is not a homogeneous material and the possibility to reuse, recycle and recover depends heavily on its composition.

**Ecodesign strategies are needed to ensure better coherence between the manufacturing and waste management processes to prevent waste where possible and to increase the quantity and quality of recyclates.**

Therefore, FEAD believes that the following points should be supported by the Commission:

1. **Ecodesign should go beyond energy efficiency** and encompass measures for material resource efficiency.
2. **The transition towards better ecodesign starts with the replacement of formats and material designs that prevent effective sorting and recycling with recognised alternatives.**
3. **Material resource efficiency can be improved through the establishment of durability, reparability and recyclability requirements** for selected products (such as electronics).
4. **The Commission should facilitate cooperation between manufacturers and waste managers in ecodesign processes.** The development of ecodesign requirements is closely related to the capacity of involving all the players of the value chain and to provide them with specific indicators that will enable effective monitoring. An intensified

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ARMD, Romania

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EWMA, Estonia

FNADE, France

IWMA, Ireland

PASEPPE, Greece

VOEB,  
Austria

ASEGRE, Spain

DWMA, Netherlands

FISE, Italy

go4circle, Belgium

LASUA, Latvia

PIGO, Poland

YTP,  
Finland

cooperation will ensure that products are designed to prevent waste and to be easily reused, dismantled and recycled.

5. **The Commission should ensure and enforce that extended producer responsibility schemes take account of products' reusability and recyclability as mentioned by article 8a of the Waste Framework Directive.** Fees paid to EPR schemes should provide incentives to manufacturers to design their products in a recyclable and non-hazardous way. Member States, when determining the best national/local financial mechanism, should take into account good practices, for example, a bonus/malus system. Therefore, fees paid by waste producers to EPR systems could be modulated by taking into account products' reusability and recyclability. Moreover, EPR schemes should ensure fair and equal access to materials and resources.
6. **Biodegradability and compostability:** FEAD supports the use of bio-based materials as long as they are not promoted at the expense of using recycled ones. It is, however, important to make a clear distinction between bio-based and biodegradable materials.
  - **Today, some biodegradable materials do not biodegrade in bio-waste treatment plants and few degrade in a natural environment** (including waterways). This leads to confusion amongst consumers and creates new risks to both the environment and the industry. Indeed, some biodegradable materials may affect bio-waste treatment if they are mixed with organic waste and enter anaerobic digestion processes. Composting or anaerobic digestion processes that aim at producing high quality organic fertilisers have a strict limit in physical contaminants, regardless of whether they are in theory biodegradable.
  - **Biodegradable materials are also problematic when they are mixed with recyclable ones** as they do not have the same material properties and may impact the integrity of the recyclates. In fact, the mere risk that this might happen has already discouraged producers of these products to use recycled content.
  - **Biodegradable plastics also have a negative impact on littering.** The biodegradation process takes weeks or even months. Further research and innovation to develop biodegradable plastics is therefore important. Plastic packaging with unconditional and quick biodegradable properties would indeed offer environmental benefits. Consequently, we see the promotion and widespread marketing of biodegradable materials at this stage as potentially problematic.
7. **Hazardous substances:** FEAD members consider that reinventing products should start at the ecodesign phase by no longer using substances of concern. Treating or recycling waste which contain such substances is complex and costly, all the more as the list of substances of very high concern has been growing steadily. Nevertheless, as long as such hazardous substances can be used within products that are legally placed on the market by manufacturers of virgin raw materials, waste management companies will at some point in time have to deal with them. The challenge is, therefore, how to deal with "legacy substances" from products put on the markets many years ago.

While the current approach based on hazardousness is the cornerstone of waste classification, a risk-based approach along the waste treatment chain is needed for specific waste streams. This case-by-case, risk-based approach would offer all the required guarantees in terms of human health, safety and non-dispersion of pollutants. Recycling waste containing substances of concern remain possible, for specific uses based on a risk assessment, preferably in a closed loop.

Waste management companies need more certainty regarding the best way to treat waste containing substances of concern and therefore call for a clear methodology to be established on this issue.

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*FEAD, the European Federation for Waste Management and Environmental Services, represents the private waste and resource management industry across Europe. FEAD's members are national waste management associations covering 19 Member States, Norway and Serbia.*

*FEAD's members represent about 3,000 companies with activities in all forms of waste management. Our companies have an approximate 60% share in the household waste market and handle more than 75% of industrial and commercial waste in Europe. Their combined annual turnover is approximately € 75 billion. These companies employ over 320,000 people who operate around 2,400 recycling and sorting centres, 1,100 composting sites, 260 waste-to-energy plants and 900 controlled landfills.*

*Our companies play a key role in the transition to a circular economy by producing resources which can be re-injected in the economy and by supplying energy. They add value through innovative collection, sorting, recycling of secondary raw materials, material or energy recovery, in a competitive environment. In doing so, they play a key role in achieving the best economic and environmental outcomes.*