Source: E-Mail Hannela Artus to POPWaste2018@ramboll.com from 29.3.2108

Deal all

Thank You for the opportunity to provide input to the study to support the review of waste-related issues in Annexes IV and V of the POPs Regulation.

After careful consideration of the questionnaire we feel that by answering the questions we are unable to reflect our country's POPs waste related concerns or practices that could be an added value for the study.

The substance based approach of the questions do not correlate with the overall waste classification system. POPs are substances that do not necessarily render waste hazardous, but impose restrictions to certain waste management operations whose implementation in practice is one of the drivers of the current study. It makes it extremely difficult for waste management operators to distinguish POPs contaminated waste from non-contaminated as there might be no visual or other expected indication that materials might be contaminated, other than direct information from producers. And the availability of the latter information to waste management operators is mostly rare in practice.

Our experience with POPs containing waste electrical and electronic devices show that it is possible to use an XRF screening method to identify some of the POPs that contain bromine (e.g. PBDEs). The device measures the general bromine content indicating a possibility that the materials might contain POPs but it doesn't show specific substances. For specific substances the only option is to carry out laboratory analysis and many of these analysis aren't available in our country. The samples have to be sent abroad.

We council our waste management operators on reasonable and feasible methods they can use in identifying and separating potential POPs contaminated waste. But our practice has also shown that even when the operator uses all knowledge available to him and separates the materials, as is the case e.g. with WEEE plastic, the XRF screening method still shows high bromine levels in both materials - materials deemed non-contaminated, and materials presumably contaminated. These discoveries create high levels on uncertainties of the actual content of certain POPs in the waste. And it is not feasible and never applicable in practice to send the entire incoming waste flow to be analysed in a laboratory.

Therefore, we are unable to provide any specific information on concentration levels or their adjustment because the majority of the problem still lies in the great uncertainty of which waste components or materials might contain POPs in order to even determine any specific POPs concentration in that waste. And the reason for POPs still getting recycled is not so much the result of a deliberate action but the lack of knowledge and simple and workable screening methods for the waste management operators working in the field.

The lack of knowledge of substances no longer allowed in new products is one of the identified problems in the Commission's communication on options to address the interface between chemical, product and waste legislation. Any actions taken as a result of this communication should also provide solutions to practical problems regarding POPs waste management. And any action taken with the POPs related legislation today should bear in mind the future developments of the chemicals, products and waste interface and the circular economy package.

Kind regards and happy holidays!

Hannela Artus

Senior Officer | Environmental Technology Department

+372 6262 860 | +372 577 03202 | hannela.artus@envir.ee

Ministry of the Environment of Estonia

Narva mnt 7a | 15172 Tallinn | Estonia

E-Mail was recieved on 29 March 2018.