



Fédération Européenne des Activités du Déchet et de l'Environnement
European Federation of Waste Management and Environmental Services
Europäische Föderation der Entsorgungswirtschaft

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Comments on the „European Declaration on Recovered Paper“

The successful cooperation between the waste management industry and the paper industry ensures an ideal treatment of recovered paper. Recovered paper is one part of secondary raw materials which shows a very high collection and recycling rate; and this for the benefit of the environment.

This was made possible by an intensive and consistent investment of the waste management industry in the areas „separate collection“ and „sorting facilities“. Furthermore, discussions took place on a regular basis in the EU member states between the national associations of the waste management industry and the paper industry as well as between CEPI and FEAD, to optimize the quality of recovered paper.

In our opinion, a clear division of work, which means the definition of the tasks between the waste management industry and the paper industry is missing in the above mentioned draft of the „European Declaration on Recovered Paper“. Hereby, we understand the wording, that the waste management industry has the duty to provide the paper industry with recovered paper in such quantity and quality that allows the paper industry to reach recycling rates according to the best available technology. This includes the fulfillment of the tasks „separate collection of recovered paper“ and „sorting of recovered paper“ by the waste management industry.

As this division of work is missing in the draft, FEAD cannot put its signature under the „European Declaration on Recovered Paper“.

Other remarks:

In the ongoing above mentioned regular discussions with the paper industry during the last few years, the waste management industry has been asking for an adaptation of the CEN 643 (European List of Standard Grades of Recovered Paper and Board) to the practical experience. This concerns especially the problem of the maximal moisture content of 10% in recovered paper, which is not feasible in certain countries, as for example Poland, Austria, Germany, etc. because of climatic reasons. Furthermore, the definitions of certain grades of recovered paper do not in some cases correspond with reality. We do believe that solutions close to the practical experience could even improve the present good cooperation of the waste management industry with the paper industry. In addition, we think that a high quality of recovered paper can only be reached after sorting. Only in that case, as we already have mentioned, high recycling rates can be achieved corresponding to the best available technology.

Original signed:

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