

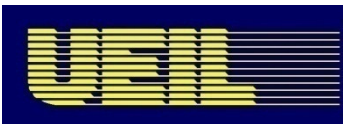
GEIR in Brussels: EU activities

24 Oct 2008



GEIR ACTIVITY REPORT

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I. GEIR strategy in the Waste Oils campaign

- **Dec 2005** : European Commission published a Strategy on the Prevention and Recycling of Waste together with a proposal for a **revised Waste Framework Directive (WFD)**, including a repeal of Waste Oil Directive
- **GEIR's Waste oils campaign**: From January 2006 to June 2008, GEIR's strategy focused on 2 main institutions within the co-decision process to ensure a favourable regulatory framework for waste oils regeneration:
 - the Council of ministers
 - the European Parliament
- **And Regular contacts** were held with the European Commission in particular with:
 - DG Environment (*sustainable production and consumption unit*)
 - the Cabinet of Environment Commissioner Stavros Dimas
- **17 June 2008**: European Parliament votes its second reading after compromise obtained with Member States
- **22 Nov 2008**: Publication in the Official Journal of the European Union



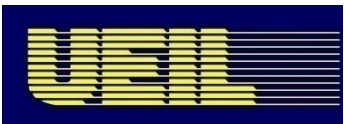
I. GEIR strategy in the Waste Oils campaign: external advice

- Technical studies on the performance of re refined oil and external advice were also received from different experts, including :
 - IFEU Heidelberg, Institute for Energy and Environmental Research
 - Dr Krämer, former Head of the Waste Unit in the European Commission
 - OKOPOL, the Institute for Politics and Ecology
 - Dr. Frankl, expert of SETAC organisation LCA Steering Committee



I. GEIR strategy, in the run up to 2nd reading (April-June 2008)

- **In the European Parliament**, GEIR had regular contacts with key MEPs (e.g. shadow rapporteurs, political coordinators, influential members of the Environment committee, etc.) and political advisors including:
 - Mailing out of GEIR position paper for 2nd reading
 - One to one meetings (incl. Italian MEPs of ENVI with FDG)
 - Regular email and telephone calls to gather intelligence
- **In the Council of Ministers**, ongoing contacts with environment attachés to gather intelligence and reiterate the importance to preserve the European Parliament's amendments of 1st reading
- **Third party outreach activities** and continued dialogue with:
 - NGOs (European Environment Bureau)
 - other recycling industries within the European Recycling Coalition, promoting the 5 step waste hierarchy and recycling over energy recovery



I. GEIR strategy: outcomes

The European Parliament and the Council of Ministers found a compromise and agreed a similar text in June 2008.

The outcomes of the co decision process revealed positive for the waste oils regeneration industry and ensured the success of the Waste Oils Campaign through:

- A reference, in the revised Waste Framework Directive, to a **5-step waste hierarchy** favouring recycling over other methods of waste treatment
 - A specific mention to the need to follow the **priority order** for the management of waste oils and to the separate collection of waste oils, **ensuring that the spirit of the revised Waste Directive is favourable to the industry across Europe** and that waste oils regeneration remains a suitable option
 - A perception that GEIR is a credible and knowledgeable European stakeholder, maximising its legitimacy to reach out to EU stakeholders on other policy issues if necessary (REACH, etc.)
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II. Waste oils regeneration within the Waste Framework Directive

- **Article 3-point 3: definition of waste oils:**

"waste oils" means any mineral or synthetic lubrication or industrial oils which have become unfit for the use for which they were originally intended, such as used combustion engine oils and gearbox oils, lubricating oils, oils for turbines and hydraulic oils;

- **Article 3-point 17: definition of recycling :**

"recycling" means any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material **but does not include energy recovery and the reprocessing into materials that are to be used as fuels** or for backfilling operations;

- **Article 3-point 18: definition of regeneration of waste oils:**

"regeneration of waste oils" means any **recycling** operation whereby base oils can be produced by refining waste oils, in particular by removing the contaminants, the oxidation products and the additives contained in such oils.



II. Waste oils regeneration within the Waste Framework Directive

- **Article 4.1: Waste hierarchy (5 steps):**

The following waste hierarchy shall apply as a priority order in waste prevention and management legislation and policy:

- (a) prevention;
- (b) preparing for re-use;
- (c) **recycling**;
- (d) other recovery, e.g. energy recovery; and
- (e) disposal.

- **Recital 44: priority order for waste oils management**

In the interests of the simplification of Community legislation and the reflection of environmental benefits, the relevant provisions of Council Directive 75/439/EEC of 16 June 1975 on the disposal of waste oils should be integrated into this Directive. Directive 75/439/EEC should therefore be repealed. The management of waste oils should be conducted in accordance with the **priority order** of the waste hierarchy, and preference should be given to options that deliver the best overall environmental outcome. The separate collection of waste oils remains crucial to their proper management and the prevention of damage to the environment from their improper disposal.



II. Waste oils regeneration within the Waste Framework Directive

- **Article 21: Waste oils:**

1. Without prejudice to the obligations related to the management of hazardous waste laid down in *Articles 18 and 19*, Member States shall take the necessary measures to ensure that:

- (a) waste oils are collected separately, where this is technically feasible;
- (b) waste oils are treated in accordance with *Articles 4 and 13*;
- (c) where this is technically feasible and economically viable, waste oils of different characteristics are not mixed and waste oils are not mixed with other kinds of waste or substances, if such mixing impedes their treatment.

2. For the purposes of separate collection of waste oils and their proper treatment, Member States may, according to their national conditions, apply additional measures such as technical requirements, producer responsibility, economic instruments or voluntary agreements.

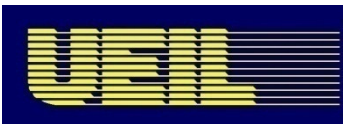
3. If waste oils, according to national legislation, are subject to requirements of regeneration, Member States may prescribe that such waste oils shall be regenerated if technically feasible and, where *Articles 11 or 12 of Regulation (EC) No 1013/2006* apply, restrict the transboundary shipment of waste oils from their territory to incineration or co-incineration facilities in order to give priority to the regeneration of waste oils.



III. GEIR in Brussels: other activities

- Pursue activities to position GEIR as a trusted advisor on waste oils management issues:
 - Continue on-going dialogue with third parties (NGOs; recycling industries)
 - Continue to develop contacts with the European Commission (DG Environment, DG Enterprise)
 - Monitor and gather intelligence on EU regulatory and policy developments

- Widen strategy to EU agenda on sustainability and climate change to convey GEIR message through other channels, e.g. *the sustainable production and consumption package*



III. GEIR in Brussels: The European Recycling Coalition

- **The European Recycling Coalition (ERC)** is an ad hoc coalition, representing a broad group of stakeholders covering several material streams and environmental interests (*the NGO EEB*), principally concerned with the promotion of **recycling activities (Oils, Tyres, Plastics, Compost)**.
- Coalition members joined forces in the context of the revision of the **Waste Framework Directive** to contribute to the debate on the future of the EU waste policy and to ensure that the new legislative framework allows for the development of recycling activities in Europe.





III. GEIR in Brussels: The European Recycling Coalition

- The GEIR strategy for the waste oil campaign included partnerships/contacts with other stakeholders to position GEIR as a trusted advisor on waste oils management issues

- GEIR has therefore maintained dialogue with non-institutional stakeholders including EEB, the European Recycling Coalition (ERC) and has taken part in specific projects including:
 - Contribution to the **ERC position papers & website** (www.recycling-coalition.eu)
 - Participation in the ERC Parliamentary event (23 January 2008) to directly dialogue with the European Commission and Members of the European Parliament



III. GEIR in Brussels: The European Recycling Coalition

- The GEIR is eager to keep relationships with members of the ERC in order to:
 - Leverage participation in a wider ad hoc coalition to convey messages when appropriate at the EU level
 - Gather intelligence
 - Carry out future advocacy activities if/when relevant (e.g. expert seminars)
 - Use the ERC website as a communications tool (e.g. to post good practice on waste oils recycling)



III. GEIR in Brussels: Implementing REACH

- **Internal exchange of information** via the GEIR REACH task force
- **Regular meetings and exchange of information** with the European Commission officials and ECHA officers dealing with waste and REACH:
 - E.g.: meeting with Mr Aguado-Monsonet, DG Enterprise, 22 July 2008 in Brussels and several contacts with CONCAWE
- **Monitoring and alerts** on REACH developments, within 24 hours of occurrence



IV. OTHER GEIR INTERNAL ISSUES

- Review of the GEIR Rules of Operations document
- New Secretary General:
 - Milagros Mostaza-Corral
- Planned **European Used Oil Recycling** Congress in Brussels-2009



Thank you

Fabio Dalla Giovanna
GEIR President

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