Janne Koivisto 13 November 2023

FORTUM WELCOMES EC PROPOSAL ON NEW RULES FOR WASTE TEXTILES IN THE WASTE DIRECTIVE

The environmental and climate impact from textiles and textile waste has been acknowledged in the EU waste directive encouraging prevention and requiring separate collection in the member states from 1 January 2025 onwards. Fortum welcomes the initiative that clarifies rules for how the separate collection systems for waste textiles should be implemented.

The textile sector has been acknowledged as resource intensive, which is why prevention, reuse, and recycling will have a significant impact on the sector's footprints. Manufacturers are to carry the cost for the textiles over their entire lifecycle, including processing the textile waste into recycled materials. Textile products do not currently contain the cost for the entire life cycle. The introduction of EPR schemes will in time support the inclusion of the cost for the management of the textiles' entire life cycles.

Reuse and recycling require a separate collection system in order to avoid contamination. Post-sorting and separation should take place where it is most efficient, e.g. in centralised automated installations. The EC's proposal to require screening and removal of non-targeted items at each collection point will not be practically feasible. It is not possible to completely prevent the mixing of items that could damage and ruin the quality of textiles, but it could be minimised with the information measures as set out in the proposal.

> Article 22d
> 2. Member States shall ensure that the collection, loading and unloading, transportation and storage infrastructure and operations and other handling of textile waste, including at subsequent sorting and treatment operations, receives protection from weather conditions and other sources of contamination to prevent damage and cross-contamination of the collected textiles. Separately collected used and waste textiles shall be subject to a screening ~~at the separate collection point~~ to identify and remove non-target items or materials or substances that are a source of contamination.

Over time, the downgrading of fibres in repeated mechanical recycling is inevitable. When the fibre no longer serves its purpose, incineration with carbon capture and utilisation may be an environmentally sound option to return the carbon into useful novel raw materials and to replace virgin feedstocks. Textile waste that cannot be recycled in the current state-of-the-art recycling facilities, e.g. because of contamination or complex composition by nature, should be assigned to other circular treatment solutions.

Legacy substances in textiles that are no longer eligible for reuse or recycling must be recognised and managed safely and sustainably. Substances requiring irreversible destruction have to be recognised in the different textile product groups so that the harmful substances will not end up where they do not belong. Incineration will play an important role in the treatment of such textile waste, and combining incineration with carbon capture for manufacturing novel materials will take recycling to the next level. The EU waste classification rules must recognise the restricted and banned groups of substances in order to prevent the management of legacy textiles from causing adverse impact to human health and environment. The annex listing the textile products covered by the proposal should also identify objects that could contain these

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substances, and the rules should be in coherence with the EU's list of waste and the EU waste classification rules, including hazardous properties and the waste management requirements in the POPs regulation, such as brominated flame retardants and PFAS. Hence, we urge the Commission to take action towards this in the following review of the waste directive.

Fortum's views for the future revisions of the waste directive:

- Fortum would welcome a review to rethink recycling in terms of carbon capture and manufacturing novel materials from waste incineration.
- Fortum proposes that in the upcoming revision of the waste directive, the Commission should include a review of the EU's list of waste to match the targeted waste streams. The assignment of proper waste codes reflecting the targeted waste streams will ensure safer waste management.
- Fortum also calls for a review of the hazardous waste classification rules to align them with the EU POPs regulation.

Calculation rules for the recycling rate for CCU processes utilising waste-originated carbon should be established

The importance of a predictable market for recycled materials is essential when driving investments in novel technologies. Mandatory recycled content in new textile products, including carbon capture derived materials, will be key in this progress.

CCU can also be a future solution to help achieve the EU's recycling targets when it is applied in municipal or hazardous waste incineration plants. Fortum sees that such CO_2-based production of materials should be considered as *recycling* as defined in the Waste Framework Directive, because the materials treated, i.e. the feedstock, is waste.

The EU waste hierarchy does not consider waste incineration as recycling. That being said, the Commission has already set rules for metals separated from the waste incineration slag and then recycled to be counted in the metal packaging recycling targets. Following a similar logic for CO_2, the synthetic materials produced from carbon and separated from the gaseous effluents should be considered as recycled materials. This would mean that waste incineration plants with CCU technology could be considered as multi-output (both material recycling and energy recovery) waste treatment facilities.

In the future, waste-to-energy plants equipped with CCU can help to increase the recycling rate in the EU especially for those waste fragments which are not suitable for, or do not end up in, mechanical or chemical recycling. This is particularly the case with plastic waste, but also with textile waste. Thus, Fortum calls for the Commission to establish clear calculation rules for the recycling rate for CCU processes utilising waste-originated carbon.

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EU List of Waste (2014/955/EU)

2. Classification of waste as hazardous: **Remove:** Wastes containing polychlorinated dibenzo-p-dioxins and dibenzofurans (PCDD/PCDF), DDT (1,1,1-trichloro-2,2- bis (4-chlorophenyl)ethane), chlordane, hexachlorocyclohexanes (including lindane), dieldrin, endrin, heptachlor, hexaclorobenzene, chlordecone, aldrine, pentachlorobenzene, mirex, toxaphene hexabromobiphenyl and/or PCB exceeding the concentration limits indicated in Annex IV to Regulation (EC) No 850/2004 of the European Parliament and of the Council (1) shall be classified as hazardous. **Replace with:** *'POPs waste'*

Add to article 3 Definitions:

2.d 'POPs waste' means waste containing Persistent Organic Pollutants listed in annex IV of EU (2019/1021) exceeding the concentration limit values;

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