

Brussels, 16 August 2022

BeST Position Paper on the Waste Framework Directive

Introduction

The Waste Framework Directive (WFD) establishes waste prevention and management principles based on the five-step “waste hierarchy” and provides minimum rules on separate collection and waste management performance targets for several waste streams.

BeST comments:

In the frame of the review of the WFD, BeST highlights the following main points:

- **Definition of waste and harmonisation** – A new, revised and flexible definition of waste, acknowledged as a resource, should be developed and implemented. Additionally, more effort should be dedicated to the harmonisation of legislation on waste in the EU and outside the EU to efficiently remove barriers to waste management.
- **Hazardous materials** – The presence of hazardous materials does not prevent per se the re-use, refurbishment and/or recycle of products and materials. These materials are used in products due to their unmatched properties and the benefits they bring to the performance and lifespan of the product. Policymakers should therefore implement a result-orientated approach concentrating on material barriers to waste management, i.e., physical form of the material, concentration, availability of infrastructure and know-how, etc.
- **Holistic approach** – When assessing and defining criteria for waste and waste streams, policymakers should implement a holistic approach considering the different characteristics and lifespan of the products and their contribution to the achievement of the EU’s overall objectives of the EU Green Deal. This will avoid that unintended consequences derived from unnecessarily stringent rules at the waste stage have a negative spill-over impact on supply/value chains.
- **Flexible solutions** – Considering the heterogeneity of waste streams and of the products and substances contained therein, ad hoc solutions should be preferred to a one-size-fits all approach.
- **Feasible targets** – Targets on collection of waste, recycling, recycling efficiencies, recycled content, etc. must be feasible and implementable based on adequate socio-economic impacts assessments.

About BeST

The Beryllium Science and Technology Association (BeST) represents the manufacturers, suppliers and users of beryllium metal, beryllium containing alloys and beryllium oxide ceramics in the EU market. BeST has the objective of promoting sound policies, regulations, science and actions related to the safe use of beryllium and to serve as an expert resource for the international community on the benefits and criticality of beryllium applications. It is also the objective of BeST to promote good practices in the workplace to protect workers handling beryllium containing materials.
