# **ESRG**



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Verband Chemiehandel e.V. Große Neugasse 6, D-50667 Köln

Telefon +49 (0)221 - 2 58 11 33/34 Telefax +49 (0)221 - 2 58 24 96

Freitag@vch-online.de Stephan@vch-online.de Internet: www.vch-online.de

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### **DECLARATION**

# REACH and solvent recycling – an industry statement

#### Introduction:

Today the principal types of organic solvents are classified under three broad categories; being either hydrocarbon, oxygenated or halogenated. Their uses are extremely wide and diverse, from the making of medicines to applying paint and cleaning surfaces. Suffice is here to say these materials support the manufacturing processes and application of numerous materials used across Europe in a range of industries underpinning multi-billion € businesses, particularly those with high technology based applications.

One of the key benefits of these solvents is that after use they can often be recovered many times over for re-use, thus supporting the European Waste Strategy at its highest level of priority. Even when their role as a solvent has finished, it is often possible to recover energy from them, thus maximising their useful benefit while minimising the impact on the environment by saving resources. Recycling of solvents plays a central role in service oriented business models, sometimes referred to as chemical leasing that offer an inherent support of the concept of sustainability.

The application of the European Chemicals Strategy under the acronym REACH has significant implications for all businesses in this sector. Representatives from all European Solvent Recycling businesses have joined together to issue the following statement.

## **European Solvent Recycler Group**

**ESRG** 



#### Declaration

The group of European Solvent Recyclers \* declare:

- Recycling solvents plays a key role in the chemical sector by using resources optimally and minimising environmental impacts.
- REACH legislation should allow for addressing those areas where solvent recovery as a recycling activity may contribute to a materials life cycle and is in support of sustainability.
- To be successful in supporting solvent recycling as downstream use, REACH should play a fair part in providing due recognition to the role that recycling offers. Further, the definitions for producer and downstream user should be clarified so as not to burden the solvent recycling industry with non-proportionate roles and responsibilities that would otherwise reduce their effectiveness.
- Complexities in the Waste Framework Directive for recovery and disposal operations must not become a barrier to defining solvent recycling activity as downstream use within REACH.
- The recycling group commits to playing a constructive role for the sector in contributing the framework legislation proposed for REACH.

#### \* The EUROPEAN SOLVENT RECYCLER GROUP:

• Sita, Belgium • De Neef Chemical Recycling / Aproc, Belgium • Bip Organics, England • Chemical Recycling Association, England • Disposal Services Limited, England • Dow Halterman Custom Processing, England • SRM, England • Alpes Environnement, France • Speichim Processing, France • Syres, France • Assicc, Italy • Fortom Chimica, Italy • Solveko Spa, Italy • Orm Bergold Chemie, Germany • Richard Geiss, Germany • RCN Chemie, Germany • Remondis Medison, Germany • Safechem Europe, Germany • Wistema Chemiehandel, Germany • Rabochem, Switzerland • Derpinsa, Spain • Tradebe, Spain • Valls Quimica, Spain, • Ecologia Quimica, Spain