



**Comments on the report “Review of Regulation EC 2037/2000 on substances that deplete the ozone layer”
Milieu Ltd. and Ecosphere Lda, 14 December 2007**

BING, federation which represents rigid polyurethane insulation industries in Europe, welcomes the recommendation stated in the summary report on page 27 para 5 and which reads:

“Another recommendation is aimed at addressing the issue of building foams, the largest single bank of ODS. Though the current Regulation calls for recovery of these ODS “if practicable”, no Member State at this point carries out systematic recovery of these ODS (Norway plans to address this issue under new building waste legislation). The impact assessment shows that the cost of requiring recovery of even a portion of building foams across the EC is quite high. As a result, any requirement would be at best partially implemented, in particular without a new financing mechanism and without EC legislation to address building waste. Since an EU-wide requirement does not appear to be appropriate this time, the recommendation is to call on Member States to address this issue. Moreover, a new actor, the voluntary carbon market, may be interested in providing the necessary finance. Finally, this issue is not an immediate concern, as building foams containing ODS will enter the waste stream slowly in coming years.”

The industry assessment of the situation today is totally in line with this recommendation. Further activities in the area are already being evaluated, looking both at the local dimension, technical and logistic aspects and possible financing routes such as the carbon financing option.

In addition, for each proposed options, a cost-benefit analysis should be carried out to evaluate the economical and ecological effectiveness of the proposed measures to mitigate the ozone depletion effects. These analyses should be based on transparent criteria and agreed amongst the relevant actors. Also any such cost-benefit analysis should be carried out at national level since efficiency of measures will be highly dependant on local schemes, population densities and local infrastructures.

In our view proposal 4(b) is probably the best way to prepare an adequate cost-benefit analysis and identify sensible routes to deal with banks. Understanding the inventory of banks will help each Member States identify options for future consideration.

We share these views together with other polyurethane related associations such as ISOPA the and EPIC which are also submit their positions.

Proposed amendments to final reports

Final report, section 8, page 107, para 3 and 4

The statement regarding the technical feasibility of handling panels, is missing some key dimensions which were highlighted in a recent industry report¹:

- Logistics are driving the practicability and cost efficiency of the operation (up to 80% of cost is linked to dismantling, sorting and transport) and will vary substantially across the different EU countries
- Higher concentration of ODS in building foam waste in contrast with refrigerator foam waste means that mixed waste feeds need to be adopted to avoid reducing the recycling throughput and process yields
- More technical evaluation is required

Final report, section 8, page 101, para 2

There are some errors in the description of building products containing polyurethane foam and the proposed list should read as follow:

- “ ... The types of building products that contain foams with ODS include
- o Sandwich panels, with rigid facings, containing polyurethane foam
 - o Polyurethane panels with flexible facings
 - o Sprayed foams
 - o Slabstock polyurethane foam to insulate pipes and storage tanks, containing rigid PU foams
 - o Pipe-in-pipe sections with PU foam
 - o ...

About BING

BING represents the rigid polyurethane insulation Industry in Europe. Polyurethane is the most economic, efficient, high performance insulation material available, enabling effective insulation with minimal occupation of space.

Contact details

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¹ Recycling organically-coated steel sandwich panels: identification and removal of the barriers - Final Phase 2 report. The Steel Construction Institute. Document RT1019. May 2005